



**LORNAY**  
ENVIRONMENTAL CONSULTING

## **PROOF OF PUBLIC PARTICIPATION**

**PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON THE  
REMAINDER OF PORTION 2 OF THE FARM 711, GANSBAAI**

**JUNE 2026**

**Consultant:**

**Michelle Naylor** | Env. Consultant | M.Sc., Pr. Sci. Nat., EAPASA  
cell: 083 245 6556 | [michelle@lornay.co.za](mailto:michelle@lornay.co.za) | [www.lornay.co.za](http://www.lornay.co.za)  
Unit 5/1F, Hemel & Aarde Wine Village, Hermanus  
Lornay Environmental Consulting Pty Ltd | Reg 2015/445417/07

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## **1. INTRODUCTION**

The Public Participation Process was conducted in terms of the Environmental Impact Assessment (EIA) regulations as promulgated in the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) (as amended) and the 2014 NEMA EIA Regulations promulgated in Government Gazette No. 38282 and Government Notice R983, R984 and R985 on 4 December 2014 (as amended).

Four rounds of Public Participation have been provided:

1. PPP 1 – Out of process
2. PPP2 – In Process
3. PPP3 – 50 Day extension PPP
4. PPP4 – In Process (Final BAR)
5. PPP 5 June 2026

# OUT OF PROCESS PUBLIC PARTICIPATION

## PPP1

### 2. LIST OF INTERESTED AND AFFECTED PARTIES AND ORGANS OF STATE

In line with the requirements of NEMA, all potential Interested and Affected Parties (I&APS) were notified of the project and provided with an opportunity to comment. This included applicable organs of state. See list of I&AP's identified for the project:

<b>PRE-APPLICATION PUBLIC PARTICIPATION</b>	
<p><b>WC Government Env Affairs &amp; Dev Planning</b> <b>Development Management</b> D'mitri Matthews Registry Office 1st Floor, Utilitas Building 1 Dorp Street 8001</p>	<p><b>Overberg District Municipality</b> F. Kotze / R. Volschenk Private Bag x 22 Bredasdorp 7280 F. Kotze Email</p>
<p><b>Cape Nature</b> Rhett Smart <a href="mailto:rsmart@capenature.co.za">rsmart@capenature.co.za</a></p>	<p><b>Overstrand Municipality</b> Chester Arendse PO Box 26 Gansbaai 7200 <a href="mailto:gbenvironmental@overstrand.gov.za">gbenvironmental@overstrand.gov.za</a></p>
<p><b>National Department of Public Works</b> Director General Frederick Johnson Private Bag x65 Pretoria 0001 <a href="mailto:frederick.johnson@dpw.gov.za">frederick.johnson@dpw.gov.za</a> 02 1402 2338 Letter</p>	<p><b>National Department of Public Works</b> Chief Town Planner Basson Geldenhuys National Dept of Public Works Cape Town Regional Office Room 1419, Customs House Lower Heerengracht Street, cape Town <a href="mailto:Basson.Geldenhuys@dpw.gov.za">Basson.Geldenhuys@dpw.gov.za</a> 021 404 2174 Letter</p>
<p><b>Department of Agriculture, Forestry and Fisheries:</b> <b>Sustainable Aquaculture Management</b> Michelle Pretorius Private Bag x2 Roggebaai Cape Town</p>	<p><b>Department of Agriculture, Forestry and Fisheries</b> <b>Land Management</b> Cor van Der Walt Private Bag x 1 Elsenburg 7607</p>

8012

021 430 7034

[michellePR@daff.gov.za](mailto:michellePR@daff.gov.za)

[CorvdW@elsenburg.com](mailto:CorvdW@elsenburg.com)

Letter

Tel: 021 808 5099

Fax: 021 808 5092

**WC Government Env Affairs & Dev Planning**

**Transport and Public Works**

Provincial Roads

Vanessa Stoffels

PO Box 2603

Cape Town

8000

Ref: 17/1/11/B

[Vanessa.Stoffels@westerncape.gov.za](mailto:Vanessa.Stoffels@westerncape.gov.za)

**WC Government Env Affairs & Dev Planning**

**Spatial Planning & Coastal Impact Mgmt**

Mercia Liddle / Lynn Jacobs

Registry Office

1st Floor, Utilitas Building

1 Dorp Street

8001

021 483 3370

[Mercia.Liddle@westerncape.gov.za](mailto:Mercia.Liddle@westerncape.gov.za)

**Department of Forestry, Fisheries and the Environment**

**GDA Authorisation**

For Att. X. Myanga

[xmyanga@dffe.gov.za](mailto:xmyanga@dffe.gov.za)

[RMolale@dffe.gov.za](mailto:RMolale@dffe.gov.za)

**Cape Nature Head office Lease agreement**

[accounts@capenature.co.za](mailto:accounts@capenature.co.za)

**Overstrand Municipality**

Operational Manager

Ricardo Andrews

PO Box 20

Hermanus

7220

T 028 384 8326

F 028 384 0241

Email

**DFFE Oceans and Coasts: Coastal Conservation Strategies**

Funanani Ditinti

2 East Pier Building,

East Pier Road

Victoria and Alfred Waterfront

Cape Town

8001

[fditinti@environment.gov.za](mailto:fditinti@environment.gov.za)

**Whale Coast Conservation**

Att: Pat Miller

Chair: Whale Coast Conservation

Tel: (028) 313-0093

[pat.miller7@outlook.com](mailto:pat.miller7@outlook.com)

**Ward Councillor 2**

Ald A Nqinata

[nnqinata@overstrand.gov.za](mailto:nnqinata@overstrand.gov.za)

**Overstrand Heritage & Aesthetics Committee**

Att: E. A Lowings

[elowings@overstrand.gov.za](mailto:elowings@overstrand.gov.za)

**David Mostert**

[david@romansbaai.co.za](mailto:david@romansbaai.co.za)

**Interested and Affected Parties**

**Erf 70**

Bolus Family Trust

Cr MGM Bolus

[bolusmgm@telkomsa.net](mailto:bolusmgm@telkomsa.net)

**RE/ 210**

OVERSTRAND MUNICIPALITY - COMMONAGE

[enquiries@overstrand.gov.za](mailto:enquiries@overstrand.gov.za)

**Erf: RE/448**

DANGER POINT ECOLOGICAL DEVELOPMENT CO

[accounts@lomond.co.za](mailto:accounts@lomond.co.za)

**Erf 191**

Not registered

Romansbaai Beach Estate

**Erf: 81**

Not registered

Romansbaai Beach Estate

**Erf: 80**

Not registered

Romansbaai Beach Estate

**Erf: 79**

Not registered

Romansbaai Beach Estate

**Erf: 78**

Not registered

Romansbaai Beach Estate

**Erf 77**

Not registered

Romansbaai Beach Estate

**Erf 76**

Not registered

Romansbaai Beach Estate

**Erf 75**

Lukel Randal Shearer

[shearer.luke@gmail.com](mailto:shearer.luke@gmail.com)

**Erf 74**

Not registered

Romansbaai Beach Estate

**Erf 73**

Not registered  
Romansbaai Beach Estate

**Erf 72**

Thys Geysler  
[thys@fractions.co.za](mailto:thys@fractions.co.za)  
[werner@rainmakers.io](mailto:werner@rainmakers.io)

**Erf 71**

Joseph Owen Roux  
[roux@profengineers.com](mailto:roux@profengineers.com)

**Erf 190**

Not registered  
Romansbaai Beach Estate

### **3. WRITTEN NOTICE TO I&APS AND ORGANS OF STATE OF DRAFT BAR:**

The I&AP's identified above were given written notice of the first round of public participation, via registered mail or courier, as appropriate. The written notice included details of the applicable legislation, the proposed expansion and means to provide comment or register as I&AP. See written notice below:



## NOTICE OF PUBLIC PARTICIPATION FOR BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN TERMS OF NEMA

Notice is hereby provided, in accordance with the Environmental Impact Assessment (EIA) regulations, as stipulated under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the 2014 NEMA EIA Regulations (as amended) as published in Government Gazette No. 38282, Government Notice R983, R984, and R985, on 4 December 2014, to register as a Interested and Affected Party (I&AP) and provide comments on the Pre-application Basic Assessment Report for the *Proposed Expansion of Romansbaai Abalone Farm on Portion 2 of the Farm No. 711, Gansbaai, Caledon Rd.*

**DEA&DP REFERENCE:** 16/3/3/6/7/1/E2/10/1628/23

**LORNAY REF:** RB/D1

**APPLICANT:** Terrasan Group (Pty) Ltd

**LOCATION:** Portion 2 of the Farm No. 711, Romansbaai, Gansbaai, Overstrand Municipality

**PROJECT OVERVIEW:** The expansion of Romansbaai Abalone Farm is proposed. This includes expansion of the pumphouse, installation of additional of water pipelines, expansion of production area and addition of abalone grow out tanks, addition of ground mounted solar array and installation of seawater holding reservoir.

**LISTED ACTIVITIES:** The following Listed Activities are applied for in terms of the NEMA EIA Regulations:

- **Listing Notice 1 (GN R983):** Activities 1, 8, 9, 10, 13, 15, 17, 19A, 27, 28, 30, 34, 41, 43, 45, 46, 52, 54
- **Listing Notice 3 (GN R985):** Activities 2, 12

A copy of the Pre-Application Basic Assessment Report is available for public review and download on our website, or upon request. Interested and Affected Parties (I&APs) are invited to register and/or provide comments on the application during the public participation period from **09 October 2024 to 07 November 2024**.

**HOW TO PARTICIPATE:** Please register or submit your comment via the following details:

**Lornay Environmental Consulting**  
**For Att:** Michelle Naylor  
**Tel:** 083 245 6556  
**Email:** [michelle@lornay.co.za](mailto:michelle@lornay.co.za)  
**Website:** [www.lornay.co.za](http://www.lornay.co.za)

**IMPORTANT NOTICE:** In accordance with the Protection of Personal Information Act (POPI Act, 2023), by registering and commenting as an I&AP your name and comments will be made public.



*Environmental Impact Assessments | Basic Assessments | 24G  
Applications | Water Use License Applications | Environmental  
Audits*

#### 4. PROOF OF NOTICE TO I&APS AND ORGANS OF STATE

Written notice of PPP1 was provided to I&APs and Organs of State via registered mail or courier, as indicated in the proofs below:

**michelle@lornay.co.za**

---

**From:** michelle@lornay.co.za  
**Sent:** Wednesday, 09 October 2024 10:18  
**To:** Dmitri.Matthews@westerncape.gov.za; Rulien Volschenk; Rhett Smart; 'Chester Arendse'; Penelope Aplon; 'frederick.johnson@dpw.gov.za'; Basson.Geldenhuis@dpw.gov.za; 'MPretorius@environment.gov.za'; Cor Van der Walt; 'Brandon.Layman@westerncape.gov.za'; 'Vanessa Stoffels'; 'Mercia J Liddle'; 'leptieshaam Bekko'; 'xmyanga@dfpe.gov.za'; 'Rueben Molale'; 'accounts@capenature.co.za'; 'randrew@overstrand.gov.za'; 'fditinti@environment.gov.za'; 'pat.miller7@outlook.com'; Sheraine Van Wyk  
**Cc:** 'nnqinata@overstrand.gov.za'; 'elowings@overstrand.gov.za'  
**Subject:** Notice of Public Participation | Proposed Expansion of Romansbaai Abalone Farm | Ptn RE2/711, Gansbaai, Caledon RD  
**Attachments:** Notice of PPP RB1 091024.pdf

Dear Organ of State

**DEA&DP Ref. No. 16/3/3/6/7/1/E2/10/1628/23**  
**Lornay Ref. No. RB/D1**

DEADP – D. Matthews  
ODM – R. Volschenk  
Cape Nature – R. Smart  
Overstrand Municipality – C. Arendse / P. Aplon  
DPW – F. Johnson  
DPW – B. Geldenhuis  
DFFE Sustainable Aquaculture – M. Pretorius  
DOA – C. van der Walt  
WCG Transport & PW – V. Stoffels  
DEADP Spatial Planning & Coastal Mgmt – I. Bekko / M. Liddle  
DFFE Authorisation – R. Molale / X. Myanga  
Cape Nature Coastal Lease agreement – Accounts  
Overstrand Municipality Operations – R. Andrews  
DFFE Coastal Conservation Strategies – F. Ditinti  
Whale Coast Conservation – P. Miller / S. Van Wyk  
Overstrand Heritage & Aesthetics Comm – E. Lowings  
Ward Councillor – T. Nqinata

Please see attached notice of public participation for the proposed expansion of Romansbaai Abalone Farm,

Should you have no further comment, please ignore this notice.

Kind regards,

1

**michelle@lornay.co.za**

---

**From:** michelle@lornay.co.za  
**Sent:** Wednesday, 09 October 2024 10:20  
**To:** 'david@romansbaai.co.za'  
**Subject:** Notice of Public Participation | Proposed Expansion of Romansbaai Abalone Farm | Ptn RE2/711, Gansbaai, Caledon RD  
**Attachments:** Notice of PPP RB1 091024.pdf

Dear Interested and Affected Party,

**DEA&DP Ref. No. 16/3/3/6/7/1/E2/10/1628/23**

**Lornay Ref. No. RB/D1**

Please see attached notice of public participation for the proposed expansion of Romansbaai Abalone Farm,

Should you have no further comment, please ignore this notice.

Kind regards,



**LORNAY**

**ENVIRONMENTAL CONSULTING**

*Michelle Naylor*

*M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAAs*

*Hemel & Aarde Wine Village – Unit 3A*

*PO Box 1990, Hermanus, 7200, South Africa*

*T +27 (0) 83 245 6556*

*E [michelle@lornay.co.za](mailto:michelle@lornay.co.za) | W [www.lornay.co.za](http://www.lornay.co.za)*

*Reg No. 2015/445417/07*

**michelle@lornay.co.za**

**From:** michelle@lornay.co.za  
**Sent:** Wednesday, 09 October 2024 20:23  
**To:** 'bolusmgm@telkomsa.net'; 'enquiries@overstrand.gov.za'; 'accounts@lomond.co.za'; 'shearer.luke@gmail.com'; 'thys@fractions.co.za'; 'werner@rainmakers.io'; 'roux@profengineers.com'  
**Cc:** 'david@romansbaai.co.za'; 'thys@romansbaai.co.za'  
**Subject:** Notice of Public Participation | Proposed Expansion of Romansbaai Abalone Farm | Ptn RE2/711, Gansbaai, Caledon RD  
**Attachments:** Notice of PPP RB1 091024.pdf

Dear Interested and Affected Party,

**DEA&DP Ref. No. 16/3/3/6/7/1/E2/10/1628/23**  
**Lornay Ref. No. RB/D1**

Please see attached notice of public participation for the proposed expansion of Romansbaai Abalone Farm,

Should you have no further comment, please ignore this notice.

Kind regards,



**LORNAY**  
ENVIRONMENTAL CONSULTING

*Michelle Naylor*  
M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAAsa  
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Reg No. 2015/445417/07

## 5. NEWSPAPER ADVERTISEMENT

An advertisement was placed in the local newspaper, the Hermanus Times, regarding the proposed development:

**6 Hermanus Times SKOLE SKOOLSKOOL**

# Leerders dans by Kunstekaap

**Mitzi Buys**

Vyf leerders van Swartberg Primêr het onlangs aan die Kunstekaap se Skool-kunstees deelgeneem.

Casey Keet van Swartberg Primêr vertel aan *Hermanus Times*: "Ons het van die Kunstekaap se kunstees vir skole te hore gekom en besluit om vyf leerders vir 'n dans-tem in te skryf. Ons moes 'n opsomming skryf oor waarom ons wil deelneem en wat dit vir ons sal beteken, en moes dit saam met ons inskrywing aanstuur. Gelukkig is ons gekies om saam met ander skole aan hierdie geleentheid deel te neem.

"Die meisies het self hul dans choreografeer – ek het maar net gemonitor en hier en daar 'n bietjie raad gegee. Die meisies het baie hard gewerk en het elke pose en ook na skool geoeft. Hulle het ook self hul uitrustings gekies."

Swartberg Primêr was die enigste skool wat van so ver gekom het om deel te neem en was een van 16 skole wat by die kunstefees vir skole opgetree het.

Die vyf meisies – Liphwe Mphanda, Shandukani Mugivhi, Lithapelo Sam, Tholwames Stuurman en Siziphwe Mkozzane – noem aan *Hermanus Times* dit was vir hulle wonderlike ervaring wat hulle geweldig baie geniet het.

**Stylvol en uniek**

Mitzi Dunsdon se stylvolle geel uitrusting het die aandag getrek by die Hoërskool Hermanus se matriekafskied. Sy is deur Die Lapa in Hawston gehou.



**Bursary opportunities for Overberg youth**

**Mitzi Buys**

The Globeleq Scholarship Fund (GSF) celebrates a decade of investment into South Africa's youth this year and has supported 40 Western Cape students to date.

The good news is that the GSF for 2025 is now open for bursary applications, specifically for the youth of the Overberg living within 50 km of the Klipheuwel Wind Farm, just outside Caledon.

This means that youths located in Caledon, Genadendal, Botrivier, Grabouw and Hermanus can now apply for the bursaries.

The fund has been an important supporter of students in this region, helping to break down financial barriers to higher education. The GSF continues its commitment to the above-mentioned communities by offering bursary opportunities for aspiring students seeking to further their studies.

Hlangwe Radabe, Economic Development Director at Globeleq South Africa Management Services and Klipheuwel Wind Farm, said the scholarship programme addresses multiple objectives and meets the growing demand for education, bridging gaps that state funding alone cannot fill.

"As a vehicle for tertiary education funding, it plays a role in advancing the country's transformation agenda," said Radabe.

The GSF's holistic approach goes beyond academic performance, taking into account financial need, location and gender, reflecting its mission to diversify the engineering sector and uplift women in STEM (Science, technology, engineering and mathematics) fields.

With an annual budget of approximately R4 million, the GSF aims to nurture the skills essential for the renewable energy industry while enhancing the sustainability of the communities it serves.

Students from within local communities in the Western Cape can apply to one of two categories:

- The GSF Engineering Sciences bursary, open to all students nationwide, pursuing an engineering-related qualification full-time in 2025.
- The GSF Communities bursary, which supports students living in communities within 50 km of the wind farm, pursuing any tertiary qualification in 2025.

The application deadline is 31 October 2024. Interested candidates can apply online at [www.globeleq.za/raams.app](http://www.globeleq.za/raams.app) or contact [support@raams.app](mailto:support@raams.app)



Casey Keet saam met die vyf leerders wat aan die Kunstekaap se kunstees vir skole deelgeneem het. Foto: Mitzi Buys



Curro-paar steel kollig

By Curro Hermanus se matriekafskied het Ryan Bantam en sy metgesel, Chaudene Bantam, baie elegant in hul uitrustings gelyk.

Foto: Olivia Dickson



Uitgevat vir hul groot dag

Gansbaai Akademie het onlangs sy matriekafskied gehou. Karla Hoffman, Tashney Richter (onderhoofmeisies) en Kaylin Minnear was uitgevat vir hul groot dag. Foto: Olivia Dickson

**NOTICE OF PUBLIC PARTICIPATION FOR BASIC ENVIRONMENTAL IMPACT ASSESSMENT**

**AQUION**

Notice is hereby provided, in accordance with the Environmental Impact Assessment (EIA) regulations, as stipulated under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the 2014 NEMA (EIA Regulations) (as amended) as published in Government Gazette No. 39323, Government Notice R051, R064, and R065, on 4 December 2024, to register as a Interested and Affected Party (I&AP) and provide comments on the Pre-application Basic Assessment Report for the Proposed Expansion of Romansbaai Abalone Farm on Portion 2 of the Farm No. 711, Gansbaai, Caledon Rd.

**DEADLINE REFERENCE:** 16/2/2024/12/10/1628/23  
**LORNAY REF:** RB/01

**APPLICANT:** Tereza Group (Pty) Ltd

**LOCATION:** Portion 2 of the Farm No. 711, Romansbaai, Gansbaai

**PROJECT OVERVIEW:** The expansion of Romansbaai Abalone Farm is proposed. This includes expansion of the pumphouse, installation of additional of water pipelines, expansion of production area and addition of abalone grow-out tanks, addition of ground mounted solar array and installation of seawater holding reservoir.

**LISTED ACTIVITIES:** The following Listed Activities are applied for in terms of the NEMA EIA Regulations:

- ◆ Listing Notice 1 (GN R051): Activities 1, 8, 9, 10, 11, 15, 17, 19A, 27, 28, 30, 34, 41, 43, 45, 46, 52, 54
- ◆ Listing Notice 2 (GN R065): Activities 2, 12

A copy of the Pre-Application Basic Assessment Report is available for public review and download on our website, or upon request. Interested and Affected Parties (I&APs) are invited to register and/or provide comments on the application during the public participation period from 09 October 2024 to 08 November 2024.

**HOW TO PARTICIPATE:** Please register or submit your comment via the following details:

Lornay Environmental Consulting  
For At: Michelle Naylor  
Tel: 083 245 8556  
Email: [michelle@lornay.co.za](mailto:michelle@lornay.co.za)  
Website: [www.lornay.co.za](http://www.lornay.co.za)

**IMPORTANT NOTICE:** In accordance with the Protection of Personal Information Act (POPI Act, 2023), by registering and commenting as an I&AP your name and comments will be made public.

**LORNAY ENVIRONMENTAL CONSULTING**  
Environmental Impact Assessments | Basic Assessments | 24/7 Applications  
Water Use License Applications | Environmental Audits



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**The LEGO Foundation**






## 6. NOTICEBOARDS

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Noticeboards were placed on site, as required in terms of the legislation:



## 7. COMMENTS RECEIVED DURING DRAFT / PRE-APPLICATION PPP 1



### THE HERITAGE AND AESTHETICS COMMITTEE

#### MINUTES OF MEETING

**Date:** Thursday – 11<sup>th</sup> APRIL 2024

**Time:** 14h00 – 16h30

Mr N. Clark (Chair)

Mrs L. Fick (Vice chair)

Mr A. Greeff

Mr A. Finlayson

Mrs S. Titlestad

Mr J. Simson

Mr L. Smith

Mr C Roux

Mr J Kelley (Stanford Heritage)

Mr J Aling (Stanford Heritage)

In Attendance for Overstrand:

Mrs E.A. Lowings (Admin)

---

6.5 **GANSBAAI : ERF 711 PORT 2 OF FARM KLIPFONTEYN : PROPOSED ADDITIONS TO ABALONE FARM : TP APPLICATION FROM J KAPLAN (HPOZ)**

DISCUSSED.

**Comment:**

HIA authored by Lornay Environmental Consulting dated April 2024 scrutinized. Supported.

HWC to provide electronic drawing & minute to [elowings@overstrand.gov.za](mailto:elowings@overstrand.gov.za)

**Action:**

Submit to Heritage Western Cape

**MEETINGS : 16<sup>th</sup> MAY (due to holiday ) & 13<sup>th</sup> JUNE & 11<sup>th</sup> JULY 2024.**



LORNAY

ENVIRONMENTAL CONSULTING

*Michelle Naylor*

*M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAAa*

Hemel & Aarde Wine Village – Unit 5/1F

PO Box 1990, Hermanus, 7200, South Africa

T +27 (0) 83 245 6556

E [michelle@lornay.co.za](mailto:michelle@lornay.co.za) | W [www.lornay.co.za](http://www.lornay.co.za)

Reg No. 2015/445417/07

---

**From:** Chester Arendse <carendse@overstrand.gov.za>

**Sent:** Thursday, 07 November 2024 12:43

**To:** michelle@lornay.co.za

**Subject:** RE: Notice of Public Participation | Proposed Expansion of Romansbaai Abalone Farm | Ptn RE2/711, Gansbaai, Caledon RD

Good afternoon, Michelle.

Hope that this mail finds you well.

With regards to the application of the expansion of Romansbaai Abalone Farm | Farm 711 Ptn 2, Gansbaai, **the Environmental Management & Conservation Division has no objection towards this application.**

Taken into account that all the necessary and relevant documents are submitted to the DEA&DP for their approval and reconsideration, the only condition from our office is that the applicant meet the necessary requirements in accordance with the Environmental Impact Assessment (EIA) regulations, as stipulated under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the 2014 NEMA EIA Regulations (as amended) as published in Government Gazette No. 38282, Government Notice R983, R984, and R985, on 4 December 2014.

Hope that the above is in order.

Regards



Department of Environmental Affairs and Development Planning

**Mercia Liddle**

Biodiversity and Coastal Management

[Mercia.Liddle@westerncape.gov.za](mailto:Mercia.Liddle@westerncape.gov.za) | Tel: 021 483 4627

DEA&DP Reference: 16/3/3/6/7/1/E2/10/01628/23

CMU Reference: 17/1/8(CMU 102/2024)

---

The EAP  
Lornay Environmental Consulting  
P.O. Box 1990  
HERMANUS  
7200

**Attention: Ms Michelle Naylor**

Tel: 083 245 6556

Email: [michelle@lornay.co.za](mailto:michelle@lornay.co.za)

**RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI, CALEDON ROAD.**

Good Day Madam,

Your request for comment from the Sub-directorate: Coastal Management on the above-mentioned pre-application basic assessment report received on 09 October 2024, refers.

## **1. CONTEXT**

- 1.1. The Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("NEM: ICMA") is a Specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"). The NEM: ICMA sets out to manage the nation's coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment. In terms of Section 38 of the NEM: ICMA, the Department of Environmental Affairs and Development Planning ('the Department') is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the "Management of public launch sites in the coastal zone (GN No. 497, 27 June 2014) "Public Launch Site Regulations".
- 1.2. The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme ("PCMP"). The PCMP is a five (5) year strategic document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the Province. The Department has developed the next generation PCMP that includes priority

objectives for the next 5 years. This PCMP was adopted on 19 May 2023 and is available upon request.

- 1.3. A key priority of the PCMP is the Estuary Management Programme, which is implemented in accordance with the NEM: ICMA and the National Estuarine Management Protocol ("NEMP"). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The Department is in the process of approving a series of Estuarine Management Plans.
- 1.4. The facilitation of public access to the coast is an objective of the NEM: ICMA as well as a Priority in the WC PCMP. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 ("PCASP") and commissioned coastal access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NEM: ICMA. The PCASP as well as the coastal access audits are available upon request.

## **2. COMMENT**

- 2.1 The sub-directorate: Coastal Management ("SD: CM") has reviewed the information as specified above and have the following commentary:
  - 2.1.1. The proposal entails the expansion of the existing production and grow out area to increase the production output by 300 tons / annum in order to meet the growing market demands on Farm 2/711. The SD: CM notes that the existing pumphouse is said to increase in size to allow for the abstraction of seawater, additionally seawater lines will also be used to transport the seawater from the farm. A lined seawater reservoir is also proposed to temporarily hold seawater which can be used during peak electricity tariff periods or during electricity outages.
  - 2.1.2. The applicant accurately noted the subject property in relation to critical biodiversity and ecological support areas in accordance with the Western Cape Biodiversity Spatial Plan 2017.
  - 2.1.3. The applicant has depicted the subject property relation the Coastal Protection Zone ("CPZ") as defined in Section 16 of the NEM: ICMA and it should be noted that the purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes, including the risk of sea level risks. Due to the subject property's location within the CPZ, Section 63 of the NEM: ICMA must be considered where an authorisation is required in terms of Chapter 5 of the NEMA. Furthermore, Section 62 of the NEM: ICMA obliges all organs of state that regulates the planning of land to apply that legislation in a

manner that gives effect to the purpose of the CPZ. As such, Section 63 of the NEM: ICMA must be considered by local authorities for land use decision making.

- 2.1.4. The applicant adequately considered the subject property in relation to the Overberg District Coastal Management Line ("CML"). The technical delineation of the CML was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk flooding, wave run-up modelling, *inter alia* and was delineated in conjunction with and supported by organs of state. The principal purpose of the CML is to protect coastal public property, private property, and public safety; to protect the coastal protection zone; and to preserve the aesthetic value of the coastal zone. The use of CMLs is of particular importance in response to the effects of climate change, as it involves both the quantification of risks and pro-active planning for future development.
- 2.1.5. The SD: CM confirms that the majority of the proposed expansion on Farm 2/711 will occur landward of the CML however a portion of the pipeline will occur seaward of the CML, below the highwater mark and within the littoral active zone. The SD: CM notes the very nature of this pipeline requires it to be located in this area and that the bulk infrastructure including the production area for the expansion is strategically placed on elevated ground above the 10m-contour line and the new production area beyond the 30m-contour line. It is noted that this proposed layout specifically considered climate change, sea-level rise, storm surges and coastal erosion.
- 2.1.6. The SD: CM also notes that the applicant is in the process of obtaining a lease agreement with CapeNature for a section of the channel that is located within the littoral active zone.
- 2.1.7. The SD: CM notes from the Pre-App DBAR that the expansion of the abalone farm will require the abstraction of more seawater which will be facilitated through the expansion of the pumphouse and thus result in an increase in effluent water discharge. According to the Pre-App DBAR ecologically, the operation of the abalone farm can be considered to be a low impact activity with negligible impact on the environment compared with other land-based agricultural activities.
- 2.1.8. The effluent water, which is circulated seawater and gets discharged back into the marine environment, has been found to have a negligible to zero impact on the marine environment. Be advised that the SD: CM does not support any activities that will alter the seawater temperature, as such the SD: CM advises the applicant to have appropriate measures in place to ensure that temperature changes would not negatively affect the receiving environment.

- 2.1.9. According to the Western Cape Provincial Coastal Access Audit for the Garden Route Municipal District (2019), the subject stretch has ample vehicle access to the coast to the coast. Be advised that in accordance with Section 13 of the NEM: ICMA, the proposed development and associated activities may in no way impede the general public's ability to access coastal public property now or in the future. Furthermore, the applicant should be informed that they may not create any formal or informal walkways/pathways to the coast through the littoral active zone, with any future developments on the subject property as this is an active area that performs an important ecological function.
- 2.1.10. It is further noted that the discharge is undertaken in line with the DFFE General Discharge Authorisation ("GDA") issued to the applicant in terms of Section 69(2) of the NEM: ICMA and no amendment to the GDA is required to accommodate the increased seawater discharge.
- 2.1.11. The applicant indicated that coastal access will not be affected during the construction or operational phases of the proposed expansion and access to the coast will be retained as the general public currently has unrestricted access along the subject coastline.
- 2.1.12. Considering the location of the subject property, the applicant must be informed of risk pertaining to the loss of property should the highwater mark of the sea move inland of the property boundary. In this regard, Section 14 of the NEM: ICMA and the [Advisory Note from the Office of the Chief Surveyor-General](#) dated 15 October 2021, is applicable.
- 2.1.13. The SD: CM notes that the proposed expansion of the Romansbaai Abalone Farm falls within the realm of aquaculture which was identified as one of the components of the rural economy in the Western Cape Provincial Spatial Development Framework. It is further noted in the DBAR that aquaculture is deemed as a compatible activity that does not compromise biodiversity, farming activities or cultural and scenic landscapes as the development fits into the context of rural landscapes while contributing to the economic growth of these areas.
- 2.1.14. Based on all the abovementioned items, the SD: CM does not object to the proposed expansion of the Romansbaai Abalone Farm (Farm 2/711) as it aligns with the PSDF, Priority Areas of the PCMP (2022) as well as the MSDF (2024) and Municipal IDP (2020).
3. The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: *"...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment..."* together with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.

4. The SD: CM reserves the right to revise or withdraw its comments and request further information from you based on any information that may be received.

Yours faithfully

**leptieshaam  
Bekko**

 Digitally signed by  
leptieshaam Bekko  
Date: 2024.11.07 20:01:17  
+02'00'

**leptieshaam Bekko**  
**CONTROL ENVIRONMENTAL OFFICER**  
**SUB-DIRECTORATE: COASTAL MANAGEMENT**  
**DATE: 07 November 2024**



**CONSERVATION INTELLIGENCE: SOUTH**

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reference LS14/2/6/1/7/2/711-2\_aquaculture\_Gansbaai  
date 7 November 2024

Lornay Environmental Consulting  
P.O. Box 1990  
Hermanus  
7200

Attention: Michelle Naylor  
By email: [michelle@lornay.co.za](mailto:michelle@lornay.co.za)

Dear Ms Naylor

**Pre-Application Basic Assessment Report for the Proposed Expansion of the Romansbaai Abalone Farm, Remainder of Portion 2 of Farm Klipfonteyn 711, Gansbaai**

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.

**Desktop Information**

The application is for the expansion of an existing aquaculture facility. We wish to note that the conditions of approval for both environmental and municipal planning approvals for the establishment of the facility and the first expansion remain relevant.

The property contains Critical Biodiversity Area I (CBA) in the north-east corner as mapped in the Western Cape Biodiversity Spatial Plan (BSP) with the remainder consisting of Other Natural. We wish to note that the BSP has been updated and the final version will be gazetted within the next few months. In the updated version of the BSP, the property is mapped as CBA I apart from (some) existing development footprints.

The vegetation type mapped for the property is Overberg Dune Strandveld which is listed as endangered in the revised 2022 listing. This vegetation type was previously listed as least threatened and the increase in the threat status is likely one of the reasons for the increase in the amount of CBA on the site. We further wish to note that there have been recent amendments to the National Vegetation Map, which includes the introduction of five new strandveld types which have been mapped with associated descriptions (SANBI 2024). In the updated map, the property is mapped as Southwestern Strandveld (Cowling et al 2023). Threat statuses have not been determined for the new vegetation types.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Collin Johnson, Mr Paul Slack

### **Screening Tool and Site Sensitivity Verification Report**

The screening tool results indicate very high sensitivity for terrestrial biodiversity and aquatic biodiversity, high sensitivity for animal species and medium sensitivity for plant species. The site sensitivity verification report indicates that a botanical assessment will be undertaken which addresses the terrestrial biodiversity and plant species themes.

For animal species, it states that the site is already impacted by the existing facility and therefore a specialist study is not required. It refers to the site being stocked with small antelope, however the botanical assessment refers to large game species. The two species flagged as high sensitivity are black harrier (*Circus maurus*) and African Marsh Harrier (*Circus ranivorus*) with several species flagged as medium sensitivity. While the lack of wetlands means that it is unlikely that African Marsh Harrier is present, the intact strandveld is suitable habitat for Black Harriers although the surrounding urban development does reduce the suitability. CapeNature therefore recommends that as a minimum an animal species compliance statement is undertaken. We recommend that problem causing animals for the aquaculture facility should also be addressed e.g. gulls.

For aquatic biodiversity, the response is that there are no freshwater features mapped for the site or which were found during site visits by the environmental assessment practitioner and the botanist. We wish to note that if the proposed development footprint was used for the screening tool, the results would have indicated a low sensitivity, as the very high sensitivity is in the north-western corner of the property outside the footprint. CapeNature is satisfied that an aquatic biodiversity assessment is not required.

### **Botanical Assessment**

The botanical assessment reports that the fieldwork was undertaken in a sub-optimal time of year, namely autumn, however there is a high confidence in the findings and recommendations due to the dominance of perennial species in this habitat and good knowledge of the area. The vegetation occurring on site is confirmed to consist of Overberg Dune Strandveld. The threat status of this vegetation type is queried due to the high percentage remaining extent and under formal protection. The revised threat status is as a result of the methodology used for the 2022 revised threat status adapted from the IUCN methodology and is related to the level of alien invasive species infestation, however the queries from the specialist are acknowledged as valid.

We recommend that the botanical assessment should review the revised mapping of the 2024 beta National Vegetation Map and include a discussion in this regard in the botanical assessment. The assessment should further indicate whether this results in any changes regarding the outcome of the assessment. CapeNature can be contacted for access to the referenced literature if required.

The vegetation occurring on site is considered to generally be in a good condition with a very low level of occurrence of alien invasive species. The sensitivity mapping of the expansion footprint to the east of the existing facility indicates high sensitivity in the north and south and medium sensitivity in the central section, with low sensitivity in the areas subject to edge effects from the existing facility. The mapping of the BSP is queried with the recommendation that all the habitat east of the existing

took into account that the vegetation would only be brush-cut within the footprint of the solar photovoltaic array and therefore would not result in complete loss of vegetation and therefore does not exceed the thresholds despite being partly located within the high sensitivity area.

However, the two development layouts presented in the Basic Assessment Report (BAR) differ from the layout assessed in the botanical assessment and therefore the impact significance would need to be re-assessed for both layouts. It is also essential that the mitigation hierarchy is followed and must include investigation of alternative locations for project components which result in an impact significance of medium or higher.

The proposed mitigation measures are supported. The applicant must confirm that the mitigation measures associated with the solar PV array can be implemented. We also recommend that the impacts associated with the solar PV array should also be evaluated in the context of the alternative of connecting to the local electricity grid.

It should be noted that the original approval for the aquaculture facility which was for consent use included a condition of approval that the development of the site should be confined to the area on the site plan and the remainder should be managed as a nature reserve. The approval was granted by the Overberg Regional Services Council in terms of the Land Use Planning Ordinance (LUPO) in 1996 prior to the gazettement of the National Environmental Management Act (NEMA) when conservation measures needed to be included in the planning approvals. We note that we referred to this condition in our comment on the municipal planning application, however conditions related to biodiversity conservation are more appropriate to NEMA applications since its promulgation. We therefore recommend that the existing condition must be taken into account and comment obtained from the Overstrand Municipality Spatial Planning component in this regard. This existing condition would then link in with any biodiversity offset requirements.

#### **Coastal and Marine Environment**

A major gap in the screening tool is the coastal and marine environment. The proposed project includes an expansion of the pumphouse which abstracts water from the sea. The impact on the coastal and marine ecosystems must be evaluated in a separate specialist study.

The increase in capacity will result in an increase in the volumes of water abstracted and effluent discharged. According to the BAR, the discharge volumes are within the General Discharge Authorisation in terms of the National Environmental Management: Integrated Coastal Management Act (NEM:ICMA) and no amendments are required. We wish to query the legislation which would be relevant for storage of seawater, as storage of freshwater is a water use in terms of the National Water Act. We therefore recommend that comment must be obtained from Department of Fisheries, Forestry and the Environment (DFFE) Oceans and Coasts, Department of Environmental Affairs and Development Planning (DEA&DP) Coastal Management and the Breede Olifants Catchment Management Agency (BOCMA) regarding the abstraction and storage of seawater and discharge of effluent. Any additional legislative processes should proceed concurrently with the Basic Assessment process.

Structures below the high water mark of the sea require a Sea Shore Lease from CapeNature in terms of the Sea Shore Act. The expansion of the pumphouse is located well below the high water mark as indicated on the DFFE and DEA&DP Coastal Viewers and therefore requires a Sea Shore Lease. The Sea Shore Lease application will only be processed once an environmental authorisation is issued, however it can be applied for before then. Any other structures on the property which are below the high water mark and which currently don't have a Sea Shore Lease should be included in the application.

### **Conclusion**

In conclusion, CapeNature recommends that the following must be addressed before the application can be considered for approval:

- The botanical assessment should be amended to:
  - Assess the impact significance of the two layout alternatives included in the BAR including the individual project components and determine whether a biodiversity offset is required for any project components.
  - Ideally an additional spring survey must be conducted, unless adequately motivated.
  - The updated BSP and National Vegetation Map must be discussed and used to inform the assessment.
  - The SEI must be calculated for the plant SCCs.
- Where the impact significance of project components exceeds offset thresholds additional locations with a lower impact must be investigated in accordance with the mitigation hierarchy.
- The animal species theme must be addressed by a specialist in accordance with the protocols.
- A coastal and marine ecological specialist study must be undertaken to assess the impacts associated with the expansion of the pumphouse, abstraction of seawater and discharge of effluent.
- The existing NEMA and municipal planning approvals need to be taken into account before the current application is considered for approval. Existing conditions remain relevant unless an amendment is applied for.

Regards

*RSmart*

Rhett Smart

For: Manager: Landscape Conservation Intelligence South

cc. Rowena Crowe, CapeNature  
D'mitri Matthews, DEA&DP  
Schalk van der Merwe, Overstrand Municipality

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Colin Johnson, Mr Paul Slack



Department of Environmental Affairs and Development Planning  
**D'mitri Matthews**  
Directorate: Development Management, Region 1  
D'mitri.Matthews@westerncape.gov.za | Tel: 021 483 8350

**REFERENCE:** 16/3/3/6/7/1/E2/10/1628/23  
**DATE:** 8 November 2024

The Board of Directors  
Terrasan Group (Pty)Ltd  
P. O. Box 1086  
**HERMANUS**  
7200

**Attention: Ms. L. Schoonbee**

Tel.: (028) 312 1106  
Email: rowan@aqunion.co.za

Dear Madam

**COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT ("BAR") SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998) ("NEMA") ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) ("EIA") FOR THE PROPOSED EXPANSION OF THE ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI**

1. The draft BAR dated 2 October 2024, as received by the Directorate: Development Management Region 1 (hereinafter referred to as "this Directorate") on 9 October 2024, refers.
2. Following review of the information submitted to this Department, the Department notes the following:
  - 2.1 The expansion of the abalone facility will include the following:
    - Increase in Production Capacity  
The expansion will be executed in two phases, each targeting an annual production increase of 150 tons (wet weight).  
  
Phase 1:
      - Additional production area: 17500 m<sup>2</sup> (1.75 ha)
      - Production additions:
        - Production capacity increase: 150 tons (wet weight)
        - Number of tanks: 1 850
        - Number of baskets: 12 950
        - Seawater usage: 2 400 m<sup>3</sup>/hour
        - Aeration fans / blower room: 4 units
        - Split/grading station: 1 unit
  
Phase 2:
      - Additional production area: 17500 m<sup>2</sup> (1.75 ha)
      - Production additions:
        - Production capacity: 150 tons (wet weight)
        - Number of tanks: 1 850
        - Number of baskets: 12 950
        - Seawater usage: 2 400 m<sup>3</sup>/hour
        - Aeration fans blower room: 4 units



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Department of Environmental Affairs and Development Planning

- Split/grading station: 1 unit
  - Construction of a lined seawater reservoir:
    - Storage capacity: 41 000 m<sup>3</sup>
    - Surface area: 20 000 m<sup>2</sup> (2 ha)
    - Coverage footprint: 20000 m<sup>2</sup> (2 ha)
  - Solar Power Array:
    - Power generation capacity: 4 MW (backup)
    - Coverage footprint: 40000 m<sup>2</sup> (4 ha)
  - Expansion of the existing pumphouse
    - The existing pumphouse will be expanded by approximately 140 m<sup>2</sup> to accommodate additional infrastructure for increased water intake.
      - A total of 4 new pumps and 4 pipelines will be installed at the pumphouse.
        - 1 new pump and 1 new pipeline will be fitted within the existing pumphouse.
        - 3 new pumps and 3 pipelines will be installed within the proposed expanded pumphouse.
    - Coverage footprint: 140 m<sup>2</sup>
  - Installation of additional pipelines:
    - 4 new pipelines will be installed from the pumphouse to connect the new lined seawater reservoir directly to the production area:
    - Each pipeline will be 600 meters long and 500 mm in diameter.
    - The combined water extraction rate will be 1600 m<sup>3</sup> per hour.
    - Pipeline installation will not require major ground excavation, as they will be laid alongside the existing pipeline in a previously disturbed area
  - Seawater Intake and Discharge Systems  
The expansion of the abalone farm will require the abstraction of more seawater which will be facilitated through the expansion of the pumphouse. The additional seawater intake will therefore result in an increase in effluent water discharge.
3. Departmental comments on the draft BAR:
- 3.1 The applicant must ensure that the proposed expansion does not contradict any specific conditions that are contained in the Environmental Authorisation issued on 3 March 2009 (Reference: E12/2/3/1-E2/11-0262/07).
- 3.2 Since a new entity owns the existing facility, an amendment application must be submitted to the Department to transfer the rights and obligations of the EA issued on 3 March 2009 (Reference: E12/2/3/1-E2/11-0262/07).
- 3.3 An extensive list of activities has been included as part of the proposed expansion. The Environmental Assessment Practitioner must filter this list to include only the relevant listed activities applicable to the proposed expansion.
- 3.4 It is noted that the recommendations of the botanical specialist regarding the offset have not been included in the Environmental Management Programme ("EMPr"). It is therefore requested to provide reasons/motivations why this recommendation has not been included as part of the mitigation measures, since there will be unavoidable impacts within an ecosystem listed as critically endangered, in terms of Section 52 of the National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004) ("NEMBA").

4. The applicant Regulatory Requirements:
  - 4.1 Proof of the notifications sent to registered I&APs for the commenting purposes must be included in the BAR.
  - 4.2 A dated photograph of erecting a site notice must be provided.
  - 4.3 Proof of placing an advertisement must be provided.
  - 4.4 Any new representations and comments received in connection with the application must be included in the BAR.
  - 4.5 Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the BAR.
  - 4.6 The minutes of any meetings held by the environmental assessment practitioner ("EAP") with I&AP's and other role players which record the views of the participants must be included in the BAR.
  - 4.7 Please be advised that the signed and dated applicant declaration is required to be submitted with the BAR during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.
  - 4.8 In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the BAR during the formal application process for decision-making.
  - 4.9 You are furthermore reminded that the BAR must contain all the information outlined in Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended).
5. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.
6. This Department reserves the right to revise or withdraw its comments and request further information based on any information received.

Yours faithfully

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Marbe Coetzee  
Date: 2024.11.08  
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**HEAD OF COMPONENT**  
**ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 1**  
**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Cc to: (1) Ms. M. Naylor (Lornay Environmental Consulting)  
(2) Ms. P. Aplon (Overstrand Municipality)

Email: michelle@lornay.co.za  
Email: paplon@overstrand.gov.za



**Western Cape  
Government**

Department of Infrastructure

**Vanessa Stoffels**

Chief Directorate: Road Planning

Vanessa.Stoffels@westerncape.gov.za | Tel: 021 483 4669

**Ref:** DOI/CFS/RN/LU/REZ/SUB-21/297 (Application no: 2024-10-0065)

Lornay Environmental Consulting  
P O Box 1990  
**HERMANUS**  
7200

Attention: Ms M Lornay

Dear Madam

**PROPOSED EXPANSION OF ROMANSBAAI ABALONE, REMAINDER OF PORTION 2 OF FARM 711,  
GANSBAAI: COMMENTS ON PRE-APPLICATION BASIC ASSESSMENT REPORT**

1. Your email to this Branch dated 09 October 2024 refers.
2. The subject property is located 150m south of Gansbaai and takes access off Divisional Road 1214.
3. This Branch offers no objection to the issuing of Environmental Authorisation in terms of the National Environmental Management Act 107 of 1998.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'DD Fortuin'.

**DD FORTUIN**

**For DEPUTY DIRECTOR-GENERAL: TRANSPORT INFRASTRUCTURE BRANCH**

**DATE: 19 NOVEMBER 2024**



## LORNAY

### ENVIRONMENTAL CONSULTING

*Michelle Naylor*

*M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAsa*

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Reg No. 2015/445417/07 | Vat. Reg. 429 031 9468

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**From:** Michelle Pretorius <MPretorius@dffe.gov.za>

**Sent:** Friday, 24 January 2025 12:27

**To:** michelle@lornay.co.za

**Cc:** Fatima Daya <FDaya@dffe.gov.za>; Maxhoba Jezile <MJezile@dffe.gov.za>; Alexis Osborne <AOsborne@dffe.gov.za>

**Subject:** Re: Notice of Public Participation | Proposed Expansion of Romansbaai Abalone Farm | Ptn RE2/711, Gansbaai, Caledon RD

Dear Michelle

Compliments of the season to you for 2025, I was just catching up on emails and came across your email.

I see that your original email sent in Oct 2024 was not received due to the incorrect email address for myself. However, your follow up email of Nov 2024 caught me in a very busy time, and I was not able to review the documents.

Please can you update your database to include my colleagues in Environmental interaction's cc'd herein, who are to review EIAs for aquaculture. I have since moved to the Phakisa Delivery unit and so no longer comment on EIAs.

Kindest regards  
Michelle



Cor Van Der Walt  
LandUse Management  
Email: Cor.VanderWalt@westerncape.gov.za  
tel: +27 21 808 5099 fax: +27 21 808 5092

**OUR REFERENCE : 20/9/2/4/2/038**  
**YOUR REFERENCE : RB/D1**  
**DEA&DP REFERENCE : 16/3/3/6/7/1/E2/10/1628/23**  
**ENQUIRIES : Cor van der Walt/Fadwa Mohammed**

Lornay Environmental Consulting  
Email: michelle@lornay.co.za

Att: Michelle Naylor

**PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM: DIVISION CALEDON  
PORTION 2 OF THE FARM NO 711**

Your application of 09 October 2024 has reference.

The Western Cape Department of Agriculture (WCDoA) has no objection to the proposed application.

Please note:

- Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.
- The Department reserves the right to revise initial comments and request further information based on the information received.

Yours sincerely

Mr. C.J. van der Walt

**LANDUSE MANAGER: LANDUSE MANAGEMENT**

**2025-02-04**

Copies:	
Department of Environmental Affairs & Development Planning 1 Dorp Street Cape Town 8000	Theewaterskloof Municipality PO Box 24 CALEDON 7230



## IN PROCESS PUBLIC PARTICIPATION

### PPP 2

#### 8. REGISTER OF I&APS

##### REGISTERED I&APs

###### WC Government Env Affairs & Dev Planning

###### Development Management

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###### Cape Nature

Rhett Smart  
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###### Overstrand Municipality

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###### National Department of Public Works

Director General  
Frederick Johnson  
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0001  
[frederick.johnson@dpw.gov.za](mailto:frederick.johnson@dpw.gov.za)  
02 1402 2338  
Letter

###### Department of Agriculture, Forestry and Fisheries: Sustainable Aquaculture Management

Michelle Pretorius  
Private Bag x2  
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###### WC Government Env Affairs & Dev Planning

###### Overberg District Municipality

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###### National Department of Public Works

Chief Town Planner  
Basson Geldenhuys  
National Dept of Public Works  
Cape Town Regional Office  
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Letter

###### Department of Agriculture, Forestry and Fisheries

###### Land Management

Cor van Der Walt  
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Letter

Tel: 021 808 5099

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###### WC Government Env Affairs & Dev Planning

###### Spatial Planning & Coastal Impact Mgmt

Mercia Liddle / Lynn Jacobs  
Registry Office  
1st Floor, Utilitas Buidling  
1 Dorp Street  
8001  
021 483 3370  
[Mercia.Liddle@westerncape.gov.za](mailto:Mercia.Liddle@westerncape.gov.za)

**Transport and Public Works**

Provincial Roads  
Vanessa Stoffels  
PO Box 2603

Cape Town  
8000  
Ref: 17/1/11/B  
[Vanessa.Stoffels@westerncape.gov.za](mailto:Vanessa.Stoffels@westerncape.gov.za)

**Department of Forestry, Fisheries and the Environment  
GDA Authorisation**

**For Att. X. Myanga**  
[xmyanga@dff.gov.za](mailto:xmyanga@dff.gov.za)  
[RMolale@dff.gov.za](mailto:RMolale@dff.gov.za)

**Overstrand Municipality**

Operational Manager  
Ricardo Andrews  
PO Box 20  
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7220  
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Email

**Whale Coast Conservation**

Att: Pat Miller  
Chair: Whale Coast Conservation  
Tel: (028) 313-0093  
[pat.miller7@outlook.com](mailto:pat.miller7@outlook.com)  
Sheraine van Wyk  
IAPs

**Erf 70**

Bolus Family Trust  
Cr MGM Bolus  
[bolusmgm@telkomsa.net](mailto:bolusmgm@telkomsa.net)

**David Mostert**

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**Cape Nature Head office Lease agreement**

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**DEFF Oceans and Coasts: Coastal Conservation Strategies**

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**Ward Councillor 2**

Ald A Nqinata  
[nnqinata@overstrand.gov.za](mailto:nnqinata@overstrand.gov.za)

Additional DFFE contacts as per Michelle Pretorius request

[FDaya@dff.gov.za](mailto:FDaya@dff.gov.za)  
[MJezile@dff.gov.za](mailto:MJezile@dff.gov.za)  
[AOsborne@dff.gov.za](mailto:AOsborne@dff.gov.za)

## **9. NOTICE OF PPP 2**

In process public participation was undertaken and all registered I&AP's and Organs of State were notified of their commenting opportunity:



## NOTICE OF PUBLIC PARTICIPATION FOR BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN TERMS OF NEMA

Notice is hereby provided, in accordance with the Environmental Impact Assessment (EIA) regulations, as stipulated under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the 2014 NEMA EIA Regulations (as amended) as published in Government Gazette No. 38282, Government Notice R983, R984, and R985, on 4 December 2014, to register as an Interested and Affected Party (I&AP) and provide comments on the In Process Basic Assessment Report for the *Proposed Expansion of Romansbaai Abalone Farm on Portion 2 of the Farm No. 711, Gansbaai, Caledon Rd.*

**DEA&DP REFERENCE:** 16/3/3/6/7/1/E2/10/1628/23  
**LORNAY REF:** RB/D1  
**APPLICANT:** Aquinion (Pty) Ltd

**LOCATION:** Portion 2 of the Farm No. 711, Romansbaai, Gansbaai, Overstrand Municipality

**PROJECT OVERVIEW:** The expansion of Romansbaai Abalone Farm is proposed. This includes expansion of the pumphouse, installation of additional of water pipelines, expansion of production area and addition of abalone grow out tanks, addition of ground mounted solar array and installation of seawater holding reservoir.

**LISTED ACTIVITIES:** The following Listed Activities are applied for in terms of the NEMA EIA Regulations:

- Listing Notice 1 (GN R983): Activities 1, 9, 10, 13, 15, 17, 19A, 27, 30, 34, 41, 43, 45, 46, 52, 54
- Listing Notice 3 (GN R985): Activities 12

A copy of the In Process Basic Assessment Report is available for public review and download on our website, or upon request. Interested and Affected Parties (I&APs) are invited to register and/or provide comments on the application during the public participation period from 21 May 2025 to 23 June 2025.

**HOW TO PARTICIPATE:** Please register or submit your comment via the following details:

**Lornay Environmental Consulting**  
**For Att:** Michelle Naylor  
**Tel:** 083 245 6556  
**Email:** [michelle@lornay.co.za](mailto:michelle@lornay.co.za)  
**Website:** [www.lornay.co.za](http://www.lornay.co.za)

**IMPORTANT NOTICE:** In accordance with the Protection of Personal Information Act (POPI Act, 2023), by registering and commenting as an I&AP your name and comments will be made public.



*Environmental Impact Assessments | Basic Assessments | 24G  
Applications | Water Use License Applications | Environmental  
Audits*

## 10. PROOF OF NOTICE OF PPP2

**michelle@lornay.co.za**

**From:** michelle@lornay.co.za  
**Sent:** Tuesday, 20 May 2025 11:32  
**To:** Dmitri.Matthews@westerncape.gov.za; Cor Van der Walt; 'Brandon Layman'; Rulien Volschenk; carendse@overstrand.gov.za; 'gbenvironmental@overstrand.gov.za'; Penelope Aplon; 'frederick.johnson@dpw.gov.za'; Basson.Geldenhuis@dpw.gov.za; 'MPretorius@dffe.gov.za'; Rhett Smart; 'Pat Miller'; 'Sheraine Van Wyk'; 'Vanessa.Stoffels@westerncape.gov.za'; 'Mercia J Liddle'; 'RMolale@dffe.gov.za'; 'fditinti@environment.gov.za'; 'FDaya@dffe.gov.za'; 'MJeziile@dffe.gov.za'; 'AOsborne@dffe.gov.za'; 'nnqinata@overstrand.gov.za'  
**Cc:** DEADP EIA Admin  
**Subject:** Notice of IN-PROCESS NEMA PPP | Proposed Expansion of Romansbaai Abalone Farm, Gansbaai  
**Attachments:** Notice of In Process PPP 210525.pdf

Dear Organ of State and / I&AP,

**PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM, PORTION 2 OF 711, GANSBAAI, CALEDON RD  
DEA&DP Ref No. 16/3/3/6/7/1/E2/10/1628/23**

DEA&DP Development Management – D. Matthews  
DOA – C. van Der Walt  
DOA – B. Layman  
Overberg District Municipality – R. Volschenk  
Overstrand Municipality – C. Arendse / P. Aplon  
DPW – F. Johnson / B. Geldenhuis  
DFFE Sustainable Aquaculture – M. Pretorius  
Cape Nature – R. Smart  
Whale Coast Conservation – P. Miller  
Dept. Transport & PW – V. Stoffels  
DEA&DP CMU – M. Liddle / I. Bekko  
DFFE GDA – R. Molale  
DFFE Coastal Conservation Strategies – F. Ditinti  
DFFE - [FDaya@dffe.gov.za](mailto:FDaya@dffe.gov.za)  
DFFE - [MJeziile@dffe.gov.za](mailto:MJeziile@dffe.gov.za)  
DFFE - [AOsborne@dffe.gov.za](mailto:AOsborne@dffe.gov.za)  
Ward Councillor - [nnqinata@overstrand.gov.za](mailto:nnqinata@overstrand.gov.za)

Please see attached notice of in-process public participation on the above-mentioned BAR.  
**Closing date for comment: 23 June 2025**

Should you have no further comment, please ignore this notice.

Kind regards

**michelle@lornay.co.za**

---

**From:** michelle@lornay.co.za  
**Sent:** Tuesday, 20 May 2025 11:33  
**To:** 'bolusmgm@telkomsa.net'; 'david@romansbaai.co.za'  
**Subject:** Notice of IN-PROCESS NEMA PPP | Proposed Expansion of Romansbaai Abalone Farm, Gansbaai  
**Attachments:** Notice of In Process PPP 210525.pdf

Dear Organ of State and / I&AP,

**PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM, PORTION 2 OF 711, GANSBAAI, CALEDON RD  
DEA&DP Ref No. 16/3/3/6/7/1/E2/10/1628/23**

Please see attached notice of in-process public participation on the above-mentioned BAR.

**Closing date for comment: 23 June 2025**

Should you have no further comment, please ignore this notice.

Kind regards



**LORNAY**

**ENVIRONMENTAL CONSULTING**

*Michelle Naylor*

*M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAso*

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Reg No. 2015/445417/07 | Vat. Reg. 429 031 9468

You are receiving communication from us for professional reasons or as an identified Interested and Affected Party only. The Protection of Personal Information Act (POPIA) requires that we protect your information and that we obtain your consent to communicate with you in the future.

If you wish to be removed from any data list, please state so and we will remove your details.

Note that we will only use your personal information in a confidential and professional manner relating to this specific project.

## 11. COMMENTS RECEIVED DURING PPP 2



### CONSERVATION INTELLIGENCE: SOUTH

postal 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
physical 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
website [www.capenature.co.za](http://www.capenature.co.za)  
enquiries Rhett Smart  
telephone 087 087 8017  
email [rsmart@capenature.co.za](mailto:rsmart@capenature.co.za)  
reference LS14/2/8/1/7/2/711-2\_aquaculture\_Gansbaai  
date 23 June 2025

Lornay Environmental Consulting  
P.O. Box 1990  
Hermanus  
7200

Attention: Michelle Naylor  
By email: [michelle@lornay.co.za](mailto:michelle@lornay.co.za)

Dear Ms Naylor

**Draft Basic Assessment Report for the Proposed Expansion of the Romansbaai Abalone Farm, Remainder of Portion 2 of Farm Klipfonteyn 71 I, Gansbaai**

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments.

Additional specialist studies have been undertaken, and the botanical assessment has been amended in accordance with the comments provided on the Pre-Application Basic Assessment Report (BAR). The need for a biodiversity offset has been evaluated.

### **Botanical Assessment**

The botanical assessment has updated the desktop mapping to include mention of the updated 2023 Western Cape Biodiversity Spatial Plan (BSP) and the draft updates in the beta National Vegetation Map. The 2023 BSP is considered more accurate for this site with the affected area mapped as Critical Biodiversity Area 1 (CBA) and the determination that draft change of the vegetation mapping from Overberg Dune Strandveld (endangered) to Southwestern Strandveld (not assessed) does not have any effect on the assessment or recommendations.

The motivation for not calculating the site ecological importance (SEI) is noted. We wish to advise that the recommendation is in accordance with the protocols which state for terrestrial plant species specialist assessment that "2.3. The assessment must be undertaken in accordance with the Species Environmental Assessment Guideline". The Species Environmental Assessment Guideline refer to a "a standardised metric for identifying site-based ecological importance for species" which is the SEI. The constraints related to quantitative data and level of accuracy within the scope of a specialist study

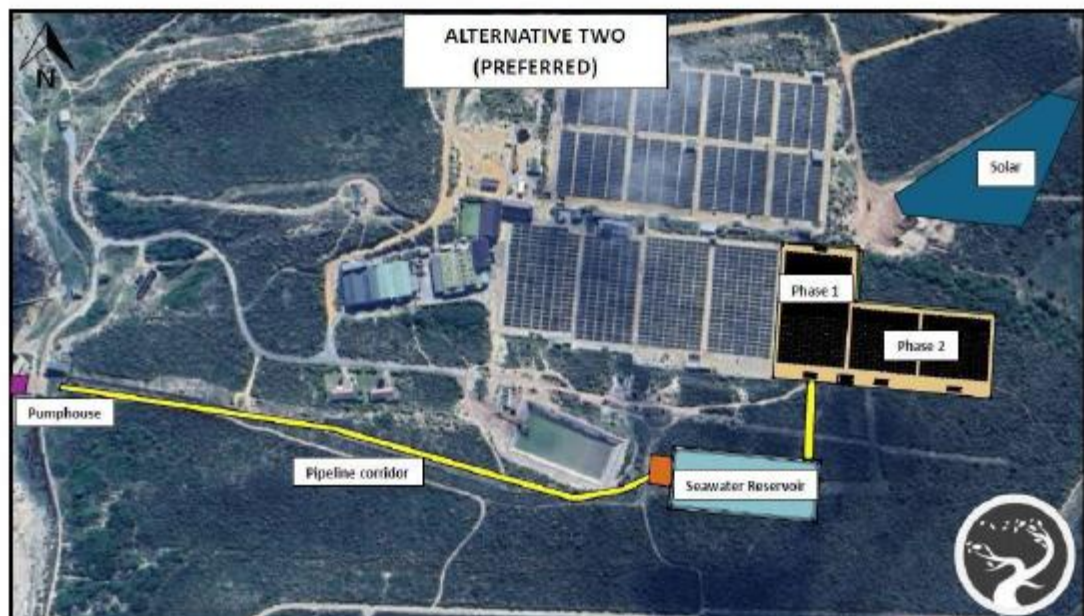
The Western Cape Nature Conservation Board trading as CapeNature

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

for a Basic Assessment process are however acknowledged and an estimate would be accepted. The estimated percentage of the global population for each of the Species (Taxa) of Conservation Concern (SCCs) within the development footprint are presented each of which is estimated to be <1%.

The revised botanical assessment assessed the development alternatives which were presented in the Pre-Application BAR, as the previous version of the botanical assessment assessed a different layout. However, the layouts as indicated in the botanical assessment are not the same as those included within the Pre-Application BAR. The extent of the solar array is much larger than that indicated in Appendix B2 which was the previously preferred alternative. The extent of the solar array for the new preferred layout is also much larger than the previous preferred layout. The layout plans have the logo of the environmental assessment practitioner (EAP), therefore it is not evident that these are not the layout plans designed by the project team with accurate delineation. The lack of accurate and consistent layout plans for each alternative for evaluation by the specialists and authorities is a concern.

To more clearly illustrate the inaccurate spatial delineation of the layouts we wish to refer to the previous preferred layout and current preferred layout below (Figures 1&2). As a reference, the solar array is presented as 4 ha/40 000 m<sup>2</sup> for both alternatives, however is spatially much larger in the current layout. The total footprint for the current preferred layout is much smaller (6.9 ha) than the previous preferred layout (9.6 ha), however this is not evident from the spatial depiction (footprints as stated in the BAR).



**Figure 1:** Preferred layout for the Pre-Application Basic Assessment Report. Note the small extent of the solar array relative to the existing structures and relevant landmarks.



Figure 2: Preferred layout for the Draft Basic Assessment Report. Note the large extent of the solar array relative to the existing structures and relevant landmarks.

Notwithstanding the above, the revised botanical assessment assessed the purported alternatives presented in the Pre-Application BAR, although it is not known which of the two spatial depictions is accurate/more accurate. With regards to the location of the SCCs, Alternative 1 is preferred as Phase 2 of the expansion area for Alternative 2 impacted on the all the SCCs but Phase 2 for Alternative 1 impacted on none. Alternative 1 was not the preferred alternative in the Pre-Application BAR. In the impact assessment, Phase 2 is rated as medium negative for Alternative 2 as it was for the initial layout, however for Alternative 1 it is reduced to low negative. The location of the seawater reservoir remains the same for all alternatives and therefore remains medium-high negative. The residual impact significance therefore remains above the threshold requiring a biodiversity offset, although it is motivated that an alien clearing offset is preferred to securing more of the same vegetation type according to the offset ratios.

An addendum to the botanical assessment is provided which evaluates the current preferred alternative. This would align to Figure 2 above, although no diagrams are provided in the addendum therefore it cannot be certain which layout was presented to the botanical specialist. The addendum only refers to the reduction in the footprint size of the revised layout as indicated in the Draft BAR. The reduction is assumed to be a reduced version of Alternative 2 and as a result, Phase 2 is reduced to low-medium negative and the seawater reservoir to medium negative. Medium negative is still within the threshold requiring a biodiversity offset, however it is motivated that a smaller quantum is required compared to the previous preferred alternative.

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Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Garli, Dr Collin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwaylta Shude-Mareka, Dr Razeena Omar

In response to the queries regarding the previous approval for expansion, confirmation is provided that the proposed expansion area does not encroach into the milkwood thicket or limestone outcrop. Appendix K includes an audit of the existing EA with no findings of non-compliance. Confirmation is provided that there are adequate design and mitigation measures to prevent the potential impact of discharge of saline water from the seawater reservoir into the natural habitat. Confirmation is also provided that the mitigation measures for the solar array will be implemented, including retention of indigenous vegetation under the solar panels. The measure included in the Environmental Management Programme Report (EMPr) is that the vegetation under the solar panels will be maintained at a height of between 30 cm and 100 cm.

### **Terrestrial Animal Compliance Statement**

The terrestrial animal compliance statement was undertaken in accordance with CapeNature comments. A field survey of the site was undertaken with 11 locality points indicated with associated photographs. Three main faunal habitats were identified, namely natural fynbos, short disturbed fynbos pasture and built-up areas, the latter consisting of the existing development footprint on site. All faunal species which were observed on site are listed with occurrence records in the three habitats, and with the largest percentage consisting of birds.

A total of 7 SCCs were flagged in the screening tool as high or medium sensitivity. None of these species were observed on site. One additional species (Cape dwarf chameleon – *Bradypodion pumilum*) was added based on desktop information. Black Harrier (*Circus maurus*) and Cape dwarf chameleon are considered to potentially occur on site, however none of the species flagged are assessed to potentially experience an impact of higher than low significance.

There was only one SCC observed on site, namely bontebok (*Damaliscus pygargus pygargus*), although more accurately a subspecies of conservation concern. Bontebok is a large mammal game species, and the species was almost certainly introduced to the property along with other game species. The only other game species referred to in the animal species compliance statement is the Burchell's zebra (plains zebra), although the botanical assessment also referred to eland and springbuck. The bontebok was only found on the short, disturbed fynbos pasture.

Although bontebok have been introduced there is a Biodiversity Management Plan (BMP) for the subspecies, for which the aim is to manage the meta-population with the subpopulations mainly consisting of introductions due to the inability for natural dispersal within the natural distribution range since it is occupied mainly by intensive agriculture farms. According to the BMP, the property is within the natural distribution range of the species however the map doesn't indicate a population record at the site location (Cowell & Birss 2017). Historically the subspecies occurred in a roughly triangular area between Elgin and Heidelberg and south to the Breede River mouth, Cape Agulhas and the Bot River Estuary (Skead 2011). The preferred habitat of the species does not however correlate the primary strandveld habitat occurring across the site, but rather the managed pasture areas for this site (it primarily occurred within renosterveld). As a result of the BMP and the

management of the meta-population within the natural distribution range, bontebok should be included as one of the taxa assessed.

The recommendation of the terrestrial animal species compliance statement is that the development proposal is acceptable as the impacts are of low or very low significance, and the preferred alternative which will result in the least clearance of vegetation is preferred. As mentioned, bontebok should also be included in the assessment and the habitat suitability should also be taken into account. It should be noted that the brush-cutting of vegetation under the solar panels is likely to favour the bontebok, unless the solar panels act as a behavioural deterrent for the species. Compliance with provincial legislation with regards to game is separate from this process.

### **Coastal and Marine Impact Report**

A coastal and marine impact report has been compiled to address impacts on the coastal and marine environment, which as CapeNature highlighted is not addressed within the screening tool. The study identified several impacts in both the construction and operational phase and each impact is assessed. The impacts during the construction phase are: disturbance to coastal habitat; blasting; vehicle and pedestrian traffic; erosion and turbidity; and during the operational phase: abstraction of seawater; discharge of effluent; genetic impacts and disease; and disturbance during maintenance. Some of these impacts are rated as high or medium significance prior to mitigation, however all can be reduced to low significance after mitigation. There are a number of mitigation measures proposed all of which must be considered essential and included in the EMPr.

While the impact assessment of the coastal and marine impact report is considered comprehensive, there is no description provided regarding the coastal habitat which will be affected. With regards to the National Biodiversity Assessment coastal ecosystem types, the ecosystem at the location of the pump station is Agulhas Exposed Rocky Shore. The location is classified as CBA Restore as reflected on the Department of Forestry, Fisheries and Environment (DFFE) Coastal Viewer (NMU 2023). It does however appear that the development footprint has already been disturbed by the existing infrastructure.

### **Biodiversity Offset Applicability Assessment**

The biodiversity offset applicability assessment provides an overview of the botanical and animal species studies. We wish to note that biodiversity offsets can also be applicable to the coastal and marine environment, and we are aware of at least one precedent which was investigated, but would not be relevant in this case. The only residual impact after mitigation which is of medium negative significance or higher and therefore within the threshold for a biodiversity offset is the loss of terrestrial habitat for the proposed seawater reservoir.

The study refers to the conclusions of the botanical assessment regarding the proposed offset, which states that the affected vegetation type, Overberg Dune Strandveld, is already well conserved and

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Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

there is a large remaining extent, however the main threat is alien invasive species. It is therefore motivated that conserving more of this vegetation type will have less of a positive outcome for biodiversity than implementing an offset targeted at clearing alien invasive species. The conclusion provided is that a biodiversity offset is not applicable for this site.

By applying the National Biodiversity Offset Guidelines, CapeNature does not support this conclusion. Firstly, the biodiversity offset applicability assessment has not demonstrated detailed investigation of the mitigation hierarchy of avoid, minimize, mitigate/restore and only then investigate an offset for the residual impact if it is of medium significance or higher. The primary flaw in this regard is the inconsistent and inaccurate layout plans provided which have not permitted an accurate determination of the options of avoid and minimize. The layout plans need to be provided by the project engineers and architects with detailed plans that would also be submitted to the Overstrand Municipality for building plan approval. The plans should include co-ordinates of the development components.

Should it still be confirmed that a biodiversity offset is required after a detailed investigation of the alternatives with accurate detailed layout plans, the biodiversity offset must comply with the National Biodiversity Offset Guidelines. While the motivation provided by the botanical specialist that alien clearing would be the best option is backed by sound logic, the offset would still need to be framed within the context of the guidelines and be supported by the best available science – an arbitrary financial contribution towards alien clearing would not be supported. We also wish to note that there should be sufficient natural habitat remaining on the property should an on-site offset be considered.

#### **Conclusion**

CapeNature does not support the Biodiversity Offset Applicability Assessment and wishes to raise concern regarding the inaccuracies and inconsistencies in the layout plans for the alternatives presented in both Appendix B and the specialist studies. The layout plans should be provided by the project team as would be submitted for the building plans. A thorough investigation of the mitigation hierarchy must be undertaken using the accurate layout plans and if a biodiversity offset is required, it must comply with the National Biodiversity Offset Guidelines.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Regards



Rhett Smart

For: Manager: Landscape Conservation Intelligence South

cc. Thandeka Mabena, CapeNature  
D'mitri Matthews, DEA&DP

References

Cowell, C.R. and Birss, C. 2017. Biodiversity Management Plan for The Bontebok (*Damaliscus pygargus pygargus*) in South Africa. Unpublished Report, jointly developed by South African National Parks, CapeNature and the National Department of Environmental Affairs. Version 1.0

Skead, C.J. 2011. Historical Incidence of the Larger Land Mammals in the broader Western and Northern Cape. Second Edition (eds: Boshoff, A.F., Kerley, G.I.H. & Lloyd, P.H.), Centre for African Conservation Ecology, Nelson Mandela Metropolitan University, Port Elizabeth

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Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar



Department of Environmental Affairs and Development Planning  
D'mitri Matthews  
Directorate: Development Management, Region 1  
D'mitri.Matthews@westerncape.gov.za | Tel: 021 483 8350

**REFERENCE:** 16/3/3/1/E2/10/1035/25  
**DATE:** 26 June 2025

The Board of Directors  
Terrasan Group (Pty)Ltd  
P. O. Box 1086  
**HERMANUS**  
7200

**Attention: Mr. R. Yearsley**

Tel.: (028) 312 1106  
Email: rowan@aqunion.co.za

Dear Sir

**COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT ("BAR") SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998) ("NEMA") ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) ("EIA") FOR THE PROPOSED EXPANSION OF THE ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI**

1. The Draft BAR dated 19 May 2025, as received by the Directorate: Development Management Region 1 (hereinafter referred to as "this Directorate") on 20 May 2025, refers.
2. Following review of the information submitted this Directorate notes the following:

2.1 The expansion of the abalone facility will include the following:

Description	Volume	Size (m <sup>2</sup> )
New production area/ grow out	150 tons (wet weight)	20000
Line seawater reservoir	41 000 m <sup>3</sup>	8000
Solar array	4MW	40000
Pumphouse		140
4 additional pipelines		1200
Total development footprint		69 340 (6.9 ha)

3. This Directorate as the following comments on the draft BAR:
  - 3.1 Since a new entity owns the existing facility, an amendment application must be submitted to the Department to transfer the rights and obligations of the EA issued on 3 March 2009 (Reference: E12/2/3/1-E2/11-0262/07).
  - 3.2 The issues highlighted by CapeNature must be addressed, especially their comments regarding the requirement for a biodiversity offset must be addressed
  - 3.3 A Georeferenced map of all the proposed components for the expansion must be provided for the preferred alternative.



4. The applicant Regulatory Requirements:
  - 4.1 Proof of the notifications sent to registered I&APs for the commenting purposes must be included in the BAR.
  - 4.2 A dated photograph of erecting a site notice must be provided.
  - 4.3 Proof of placing an advertisement must be provided.
  - 4.4 Any new representations and comments received in connection with the application must be included in the BAR.
  - 4.5 Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the BAR.
  - 4.6 The minutes of any meetings held by the environmental assessment practitioner ("EAP") with I&AP's and other role players which record the views of the participants must be included in the BAR.
  - 4.7 Please be advised that the signed and dated applicant declaration is required to be submitted with the BAR during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.
  - 4.8 In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the BAR during the formal application process for decision-making.
  - 4.9 You are furthermore reminded that the BAR must contain all the information outlined in Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended).
5. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.
6. This Department reserves the right to revise or withdraw its comments and request further information based on any information received.

Yours faithfully

**Marbe**  
pp **Coetzee**  
Digitally signed by  
Marbe Coetzee  
Date: 2025.06.26  
14:16:36 +0200

**HEAD OF COMPONENT**

**ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 1**

**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Cc to: (1) Ms. M. Naylor (Lornay Environmental Consulting)  
(2) Ms. P. Aplon (Overstrand Municipality)

Email: michelle@lornay.co.za  
Email: paplon@overstrand.gov.za

# OVERBERG

DISTRIKSMUNISIPALITEIT  
DISTRICT MUNICIPALITY  
UMASIPALA WESITHILI



*MELD ASB/PLEASE QUOTE*

*Ons Verw./Our Ref.:* 18/5/5/4

*Navrae/Enquiries:* Francois Kotze

*Bylyn/Ext.:*

Privaatsak: X22  
Private Bag:  
BREDASDORP  
7280  
Tel: (028) 4251157  
Faks/Fax: (028) 4251014  
E-mail/E-pos: [rvolschenk@odm.org.za](mailto:rvolschenk@odm.org.za)

23 June 2025

**LORNAV ENVIRONMENTAL CONSULTING**

**PO Box 1990  
HERMANUS  
7200**

For attention: Michelle Naylor

**RE: PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON REMAINDER OF  
PORTION 2 OF THE FARM 711, GANSBAAI**

**DEA&DP REFERENCE: 16/3/3/6/7/1/E2/10/1628/23**

The Environmental Management Services Department of the Overberg District Municipality acknowledges receipt and review of the draft Basic Assessment Report and Environmental Management Programme.

According to the 2017 Western Cape Biodiversity Spatial Plan (WCBSP), the majority of the property is designated as an *Other Natural Area (ONA)*, while a smaller portion within the demarcated zone for photovoltaic (PV) development is classified as a *Critical Biodiversity Area (CBA)*. However recently the WCBSP has been reviewed and the area is now categorise as CBA.

The Overberg District Municipality's Spatial Development Framework clearly define Spatial Planning Categories (SPCs) to reflect how the area should be developed spatially to ensure sustainability. These SPCs are linked with the Biodiversity Spatial Plan Categories as defined in the WCBSP.

Critical Biodiversity Areas (CBAs) are designated as *Core 1* under the Spatial Planning Categories. The primary management objective for these areas is to maintain them in a natural or near-natural state, ensuring no further loss of natural habitat. Where degradation has occurred, restoration efforts should be undertaken. Only low-impact, biodiversity-sensitive land uses are considered appropriate within these zones.

Alle korrespondensie moet aan die Munisipale Bestuurder gerig word.  
All correspondence must be addressed to the Municipal Manager

Other Natural Areas (ONAs) fall under the *Buffer 2* category, where the focus is on minimizing habitat and species loss while preserving ecosystem functionality through strategic, landscape-level planning.

The proposed development is located within the Overberg Dune Strandveld, an ecosystem officially classified as *Endangered*. According to the Overberg District Municipality's Spatial Development Framework, the preservation of vulnerable ecosystems must be a key consideration. Mitigation measures recommended in specialist reports, aimed at conserving areas of ecological significance, are supported. Further expansion that could place species of conservation concern at greater risk should not be pursued.

In accordance with the National Environmental Management: Biodiversity Act (2004) and the Conservation of Agricultural Resources Act (1983), landowners are legally obligated to manage invasive species present on their properties. As part of effective mitigation, all listed alien and invasive species must be removed, followed by routine maintenance to prevent regrowth. To safeguard sensitive ecosystems from further degradation, a comprehensive alien vegetation management plan should be developed and implemented across the entire property.

The Overberg District Municipality reserves the right to amend its comments and to request further information should any additional relevant documentation or details become available.

Yours faithfully,



**R. BOSMAN**  
**MUNICIPAL MANAGER**



forestry, fisheries  
& the environment

Department:  
Forestry, Fisheries and the Environment  
REPUBLIC OF SOUTH AFRICA

Branch: Fisheries Management, Directorate: Sustainable Aquaculture Management, Private Bag X2, Valseberg, Cape Town, 8018  
Tel: +27 21 402 3911

Ref: 16/3/3/6/7/1/E2/10/1628/23

Enquiries: Alexis Osborne

Tel+27 21 402 3672 Email: EnvironAssessments@dfef.gov.za

Lornay Environmental Consulting  
Unit F, Hemel en Aarde Valley  
Hermanus  
7200  
Email: michelle@lornay.co.za

Dear Michelle Naylor

**RE: APPLICATION FOR A PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON REMAINDER OF PORTION 2 OF THE FARM 711, GANSBAAI, WESTERN CAPE.**

The Directorate: Sustainable Aquaculture Management of the Department of Forestry, Fisheries and the Environment ("DFFE") has reviewed the Basic Assessment Report and associated reports for the Proposed Expansion of Romansbaai Abalone Farm on Portion 2 of the Farm No. 711, Gansbaai, Western Cape.

The comments of the DFFE are as follows:

1. The DFFE, Branch: Fisheries Management has a mandate for the development and management of aquaculture in South Africa, please register the Directorate: Sustainable Aquaculture Management as an Interested and Affected Party (I&AP) to be included for further communication go forward.
2. Under SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOL: 4 Policies (Page 24-25), the *National Environmental Management Act (NEMA)* and its associated regulations, as well as the *Marine Living Resources Act (MLRA)*, have been omitted from the list of key legislation applicable to the operation. Please ensure that the MLRA, along with the relevant policies must include that are applicable for Marine Aquaculture permit and Right. The applicant must submit the revised and approved Environmental Management Programme (EMPr) (Reference: EMP/RB/Rev3) to the DFFE Sub-Directorate: Aquaculture Authorisations for monitoring and record-keeping purposes.
3. Precautions must be taken to ensure that incoming seawater remains uncontaminated during construction activities near or upstream of the intake, particularly in relation to the pumphouse



Batho pele – putting people first



The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and/or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

**RE: APPLICATION FOR A PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON  
REMAINDER OF PORTION 2 OF THE FARM 711, GANSBAAI**

expansion. Disturbance of sediments in this area may release heavy metals and other pollutants. Additionally, effluent discharge must be carefully managed to prevent cross-contamination with the intake water, considering nearshore current dynamics.

4. The applicant must ensure that the lined seawater reservoir proposed as part of the expansion does not introduce harmful chemicals from the lining materials, which could pose risks to food safety and/or aquatic animal health. Additionally, the design should prevent the formation of dead zones (i.e. areas with poor water circulation) that could promote the growth of pathogenic microorganisms, leading to further challenges.
5. The DFFE further notes that the proposed expansion will increase the farming production by 150 tons (wet weight) of abalone annually, however, it is important that the expansion includes additional hygiene management, biosecurity controls, staff training, and waste management to prevent risks associated with over stocking, cross-contamination, and pathogen proliferation.
6. The installation of a 4 MW solar array is supported as it enhances the sustainability of the farm's operations and reduces reliance on grid-supplied electricity. This measure aligns with best practice in sustainable aquaculture infrastructure design and management.
7. EMPr: 10.1.6 Waste – The drafting of a Site-specific Waste Management Plan is supported, and it is advised that prior approval be obtained from the Local Municipality for disposal of biological waste and also ensure that Marine Aquaculture permit conditions are followed whenever there is mass mortality on the farm and that this is reported the DFFE accordingly.

The Directorate supports the proposed expansion in principle, provided that the applicant commits to enhanced environmental management, robust biosecurity controls, and the mitigation of risks to marine and coastal systems. Ongoing monitoring and compliance with environmental authorisation conditions will be critical to ensuring that the expansion contributes positively to the sustainable growth of aquaculture in the region.

Please note that the Directorate Sustainable Aquaculture Management reserves the right to review and/or provide additional comments in future. Enquiries may be directed to the contacts provided at the top of this correspondence.

Yours sincerely



**Ms Fatima Daya**  
**ACTING DIRECTOR: SUSTAINABLE AQUACULTURE MANAGEMENT**  
**DATE: 13 June 2025**

## IN PROCESS PUBLIC PARTICIPATION

### PPP 3

A third and final round of public participation was conducted during the 50-day extension period as required in terms of the NEMA EIA Regulations.

#### 12. REGISTER FOR I&APs

##### **WC Government Env Affairs & Dev Planning**

##### **Development Management**

D'mitri Matthews  
Registry Office  
1st Floor, Utilitas Buidling  
1 Dorp Street  
8001

##### **Cape Nature**

Rhett Smart  
[rsmart@capenature.co.za](mailto:rsmart@capenature.co.za)

##### **Overstrand Municipality**

Chester Arendse  
PO Box 26  
[gbenvironmental@overstrand.gov.za](mailto:gbenvironmental@overstrand.gov.za)

##### **National Department of Public Works**

Director General  
Frederick Johnson  
Priavte Bag x65  
Pretoria  
0001  
[frederick.johnson@dpw.gov.za](mailto:frederick.johnson@dpw.gov.za)  
02 1402 2338  
Letter

##### **Department of Agriculture, Forestry and Fisheries:**

##### **Sustainable Aquaculture Management**

Michelle Pretorius  
Private Bag x2  
Roggebaai  
Cape Town  
8012  
021 430 7034

##### **Overberg District Municipality**

F. Kotze / R. Volschenk  
Private Bag x 22  
Bredasdorp  
7280  
F. Kotze  
Email  
[rvolschenk@odm.org.za](mailto:rvolschenk@odm.org.za)

##### **National Department of Public Works**

Chief Town Planner  
Basson Geldenhuys  
National Dept of Public Works  
Cape Town Regional Office  
Room 1419, Customs House  
Lower Heerengracht Street, cape Town  
[Basson.Geldenhuys@dpw.gov.za](mailto:Basson.Geldenhuys@dpw.gov.za)  
021 404 2174  
Letter

##### **Department of Agriculture, Forestry and Fisheries**

##### **Land Management**

Cor van Der Walt  
Private Bag x 1  
Elsenburg  
7607  
[CorvdW@elsenburg.com](mailto:CorvdW@elsenburg.com)  
Letter

Tel: 021 808 5099

Fax: 021 808 5092

##### **WC Government Env Affairs & Dev Planning**

##### **Spatial Planning & Coastal Impact Mgmt**

Mercia Liddle / Lynn Jacobs  
Registry Office  
1st Floor, Utilitas Buidling

[michellePR@daff.gov.za](mailto:michellePR@daff.gov.za)

**WC Government Env Affairs & Dev Planning  
Transport and Public Works**

Provincial Roads  
Vanessa Stoffels  
PO Box 2603

Cape Town  
8000  
Ref: 17/1/11/B

[Vanessa.Stoffels@westerncape.gov.za](mailto:Vanessa.Stoffels@westerncape.gov.za)

**Department of Forestry, Fisheries and the Environment  
GDA Authorisation**

**For Att. X. Myanga**

[xmyanga@dffe.gov.za](mailto:xmyanga@dffe.gov.za)

[RMolale@dffe.gov.za](mailto:RMolale@dffe.gov.za)

**Overstrand Municipality**

Operational Manager  
Ricardo Andrews  
PO Box 20  
Hermanus

7220

[randrew@overstrand.gov.za](mailto:randrew@overstrand.gov.za)

T 028 384 8326

F 028 384 0241

Email

**Whale Coast Conservation**

Att: Pat Miller

Chair: Whale Coast Conservation

Tel: (028) 313-0093

[pat.miller7@outlook.com](mailto:pat.miller7@outlook.com)

Sheraine van Wyk

IAPs

**Erf 70**

Bolus Family Trust

Cr MGM Bolus

[bolusmgm@telkomsa.net](mailto:bolusmgm@telkomsa.net)

**David Mostert**

[david@romansbaai.co.za](mailto:david@romansbaai.co.za)

1 Dorp Street

8001

021 483 3370

[Mercia.Liddle@westerncape.gov.za](mailto:Mercia.Liddle@westerncape.gov.za)

**Cape Nature Head office Lease agreement**

[accounts@capenature.co.za](mailto:accounts@capenature.co.za)

**DEFF Oceans and Coasts: Coastal Conservation  
Strategies**

Funanani Ditinti

2 East Pier Building,

East Pier Road

Victoria and Alfred Waterfront

Cape Town

8001

[fditinti@environment.gov.za](mailto:fditinti@environment.gov.za)

**Ward Councillor 2**

Ald A Nqinata

[nqinata@overstrand.gov.za](mailto:nqinata@overstrand.gov.za)

Additional DFFE contacts as per Michelle Pretorius  
request

[FDaya@dffe.gov.za](mailto:FDaya@dffe.gov.za)

[MJezile@dffe.gov.za](mailto:MJezile@dffe.gov.za)

[AOsborne@dffe.gov.za](mailto:AOsborne@dffe.gov.za)

**Paul Slabbert - PHS Consulting**  
[paul@phsconsulting.co.za](mailto:paul@phsconsulting.co.za)

### 13. NOTICE OF ADDITIONAL PUBLIC PARTICIPATION – PPP 3



#### NOTICE OF PUBLIC PARTICIPATION FOR BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN TERMS OF NEMA

Notice is hereby provided, in accordance with the Environmental Impact Assessment (EIA) regulations, as stipulated under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the 2014 NEMA EIA Regulations (as amended) as published in Government Gazette No. 38282, Government Notice R983, R984, and R985, on 4 December 2014, to register as a Interested and Affected Party (I&AP) and provide comments on the In Process Basic Assessment Report for the *Proposed Expansion of Romansbaai Abalone Farm on Portion 2 of the Farm No. 711, Gansbaai, Caledon Rd.*

**DEA&DP REFERENCE:** 16/3/3/6/7/1/E2/10/1628/23 and 16/3/3/1/E2/10/1035/25  
**LORNAY REF:** RB/D1  
**APPLICANT:** Aqunion (Pty) Ltd

**LOCATION:** Portion 2 of the Farm No. 711, Romansbaai, Gansbaai, Overstrand Municipality

**PROJECT OVERVIEW:** The expansion of Romansbaai Abalone Farm is proposed. This includes expansion of the pumphouse, installation of additional of water pipelines, expansion of production area and addition of abalone grow out tanks, addition of ground mounted solar array and installation of seawater holding reservoir.

**LISTED ACTIVITIES:** The following Listed Activities are applied for in terms of the NEMA EIA Regulations:

- Listing Notice 1 (GN R983): Activities 1, 9, 10, 13, 15, 17, 19A, 27, 30, 34, 41, 43, 45, 46, 52, 54
- Listing Notice 3 (GN R985): Activities 12

The Department of Environmental Affairs and Development Planning has granted a 50-day extension to the legislated process and as per the requirements, an additional 30 day commenting period must be provided.

A copy of the In Process Basic Assessment Report is available for public review and download on our website, or upon request. Interested and Affected Parties (I&APs) are hereby invited to register and/or submit written comments on the application during/within the extended public participation period, which will run from 29 August 2025 to 01 October 2025.

**HOW TO PARTICIPATE:** Please register or submit your comment via the following details:

Lornay Environmental Consulting  
For Att: Michelle Naylor  
Tel: 083 245 6556  
✉ mail: [michelle@lornay.co.za](mailto:michelle@lornay.co.za)  
/ebsite: [www.lornay.co.za](http://www.lornay.co.za)

**IMPORTANT NOTICE:** In accordance with the Protection of Personal Information Act (POPI Act, 2023), by registering and commenting as an I&AP your name and comments will be made public.



Environmental Impact Assessments | Basic Assessments | 24G  
Applications | Water Use License Applications | Environmental  
Audits

## 14. PROOF OF NOTICE OF PPP 3

**michelle@lornay.co.za**

**From:** michelle@lornay.co.za  
**Sent:** Thursday, 28 August 2025 20:43  
**To:** 'bolusmqm@telkomsa.net'; 'david@romansbaai.co.za'; 'paul@phsconsulting.co.za'  
**Subject:** Notice of IN-PROCESS NEMA PPP | Proposed Expansion of Romansbaai Abalone Farm, Gansbaai  
**Attachments:** Notice of PPP 3 Romansbaai Abalone Farm 290825.pdf

Dear Organ of State and / I&AP,

**PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM, PORTION 2 OF 711, GANSBAAI, CALEDON RD  
DEA&DP Ref No. 16/3/3/6/7/1/E2/10/1628/23 & 16/3/3/1/E2/10/1035/25**

Please see attached notice of additional in-process public participation on the above-mentioned BAR.

**Closing date for comment: 1 October 2025**

Should you have no further comment, please ignore this notice.

Kind regards,



**LORNAY**

ENVIRONMENTAL CONSULTING

*Michelle Naylor*

*M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAAs*

Hemel & Aarde Wine Village – Unit 5/1F

PO Box 1990, Hermanus, 7200, South Africa

T +27 (0) 83 245 6556

E [michelle@lornay.co.za](mailto:michelle@lornay.co.za) | W [www.lornay.co.za](http://www.lornay.co.za)

Reg No. 2015/445417/07 | Vat. Reg. 429 031 9468

You are receiving communication from us for professional reasons or as an identified Interested and Affected Party only. The Protection of Personal Information Act (POPIA ) requires that we protect your information and that we obtain your consent to communicate with you in the future.

If you wish to be removed from any data list, please state so and we will remove your details.

Note that we will only use your personal information in a confidential and professional manner relating to this specific project.

**michelle@lornay.co.za**

---

**From:** michelle@lornay.co.za  
**Sent:** Thursday, 28 August 2025 20:46  
**To:** Dmitri.Matthews@westerncape.gov.za; Cor Van der Walt; 'Brandon Layman'; Rulien Volschenk; carendse@overstrand.gov.za; 'gbenvironmental@overstrand.gov.za'; Penelope Aplon; 'frederick.johnson@dpw.gov.za'; Basson.Geldenhuis@dpw.gov.za; 'MPretorius@dfpe.gov.za'; Rhett Smart; 'Pat Miller'; 'Sheraine Van Wyk'; 'Vanessa.Stoffels@westerncape.gov.za'; 'Mercia J Liddle'; 'leptieshaam Bekko'; 'RMolale@dfpe.gov.za'; 'fditinti@environment.gov.za'; 'FDaya@dfpe.gov.za'; 'MJezele@dfpe.gov.za'; 'AOsborne@dfpe.gov.za'; 'nnqinata@overstrand.gov.za'  
**Cc:** DEADP EIA Admin  
**Subject:** Notice of ADDITIONAL IN-PROCESS NEMA PPP | Proposed Expansion of Romansbaai Abalone Farm, Gansbaai  
**Attachments:** Notice of PPP 3 Romansbaai Abalone Farm 290825.pdf

Dear Organ of State and / I&AP,

**PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM, PORTION 2 OF 711, GANSBAAI, CALEDON RD  
DEA&DP Ref No. 16/3/3/6/7/1/E2/10/1628/23 & 16/3/3/1/E2/10/1035/25**

DEA&DP Development Management – D. Matthews  
DOA – C. van Der Walt  
DOA – B. Layman  
Overberg District Municipality – R. Volschenk  
Overstrand Municipality – C. Arendse / P. Aplon  
DPW – F. Johnson / B. Geldenhuis  
DFPE Sustainable Aquaculture – M. Pretorius  
Cape Nature – R. Smart  
Whale Coast Conservation – P. Miller  
Dept. Transport & PW – V. Stoffels  
DEA&DP CMU – M. Liddle / I. Bekko  
DFPE GDA – R. Molale  
DFPE Coastal Conservation Strategies – F. Ditinti  
DFPE - [FDaya@dfpe.gov.za](mailto:FDaya@dfpe.gov.za)  
DFPE - [MJezele@dfpe.gov.za](mailto:MJezele@dfpe.gov.za)  
DFPE - [AOsborne@dfpe.gov.za](mailto:AOsborne@dfpe.gov.za)  
Ward Councillor - [nnqinata@overstrand.gov.za](mailto:nnqinata@overstrand.gov.za)

Please see attached notice of ADDITIONAL in-process public participation on the above-mentioned BAR.

**Closing date for comment: 1 October 2025**

Should you have no further comment, please ignore this notice.

Kind regards

**Michelle@lornay.co.za**

---

**From:** michelle@lornay.co.za  
**Sent:** Wednesday, 09 October 2024 20:23  
**To:** 'bolusmgm@telkomsa.net'; 'enquiries@overstrand.gov.za'; 'accounts@lomond.co.za'; 'shearer.luke@gmail.com'; 'thys@fractions.co.za'; 'werner@rainmakers.io'; 'roux@profengineers.com'  
**Cc:** 'david@romansbaai.co.za'; 'thys@romansbaai.co.za'  
**Subject:** Notice of Public Participation | Proposed Expansion of Romansbaai Abalone Farm | Ptn RE2/711, Gansbaai, Caledon RD  
**Attachments:** Notice of PPP RB1 091024.pdf

Dear Interested and Affected Party,

**DEA&DP Ref. No. 16/3/3/6/7/1/E2/10/1628/23**  
**Lornay Ref. No. RB/D1**

Please see attached notice of public participation for the proposed expansion of Romansbaai Abalone Farm,

Should you have no further comment, please ignore this notice.

Kind regards,



**LORNAY**

**ENVIRONMENTAL CONSULTING**

*Michelle Naylor*

*M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAAs*

Hemel & Aarde Wine Village – Unit 3A

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T +27 (0) 83 245 6556

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Reg No. 2015/445417/07

## 15. COMMENTS RECEIVED DURING PPP 3



### CONSERVATION INTELLIGENCE: SOUTH

**postal** 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
**physical** 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
**website** [www.capenature.co.za](http://www.capenature.co.za)  
**enquiries** Rhett Smart  
**telephone** 087 087 8017  
**email** [rsmart@capenature.co.za](mailto:rsmart@capenature.co.za)  
**reference** LS14/2/6/1/7/2/711-2\_aquaculture\_Gansbaai  
**date** 19 September 2025

Lornay Environmental Consulting  
P.O. Box 1990  
Hermanus  
7200

Attention: Michelle Naylor  
By email: [michelle@lornay.co.za](mailto:michelle@lornay.co.za)

Dear Ms Naylor

### **Revised Basic Assessment Report for the Proposed Expansion of the Romansbaai Abalone Farm, Remainder of Portion 2 of Farm Klipfonteyn 711, Gansbaai**

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments.

The Basic Assessment Report and appendices have been updated to address concerns related to discrepancies in the alternative layout plans presented and the Biodiversity Offset Applicability Assessment has been replaced by a Biodiversity Offset Report which proposes two potential offsets.

Other concerns raised have been adequately addressed, including confirmation that the game species occurring on the site belong to neighbouring Romans Bay Estate with the relevant CapeNature approvals, who requested that the fences between the properties are removed, and the coastal and marine impact report has been updated to include a description of the affected environment.

### **Development Layout**

The layout alternative which was selected as the preferred alternative layout in the Pre-Application phase (Alternative 2) and the current preferred alternative (Alternative 4) are presented as layouts compiled by a draughtsman and include the dimensions of the development components in m<sup>2</sup>. The layout plans are therefore considered accurate and address concerns previously raised. The preferred alternative layout compiled by the draughtsman is included in the botanical assessment addendum thereby providing evidence that the same layout is referred to.

The Western Cape Nature Conservation Board trading as **CapeNature**  
Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson,  
Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

We wish to note that the table comparing the dimensions of the three alternative development layouts in Appendix B3 differs from the layout plan for Alternative 1 whereby the table indicates that grow-out platforms are each 1.5 ha whereas the layout plan indicates that the grow-out platforms are each 1.75 ha. If the layout plan is accurate, it confirms that Alternative 1 has the largest development footprint of three alternatives and remains least preferred of the three alternative layouts as recommended.

We recommend that should the application be authorised, the co-ordinates of the vertices for each of the five development components should be provided as is standard practice for environmental authorisations issued by the competent authority.

### **Biodiversity Offset Report**

The Biodiversity Offset Report includes a discussion of the investigation of the mitigation hierarchy which is the starting point before a biodiversity offset can be contemplated. The progressive amendment of the development layout until the current preferred layout was derived provides evidence of investigating avoidance, based on the high sensitivity areas identified in the botanical assessment and minimization whereby the current preferred layout has reduced the size of the grow-out areas and seawater reservoir. Detailed accurate alternative layout plans as discussed above were required to adequately evaluate whether avoidance and minimization were adequately investigated. Additional mitigation measures are recommended in the three biodiversity specialist assessments to further reduce the residual impact. A motivation is provided for the encroachment of the minimized reservoir into the high sensitivity areas due to the requirement for this facility to be located on a high point on the property to allow for gravity flow of water.

The biodiversity offset is therefore only required for the 0.8 ha extent of the reservoir, as the botanical assessment had separated out the impact assessment according to the development components. The offset ratio which was applied is 10:1 (area conserved: area lost). The vegetation type referred to in the Biodiversity Offset Report is Southwestern Strandveld, however the ratios which have been applied are for Overberg Dune Strandveld, listed as endangered, which is still the official vegetation type occurring on the site. An explanation should be provided that the vegetation is mapped as Southwestern Strandveld in the current draft beta National Vegetation Map, however the threat status of this vegetation type has not yet been determined and the 2018 National Vegetation Map is still the official version, therefore the offset should be calculated based on the statistics for Overberg Dune Strandveld. It should further be noted that the full extent of Overberg Dune Strandveld will be incorporated into Southwestern Strandveld and Grootbos Strandveld (Sean Privett pers. comm.).

The proposed ratio is supported as the National Biodiversity Offset Guideline (the guideline) indicates that it should be based either on the threat status or a combination of the ecosystem extent and protection level, whichever is higher. Using the latter, no offset is required for Overberg Dune Strandveld, however the endangered threat status dictates an offset ratio of 10:1, and is further confirmed in Annexure A of the guidelines. The area which needs to be conserved must therefore ideally consist of 8 ha of intact Overberg Dune Strandveld.

Two alternative offset options are presented, namely a monetary contribution which is the preferred option and an on-site offset. The preferred option of a monetary contribution consists of a financial contribution towards alien clearing on an existing conservation area which lacks sufficient resources to adequately manage alien invasive plants. As stated, this option was presented by the botanical specialist and was strongly supported over the option of securing an additional area for conservation. It should be noted that one of the motivations is that Overberg Dune Strandveld is threatened because of alien invasive species, meanwhile there is a large percentage remaining and in the conservation estate.

The proposal is that the Grootbos Foundation can be the recipient of the funds as the organisation carries out alien clearing on properties within the broader Gansbaai region, including nature reserves and other conservation areas. Correspondence from Grootbos Foundation in Appendix A indicates a fund which has been set aside for this purpose. The correspondence provides an overview of the operations of the Grootbos Foundation, however it does not provide a plan of operations for the expenditure of the funds.

Reference is made to the meeting with CapeNature, however the report does not reflect that it was clearly stipulated that a financial contribution towards a strategic offset would need to demonstrate alignment with the guidelines. The guidelines state that removal of alien invasive species is a legal requirement and therefore does not satisfy the additionality principle of offsetting (pg 42). However as stipulated in Section 7.6.2., the funds for an offset would encompass both funds for securing the site (e.g. land purchase, legal fees, declaration costs etc.) and funds for ongoing management (e.g. invasive species alien control, firebreaks, erosion control etc.). A strategic offset would consist of an aggregation of funds towards these objectives.

A strategic offset requires a detailed plan regarding the proposed areas which will be targeted for protected area expansion as well as define the areas which can qualify towards the strategic offset. A number of role-players will need to be on-board in addition to the primary implementing agent, including authorities. Therefore, setting up the strategic offset will require more resources than an individual offset at the outset, however once set up the process will be streamlined for those who contribute. Precedents which can be referred to are the Atlantis Land Bank, the Cape Metro South East Strandveld Conservation Implementation Plan (CIP) and the Saldanha Strategic Offset. The motivation behind these strategic offsets also has relevance for this case whereby aggregating a number of small offsets into one large conservation area which can be well resourced and managed can have a much better outcome in terms of biodiversity conservation than attempting to manage small, isolated fragments of habitat with more limited overall biodiversity value, particularly within an urban setting.

It is for this reason that CapeNature was willing to consider this option, however the proposal requires much more detailed planning and proposal with buy-in from relevant stakeholders before it can be considered further. It will also have to demonstrate adherence to the guidelines. Informal communication with the competent authority has indicated that the monetary contribution option is

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayila Shude-Mareka, Dr Razeena Omar

not supported. If this option is to be explored further, the application should be withdrawn so that a more detailed proposal that adheres to the guidelines can be developed. We further recommend that the term strategic offset is used rather than monetary contribution.

If the current application is to be concluded, we recommend that the option of an on site offset should be implemented. There is more than the 8 ha quantum of intact Overberg Dune Strandveld available on the property to secure the offset. With regards to the selection of the 8 ha area, the current proposal as included in the Biodiversity Offset Report is supported as it includes most of the southern high sensitivity node and extends northwards to the northern high sensitivity node. The proposed area also connects to the open space areas on Roman Bay Estate. We would support if all high sensitivity areas were included beyond the 8 ha offset quantum. The initial offset proposal consisting of a narrow elongated area along the eastern and northern boundaries was not supported as it only included a small proportion of the high sensitivity area and narrow elongated areas are not preferred for conservation areas due to edge effects.

While CapeNature indicated that the 8 ha on site offset would not be considered a priority for the CapeNature stewardship programme, we did not indicate that it is not feasible, however we encouraged that other alternatives should also be investigated where partners in conservation can assist. With regards to the option of a conservation servitude, it is agreed that Grootbos Foundation and Overberg Renosterveld Trust would not be able to assist with this site. It should however be noted that CapeNature is investigating servitudes as an option. The site can also be considered within the CapeNature Stewardship Programme.

Consultation with the Overstrand Municipality indicates that they do not support spot zoning of the conservation area as an option. An alternative which would however be supported is an amendment to the site development plan (SDP) which indicates the conservation area. To CapeNature's knowledge the proposed expansion in any case still needs approval in terms of the municipal planning by-law whereby the SDP needs to be amended.

Section 7.4.2. of the guidelines indicate that there are a host of mechanisms for securing biodiversity offsets, however the most common are declaration of a NEM:PAA Protected Area, conservation servitudes and purchasing credits from a recognised biodiversity offset bank. The Biodiversity Offset Report includes consideration of these three options. The section states that the site needs to be secured for biodiversity in the long term and ideally protected into perpetuity. It further states "The above mechanisms may require that the applicable land use, town-planning or zoning scheme be amended to ensure that the biodiversity offset site may be/ is used for conservation purposes."

The option of indicating the conservation area on the SDP would need to ensure that the site is managed for conservation purposes, which is not a standard requirement. A conservation management plan would need to be included along with the SDP. It is noted that a biodiversity management plan is proposed in the Biodiversity Offset Report linked to the SDP as well as annual monitoring/audit reports. We would recommend that ideally the offset should meet the criteria for a

legally protected area or an Other Effective Area-based Conservation Measure (OECM) as per the IUCN requirements for countries obtaining conservation targets.

Another point to consider is that the landowner and his neighbour have existing obligations with CapeNature regarding the management of game on the property. It should be noted that game farms in terms of relevant conservation legislation were intended to be investigated as potential OECMs, particularly from a national level, however there were concerns that many game farms have management objectives more aligned with intensive livestock farming than biodiversity conservation.

We recommend that should the option of an on-site offset be selected, a condition of approval should be that the mechanism for securing the biodiversity offset will be decided upon by the CapeNature Stewardship Review Committee (or alternatively an *ad hoc* meeting with the chairperson of the Stewardship Review Committee). This will provide for sufficient time for deciding upon an appropriate mechanism, which must also adhere to the guidelines. We recommend that there is consultation with both CapeNature and the Overstrand Municipality prior to the site being presented to the review committee. We do not support that the application should proceed without an offset.

### Conclusion

In conclusion, CapeNature recommends that should the option of an on-site offset be selected, a condition of approval should be included that the mechanism to secure the site must be determined by the CapeNature Stewardship Review Committee. Should the option of contribution towards a strategic offset be selected, we recommend that a more detailed proposal is required that aligns with the guidelines. We are satisfied that all other comments have been adequately addressed.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Regards

**Rhett Smart**  
Digitally signed  
by Rhett Smart  
Date:  
2025.09.19  
17:25:36 +02'00'

Rhett Smart

For: Manager: Landscape Conservation Intelligence South

cc. Anita Wheeler, CapeNature  
D'mitri Matthews, DEA&DP

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

## Njabulo

---

**From:** michelle@lornay.co.za  
**Sent:** Friday, 26 September 2025 15:36  
**To:** 'Njabulo'  
**Subject:** FW: Notice of ADDITIONAL IN-PROCESS NEMA PPP | Proposed Expansion of Romansbaai Abalone Farm, Gansbaai

Record for RB pls

Pls acknowledge once done



**LORNAY**

ENVIRONMENTAL CONSULTING

*Michelle Naylor*

*M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAAsa*

Hemel & Aarde Wine Village – Unit 5/1F

PO Box 1990, Hermanus, 7200, South Africa

T +27 (0) 83 245 6556

E [michelle@lornay.co.za](mailto:michelle@lornay.co.za) | W [www.lornay.co.za](http://www.lornay.co.za)

Reg No. 2015/445417/07 | Vat. Reg. 429 031 9468

You are receiving communication from us for professional reasons or as an identified Interested and Affected Party only. The Protection of Personal Information Act (POPIA) requires that we protect your information and that we obtain your consent to communicate with you in the future.

If you wish to be removed from any data list, please state so and we will remove your details.

Note that we will only use your personal information in a confidential and professional manner relating to this specific project.

---

**From:** Mercia J Liddle <[Mercia.Liddle@westerncape.gov.za](mailto:Mercia.Liddle@westerncape.gov.za)>  
**Sent:** Friday, 26 September 2025 10:55  
**To:** michelle@lornay.co.za  
**Subject:** RE: Notice of ADDITIONAL IN-PROCESS NEMA PPP | Proposed Expansion of Romansbaai Abalone Farm, Gansbaai

Dear Ms Naylor,

The SD: Coastal Management has no further comments on the subject matter, and our previous comments remain.

Kind Regards

Mercia Liddle

**Environmental Officer: Coastal Management**

Department of Environmental Affairs and Development Planning

Western Cape Government

4<sup>th</sup> Floor, Leeusig, 1 Dorp Street, Cape Town, 8000

Tel: +27 (0)21 483 4627

## **Njabulo**

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**From:** michelle@lornay.co.za  
**Sent:** Tuesday, 23 September 2025 08:01  
**To:** 'Njabulo'  
**Subject:** FW: Application for the submission of a property environmental study for comment  
- App No: 2025-09-0091

Pls record for Romansbaai – road dept



**LORNAY**

**ENVIRONMENTAL CONSULTING**

*Michelle Naylor*

*M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAAsa*

Hemel & Aarde Wine Village – Unit 5/1F

PO Box 1990, Hermanus, 7200, South Africa

T +27 (0) 83 245 6556

E [michelle@lornay.co.za](mailto:michelle@lornay.co.za) | W [www.lornay.co.za](http://www.lornay.co.za)

Reg No. 2015/445417/07 | Vat. Reg. 429 031 9468

You are receiving communication from us for professional reasons or as an identified Interested and Affected Party only. The Protection of Personal Information Act (POPIA ) requires that we protect your information and that we obtain your consent to communicate with you in the future.

If you wish to be removed from any data list, please state so and we will remove your details.

Note that we will only use your personal information in a confidential and professional manner relating to this specific project.

---

**From:** Application Manager <[applications@westerncaperoadsinfrastructure.org.za](mailto:applications@westerncaperoadsinfrastructure.org.za)>  
**Sent:** Monday, 22 September 2025 21:06  
**To:** michelle@lornay.co.za  
**Subject:** Application for the submission of a property environmental study for comment - App No: 2025-09-0091

Dear Lornay Environmental Consulting

The message below refers to your application for the submission of a property environmental study for comment (Application No - 2025-09-0091) submitted to the Western Cape Government on 2025/08/27:

**Properties related to the application :**

- Portion 2 of Farm KLIP FONTEYN 711, CALEDON

**Supporting documents submitted with the application :**

- Basic Assessment Report - (IN-PROCESS-FINAL-BAR-290825.pdf)
- Power of Attorney Letter - (apointment letter.pdf)

- Site Development Plan - (APP-B4-ALTERNATIVE-4-PREFERRED.pdf)
- Application Cover Letter - (email correspondence.pdf)
- Application Cover Letter - (Notice of PPP 3 Romansbaai Abalone Farm 290825.pdf)

The matter is receiving attention, and further communication will be addressed to you as soon as circumstances permit.

Best Regards,  
Western Cape Government



*Note:  
Please ensure that you reply to this email when corresponding with us and that the application number is correctly contained in the subject line in the format App No: xxxx-xx-xxxx. Emails without this number correctly added to the subject line will not be monitored or received.*

# OVERBERG

DISTRIKSMUNISIPALITEIT  
DISTRICT MUNICIPALITY  
UMASIPALA WESITHILI



*MELD ASB/PLEASE QUOTE*

*Ons Verw./Our Ref.:* 18/5/5/4

*Navrae/Enquiries:* Francois Kotze

*Bylyn/Ext.:*

Privaatsak: X22  
Private Bag:  
BREDASDORP  
7280  
Tel.: (028) 4251157  
Faks/Fax: (028) 4251014  
E-mail/E-pos: [rvolschenk@odm.org.za](mailto:rvolschenk@odm.org.za)

01 October 2025

## LORNAY ENVIRONMENTAL CONSULTING

PO Box 1990  
HERMANUS  
7200

For attention: Michelle Naylor

### RE: PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON REMAINDER OF PORTION 2 OF THE FARM 711, GANSBAAI

**DEA&DP REFERENCE: 16/3/3/6/7/1/E2/10/1628/23**

The Environmental Management Services Department of the Overberg District Municipality acknowledges receipt and review of the final Basic Assessment Report and Environmental Management Programme.

With reference to the comments submitted by this department on 23 June 2025, the municipality is satisfied with the information as presented. Cognisance is taken of the additional specialist inputs which include the Coastal and Marine Impact Report and the update addendum to the Botanical Assessment. The department support the recommendations made in these reports to mitigate environmental impact.

The Overberg District Municipality reserves the right to amend its comments and to request further information should any additional relevant documentation or details become available.

Yours faithfully,

pp  
**R. BOSMAN**  
**MUNICIPAL MANAGER**

Alle korrespondensie moet aan die Munisipale Bestuurder gerig word.  
All correspondence must be addressed to the Municipal Manager



**Western Cape  
Government**

Department of Environmental Affairs and Development Planning

**D'mitri Mathews**

Directorate: Development Management, Region 1

D'mitri.Mathews@westerncape.gov.za | Tel: 021 483 8350

**REFERENCE:** 16/3/3/1/E2/10/1035/25

**DATE:** 1 October 2025

The Board of Directors  
Aqunion (Pty)Ltd  
P. O. Box 1086  
**HERMANUS**  
7200

**Attention: Mr. R. Yearsley**

Tel.: (028) 312 1106

Email: rowan@aqunion.co.za

Dear Sir

**COMMENT ON THE REVISED DRAFT BASIC ASSESSMENT REPORT ("BAR") SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998) ("NEMA") ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) ("EIA") FOR THE PROPOSED EXPANSION OF THE ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI**

1. The revised draft BAR 29 August 2025, as received by the Directorate: Development Management Region 1 (hereinafter referred to as "this Directorate") on the same day, refers.
2. Following review of the information submitted to this Department, the Department notes the following:

2.1 The expansion of the abalone facility will include the following:

Description	Volume	Size (m <sup>2</sup> )
New production area/ grow out	150 tons (wet weight)	20000
Line seawater reservoir	41 000 m <sup>3</sup>	8000
Solar array	4MW	40000
Pumphouse		140
4 additional pipelines		1200
Total development footprint		69 340 (6.9 ha)

3. Departmental comments on the draft BAR:
  - 3.1 The biodiversity offset for the proposed development must be finalised with consultation with CapeNature prior to the submission of the final BAR, since this aspect is an essential aspect to the decision-making process. If this cannot be achieved, it is recommended to withdraw the application and finalise the biodiversity offset prior to submitting a new application.
4. The applicant Regulatory Requirements:
  - 4.1 Proof of the notifications sent to registered I&APs for the commenting purposes must be included in the BAR.
  - 4.2 A dated photograph of erecting a site notice must be provided.
  - 4.3 Proof of placing an advertisement must be provided.



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Department of Environmental Affairs and Development Planning

- 4.4 Any new representations and comments received in connection with the application must be included in the BAR.
  - 4.5 Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the BAR.
  - 4.6 The minutes of any meetings held by the environmental assessment practitioner ("EAP") with I&AP's and other role players which record the views of the participants must be included in the BAR.
  - 4.7 Please be advised that the signed and dated applicant declaration is required to be submitted with the BAR during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.
  - 4.8 In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the BAR during the formal application process for decision-making.
  - 4.9 You are furthermore reminded that the BAR must contain all the information outlined in Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended).
5. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.
  6. This Department reserves the right to revise or withdraw its comments and request further information based on any information received.

Yours faithfully

**Marbe**  
Digitally signed by  
Marbe Coetzee  
Date: 2025.10.01  
15:26:45 +02'00'

**HEAD OF COMPONENT**

**ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 1**

**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Cc to: (1) Ms. M. Naylor (Lornay Environmental Consulting)  
(2) Ms. P. Aplon (Overstrand Municipality)

Email: michelle@lornay.co.za  
Email: paplon@overstrand.gov.za



**Western Cape  
Government**

Department of Infrastructure

**Vanessa Stoffels**

Chief Directorate: Road Planning

Vanessa.Stoffels@westerncape.gov.za | Tel: 021 483 4669

**Ref:** DOI/CFS/RN/LU/REZ/SUB-21/297 (Application No: 2025-09-0091)

Lornay Environmental Consulting

PO Box 1990

**HERMANUS**

7200

Attention: Ms M Naylor

Dear Madam

**PROPOSED EXPANSION OF ROMANSBAAI ABALONE, REMAINDER OF PORTION 2 OF FARM NO.711, CALEDON: COMMENTS ON BASIC ASSESSMENT REPORT**

1. Your e-mail to this Branch dated 28 August 2025 refers.
2. The subject property is located 150m south of Gansbaai and takes access off Divisional Road 1214.
3. This Branch offers no objection to the issuing of Environmental Authorisation in terms of the National Environmental Management Act 107 of 1998.

Yours Sincerely

**DD FORTUIN**

**For DEPUTY DIRECTOR-GENERAL: TRANSPORT INFRASTRUCTURE BRANCH**

**DATE: 6 OCTOBER 2025**



DOI/CFS/RN/LU/REZ/SUB-21/297 (Application No: 2025-09-0091)

## ENDORSEMENTS

1. Lornay Environmental Consulting  
Attention: Ms M Naylor (e-mail: [michelle@lornay.co.za](mailto:michelle@lornay.co.za))
2. DRE Paarl (e-mail: [drepaarl.technical@westerncape.gov.za](mailto:drepaarl.technical@westerncape.gov.za))
3. Ms PZ Govu (e-mail)
4. Mr DD Fortuin (e-mail)

**PUBLIC PARTICIPATION PROCESS 4:**

**30 MARCH 2026 TO 04 MAY 2026**

**16. REGISTER FOR I&APs**

<b>WC Government Env Affairs &amp; Dev Planning</b>	<b>Overberg District Municipality</b>
<b>Development Management</b>	F. Kotze / R. Volschenk
D'mitri Matthews	Private Bag x 22
Registry Office	Bredasdorp
1st Floor, Utilitas Buidling	7280
1 Dorp Street	F. Kotze
8001	Email
	<a href="mailto:rvolschenk@odm.org.za">rvolschenk@odm.org.za</a>
<b>Cape Nature</b>	
Rhett Smart	<b>National Department of Public Works</b>
<a href="mailto:rsmart@capenature.co.za">rsmart@capenature.co.za</a>	Chief Town Planner
	Basson Geldenhuys
<b>Overstrand Municipality</b>	National Dept of Public Works
Chester Arendse	Cape Town Regional Office
PO Box 26	Room 1419, Customs House
<a href="mailto:gbenvironmental@overstrand.gov.za">gbenvironmental@overstrand.gov.za</a>	Lower Heerengraght Street, cape Town
	<a href="mailto:Basson.Geldenhuys@dpw.gov.za">Basson.Geldenhuys@dpw.gov.za</a>
<b>National Department of Public Works</b>	021 404 2174
Director General	Letter
Frederick Johnson	
Private Bag x65	<b>Department of Agriculture, Forestry and Fisheries</b>
Pretoria	<b>Land Management</b>
0001	Cor van Der Walt
<a href="mailto:frederick.johnson@dpw.gov.za">frederick.johnson@dpw.gov.za</a>	Private Bag x 1
02 1402 2338	Elsenburg
Letter	7607
	<a href="mailto:CorvdW@elsenburg.com">CorvdW@elsenburg.com</a>
	Letter
<b>Department of Agriculture, Forestry and Fisheries:</b>	Tel: 021 808 5099
<b>Sustainable Aquaculture Management</b>	Fax: 021 808 5092
Michelle Pretorius	
Private Bag x2	<b>WC Government Env Affairs &amp; Dev Planning</b>
Roggebaai	<b>Spatial Planning &amp; Coastal Impact Mgmt</b>
Cape Town	Mercia Liddle / Lynn Jacobs
8012	Registry Office

021 430 7034	1st Floor, Utilitas Buidling
<a href="mailto:michellePR@daff.gov.za">michellePR@daff.gov.za</a>	1 Dorp Street
	8001
	021 483 3370
<b>WC Government Env Affairs &amp; Dev Planning</b>	<a href="mailto:Mercia.Liddle@westerncape.gov.za">Mercia.Liddle@westerncape.gov.za</a>
<b>Transport and Public Works</b>	
Provincial Roads	<b>Cape Nature Head office Lease agreement</b>
Vanessa Stoffels	<a href="mailto:accounts@capenature.co.za">accounts@capenature.co.za</a>
PO Box 2603	
Cape Town	<b>DEFF Oceans and Coasts: Coastal Conservation Strategies</b>
8000	Funanani Ditinti
Ref: 17/1/11/B	2 East Pier Buildng,
<a href="mailto:Vanessa.Stoffels@westerncape.gov.za">Vanessa.Stoffels@westerncape.gov.za</a>	East Pier Road
	Victoria and Alfred Waterfront
<b>Department of Forestry, Fisheries and the Environment</b>	Cape Town
<b>GDA Authorisation</b>	8001
<b>For Att. X. Myanga</b>	<a href="mailto:fditinti@environment.gov.za">fditinti@environment.gov.za</a>
<a href="mailto:xmyanga@dffe.gov.za">xmyanga@dffe.gov.za</a>	
<a href="mailto:RMolale@dffe.gov.za">RMolale@dffe.gov.za</a>	<b>Ward Councillor 2</b>
<b>Overstrand Municipality</b>	Ald A Nqinata
Operational Manager	<a href="mailto:nnqinata@overstrand.gov.za">nnqinata@overstrand.gov.za</a>
Ricardo Andrews	
PO Box 20	
Hermanus	
7220	Additional DFFE contacts as per Michelle Pretorius request
<a href="mailto:randrew@overstrand.gov.za">randrew@overstrand.gov.za</a>	<a href="mailto:FDaya@dffe.gov.za">FDaya@dffe.gov.za</a>
T 028 384 8326	<a href="mailto:MJezile@dffe.gov.za">MJezile@dffe.gov.za</a>
F 028 384 0241	<a href="mailto:AOSborne@dffe.gov.za">AOSborne@dffe.gov.za</a>
Email	
<b>Whale Coast Conservation</b>	
Att: Pat Miller	
Chair: Whale Coast Conservation	
Tel: (028) 313-0093	
<a href="mailto:pat.miller7@outlook.com">pat.miller7@outlook.com</a>	
Sheraine van Wyk	
IAPs	
<b>Erf 70</b>	
Bolus Family Trust	
Cr MGM Bolus	
<a href="mailto:bolusmgm@telkomsa.net">bolusmgm@telkomsa.net</a>	

<b>David Mostert</b>	
<a href="mailto:david@romansbaai.co.za">david@romansbaai.co.za</a>	
<b>Paul Slabbert - PHS Consulting</b>	
<a href="mailto:paul@phsconsulting.co.za">paul@phsconsulting.co.za</a>	

## 17. NOTICE OF PUBLIC PARTICIPATION PROCESS 4

**michelle@lornay.co.za**

---

**From:** michelle@lornay.co.za  
**Sent:** Friday, 27 March 2026 14:20  
**To:** Dmitri.Matthews@westerncape.gov.za; Cor Van der Walt; 'Brandon Layman'; Rulien Volschenk; carendse@overstrand.gov.za; 'gbenvironmental@overstrand.gov.za'; Penelope Aplon; 'frederick.johnson@dpw.gov.za'; Basson.Geldenhuis@dpw.gov.za; 'MPretorius@dfpe.gov.za'; Rhett Smart; 'Pat Miller'; 'Sheraine Van Wyk'; 'Vanessa.Stoffels@westerncape.gov.za'; 'Mercia J Liddle'; 'leptieshaam Bekko'; 'RMolale@dfpe.gov.za'; 'fditinti@environment.gov.za'; 'FDaya@dfpe.gov.za'; 'MJezile@dfpe.gov.za'; 'AOsborne@dfpe.gov.za'; 'nnqinata@overstrand.gov.za'  
**Cc:** DEADP EIA Admin  
**Subject:** Notice of FINAL NEMA PPP | Proposed Expansion of Romansbaai Abalone Farm, Gansbaai  
**Attachments:** Notice of PPP4 Romansbaai Abalone Farm 270326.pdf

Dear Organ of State and / I&AP,

**PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM, PORTION 2 OF 711, GANSBAAI, CALEDON RD  
DEA&DP Ref No. 16/3/3/6/7/1/E2/10/1628/23 & 16/3/3/1/E2/10/1035/25**

DEA&DP Development Management – D. Matthews  
DOA – C. van Der Walt  
DOA – B. Layman  
Overberg District Municipality – R. Volschenk  
Overstrand Municipality – C. Arendse / P. Aplon  
DPW – F. Johnson / B. Geldenhuis  
DFFE Sustainable Aquaculture – M. Pretorius  
Cape Nature – R. Smart  
Whale Coast Conservation – P. Miller  
Dept. Transport & PW – V. Stoffels  
DEA&DP CMU – M. Liddle / I. Bekko  
DFFE GDA – R. Molale  
DFFE Coastal Conservation Strategies – F. Ditinti  
DFFE - [FDaya@dfpe.gov.za](mailto:FDaya@dfpe.gov.za)  
DFFE - [MJezile@dfpe.gov.za](mailto:MJezile@dfpe.gov.za)  
DFFE - [AOsborne@dfpe.gov.za](mailto:AOsborne@dfpe.gov.za)  
Ward Councillor - [nnqinata@overstrand.gov.za](mailto:nnqinata@overstrand.gov.za)

Please see attached notice of FINAL public participation on the above-mentioned BAR.

Should you have no further comment, please ignore this notice.

Kind regards

**michelle@lornay.co.za**

---

**From:** michelle@lornay.co.za  
**Sent:** Friday, 27 March 2026 14:21  
**To:** 'bolusmqm@telkomsa.net'; 'david@romansbaai.co.za'; 'paul@phsconsulting.co.za'  
**Subject:** RE: Notice of FINAL PPP | Proposed Expansion of Romansbaai Abalone Farm, Gansbaai  
**Attachments:** Notice of PPP4 Romansbaai Abalone Farm 270326.pdf

Dear Organ of State and / I&AP,

**PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM, PORTION 2 OF 711, GANSBAAI, CALEDON RD  
DEA&DP Ref No. 16/3/3/6/7/1/E2/10/1628/23 & 16/3/3/1/E2/10/1035/25**

Please see attached notice of additional in-process public participation on the above-mentioned BAR.  
**Closing date for comment: 4 May 2026.**

Should you have no further comment, please ignore this notice.

Kind regards,



**LORNAY**

**ENVIRONMENTAL CONSULTING**

*Michelle Naylor*

*M.Sc.; Pr.Sci.Nat. 400327/13., EAPASA. 2019/698, Cand. APHP., IAIAsa*

Hemel & Aarde Wine Village – Unit 5/1F

PO Box 1990, Hermanus, 7200, South Africa

T +27 (0) 83 245 6556

E [michelle@lornay.co.za](mailto:michelle@lornay.co.za) | W [www.lornay.co.za](http://www.lornay.co.za)

Reg No. 2015/445417/07 | Vat. Reg. 429 031 9468

You are receiving communication from us for professional reasons or as an identified Interested and Affected Party only.  
The Protection of Personal Information Act (POPIA ) requires that we protect your information and that we obtain your consent to communicate with you in the future.

If you wish to be removed from any data list, please state so and we will remove your details.

Note that we will only use your personal information in a confidential and professional manner relating to this specific project.

## 18. PROOF OF NOTICE OF PPP 4



30 March 2026

**NOTICE OF PUBLIC PARTICIPATION PROCESS  
ROMANSBAAI ABALONE FARM  
PORTION 2 OF THE FARM NO. 711, GANSBAAI, CALEDON RD**

Notice is hereby given of the public participation period in terms of the Environmental Impact Assessment (EIA) regulations under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), as well as the 2014 NEMA EIA Regulations (as amended) published in Government Gazette No. 38282, Government Notices R983, R984, and R985 on 4 December 2014.

You are invited to register as an Interested and Affected Party (I&AP) and/or submit comments on the Final Basic Assessment Report for the Proposed Expansion of Romansbaai Abalone Farm on Portion 2 of the Farm No. 711, Gansbaai, Caledon Rd

A copy of the Basic Assessment Report is available on our website, or upon request. Interested and Affected Parties (I&APs), as well as Organs of State, are invited to register and submit written comments. Public Participation will close on the **04 May 2026**.

**LORNAY REF:** PTN/2/711

**DEA&DP REFERENCE:** 16/3/3/1/E2/10/1035/25

**APPLICANT:** Aquinion (Pty) Ltd

**LOCATION:** Portion 2 of the Farm No. 711, Gansbaai

**PROJECT OVERVIEW:** The expansion of Romansbaai Abalone Farm is proposed. This includes expansion of the pumphouse, installation of additional of water pipelines, expansion of production area and addition of abalone grow out tanks, addition of ground mounted solar array and installation of seawater holding reservoir.

The following Listed Activities are applied for in terms of the NEMA EIA Regulations:

- **Listing Notice 1 (GN R983):** Activities 1; 9;13; 15; 17; 19A; 27; 30; 34; 41; 43; 45; 52; 54;
- **Listing Notice 3 (GN R985):** Activity 12

**HOW TO PARTICIPATE:** Please register or submit your comment, via the following details:

**LORNAY ENVIRONMENTAL CONSULTING**

**For Att:** Michelle Naylor

**Tel:** 083 245 6556

**Email:** [michelle@lornay.co.za](mailto:michelle@lornay.co.za)

**Website:** [www.lornay.co.za](http://www.lornay.co.za)

**IMPORTANT NOTICE:** In accordance with the Protection of Personal Information Act (POPI Act, 2023), by registering and commenting as an I&AP your name and comments will be made public.



*Environmental Impact Assessments | Basic Assessments| 24G  
Applications |Water Use License Applications | Environmental Audits  
Lornay Environmental Consulting Pty Ltd | Reg 2015/445417/07  
Unit 5/1F, Hemel & Aarde Wine Village, Hermanus*



## 19. COMMENTS RECEIVED DURING PPP4

You are receiving communication from us for professional reasons or as an identified interested and Affected Party only.  
The Protection of Personal Information Act (POPIA) requires that we protect your information and that we obtain your consent to communicate with you in the future.  
If you wish to be removed from any data list, please state so and we will remove your details.  
Note that we will only use your personal information in a confidential and professional manner relating to this specific project.

---

**From:** Mercia J Liddle <Mercia.Liddle@westerncape.gov.za>  
**Sent:** Wednesday, 15 April 2026 09:37  
**To:** michelle@lornay.co.za  
**Subject:** RE: Notice of FINAL NEMA PPP | Proposed Expansion of Romansbaai Abalone Farm, Gansbaai

Good day,

The Sub-Directorate: Coastal Management has no further comments on the subject matter.

Kind Regards

Mercia Liddle  
**Environmental Officer: Coastal Management**  
Directorate: Biodiversity and Coastal Management  
Department of Environmental Affairs and Development Planning  
Western Cape Government

4<sup>th</sup> Floor, Leeusig, 1 Dorp Street, Cape Town, 8000  
Tel: +27 (0)21 483 4627  
Email: [mercia.liddle@westerncape.gov.za](mailto:mercia.liddle@westerncape.gov.za)

1



**ENVIRONMENTAL MANAGEMENT & CONSERVATION DIVISION**  
PLANNING & DEVELOPMENT  
**AFDELING VAN OMGEWINGSBESTUUR & BEWARING**  
BEPLANNING & ONTWIKKELING

NAVRAE | ENQUIRIES : CHESTER ARENDESE | 028 384 8320  
DATE | DATUM : 30 APRIL 2026

Dear Michelle Naylor  
LORNAY ENVIRONMENTAL CONSULTING  
Hemel & Aarde Wine Village – Unit 5/1F  
PO Box 1990, Hermanus, 7200, South Africa  
T +27 (0) 83 245 6556  
E [michelle@lornay.co.za](mailto:michelle@lornay.co.za) | W [www.lornay.co.za](http://www.lornay.co.za)

**RE: Notice of Public Participation | Romansbaal Abalone Farm, Farm 711 Portion 2, Gansbaal.**

Your email dated 30<sup>th</sup> March 2026, please find attached comments from the Overstrand Environmental Management & Conservation Division on the public participation process, on the Final Basic Assessment Report for the Proposed Expansion of Romansbaal Abalone Farm on Portion 2 of the Farm No. 711, Gansbaal, Caledon Rd.

A well-drafted report was submitted, and all the aspects were noted. Part of that, the following points were highlighted and noted:

- Alternative 4 emerged as the most environmentally and operationally balanced solution chosen through specialist involvements. This alternative sees the reduction in the proposed production area's footprint from 3 ha to 2 ha and the shifting of the platform to areas of low to medium ecological sensitivity.

**Botanical assessment:**

- The primary ecological impacts identified as likely during the construction phase include:
  - Loss of vegetation in areas mapped as Low, Medium, and High botanical sensitivity, including parts of an Endangered ecosystem (Southwestern Strandveld);
  - Direct loss of five plant Species of Conservation Concern;
  - Permanent transformation of approximately 0.8 ha of indigenous vegetation in the seawater reservoir footprint resulting in a Medium negative impact prior to mitigation and low-medium after mitigation has been applied.
- The biodiversity offset is no longer considered applicable for the project. The area that was previously assessed as having a Medium residual impact has been reassessed following the reapplication of the mitigation hierarchy. Through the identification and implementation of additional mitigation measures, the botanical specialist confirmed that the residual impact associated with the loss of the Overberg Dune Strandveld vegetation type due to the construction of the seawater reservoir has been reduced to a Low-Medium negative impact.

**Animal Species Compliance Statement:**

- The compliance statement confirmed the absence of sensitive animal species and habitats on the site. Based on a combination of desktop research and field verification, no species requiring further assessment were identified.

Tel.: 028 384 8320  
E-mail: [arendse@overstrand.gov.za](mailto:arendse@overstrand.gov.za)  
72 Main Road GANSBAAI | 7220

**Visual Impact Assessment:**

- The overall visual impact of the proposed abalone farm expansion is low and not of such a nature that it will result in a deterioration of the cultural landscape. No mitigation measures are therefore deemed necessary.
- In summary, the 2025 expansion application has been developed with full consideration of the existing NEMA and municipal planning approvals. All relevant conditions from the 2008 assessments, 2009 Environmental Authorization, and 2013 amendment correspondence remain applicable and are adhered to. The application for consent use and amendment of the site development plan will be undertaken
- It is also noted that the botanical sensitivity of the site, indicates two patches of high botanical sensitivity. These areas are primarily located within the proposed photovoltaic (PV) array area and the footprint for the new seawater reservoir. Recognizing the ecological importance of these sensitive areas, the design of the new preferred alternative, Alternative Layout 4, has been refined to reduce environmental impacts. Alternative Layout 4 shifts the proposed production area, including the grow-out tanks, into areas of low and medium botanical sensitivity, avoiding the mapped high-sensitivity patches wherever possible. Compared to previous alternatives, the development footprint in Alternative Layout 4 has been significantly reduced.

The EM&C agree that Alternative 4 will be the referred lay-out to be implemented, due to the following:

**Positive impacts:**

- Reduction in development footprint, minimizing the loss of endangered vegetation type.
- Production area is situated within low and medium botanical areas, avoiding complete loss of indigenous vegetation within high botanical sensitive areas.
- Location of the components next to the existing operation area minimizes the extent of the environmental impacts.
- The placement of new infrastructure (e.g., pipelines and pumphouse expansion) adjacent to existing operations avoids further habitat fragmentation and minimizes the need to disturb previously undisturbed areas.
- The installation of a solar PV array reduces the long-term reliance on fossil fuels and contributes to a more sustainable operational model, supporting broader climate change mitigation efforts.
- The proposed expansion is anticipated to create employment opportunities during both construction and operational phases, contributing positively to the local economy.

**Negative impacts:**

- Despite efforts to avoid high-sensitivity areas, the development will still result in the loss of vegetation within low to medium sensitivity zones, which may contribute to habitat degradation if not properly managed.
- Temporary but unavoidable impacts such as dust generation, noise, and increased human activity during the construction phase may disturb local fauna and flora and require strict management through the EMPr.

It should be noted the Overstrand Municipal EM&C does support this application on the basis that the applicant adheres to all the aspects listed in the Draft report to ensure that the impact on the surrounding environment is minimized or avoided. It should be noted that the response from all relevant I&AP's are noted and that the applicant should adhere to all.

Tel.: 028 384 8320  
E-mail: [carendse@overstrand.gov.za](mailto:carendse@overstrand.gov.za)  
72 Main Road GANSBAAI | 7220

The Municipality reserves the right to revise these comments based on the availability of new information.

Regards



**Chester Arendse**

Environmental Officer  
Environmental Management & Conservation Division  
Overstrand Municipality

T: +27 (0) 28 384 8320

E: [carendse@overstrand.gov.za](mailto:carendse@overstrand.gov.za)

Tel.: 028 384 8320  
E-mail: [carendse@overstrand.gov.za](mailto:carendse@overstrand.gov.za)  
72 Main Road GANSBAAI | 7220

# OVERBERG

DISTRIKSMUNISIPALITEIT  
DISTRICT MUNICIPALITY  
UMASIPALA WESITHILI



*MELD ASB/PLEASE QUOTE*

*Ons Verw./Our Ref.:*

*Navrae/Enquiries:*

*Bylyn/Ext.:*

Francois Kotze

Privaatsak: X22  
Private Bag:  
BREDASDORP  
7280  
Tel.: (028) 4251157  
Faks/Fax: (028) 4251014  
E-mail/E-pos: fkotze@odm.org.za

04 May 2026

LORNAV ENVIRONMENTAL CONSULTING

PO Box 1990,  
Hermanus, 7200  
South Africa

For attention: Michelle Naylor

**RE: PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON REMAINDER OF PORTION 2 OF THE FARM 711, GANSBAAI, WESTERN PROVINCE**

The Overberg District Municipality's Department of Environmental Management Services takes cognisance of the Final Basic Assessment Report for the development of the proposed expansion of Romansbaai Abalone Farm on remainder of Portion 2 of the farm 711, Gansbaai, Western Province.

Based on the changes since the initial basic assessment of the project the municipality noted the:

- Reduction of development footprint from approximately 9.6 ha (Alternatives 1 and 2) to 6.9 ha (Alternative 4 – preferred).
- Reduction of the seawater reservoir footprint from 2 ha to 0.8 ha.
- Amendment of project drivers from solely market expansion to include operational cost reduction and energy security, particularly via solar PV and gravity-fed seawater use.
- Refinement of layout to avoid areas of highest botanical sensitivity, including milkwood thickets and limestone outcrops.

The Overberg District Municipality has no objection towards the proposed development and supports Alternative 4 as the preferred alternative, for the following reasons:

- The proposed development appropriately applies the mitigation hierarchy, reducing the impacts on Endangered Overberg Dune/Southwestern Strandveld, avoiding sensitive ecological features such as milkwood thickets.

- In alignment with municipal planning instruments (IDP & SDF), the proposed develop achieves a balanced outcome between environmental protection and socio-economic benefits.

The Overberg District Municipality notes the presence of invasive alien plant species on portions of the subject property, as identified in the specialist assessments and confirmed during the application process. In this regard, the property owner is reminded of their ongoing legal obligation, in terms of the National Environmental Management: Biodiversity Act (NEMBA), 2004 (Act No. 10 of 2004) and the Conservation of Agricultural Resources Act (CARA), 1983 (Act No. 43 of 1983), to control and eradicate invasive alien plant species and to prevent their spread across the property.

The ODM reserves the right to revise its comments and request further information based on any information that may be received.

Yours sincerely



**E. Phillips**  
**ACTING MUNICIPAL MANAGER**

Alle korrespondensie moet aan die Munisipale Bestuurder gerig word.  
All correspondence must be addressed to the Municipal Manager



**CONSERVATION INTELLIGENCE: SOUTH**

postal 16 17<sup>th</sup> Avenue, Voëklip, Hermanus, 7200  
physical 16 17<sup>th</sup> Avenue, Voëklip, Hermanus, 7200  
website [www.capenature.co.za](http://www.capenature.co.za)  
enquiries Rhett Smart  
telephone 087 087 8017  
email [rsmart@capenature.co.za](mailto:rsmart@capenature.co.za)  
reference LS14/2/6/1/7/2/711-2\_aquaculture\_Gansbaai  
date 4 May 2026

Lornay Environmental Consulting  
P.O. Box 1990  
Hermanus  
7200

Attention: Michelle Naylor  
By email: [michelle@lornay.co.za](mailto:michelle@lornay.co.za)

Dear Ms Naylor

**Final Basic Assessment Report for the Proposed Expansion of the Romansbaai Abalone Farm, Remainder of Portion 2 of Farm Klipfonteyn 711, Gansbaai (DEA&DP ref no: 16/3/3/1/E2/10/1035/25)**

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments.

The current public participation process is the fourth round of public participation. A number of concerns have been addressed in the iterations of the Basic Assessment Report (BAR) and appendices, with the only outstanding issue consisting of the biodiversity offset. To reiterate, the biodiversity offset is required due to the impact rating of medium significance after mitigation in the botanical assessment addendum (25 July 2025) for the seawater reservoir. The National Biodiversity Offset Guidelines ("the guidelines") require that a biodiversity offset must be investigated if the residual impact (impact after mitigation) is rated as medium negative or higher.

It is noted in the introduction to the Final BAR that the demand for abalone has decreased and therefore the potential expansion is currently being put on hold. It further states that electricity costs are high, therefore the solar array is still proposed for implementation for off-grid electricity supply. The full development proposal is however still part of the application in case the abalone market recovers.

An additional botanical specialist input is provided following the concerns raised regarding the proposed biodiversity offset in the previous round of comments. The two options which were presented in the biodiversity offset report were a monetary contribution or an on-site offset. The recommendation for the monetary contribution was based on the recommendation in the botanical addendum that conserving more of the same vegetation type which is well protected, namely

The Western Cape Nature Conservation Board trading as CapeNature

Board Members: Mr Tom Blok, Ms Rayhana Gari, Dr Colin Johnson, Ms Ayanda Mvundaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razzena Omar

Overberg Dune Strandveld would not result in a substantial contribution towards biodiversity, but rather that investment in clearing of invasive alien plant species within this vegetation type would result in a more substantial contribution towards biodiversity conservation. In this regard, the main reason for the endangered threat status is invasive alien plant species. The monetary contribution was proposed to be provided to a non-profit organization that undertakes clearing of invasive alien species, however there was no proposal for the specific expenditure of the funds and the concept in general did not comply with the National Biodiversity Offset Guidelines as then proposed. The monetary contribution was not supported by CapeNature.

An 8 ha area which meets the offset ratios as per the guidelines was identified on site which could be conserved as an on-site offset. CapeNature supported that this proposal would meet the requirements of the guidelines, however we were in support of the recommendation by the botanical specialist that this would not make any meaningful contribution to the conservation of this vegetation type nor biodiversity conservation in general. The proposal was presented at the pilot Landscape South Offset Stewardship Screening Review on 3 February 2025. The purpose is to review potential biodiversity and wetland offsets prior to the CapeNature Stewardship Review to screen out sites that are not worthy of stewardship in terms of biodiversity value. The proposed 8 ha on site offset was not considered worthy of biodiversity stewardship and was recommended that contribution towards a cumulative strategic offset would be a more feasible option that will contribute towards biodiversity conservation.

The additional botanical specialist input motivates that due to the intractability of the two proposed offsets, the impact ratings have been reviewed taking into consideration the reduced size of the reservoir to 0.8 ha and the well conserved status of the vegetation type and the residual impact is reduced from medium to medium-low. As a result, there is no requirement for a biodiversity offset. The previous proposed monetary contribution is put forward as a potential strategic offset.

We wish to note that neither the size of the reservoir nor the protection status of the vegetation type have changed since the previous botanical addendum and we wish to recommend that the intractability of identifying an offset is not an acceptable motivation for changing the impact ratings. The botanical addendum assessed the impact significance in a table which took into account several criteria, namely extent, duration, intensity and probability. Section 6.2 of the guidelines which relates to impact significance indicates that significance is a combination of consequence and likelihood, whereby consequence is a combination of extent, duration and intensity. The criteria which were used in the botanical addendum therefore comply with the guidelines. The criteria for assessing impact significance are consistent with other guidelines such as the Species Environmental Assessment Guidelines, the draft provincial offset guidelines etc.

With regards to the impact table in the botanical addendum, the rating of the extent of the impact for the development of the reservoir as local and regional could be queried, as the extent of the reservoir relative to the remaining extent of Overberg Dune Strandveld is insignificant and could be motivated to only be local. It is not however evident that a quantitative method was used to determine the significance. We further note that guidelines refer to significance in relation to vegetation threat

status used in the 2012 methodology for threat status calculation focused on remaining extent and not the current multi-variable IUCN methodology.

The correspondence from the non-profit organisation has been amended to refer to a particular property which is targeted for alien clearing. The property is the Remainder of Portion 2 of Farm 215 (referred to as "brown dog farm"), located east of the Kraaibosch Dam, in the vicinity of Baardskeerderbos. The vegetation type referred to for the property is Agulhas Sand Fynbos, listed as critically endangered, however the National Vegetation Map indicates the site as Overberg Sandstone Fynbos, listed as endangered, with small patches of Elim Ferricrete Fynbos (endangered) and Western Coastal Shale Band Vegetation (endangered in the west). The proposal therefore is an improvement from the previous proposal in that a specific property is targeted, but it is not framed within the context of a biodiversity offset.

Regardless, if there is no requirement for a biodiversity offset as determined through the residual impact significance, the proposed monetary contribution would not be relevant to the outcome of the application, as it is not linked to the environmental impacts incurred by the development. We further do not consider the proposed monetary contribution to fall within the initial steps of mitigation, namely avoid, minimize and mitigate/restore, all of which would apply to actions which take place on the impacted property. The monetary contribution would fall within the definition of a trade-off or compensation.

In conclusion, if the revised assessment of the residual impacts for terrestrial biodiversity is accepted, a biodiversity offset is not required, and the impact significance of the proposed development will be within the acceptable thresholds provided the other recommended mitigation measures are implemented. The current motivation for the change in impact significance is however not accepted and would need to be motivated in relation to initial methodology for determining the impact significance whereby there may be additional information or an aspect which was overlooked or misinterpreted.

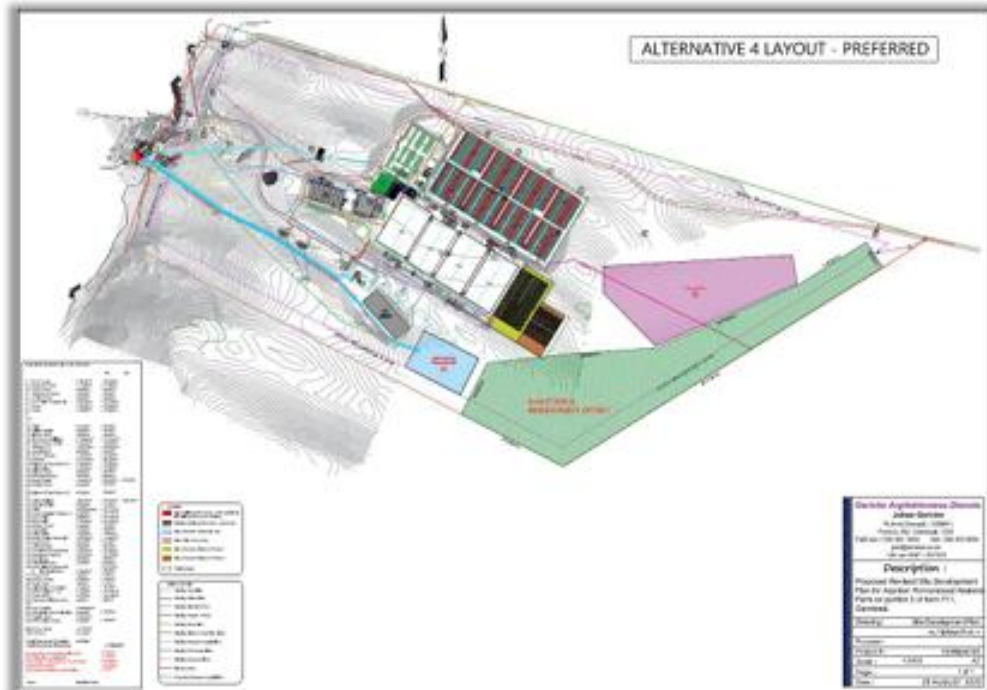
Should the change in impact significance not be accepted by the competent authority we recommend either of the two following options:

- The development application is authorised (assuming non-biodiversity impacts are acceptable) but excludes the seawater reservoir from the authorisation. The project description indicates that only the solar array is being considered for development in the near future, therefore once/if the circumstances change such that the seawater reservoir is proposed for development, it can be included in an amendment application or separate application. By that stage a strategic offset may be set up and in place (unlike the current proposal), similar to the other operational strategic offset precedents e.g. Atlantis Land Bank, Saldanha (Besaansklip) Strategic Offset. The revised proposal still does not meet these requirements and would require buy-in from additional stakeholders.
- The development is authorised with an on-site offset consisting of the 8 ha as indicated in the layout plan below. The on-site offset does not qualify as a stewardship site therefore the

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Mr Tom Blok, Ms Rayhana Gani, Dr Colin Johnson, Ms Ayanda Mvundaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mankwa, Dr Razeena Omar

conservation area can be a requirement in terms of the environmental authorisation. A conservation management plan would need to be a requirement for the conservation area. There are precedents for conservation areas which do not have a status other than a requirement in terms of the EA.



We further wish to note that the application for a Sea Shore Lease for the expansion of the seawater intake pump house has been submitted which will be considered further once/if an environmental authorisation is issued.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Regards

**Rhett Smart**  
Digitally signed by Rhett Smart  
Date: 2026.05.05 07:49:38 +02'00'

Rhett Smart  
For: Manager: Landscape Conservation Intelligence South



Department of Environmental Affairs and Development Planning  
**D'mitri Matthews**  
Directorate: Development Management, Region 1  
Dmitri.Matthews@westerncape.gov.za | Tel: 021 483 8350

**REFERENCE:** 16/3/31/E2/10/1030/26  
**DATE:** 8 May 2026

The Board of Directors  
Terrasan Group (Pty)Ltd.  
P. O. Box 1086  
**HERMANUS**  
7200

**Attention: Mr. R. Yearsley**

Tel: (028) 312 1106  
Email: rowan@aquion.co.za

Dear Sir

**COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT ("BAR") SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998) ("NEMA") ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED EXPANSION OF THE ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI**

1. The Draft BAR March 2026, as received by the Directorate: Development Management Region 1 (hereinafter referred to as "this Directorate") on 27 March 2027, refers.
2. Following review of the information submitted to this Directorate, the Directorate notes the following:

Description	Volume	Size (m <sup>2</sup> )
New production area/ grow out	150 tons (wet weight)	20000
Line seawater reservoir	41 000 m <sup>3</sup>	8000
Solar array	4MW	40000
Pumphouse		140
4 additional pipelines		1200
Total development footprint		69 340 (6.9 ha)

3. Departmental comments on the draft BAR:
  - 3.1 Biodiversity offset
    - 3.1.1. It is noted that the requirement with respect to a biodiversity offset has not been resolved.
    - 3.1.2. CapeNature has indicated in comment (dated 4 May 2026) that the recommendation by the botanical specialist for an on-site offset of 8ha would not make any meaningful contribution to the conservation of this vegetation type nor biodiversity conservation in general. The comment further indicated that the proposed 8 ha on-site offset was not considered worthy of biodiversity stewardship. Clarity in this regard is required, as an offset is deemed necessary; however, it is also stated that the on-site vegetation is not conservation worthy and is not considered suitable for biodiversity stewardship.
    - 3.1.3. CapeNature further indicated that neither the size of the reservoir nor the protection status of the vegetation type have changed since the previous botanical addendum and that the intractability of identifying an offset is not an acceptable motivation for changing the impact ratings.



- 3.1.4. The matter regarding the appropriate offset, or whether an offset is required, must be further investigated, and a motivation must be provided as to the appropriate mechanism that will be implemented to manage the biodiversity impacts associated with the reservoir.
- 3.2. Alternatives
- 3.2.1. Since the site identified for the placement of the reservoir is regarded as sensitive from a botanical perspective, it is advised that further technology alternatives be investigated.
- 3.2.2. Placing the reservoir on raised platforms could be considered to minimise impacts.
4. The applicant Regulatory Requirements:
- 4.1. Proof of the notifications sent to registered I&APs for the commenting purposes must be included in the BAR.
- 4.2. A dated photograph of erecting a site notice must be provided.
- 4.3. Proof of placing an advertisement must be provided.
- 4.4. Any new representations and comments received in connection with the application must be included in the BAR.
- 4.5. Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the BAR.
- 4.6. The minutes of any meetings held by the environmental assessment practitioner ("EAP") with I&AP's and other role players which record the views of the participants must be included in the BAR.
- 4.7. Please be advised that the signed and dated applicant declaration is required to be submitted with the BAR during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.
- 4.8. In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the BAR during the formal application process for decision-making.
5. You are furthermore reminded that the BAR must contain all the information outlined in Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended).
6. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.
7. This Directorate reserves the right to revise or withdraw its comments and request further information based on any information received.

Yours faithfully



Digitally signed by  
Melanese Schippers  
Date: 2025.05.08  
11:19:00 +0200

**pp HEAD OF COMPONENT**  
**DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1)**  
**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Cc to: (1) Ms. M. Naylor (Lornay Environmental Consulting)  
(2) Ms. P. Aplon (Overstrand Municipality)

Email: michelle@lornay.co.za  
Email: paplon@overstrand.gov.za

## **20. COMMENTS AND RESPONSE REPORT AND REGISTER FOR I&APS**

A Register was opened during the first round of public participation and updated throughout the public participation process.

A Comments and Response report was also opened at the onset of the public participation. This report contains the comment made by the I&AP, as well as formal response by the Environmental Assessment Practitioner (EAP).



## COMMENTS AND RESPONSE REPORT

**PROJECT:** Expansion of Romansbaai Abalone

**DRAFT BAR / PRE-APPLICATION (PPP 1)**  
**09 October 2024 to 08 November 2024**

NAME:	COMMENT:	RESPONSE:	DATE & REF:
<p>E.A Lowings on Behalf of Heritage and Aesthetic committee</p>	<p><b>Letter dated 11 April 2024</b></p> <p>Gansbaai: Erf 711 PORTION 2 OF FARM KLIPFONTEIN: PROPOSED ADDITIONS TO ABALONE FARM: TP APPLICATION FORM FROM J KAPLAN (HPOZ)</p> <p>DISCUSSION</p> <p>Comment:</p> <p>HIA authorised by Lornay Environmental Consulting dated April 2024 scrutinized. Supported.</p> <p>HWC to provide electronic drawing and minute to <a href="mailto:elowings@overtstrand.gov.za">elowings@overtstrand.gov.za</a></p> <p>Actions:</p>	<p>Noted</p>	

	Submit to Heritage Western Cape.		
<b>David Mostert</b>	<p><b>Email dated 10 October 2024</b> Morning Michelle</p> <p>Please register the Romansbaai HOA as an "Interested and affected party"</p> <p>Thanks</p> <p><b>David</b></p>	Registered as an I&AP.	10 October 2024
<b>Dr MGM Bolus</b>	<p><b>Email dated 10 October</b></p> <p><b>Subject: RE: Notice of Public Participation   Proposed Expansion of Romansbaai Abalone Farm   Ptn RE2/711, Gansbaai, Caledon RD</b></p> <p>Dear Ms Naylor</p> <p>Thank you for attached mail.</p> <p>This is rather an alarming development for us as owners of Erf 70, which is the immediate adjoining erf on Romansbaai! Could you please provide more detail on the proposed expansion with regard to:</p> <ol style="list-style-type: none"> <li>1. Timelines (start and duration of build)</li> <li>2. Area of expansion i.e. to the east or west, further inland or out to sea. A layout of proposed plan would be good to see.</li> <li>3. Possible visual impact with height of proposed structures, roads, etc. We note solar installation - at what level would these be?</li> <li>4. Potential noise pollution and ocean water quality impact – would there still be the need for generators?</li> </ol> <p>We thank you for your time and await your speedy reply anxiously!</p> <p>Kind regards</p> <p>Mike and Doro Bolus Owners of erf 70, Romansbaai</p>	<p>The Basic Assessment report has covered these issues and detailed information addressing each point raised, including timelines, a layout plan, an assessment of visual impacts, and clarification on noise and water quality impacts. These details are also incorporated into the Environmental Management Plan. The solar array will be ground mounted with the height of approximately 1m above ground.</p> <p>The proposed site layout plan is attached as Appendix B2.</p> <p>The solar array will be placed on the Northeast of the farm, the solar will be screened from the public view and will not be visible to adjacent properties.</p> <p>Noise pollution is expected during the construction</p>	10 October 2024

		phase of the development; however, the impacts are minimum.	
<b>Vanessa Stoffels</b>	<p><b>Letter dated 11 October 2024</b></p> <p><b>RE: Notice of Public Participation   Proposed Expansion of Romansbaai Abalone Farm   Ptn RE2/711, Gansbaai, Caledon RD</b></p> <p>Dear Michelle</p> <p>We acknowledge receipt of your email regarding the abovementioned matter and wish to confirm that the matter is receiving attention.</p>	Noted. No further actions required.	<b>11 October 2024</b>
<b>Chester Arendse</b>  Overstrand Municipality	<p><b>Email dated 07 November 2024</b></p> <p>Good afternoon, Michelle.</p> <p>Hope that this mail finds you well.</p> <p>With regards to the application of the expansion of Romansbaai Abalone Farm   Farm 711 Ptn 2, Gansbaai, the Environmental Management &amp; Conservation Division has no objection towards this application.</p> <p>Taken into account that all the necessary and relevant documents are submitted to the DEA&amp;DP for their approval and reconsideration, the only condition from our office is that the applicant meet the necessary requirements in accordance with the Environmental Impact Assessment (EIA) regulations, as stipulated under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the 2014 NEMA EIA Regulations (as amended) as published in Government Gazette No. 38282, Government Notice R983, R984, and R985, on 4 December 2014.</p> <p>Hope that the above is in order.</p> <p>Regards</p>	Noted. Noted no further actions required.	<b>07 November 2024</b>
<b>Mercia Liddle (DEADP:CMU)</b>	<p><b>Email dated 07 November 2024 (same comment)</b></p> <p><b>RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI, CALEDON ROAD.</b></p>	Noted.	

	<p>Good Day Madam,</p> <p>Your request for comment from the Sub-directorate: Coastal Management on the above-mentioned pre-application basic assessment report received on 09 October 2024, refers.</p> <p><b>1. CONTEXT</b></p> <p>1.1. The Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“NEM: ICMA”) is a Specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”). The NEM: ICMA sets out to manage the nation’s coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment. In terms of Section 38 of the NEM: ICMA, the Department of Environmental Affairs and Development Planning (‘the Department’) is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the “Management of public launch sites in the coastal zone (GN No. 497, 27 June 2014) “Public Launch Site Regulations”.</p> <p>1.2. The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme (“PCMP”). The PCMP is a five (5) year strategic document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the Province. The Department has developed the next generation PCMP that includes priority objectives for the next 5 years. This PCMP was adopted on 19 May 2023 and is available upon request.</p> <p>1.3. A key priority of the PCMP is the Estuary Management Programme, which is implemented in accordance with the NEM: ICMA and the National Estuarine Management Protocol (“NEMP”). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The Department is in the process of approving a series of Estuarine Management Plans.</p> <p>1.4. The facilitation of public access to the coast is an objective of the NEM: ICMA as well as a Priority in the WC PCMP. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 (“PCASP”) and commissioned coastal</p>		
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	<p>access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NEM: ICMA. The PCASP as well as the coastal access audits are available upon request.</p> <p><b>2. COMMENT</b></p> <p>2.1 The sub-directorate: Coastal Management (“SD: CM”) has reviewed the information as specified above and have the following commentary: 2.1.1. The proposal entails the expansion of the existing production and grow out area to increase the production output by 300 tons / annum in order to meet the growing market demands on Farm 2/711. The SD: CM notes that the existing pumphouse is said to increase in size to allow for the abstraction of seawater, additionally seawater lines will also be used to transport the seawater from the farm. A lined seawater reservoir is also proposed to temporarily hold seawater which can be used during peak electricity tariff periods or during electricity outages.</p> <p>2.1.2. The applicant accurately noted the subject property in relation to critical biodiversity and ecological support areas in accordance with the Western Cape Biodiversity Spatial Plan 2017.</p> <p>2.1.3. The applicant has depicted the subject property relation the Coastal Protection Zone (“CPZ”) as defined in Section 16 of the NEM: ICMA and it should be noted that the purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes, including the risk of sea level risks. Due to the subject property’s location within the CPZ, Section 63 of the NEM: ICMA must be considered where an authorisation is required in terms of Chapter 5 of the NEMA. Furthermore, Section 62 of the NEM: ICMA obliges all organs of state that regulates the planning of land to apply that legislation in a manner that gives effect to the purpose of the CPZ. As such, Section 63 of the NEM: ICMA must be considered by local authorities for land use decision making.</p> <p>2.1.4. The applicant adequately considered the subject property in relation to the Overberg District Coastal Management Line (“CML”). The technical delineation of the CML was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone. The CML was informed by various layers</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	
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	<p>of information including biodiversity, estuarine functionality, risk flooding, wave run-up modelling, <i>inter alia</i> and was delineated in conjunction with and supported by organs of state. The principal purpose of the CML is to protect coastal public property, private property, and public safety; to protect the coastal protection zone; and to preserve the aesthetic value of the coastal zone. The use of CMLs is of particular importance in response to the effects of climate change, as it involves both the quantification of risks and pro-active planning for future development.</p> <p>2.1.5. The SD: CM confirms that the majority of the proposed expansion on Farm 2/711 will occur landward of the CML however a portion of the pipeline will occur seaward of the CML, below the highwater mark and within the littoral active zone. The SD: CM notes the very nature of this pipeline requires it to be located in this area and that the bulk infrastructure including the production area for the expansion is strategically placed on elevated ground above the 10m-contour line and the new production area beyond the 30m-contour line. It is noted that this proposed layout specifically considered climate change, sea-level rise, storm surges and coastal erosion.</p> <p>2.1.6. The SD: CM also notes that the applicant is in the process of obtaining a lease agreement with CapeNature for a section of the channel that is located within the littoral active zone.</p> <p>2.1.7. The SD: CM notes from the Pre-App DBAR that the expansion of the abalone farm will require the abstraction of more seawater which will be facilitated through the expansion of the pumphouse and thus result in an increase in effluent water discharge. According to the Pre-App DBAR ecologically, the operation of the abalone farm can be considered to be a low impact activity with negligible impact on the environment compared with other land-based agricultural activities.</p> <p>2.1.8. The effluent water, which is circulated seawater and gets discharged back into the marine environment, has been found to have a negligible to zero impact on the marine environment. Be advised that the SD: CM does not support any activities that will alter the seawater temperature, as such the SD: CM advises the applicant to have appropriate measures in place to ensure that temperature changes would not negatively affect the receiving environment.</p> <p>2.1.9. According to the Western Cape Provincial Coastal Access Audit for the</p>	<p>There is an existing lease agreement with Cape Nature.</p>	
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	<p>Garden Route Municipal District (2019), the subject stretch has ample vehicle access to the coast to the coast. Be advised that in accordance with Section 13 of the NEM: ICMA, the proposed development and associated activities may in no way impede the general public’s ability to access coastal public property now or in the future. Furthermore, the applicant should be informed that they may not create any formal or informal walkways/pathways to the coast through the littoral active zone, with any future developments on the subject property as this is an active area that performs an important ecological function.</p> <p>2.1.10. It is further noted that the discharge is undertaken in line with the DFFE General Discharge Authorisation (“GDA”) issued to the applicant in terms of Section 69(2) of the NEM: ICMA and no amendment to the GDA is required to accommodate the increased seawater discharge.</p> <p>2.1.11. The applicant indicated that coastal access will not be affected during the construction or operational phases of the proposed expansion and access to the coast will be retained as the general public currently has unrestricted access along the subject coastline.</p> <p>2.1.12. Considering the location of the subject property, the applicant must be informed of risk pertaining to the loss of property should the highwater mark of the sea move inland of the property boundary. In this regard, Section 14 of the NEM: ICMA and the <a href="#">Advisory Note from the Office of the Chief Surveyor-General</a> dated 15 October 2021, is applicable.</p> <p>2.1.13. The SD: CM notes that the proposed expansion of the Romansbaai Abalone Farm falls within the realm of aquaculture which was identified as one of the components of the rural economy in the Western Cape Provincial Spatial Development Framework. It is further noted in the DBAR that aquaculture is deemed as a compatible activity that does not compromise biodiversity, farming activities or cultural and scenic landscapes as the development fits into the context of rural landscapes while contributing to the economic growth of these areas.</p> <p>2.1.14. Based on all the abovementioned items, the SD: CM does not object to the proposed expansion of the Romansbaai Abalone Farm (Farm 2/711) as it aligns with the PSDF, Priority Areas of the PCMP (2022) as well as the MSDF (2024) and Municipal IDP (2020).</p>		
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	<p>3. The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: “...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment...” together with Section 58 of the NEM: ICMA which refers to one’s duty to avoid causing adverse effects on the coastal environment.</p> <p>4. The SD: CM reserves the right to revise or withdraw its comments and request further information from you based on any information that may be received.</p>		
<p><b>Rhett Smart Cape Nature</b></p>	<p><b>Letter dated 07 November 2024</b></p> <p><b>Pre-Application Basic Assessment Report for the Proposed Expansion of the Romansbaai Abalone Farm, Remainder of Portion 2 of Farm Klipfonteyn 711, Gansbaai</b></p> <p>CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.</p> <p><b>Desktop Information</b></p> <p>The application is for the expansion of an existing aquaculture facility. We wish to note that the conditions of approval for both environmental and municipal planning approvals for the establishment of the facility and the first expansion remain relevant.</p> <p>The property contains Critical Biodiversity Area 1 (CBA) in the north-east corner as mapped in the Western Cape Biodiversity Spatial Plan (BSP) with the remainder consisting of Other Natural. We wish to note that the BSP has been updated and the final version will be gazetted within the next few months. In the updated version of the BSP, the property is mapped as CBA 1 apart from (some) existing development footprints.</p>	<p>Noted.</p> <p>Noted.</p>	<p><b>Ref: LS14/2/6/1/7/2/711- 2_aquaculture_Gansbaai Date: 07 Nov 2024</b></p>

	<p>The vegetation type mapped for the property is Overberg Dune Strandveld which is listed as endangered in the revised 2022 listing. This vegetation type was previously listed as least threatened and the increase in the threat status is likely one of the reasons for the increase in the amount of CBA on the site. We further wish to note that there have been recent amendments to the National Vegetation Map, which includes the introduction of five new strandveld types which have been mapped with associated descriptions (SANBI 2024). In the updated map, the property is mapped as Southwestern Strandveld (Cowling et al 2023). Threat statuses have not been determined for the new vegetation types.</p> <p><b>Screening Tool and Site Sensitivity Verification Report</b></p> <p>The screening tool results indicate very high sensitivity for terrestrial biodiversity and aquatic biodiversity, high sensitivity for animal species and medium sensitivity for plant species. The site sensitivity verification report indicates that a botanical assessment will be undertaken which addresses the terrestrial biodiversity and plant species themes.</p> <p>For animal species, it states that the site is already impacted by the existing facility and therefore a specialist study is not required. It refers to the site being stocked with small antelope; however the botanical assessment refers to large game species.</p> <p>The two species flagged as high sensitivity are black harrier (<i>Circus maurus</i>) and African Marsh Harrier (<i>Circus ranivorus</i>) with several species flagged as medium sensitivity. While the lack of wetlands means that it is unlikely that African Marsh Harrier is present, the intact strandveld is suitable habitat for Black Harriers although the surrounding urban development does reduce the suitability. CapeNature therefore recommends that as a minimum an animal species compliance statement is undertaken. We recommend that problem causing animals for the aquaculture facility should also be addressed e.g. gulls.</p> <p>For aquatic biodiversity, the response is that there are no freshwater features mapped for the site or which were found during site visits by the environmental assessment practitioner and the botanist. We wish to note that if the proposed development footprint was used for the screening tool, the results would have indicated a low sensitivity, as the very high sensitivity is in the north-western corner of the property outside the footprint. CapeNature is satisfied that an aquatic biodiversity assessment is not required.</p>	<p>Terrestrial Animal Site Sensitivity Verification Report and Compliance Statement was undertaken and is attached in the BAR.</p>	
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	<p><b>Botanical Assessment</b></p> <p>The botanical assessment reports that the fieldwork was undertaken in a sub-optimal time of year, namely autumn, however there is a high confidence in the findings and recommendations due to the dominance of perennial species in this habitat and good knowledge of the area. The vegetation occurring on site is confirmed to consist of Overberg Dune Strandveld. The threat status of this vegetation type is queried due to the high percentage remaining extent and under formal protection. The revised threat status is as a result of the methodology used for the 2022 revised threat status adapted from the IUCN methodology and is related to the level of alien invasive species infestation, however the queries from the specialist are acknowledged as valid.</p> <p>We recommend that the botanical assessment should review the revised mapping of the 2024 beta National Vegetation Map and include a discussion in this regard in the botanical assessment. The assessment should further indicate whether this results in any changes regarding the outcome of the assessment. CapeNature can be contacted for access to the referenced literature if required.</p> <p>The vegetation occurring on site is considered to generally be in a good condition with a very low level of occurrence of alien invasive species. The sensitivity mapping of the expansion footprint to the east of the existing facility indicates high sensitivity in the north and south and medium sensitivity in the central section, with low sensitivity in the areas subject to edge effects from the existing facility. The mapping of the BSP is queried with the recommendation that all the habitat east of the existing facility should be mapped the same as per the sensitivity mapping. In this regard, the update to the BSP should be referred to as discussed above.</p> <p>Five species of conservation concern (one subspecies level) were recorded on the site although none are endangered or critically endangered. The two near threatened species are common across the site and the other vulnerable species of scattered occurrence. As the fieldwork was undertaken in a sub-optimal time of year, ideally this should be supplemented by a spring survey. If additional fieldwork is not undertaken this needs to be motivated and should indicate the likelihood of any species occurring on the footprint and recommend appropriate precautionary mitigation measures. We wish to highlight that the botanical assessment for the previous expansion dated March 2008 can be used to supplement the findings from the current study (while taking into consideration</p>	<p>The botanical assessment has been updated.</p>	
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	<p>changes that have since occurred) and was undertaken by the same specialist.</p> <p>It should be noted that the protocols require that the Species Environmental Assessment Guideline must be adhered to for the plant species theme. The Species Environmental Assessment Guideline indicates that the site ecological importance (SEI) must be calculated for any SCCs encountered. We therefore recommend that the botanical assessment must be amended to include the SEI calculations (SANBI 2020).</p> <p>Condition 18 of the environmental authorisation for the expansion required that the mitigation measures in the botanical assessment must be complied with (included as Appendix A to the EA) and are still relevant for the current application. Although we will not repeat the mitigation measures, we wish to note the reference to a limestone outcrop and milkwood thickets which must be avoided, and which are not referred to in the current botanical assessment, and therefore presumably outside of the current proposed expansion footprint. Search and rescue of <i>Lampranthus fergusoniae</i> was recommended and is one of the SCCs which were encountered in the current botanical assessment. In general, CapeNature recommends that an audit of the existing EA should be undertaken before the current application is considered for approval.</p> <p>There are two alternative layouts presented, however the layout assessed in the botanical assessment differs from both and is assumed to have been a previous version which was screened out. The significance of the impact of the loss of habitat for each of the project components is assessed for the botanical assessment layout, and in all cases the significance remained the same both</p>	<p>The botanical assessment has been updated and the specialist added that:</p> <p><i>“No Site Ecological Importance (SEI) was calculated for the various Species of Conservation Concern (SoCC) recorded on site as frankly I don’t believe in shoehorning ecological observations (which are never complete in terms of our recording of them or understanding of their abundance and ranges) into neat little boxes merely so that office-bound decision makers can say that this or that is now done. However, an estimate of the site abundance for each SoCC is provided, in the context of the development footprints, the study area, and the region and/or total ranges of these species, which I believe is an equally or even more useful approach, and doesn’t require an ecological shoehorn.”</i> Helme, (2025).</p> <p>Page 11 of the Botanical Assessment indicates that there are no milkwood thickets or limestone outcrops that will be impacted by the proposed expansion.</p> <p>It is important to note that the current layout (Alternative 4) represents the final preferred alternative. The positioning of proposed components has been carefully considered to align with existing operational areas of the farm, thereby minimizing</p>	
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	<p>before and after mitigation, with the motivation that there is little that can mitigate the loss of habitat and SCCs.</p> <p>The impact significance after mitigation is used to determine the requirement for a biodiversity offset. A biodiversity offset is necessary to remedy residual impacts of medium significance or higher after following the mitigation hierarchy. In this regard, Phase 2 and the dam are of medium and medium to high significance respectively and therefore a biodiversity offset would be required for the loss of habitat in these two footprints.</p> <p>We wish to note that spillage of seawater and associated salinisation of the affected habitat should be included as another potential impact associated with the seawater dam. It is noted that the assessment took into account that the vegetation would only be brush-cut within the footprint of the solar photovoltaic array and therefore would not result in complete loss of vegetation and therefore does not exceed the thresholds despite being partly located within the high sensitivity area.</p> <p>However, the two development layouts presented in the Basic Assessment Report (BAR) differ from the layout assessed in the botanical assessment and therefore the impact significance would need to be re-assessed for both layouts. It is also essential that the mitigation hierarchy is followed and must include investigation of alternative locations for project components which result in an impact significance of medium or higher.</p> <p>The proposed mitigation measures are supported. The applicant must confirm that the mitigation measures associated with the solar PV array can be implemented. We also recommend that the impacts associated with the solar PV</p>	<p>further disturbance to the surrounding natural environment (<i>milkwood thickets</i>) on the property.</p> <p>The mitigation hierarchy has been reapplied, and minor adjustments have been made to the proposed site development plan accordingly. It is important to note that the current layout (Alternative 4) represents the final preferred alternative. The positioning of proposed components has been carefully considered to align with existing operational areas of the farm, thereby minimizing further disturbance to the surrounding natural environment on the property. The biodiversity offset is no longer applicable for the loss of vegetation within the proposed sweater reservoir area.</p> <p>The dam is lined with the with HDPE lining to prevent seawater leakage. Water is abstracted in line with CWDP and GDA the volumes of water abstracted are carefully monitored via pump capacities and volume of seawater required on the farm is known, should there be a malfunction of the lining the loss of water will be immediately evident.</p> <p>The mitigation hierarchy has been reapplied, and minor adjustments have been made to the proposed site development plan accordingly. It is important to note that the current layout (Alternative 4) represents the final preferred alternative. The positioning of proposed components has been carefully considered to align with existing operational areas of the farm, thereby minimizing further disturbance to the surrounding natural environment on the property. The biodiversity offset is no longer applicable for the loss of vegetation within the proposed sweater reservoir area.</p> <p>The mitigation measures associated with the Solar PV will be strictly adhered to and these are incorporated into the EMPr. The high cost of</p>	
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	<p>array should also be evaluated in the context of the alternative of connecting to the local electricity grid.</p> <p>It should be noted that the original approval for the aquaculture facility which was for consent use included a condition of approval that the development of the site should be confined to the area on the site plan and the remainder should be managed as a nature reserve. The approval was granted by the Overberg Regional Services Council in terms of the Land Use Planning Ordinance (LUPO) in 1996 prior to the gazetting of the National Environmental Management Act (NEMA) when conservation measures needed to be included in the planning approvals. We note that we referred to this condition in our comment on the municipal planning application, however conditions related to biodiversity conservation are more appropriate to NEMA applications since its promulgation. We therefore recommend that the existing condition must be taken into account and comment obtained from the Overstrand Municipality Spatial Planning component in this regard. This existing condition would then link in with any biodiversity offset requirements.</p>	<p>electricity is one of the farm’s largest expenses, the applicant had to look for alternative energy measures to ensure long-term financial viability of the farm through renewable energy measures.</p> <p>Application for consent use for aquaculture and amendment of the site development plan will be undertaken.</p> <p><b>Existing NEMA approval</b> <b>Botanical Assessment dated 2008 by Nick Helme contained these mitigations</b></p> <ul style="list-style-type: none"> <li>• Limestone outcrops should not be impacted</li> <li>• Milkwood’s should be avoided.</li> <li>• Search and Rescue operations are undertaken in the grow out tanks’ areas before development.</li> <li>• The Dune area to the west must be excluded from any future development.</li> <li>• Adequate ecological connectivity and a corridor of vegetation must be maintained between the eastern and western parts of the site along the northern boundary. About 40m wide.</li> </ul> <p><b>Archeological Impact Assessment (2008) contained these mitigations</b></p> <ul style="list-style-type: none"> <li>• The middens were identified on the southern portion of the farm and this area has been demarcated as a no-go. This mitigation is also included in the 2025 expansion application.</li> </ul> <p><b>Conditions of Environmental Authorisation (2009)</b></p> <ul style="list-style-type: none"> <li>• The 2025 expansion application is in line with the conditions of the EA.</li> </ul>	
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<p><b>COMPLIANCE MONITORING CONDUCTED BY DEADP OFFICIAL IN 2024</b></p> <ul style="list-style-type: none"> <li>The compliance monitoring was undertaken on 14 March 2024, and the response from the Department did not find any non-compliance issues, see <b>Appendix K</b>.</li> </ul> <p><b>APPLICATION FOR THE AMENDMENT OF CONDITIONS OF AUTHORISATION DATED 2013</b></p> <ul style="list-style-type: none"> <li>The letter was submitted to Overstrand Municipality for amendment of condition of approval in 2013 for the expansion of the farm.</li> <li>The letter dated September 2013 for applicability of the NEMA Regulations of the expansion of the farm from DEADP stated that the applicant does not require an environmental authorisation in terms of the NEMA EIA Regulations 2010 in order to expand the aquaculture farm, as long as the expansion work on the aquaculture farm remains consistent with the Description of activity section as well as the conditions of the aforementioned environmental authorisation.</li> </ul> <p><b>Summary</b></p> <p>In summary, the 2025 expansion application has been developed with full consideration of the existing NEMA and municipal planning approvals. All relevant conditions from the 2008 assessments, 2009 Environmental Authorisation, and 2013 amendment correspondence remain applicable and are adhered to. The application for consent use and amendment of the site development plan will be undertaken.</p>
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	<p><b>Coastal and Marine Environment</b></p> <p>A major gap in the screening tool is the coastal and marine environment. The proposed project includes an expansion of the pumphouse which abstracts water from the sea. The impact on the coastal and marine ecosystems must be evaluated in a separate specialist study.</p> <p>The increase in capacity will result in an increase in the volumes of water abstracted and effluent discharged. According to the BAR, the discharge volumes are within the General Discharge Authorisation in terms of the National Environmental Management: Integrated Coastal Management Act (NEM:ICMA) and no amendments are required. We wish to query the legislation which would be relevant for storage of seawater, as storage of freshwater is a water use in terms of the National Water Act. We therefore recommend that comment must be obtained from Department of Fisheries, Forestry and the Environment (DFFE) Oceans and Coasts, Department of Environmental Affairs and Development Planning (DEA&amp;DP) Coastal Management and the Breede Olifants Catchment Management Agency (BOCMA) regarding the abstraction and storage of seawater and discharge of effluent. Any additional legislative processes should proceed concurrently with the Basic Assessment process. The Western Cape Nature Conservation Board trading as <b>CapeNature</b> Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Colin Johnson, Mr Paul Slack</p> <p>Structures below the high-water mark of the sea require a Sea Shore Lease from CapeNature in terms of the Sea Shore Act. The expansion of the pumphouse is located well below the high water mark as indicated on the DFFE and DEA&amp;DP Coastal Viewers and therefore requires a Sea Shore Lease. The Sea Shore Lease application will only be processed once an environmental authorisation is issued, however it can be applied for before then. Any other structures on the property which are below the high-water mark and which currently don't have a Sea Shore Lease should be included in the application.</p> <p><b>Conclusion</b> In conclusion, CapeNature recommends that the following must be addressed before the application can be considered for approval:</p>	<p>The SSVR was amended and includes reference to coastal and marine environment.</p> <p>Relevant Legislations have been included in the BAR; however, it is important to highlight that the seawater is only temporary held for few hours, and BOCMA is not the competent authority. A comment from DFFE, and DEADP are attached. However, BOCMA is not the competent authority.</p> <p>A lease agreement with Cape Nature is already in place, see <b>Appendix J</b>.</p>	
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	<p>The botanical assessment should be amended to: Assess the impact significance of the two layout alternatives included in the BAR including the individual project components and determine whether a biodiversity offset is required for any project components. Ideally an additional spring survey must be conducted, unless adequately motivated. The updated BSP and National Vegetation Map must be discussed and used to inform the assessment. The SEI must be calculated for the plant SCCs. Where the impact significance of project components exceeds offset thresholds additional locations with a lower impact must be investigated in accordance with the mitigation hierarchy.</p> <p>The animal species theme must be addressed by a specialist in accordance with the protocols.</p> <p>A coastal and marine ecological specialist study must be undertaken to assess the impacts associated with the expansion of the pumphouse, abstraction of seawater and discharge of effluent.</p> <p>The existing NEMA and municipal planning approvals need to be taken into account before the current application is considered for approval. Existing conditions remain relevant unless an amendment is applied for.</p> <p>Regards,</p>	<p>The botanical assessment has been amended.</p> <p>An animal species assessment was conducted</p> <p>Application for consent use for aquaculture and amendment of the site development plan will be undertaken.</p>	
<p><b>D'mitri Matthews</b>  <b>DEA&amp;DP</b></p>	<p><b>Email dated 08 November 2024</b></p> <p><b>COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT ("BAR") SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998) ("NEMA") ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) ("EIA") FOR THE PROPOSED EXPANSION OF THE ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI</b></p> <ol style="list-style-type: none"> <li>1. The draft BAR dated 2 October 2024, as received by the Directorate: Development Management Region 1 (hereinafter referred to as "this Directorate") on 9 October 2024, refers.</li> <li>2. Following review of the information submitted to this Department, the Department notes the following:</li> </ol>		

	<p>a. The expansion of the abalone facility will include the following:        Increase in Production Capacity        The expansion will be executed in two phases, each targeting an annual production increase of 150 tons (wet weight).</p> <p><b>Phase 1:</b>        Additional production area: 17500 m<sup>2</sup> (1.75 ha)        Production additions:        Production capacity increase: 150 tons (wet weight)        Number of tanks: 1 850        Number of baskets: 12 950        Seawater usage: 2 400 m<sup>3</sup>/hour        Aeration fans / blower room: 4 units        Split/grading station: 1 unit</p> <p><b>Phase 2:</b>        Additional production area: 17500 m<sup>2</sup> (1.75 ha)        Production additions:</p> <ul style="list-style-type: none"> <li>b. Production capacity: 150 tons (wet weight)</li> <li>c. Number of tanks: 1 850</li> <li>d. Number of baskets: 12 950</li> <li>e. Seawater usage: 2 400 m<sup>3</sup>/hour</li> <li>f. Aeration fans blower room: 4 units</li> <li>g. Split/grading station: 1 unit</li> </ul> <p>Construction of a lined seawater reservoir:        Storage capacity: 41 000 m<sup>3</sup>        Surface area: 20 000 m<sup>2</sup> (2 ha)        Coverage footprint: 20000 m<sup>2</sup> (2 ha)</p> <p>Solar Power Array:        Power generation capacity: 4 MW (backup)        Coverage footprint: 40000 m<sup>2</sup> (4 ha)</p> <p>Expansion of the existing pumphouse</p> <ul style="list-style-type: none"> <li>• The existing pumphouse will be expanded by approximately 140 m<sup>2</sup> to accommodate additional infrastructure for increased water intake. A total of 4 new pumps and 4 pipelines will be installed at the pumphouse. ▪ 1 new pump and</li> </ul>	<p>The development footprint for the new proposed production area has been reduced to 2 ha with the production capacity increase of 150 tons.</p>	
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	<p>1 new pipeline will be fitted within the existing pumphouse.</p> <ul style="list-style-type: none"> <li>• 3 new pumps and 3 pipelines will be installed within the proposed expanded pumphouse.</li> <li>• Coverage footprint: 140 m<sup>2</sup></li> <li>• Installation of additional pipelines:</li> <li>• 4 new pipelines will be installed from the pumphouse to connect the new lined seawater reservoir directly to the production area:</li> <li>• Each pipeline will be 600 meters long and 500 mm in diameter.</li> <li>• The combined water extraction rate will be 1600 m<sup>3</sup> per hour.</li> <li>• Pipeline installation will not require major ground excavation, as they will be laid alongside the existing pipeline in a previously disturbed area</li> <li>• Seawater Intake and Discharge Systems        The expansion of the abalone farm will require the abstraction of more seawater which will be facilitated through the expansion of the pumphouse. The additional seawater intake will therefore result in an increase in effluent water discharge.</li> </ul> <p>Departmental comments on the draft BAR:</p> <p>3.1 The applicant must ensure that the proposed expansion does not contradict any specific conditions that are contained in the Environmental Authorisation issued on 3 March 2009 (Reference: E12/2/3/1-E2/11-0262/07).</p> <p>3.2 Since a new entity owns the existing facility, an amendment application must be submitted to the Department to transfer the rights and obligations of the EA issued on 3 March 2009 (Reference: E12/2/3/1-E2/11-0262/07).</p> <p>3.3 An extensive list of activities has been included as part of the proposed expansion. The Environmental Assessment Practitioner must filter this list to include only the relevant listed activities applicable to the proposed expansion.</p> <p>3.4 It is noted that the recommendations of the botanical specialist regarding the offset have not been included in the Environmental</p>	<p>The application for the expansion is in line with the conditions of the Environmental Authorisation issued in 2009.</p>	
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	<p>Management Programme (“EMPr”). It is therefore requested to provide reasons/motivations why this recommendation has not been included as part of the mitigation measures, since there will be unavoidable impacts within an ecosystem listed as critically endangered, in terms of Section 52 of the National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004) (“NEMBA”).</p> <p>The applicant Regulatory Requirements:</p> <p>4.1. Proof of the notifications sent to registered I&amp;APs for the commenting purposes must be included in the BAR.</p> <p>4.2 A dated photograph of erecting a site notice must be provided.</p> <p>4.3 Proof of placing an advertisement must be provided.</p> <p>4.4 Any new representations and comments received in connection with the application must be included in the BAR.</p> <p>4.5 Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the BAR.</p> <p>4.6 The minutes of any meetings held by the environmental assessment practitioner (“EAP”) with I&amp;AP’s and other role players which record the views of the participants must be included in the BAR.</p> <p>4.7 Please be advised that the signed and dated applicant declaration is required to be submitted with the BAR during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the</p>	<p>The biodiversity offset is no longer considered applicable for the project. The area that was previously assessed as having a Medium residual impact has been reassessed following the reapplication of the mitigation hierarchy. Through the identification and implementation of additional mitigation measures, the botanical specialist confirmed that the residual impact associated with the loss of the Overberg Dune Strandveld vegetation type due to the construction of the seawater reservoir has been reduced to a Low–Medium negative impact.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	
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	<p>report with respect to this application.</p> <p>4.8 In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the BAR during the formal application process for decision-making.</p> <p>4.9 You are furthermore reminded that the BAR must contain all the information outlined in Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended).</p> <p>1. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.</p> <p>1. This Department reserves the right to revise or withdraw its comments and request further information based on any information received.</p> <p>Yours faithfully,</p>		
<p><b>Michelle Pretorius</b></p>	<p><b>Email dated 18 November 2024</b></p> <p><b>Subject: RE: Notice of Public Participation   Proposed Expansion of Romansbaai Abalone Farm   Ptn RE2/711, Gansbaai, Caledon RD</b></p> <p>Dear Michelle</p> <p>Thanks for the notice please register myself other colleagues will send their own registration requests.</p> <p>Kindest Regards</p>	<p>Registered as an I&amp;AP.</p>	<p><b>18 November 2024</b></p>
<p><b>Vannessa Stoffels (Department of Infrastructure: Roads)</b></p>	<p><b>Letter dated 19 November 2024</b></p> <p><b>PROPOSED EXPANSION OF ROMANSBAAI ABALONE, REMAINDER OF PORTION 2 OF FARM 711, GANSBAAI: COMMENTS ON PRE-APPLICATION BASIC ASSESSMENT REPORT</b></p> <p>1. Your email to this Branch dated 09 October 2024 refers.</p> <p>2. The subject property is located 150m south of Gansbaai and takes access off</p>	<p>Noted. No further actions required.</p>	<p><b>Date: 19/11/24</b></p>

	<p>Divisional Road 1214.</p> <p>3. This Branch offers no objection to the issuing of Environmental Authorisation in terms of the National Environmental Management Act 107 of 1998.</p> <p>Yours Sincerely</p>		
<p><b>Michelle Pretorius (DFFE)</b></p>	<p><b>Email dated 24 January 2025</b></p> <p>Subject: Re: Notice of Public Participation   Proposed Expansion of Romansbaai Abalone Farm   Ptn RE2/711, Gansbaai, Caledon RD</p> <p>Dear Michelle</p> <p>Compliments of the season to you for 2025, I was just catching up on emails and came across your email.</p> <p>I see that your original email sent in Oct 2024 was not received due to the incorrect email address for myself . However, your follow up email of Nov 2024 caught me in a very busy time, and I was not able to review the documents.</p> <p>Please can you update your database to include my colleagues in Environmental interaction's cc'd herein, who are to review EIAs for aquaculture. I have since moved to the Phakisa Delivery unit and so no longer comment on EIAs.</p> <p>Kindest regards Michelle</p>	<p>Noted. Included in the I&amp;AP</p>	
<p><b>Cor Van der Walt (DoA)</b></p>	<p><b>Letter dated 04 February 2025</b></p> <p><b>PROPOSED EXPANSION OF ROMANBAAI ABALONE FARM: DIVISION CALEDON PORTION 2 OF THE FARM NO. 711</b></p> <p>Your application of 09 October 2024 has reference.</p> <p>The Western Cape Department of Agriculture Western Cape (WCDoA) has no objection to the proposed application.</p> <p>Please note:</p>	<p>Noted. No further actions required.</p>	

	<ul style="list-style-type: none"> <li>• Kindly note the above-mentioned reference number in any future correspondence in respect of the application.</li> <li>• The Department reserves the right to revise initial comments and request further information based on the information received.</li> </ul> <p>Yours sincerely.</p>		
<b>IN PROCESS PUBLIC PARTICIPATION - PPP 2</b> <b>21 May 2025 to 23 June 2025</b>			
<p><b>Alexis Osborne</b> <b>DFFE</b></p>	<p><b>Email dated 13 June 2025</b></p> <p><b>RE: APPLICATION FOR A PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON REMAINDER OF PORTION 2 OF THE FARM 711, GANSBAAI, WESTERN CAPE.</b></p> <p>The Directorate: Sustainable Aquaculture Management of the Department of Forestry, Fisheries and the Environment (“DFFE”) has reviewed the Basic Assessment Report and associated reports for the Proposed Expansion of Romansbaai Abalone Farm on Portion 2 of the Farm No. 711, Gansbaai, Western Cape.</p> <p>The comments of the DFFE are as follows:</p> <ol style="list-style-type: none"> <li>1. The DFFE, Branch: Fisheries Management has a mandate for the development and management of aquaculture in South Africa, please register the Directorate: Sustainable Aquaculture Management as an Interested and Affected Party (I&amp;AP) to be included for further communication go forward.</li> <li>2. Under <b>SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOL: 4 Policies (Page 24-25)</b>, the <i>National Environmental Management Act (NEMA)</i> and its associated regulations, as well as the <i>Marine Living Resources Act (MLRA)</i>, have been omitted from the list of key legislation applicable to the operation. Please ensure that the MLRA, along with the relevant policies must include that are applicable for Marine Aquaculture permit and Right. The applicant must submit the revised and approved Environmental Management</li> </ol>	<p>Noted. This section has been amended in the BAR.</p>	

	<p>Programme (EMPr) (Reference: EMP/RB/Rev3) to the DFFE Sub-Directorate: Aquaculture Authorisations for monitoring and record-keeping purposes.</p> <p>3. Precautions must be taken to ensure that incoming seawater remains uncontaminated during construction activities near or upstream of the intake, particularly in relation to the pumphouse expansion. Disturbance of sediments in this area may release heavy metals and other pollutants. Additionally, effluent discharge must be carefully managed to prevent cross-contamination with the intake water, considering nearshore current dynamics.</p> <p>4. The applicant must ensure that the lined seawater reservoir proposed as part of the expansion does not introduce harmful chemicals from the lining materials, which could pose risks to food safety and/or aquatic animal health. Additionally, the design should prevent the formation of dead zones (i.e. areas with poor water circulation) that could promote the growth of pathogenic microorganisms, leading to further challenges.</p> <p>5. The DFFE further notes that the proposed expansion will increase the farming production by 150 tons (wet weight) of abalone annually, however, it is important that the expansion includes additional hygiene management, biosecurity controls, staff training, and waste management to prevent risks associated with over stocking, cross-contamination, and pathogen proliferation.</p> <p>6. The installation of a 4 MW solar array is supported as it enhances the sustainability of the farm's operations and reduces reliance on grid-supplied electricity. This measure aligns with best practice in sustainable aquaculture infrastructure design and management.</p> <p>7. EMPr: 10.1.6 Waste – The drafting of a Site-specific Waste Management Plan is supported, and it is advised that prior approval be obtained from the Local Municipality for disposal of biological waste and also ensure that Marine Aquaculture permit conditions are followed whenever there is mass mortality on the farm and that this is reported the DFFE accordingly.</p> <p>The Directorate supports the proposed expansion in principle, provided that the applicant commits to enhanced environmental management, robust biosecurity controls, and the mitigation of risks to marine and coastal systems. Ongoing monitoring and compliance with environmental authorisation conditions will be critical to ensuring that the expansion contributes positively to the sustainable growth of aquaculture in the region.</p> <p>Please note that the Directorate Sustainable Aquaculture Management reserves the right to review and/or provide additional comments in future. Enquiries may</p>	<p>This is covered in the EMPr and it is in line with Romansbaai farm operational Permits.</p> <p>Noted – the water does not remain in the reservoir for extended periods.</p> <p>Hygiene management, biosecurity controls, staff training is already undertaken in lien with the operational permits.</p> <p>Noted</p> <p>Noted</p>	
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	be directed to the contacts provided at the top of this correspondence.		
<b>Mercia Liddle DEADP CMU</b>	<p><b>Email dated 17 June 2025</b></p> <p><b>RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI, CALEDON ROAD.</b></p> <p><b>Good Day Madam,</b></p> <p>Your request for comment from the Sub-directorate: Coastal Management on the above-mentioned pre-application basic assessment report received on 09 October 2024, refers.</p> <p><b>1. CONTEXT</b></p> <p>1.1. The Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“NEM: ICMA”) is a Specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”). The NEM: ICMA sets out to manage the nation’s coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment. In terms of Section 38 of the NEM: ICMA, the Department of Environmental Affairs and Development Planning (‘the Department’) is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the “Management of public launch sites in the coastal zone (GN No. 497, 27 June 2014) “Public Launch Site Regulations”.</p> <p>1.2. The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme (“PCMP”). The PCMP is a five (5) year strategic document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the Province. The Department has developed the next generation PCMP that includes priority objectives for the next 5 years. This PCMP was adopted on 19 May 2023 and is available upon request.</p> <p>1.3. A key priority of the PCMP is the Estuary Management Programme, which is implemented in accordance with the NEM: ICMA and the National Estuarine Management Protocol (“NEMP”). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The</p>	Comment noted – no further actions required	<b>Date: 17/06/25</b>

	<p>Department is in the process of approving a series of Estuarine Management Plans.</p> <p>1.4. The facilitation of public access to the coast is an objective of the NEM: ICMA as well as a Priority in the WC PCMP. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 (“PCASP”) and commissioned coastal access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NEM: ICMA. The PCASP as well as the coastal access audits are available upon request.</p> <p><b>2. COMMENT</b></p> <p>2.1. The sub-directorate: Coastal Management (“SD: CM”) has reviewed the information as specified above and have the following commentary:</p> <p>2.1.1. The proposal entails the expansion of the existing production and grow out area to increase the production output by 300 tons / annum in order to meet the growing market demands on Farm 2/711. The SD: CM notes that the existing pumphouse is said to increase in size to allow for the abstraction of seawater, additionally seawater lines will also be used to transport the seawater from the farm. A lined seawater reservoir is also proposed to temporarily hold seawater which can be used during peak electricity tariff periods or during electricity outages.</p> <p>2.1.2. The applicant accurately noted the subject property in relation to critical biodiversity and ecological support areas in accordance with the Western Cape Biodiversity Spatial Plan 2017.</p> <p>2.1.3. The applicant has depicted the subject property relation the Coastal Protection Zone (“CPZ”) as defined in Section 16 of the NEM: ICMA and it should be noted that the purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes, including the risk of sea level risks. Due to the subject property’s location within the CPZ, Section 63 of the NEM: ICMA must be considered where an authorisation is required in terms of Chapter 5 of the NEMA. Furthermore, Section 62 of the NEM: ICMA obliges all organs of state that regulates the planning of land to apply that legislation in a manner that gives effect to the purpose of the CPZ. As such, Section 63 of the NEM: ICMA must be considered by local authorities for land use decision making.</p> <p>2.1.4. The applicant adequately considered the subject property in relation to</p>		
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	<p>the Overberg District Coastal Management Line (“CML”). The technical delineation of the CML was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk flooding, wave run-up modelling, inter alia and was delineated in conjunction with and supported by organs of state. The principal purpose of the CML is to protect coastal public property, private property, and public safety; to protect the coastal protection zone; and to preserve the aesthetic value of the coastal zone. The use of CMLs is of particular importance in response to the effects of climate change, as it involves both the quantification of risks and pro-active planning for future development.</p> <p>2.1.5. The SD: CM confirms that the majority of the proposed expansion on Farm 2/711 will occur landward of the CML however a portion of the pipeline will occur seaward of the CML, below the highwater mark and within the littoral active zone. The SD: CM notes the very nature of this pipeline requires it to be located in this area and that the bulk infrastructure including the production area for the expansion is strategically placed on elevated ground above the 10m-contour line and the new production area beyond the 30m-contour line. It is noted that this proposed layout specifically considered climate change, sea-level rise, storm surges and coastal erosion.</p> <p>2.1.6. The SD: CM also notes that the applicant is in the process of obtaining a lease agreement with CapeNature for a section of the channel that is located within the littoral active zone.</p> <p>2.1.7. The SD: CM notes from the Pre-App DBAR that the expansion of the abalone farm will require the abstraction of more seawater which will be facilitated through the expansion of the pumphouse and thus result in an increase in effluent water discharge. According to the Pre-App DBAR ecologically, the operation of the abalone farm can be considered to be a low impact activity with negligible impact on the environment compared with other land-based agricultural activities.</p> <p>2.1.8. The effluent water, which is circulated seawater and gets discharged back into the marine environment, has been found to have a negligible to zero impact on the marine environment. Be advised that the SD: CM does not support any activities that will alter the seawater temperature, as such the SD: CM advises the applicant to have appropriate measures in place to ensure that temperature changes would not negatively affect the receiving environment.</p> <p>2.1.9. According to the Western Cape Provincial Coastal Access Audit for the</p>		
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	<p>Garden Route Municipal District (2019), the subject stretch has ample vehicle access to the coast to the coast. Be advised that in accordance with Section 13 of the NEM: ICMA, the proposed development and associated activities may in no way impede the general public's ability to access coastal public property now or in the future. Furthermore, the applicant should be informed that they may not create any formal or informal walkways/pathways to the coast through the littoral active zone, with any future developments on the subject property as this is an active area that performs an important ecological function.</p> <p>2.1.10. It is further noted that the discharge is undertaken in line with the DFFE General Discharge Authorisation ("GDA") issued to the applicant in terms of Section 69(2) of the NEM: ICMA and no amendment to the GDA is required to accommodate the increased seawater discharge.</p> <p>2.1.11. The applicant indicated that coastal access will not be affected during the construction or operational phases of the proposed expansion and access to the coast will be retained as the general public currently has unrestricted access along the subject coastline.</p> <p>2.1.12. Considering the location of the subject property, the applicant must be informed of risk pertaining to the loss of property should the highwater mark of the sea move inland of the property boundary. In this regard, Section 14 of the NEM: ICMA and the Advisory Note from the Office of the Chief Surveyor-General dated 15 October 2021, is applicable.</p> <p>2.1.13. The SD: CM notes that the proposed expansion of the Romansbaai Abalone Farm falls within the realm of aquaculture which was identified as one of the components of the rural economy in the Western Cape Provincial Spatial Development Framework. It is further noted in the DBAR that aquaculture is deemed as a compatible activity that does not compromise biodiversity, farming activities or cultural and scenic landscapes as the development fits into the context of rural landscapes while contributing to the economic growth of these areas.</p> <p>2.1.14. Based on all the abovementioned items, the SD: CM does not object to the proposed expansion of the Romansbaai Abalone Farm (Farm 2/711) as it aligns with the PSDF, Priority Areas of the PCMP (2022) as well as the MSDF (2024) and Municipal IDP (2020).</p> <p>2.1.15. The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: "...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as</p>		
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	<p><i>such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment...</i>" together with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.</p> <p>The SD: CM reserves the right to revise or withdraw its comments and request further information from you based on any information that may be received.</p>		
<p><b>Rulien Volschenk ODM</b></p>	<p><b>Letter dated 23 June 2025</b></p> <p><b>RE: PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON REMAINDER OF PORTION 2 OF THE FARM 711, GANSBAAI</b></p> <p>DEADP REFERENCE: 16/3/3/6/7/E2/10/1628/23</p> <p>The Environmental Management Services Department of the Overberg District municipality acknowledges the receipt and review of the draft Basic Assessment Report and Environmental Management Programme.</p> <p>According to the 2017 Western Cape Biodiversity Spatial Plan (WCBSP), the majority of the property is designated as an Other Natural Area (ONA), while the smaller portion within the demarcated zone for photovoltaic (PV) development is classified as a Critical Biodiversity Area (CBA). However, recently the WCBSP has been reviewed and the area is now categorise as CBA.</p> <p>The Overberg Municipality's Spatial Development Framework clearly define Spatial Planning Categories (SPCs) to reflect how the area should be developed spatially to ensure sustainability. These SPCs are linked with the Biodiversity Spatial Plan Categories as defined in the WCBSP.</p> <p>Critical Biodiversity Areas (CBAs) are designated as Core 1 under the Spatial Planning Categories. The primary management objective for these areas is to maintain in a natural or near-natural state, ensuring no further loss of natural habitat. Where degradation has occurred, restoration efforts should be undertaken . Only low-impact, biodiversity-sensitive land uses are considered appropriate within these zones.</p> <p>Other Natural Areas (ONAs) fall under the Buffer 2 category, where the focus is on minimizing habitat and species loss while preserving ecosystem functionality through strategic, landscape-level planning.</p>	<p>Noted</p>	

	<p>The proposed development is located within the Overberg Dune Strandveld, an ecosystem officially classified as Endangered. According to the Overberg District Municipality's Spatial Development Framework, the preservation of vulnerable ecosystems must be a key consideration. Mitigation measures recommended specialist reports, aimed at conserving areas of ecological significance, area supported. Further expansion that could place species of conservation concern at greater risk should not be pursued.</p> <p>In accordance with the National Biodiversity Management : Biodiversity Act (2004) and the Conservation of Agricultural Resources Act (1983), landowners are legally obligated to manage invasive species present on their properties. As part of effective mitigating, all listed alien and invasive species must be removed, followed by the routine maintenance to prevent regrowth. To safeguard sensitive ecosystems from further degradation, a comprehensive alien management plan should be developed and implemented across the entire property.</p> <p>The Overberg District Municipality reserves the right to amend its comments and to request further information should any additional relevant documentation or details become available.</p>	<p>Invasive Alien Plant Clearing already takes place in the farm, in line with the existing IAP Management.</p> <p>No further action required.</p>	
<p><b>Rhett Smart (Cape Nature)</b></p>	<p><b>Email dated 24 June 2025</b></p> <p><b>Draft Basic Assessment Report for the Proposed Expansion of the Romansbaai Abalone Farm, Remainder of Portion 2 of Farm Klipfonteyn 711, Gansbaai</b></p> <p>CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments.</p> <p>Additional specialist studies have been undertaken, and the botanical assessment has been amended in accordance with the comments provided on the Pre-Application Basic Assessment Report (BAR). The need for a biodiversity offset has been evaluated.</p> <p><b>Botanical Assessment</b></p> <p>The botanical assessment has updated the desktop mapping to include mention of the updated 2023 Western Cape Biodiversity Spatial Plan (BSP) and the draft updates in the beta National Vegetation Map. The 2023 BSP is considered more accurate for this site with the affected area mapped as Critical Biodiversity Area 1 (CBA) and the determination that draft change of the vegetation mapping from Overberg Dune Strandveld (endangered) to Southwestern Strandveld (not</p>		

	<p>assessed) does not have any effect on the assessment or recommendations.          The motivation for not calculating the site ecological importance (SEI) is noted. We wish to advise that the recommendation is in accordance with the protocols which state for terrestrial plant species specialist assessment that “2.3. The assessment must be undertaken in accordance with the Species Environmental Assessment Guideline”. The Species Environmental Assessment Guideline refer to a “a standardised metric for identifying site-based ecological importance for species” which is the SEI. The constraints related to quantitative data and level of accuracy within the scope of a specialist study for a Basic Assessment process are however acknowledged and an estimate would be accepted. The estimated percentage of the global population for each of the Species (Taxa) of Conservation Concern (SCCs) within the development footprint are presented each of which is estimated to be &lt;1%.</p> <p>The revised botanical assessment assessed the development alternatives which were presented in the Pre-Application BAR, as the previous version of the botanical assessment assessed a different layout. However, the layouts as indicated in the botanical assessment are not the same as those included within the Pre-Application BAR. The extent of the solar array is much larger than that indicated in Appendix B2 which was the previously preferred alternative. The extent of the solar array for the new preferred layout is also much larger than the previous preferred layout. The layout plans have the logo of the environmental assessment practitioner (EAP); therefore it is not evident that these are not the layout plans designed by the project team with accurate delineation. The lack of accurate and consistent layout plans for each alternative for evaluation by the specialists and authorities is a concern.</p> <p>To more clearly illustrate the inaccurate spatial delineation of the layouts we wish to refer to the previous preferred layout and current preferred layout below (Figures 1&amp;2). As a reference, the solar array is presented as 4 ha/40 000 m<sup>2</sup> for both alternatives, however, is spatially much larger in the current layout. The total footprint for the current preferred layout is much smaller (6.9 ha) than the previous preferred layout (9.6 ha), however this is not evident from the spatial depiction (footprints as stated in the BAR).</p> <p>Notwithstanding the above, the revised botanical assessment assessed the purported alternatives presented in the Pre-Application BAR, although it is not known which of the two spatial depictions is accurate/more accurate. With regards to the location of the SCCs, Alternative 1 is preferred as Phase 2 of the expansion area for Alternative 2 impacted on the all the SCCs but Phase 2 for</p>	<p>Noted</p> <p>The Botanical report and addendum have been updated with the Architecturally drawn layouts included to create an accurate representation of the proposal.</p> <p>The layouts have been updated and drawn by Johan Gericke of Gericke Architects.</p>	
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	<p>Alternative 1 impacted on none. Alternative 1 was not the preferred alternative in the Pre-Application BAR. In the impact assessment, Phase 2 is rated as medium negative for Alternative 2 as it was for the initial layout, however for Alternative 1 it is reduced to low negative. The location of the seawater reservoir remains the same for all alternatives and therefore remains medium-high negative. The residual impact significance therefore remains above the threshold requiring a biodiversity offset, although it is motivated that an alien clearing offset is preferred to securing more of the same vegetation type according to the offset ratios.</p> <p>An addendum to the botanical assessment is provided which evaluates the current preferred alternative. This would align to Figure 2 above, although no diagrams are provided in the addendum therefore it cannot be certain which layout was presented to the botanical specialist. The addendum only refers to the reduction in the footprint size of the revised layout as indicated in the Draft BAR. The reduction is assumed to be a reduced version of Alternative 2 and as a result, Phase 2 is reduced to low-medium negative and the seawater reservoir to medium negative. Medium negative is still within the threshold requiring a biodiversity offset, however it is motivated that a smaller quantum is required compared to the previous preferred alternative.</p> <p>In response to the queries regarding the previous approval for expansion, confirmation is provided that the proposed expansion area does not encroach into the milkwood thicket or limestone outcrop. Appendix K includes an audit of the existing EA with no findings of non-compliance. Confirmation is provided that there are adequate design and mitigation measures to prevent the potential impact of discharge of saline water from the seawater reservoir into the natural habitat. Confirmation is also provided that the mitigation measures for the solar array will be implemented, including retention of indigenous vegetation under the solar panels. The measure included in the Environmental Management Programme Report (EMPr) is that the vegetation under the solar panels will be maintained at a height of between 30 cm and 100 cm.</p> <p><b>Terrestrial Animal Compliance Statement</b></p>	<p>The addendum has been updated with the architecturally drawn layout. These scaled layouts address the concerns listed above. The mitigation hierarchy has been reapplied, and minor adjustments have been made to the proposed site development plan accordingly. It is important to note that the current layout (Alternative 4) represents the final preferred alternative. The positioning of proposed components has been carefully considered to align with existing operational areas of the farm, thereby minimizing further disturbance to the surrounding natural environment on the property. The biodiversity offset is no longer applicable for the loss of vegetation within the proposed seawater reservoir area.</p> <p>Noted.</p>	
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	<p>The terrestrial animal compliance statement was undertaken in accordance with CapeNature comments. A field survey of the site was undertaken with 11 locality points indicated with associated photographs. Three main faunal habitats were identified, namely natural fynbos, short, disturbed fynbos pasture and built-up areas, the latter consisting of the existing development footprint on site. All faunal species which were observed on site are listed with occurrence records in the three habitats, and with the largest percentage consisting of birds.</p> <p>A total of 7 SCCs were flagged in the screening tool as high or medium sensitivity. None of these species were observed on site. One additional species (Cape dwarf chameleon – <i>Bradypodion pumilum</i>) was added based on desktop information. Black Harrier (<i>Circus maurus</i>) and Cape dwarf chameleon are considered to potentially occur on site, however none of the species flagged are assessed to potentially experience an impact of higher than low significance.</p> <p>There was only one SCC observed on site, namely bontebok (<i>Damaliscus pygargus pygargus</i>), although more accurately a subspecies of conservation concern. Bontebok is a large mammal game species, and the species was almost certainly introduced to the property along with other game species. The only other game species referred to in the animal species compliance statement is the Burchell's zebra (plains zebra), although the botanical assessment also referred to eland and springbuck. The bontebok was only found on the short, disturbed fynbos pasture. Although bontebok have been introduced there is a Biodiversity Management Plan (BMP) for the subspecies, for which the aim is to manage the meta-population with the subpopulations mainly consisting of introductions due to the inability for natural dispersal within the natural distribution range since it is occupied mainly by intensive agriculture farms. According to the BMP, the property is within the natural distribution range of the species however the map doesn't indicate a population record at the site location (Cowell &amp; Birss 2017). Historically the subspecies occurred in a roughly triangular area between Elgin and Heidelberg and south to the Breede River mouth, Cape Agulhas and the Bot River Estuary (Skead 2011). The preferred habitat of the species does not however correlate the primary strandveld habitat occurring across the site, but rather the managed pasture areas for this site (it primarily occurred within renosterveld). As a result of the BMP and the management of the meta-population within the natural distribution range, bontebok should be included as one of the taxa assessed.</p> <p>The recommendation of the terrestrial animal species compliance statement is that the development proposal is acceptable as the impacts are of low or very low</p>	<p>Noted.</p> <p>It is important to note that the game on the property have been introduced by the neighbouring landowner, David Mostert under a Cape Nature permit. Cape Nature is in consultation with the landowner. The game is not the responsibility of Romansbaai Abalone Farm.</p> <p>As above – the Bontebok is one of the introduced species managed by the adjacent landowner and is</p>	
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	<p>significance, and the preferred alternative which will result in the least clearance of vegetation is preferred. As mentioned, bontebok should also be included in the assessment and the habitat suitability should also be taken into account. It should be noted that the brush-cutting of vegetation under the solar panels is likely to favour the bontebok, unless the solar panels act as a behavioural deterrent for the species. Compliance with provincial legislation with regards to game is separate from this process.</p> <p><b>Coastal and Marine Impact Report</b></p> <p>A coastal and marine impact report has been compiled to address impacts on the coastal and marine environment, which as CapeNature highlighted is not addressed within the screening tool. The study identified several impacts in both the construction and operational phase and each impact is assessed. The impacts during the construction phase are: disturbance to coastal habitat; blasting; vehicle and pedestrian traffic; erosion and turbidity; and during the operational phase: abstraction of seawater; discharge of effluent; genetic impacts and disease; and disturbance during maintenance. Some of these impacts are rated as high or medium significance prior to mitigation, however all can be reduced to low significance after mitigation. There are a number of mitigation measures proposed all of which must be considered essential and included in the EMPr. While the impact assessment of the coastal and marine impact report is considered comprehensive, there is no description provided regarding the coastal habitat which will be affected. With regards to the National Biodiversity Assessment coastal ecosystem types, the ecosystem at the location of the pump station is Agulhas Exposed Rocky Shore. The location is classified as CBA Restore as reflected on the Department of Forestry, Fisheries and Environment (DFFE) Coastal Viewer (NMU 2023). It does however appear that the development footprint has already been disturbed by the existing infrastructure.</p> <p><b>Biodiversity Offset Applicability Assessment</b></p> <p>The biodiversity offset applicability assessment provides an overview of the botanical and animal species studies. We wish to note that biodiversity offsets can also be applicable to the coastal and marine environment, and we are aware of at least one precedent which was investigated but would not be relevant in this case. The only residual impact after mitigation which is of medium negative significance or higher and therefore within the threshold for a biodiversity offset is the loss of terrestrial habitat for the proposed seawater reservoir.</p>	<p>only present on the site as there is no fence between the properties.</p> <p>Updated in Coastal and Marine Report – the area where the expansion will take place is directly within and alongside the existing pumphouse infrastructure with most of the area already characterised by transformed platforms and cemented therefore the impact of the expansion at the pumphouse is considered to be short term and negligible. Mitigation measures are provided for construction and operation phases to ensure that impact associated with these phases remain low.</p> <p>The addendum has been updated with the architecturally drawn layout. These scaled layouts address the concerns listed above. Additionally, a residual impact associated with the development of the sweater reservoir has been reduced from medium to low-medium negative after mitigation hierarchy has been reapplied.</p>	
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	<p>The study refers to the conclusions of the botanical assessment regarding the proposed offset, which states that the affected vegetation type, Overberg Dune Strandveld, is already well conserved and there is a large remaining extent, however the main threat is alien invasive species. It is therefore motivated that conserving more of this vegetation type will have less of a positive outcome for biodiversity than implementing an offset targeted at clearing alien invasive species. The conclusion provided is that a biodiversity offset is not applicable for this site.</p> <p>By applying the National Biodiversity Offset Guidelines, CapeNature does not support this conclusion. Firstly, the biodiversity offset applicability assessment has not demonstrated detailed investigation of the mitigation hierarchy of avoid, minimize, mitigate/restore and only then investigate an offset for the residual impact if it is of medium significance or higher. The primary flaw in this regard is the inconsistent and inaccurate layout plans provided which have not permitted an accurate determination of the options of avoid and minimize.</p> <p>The layout plans need to be provided by the project engineers and architects with detailed plans that would also be submitted to the Overstrand Municipality for building plan approval. The plans should include co-ordinates of the development components.</p> <p>Should it still be confirmed that a biodiversity offset is required after a detailed investigation of the alternatives with accurate detailed layout plans, the biodiversity offset must comply with the National Biodiversity Offset Guidelines. While the motivation provided by the botanical specialist that alien clearing would be the best option is backed by sound logic, the offset would still need to be framed within the context of the guidelines and be supported by the best available science – an arbitrary financial contribution towards alien clearing would</p>	<p>In accordance with the National Biodiversity Offset Guidelines (2023), the mitigation hierarchy was applied thoroughly and sequentially throughout the evolution of the site layout and alternatives assessment process. The development footprint of the seawater reservoir was reduced from 2 ha to 8 000 m<sup>2</sup> through this process. Notwithstanding this reduction, the Terrestrial Specialist initially determined that a residual Medium negative impact remained for the seawater reservoir footprint, triggering the offset requirement under the Guidelines.</p> <p>Subsequently, and in direct response to the need to exhaust all possible mitigation measures before pursuing an offset, the botanical specialist and the EAP jointly undertook a reapplication of the mitigation hierarchy. Through this process, the botanical specialist identified that a strategic offset through monetary contribution toward the clearing of alien invasive plant species within the adjacent nature reserve constitutes a meaningful and implementable mitigation measure for managing this vegetation type. On the basis that this measure is funded and implemented, the botanical specialist revised the residual impact rating from Medium to Low-Medium.</p> <p>The layout plans have been updated by the architect and these plans will be used for the Planning and Building Application to the Overstrand Municipality.</p> <p>A mitigation hierarchy was applied to the proposed seawater reservoir in order to identify the most appropriate measures to avoid, minimise, and rehabilitate impacts prior to considering the implementation of a biodiversity offset. In this regard, the botanical specialist, together with the Environmental Assessment Practitioner (EAP),</p>	
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	<p>not be supported. We also wish to note that there should be sufficient natural habitat remaining on the property should an on-site offset be considered.</p> <p><b>Conclusion</b></p> <p>CapeNature does not support the Biodiversity Offset Applicability Assessment and wishes to raise concern regarding the inaccuracies and inconsistencies in the layout plans for the alternatives presented in both Appendix B and the specialist studies. The layout plans should be provided by the project team as would be submitted for the building plans. A thorough investigation of the mitigation hierarchy must be undertaken using the accurate layout plans and if a biodiversity offset is required, it must comply with the National Biodiversity Offset Guidelines. CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>reapplied the mitigation hierarchy to reassess the significance of the impacts and to identify additional mitigation measures that could further reduce the residual impact on the affected vegetation.</p> <p>The Biodiversity offset is no longer applicable for the site. Through this process, the botanical specialist recommended a targeted mitigation measure in the form of a strategic offset through monetary contribution towards alien invasive vegetation clearing within the surrounding natural areas. Following the application of this additional mitigation measure, the botanical specialist reassessed the impact significance and concluded that the residual impact could be reduced to a Low–Medium negative impact, provided that the recommended mitigation measures—specifically the financial contribution towards alien invasive plant clearing—are implemented.</p>	
<p><b>D'mitri Matthews DEA&amp;DP</b></p>	<p><b>Email dated 26 June 2025</b></p> <p><b>COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (“BAR”) SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998) (“NEMA”) ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) (“EIA”) FOR THE PROPOSED EXPANSION OF THE ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI</b></p> <ol style="list-style-type: none"> <li>1. The Draft BAR dated 19 May 2025, as received by the Directorate: Development Management Region 1 (hereinafter referred to as “this Directorate”) on 20 May 2025, refers.</li> <li>2. Following review of the information submitted this Directorate notes the following: <ol style="list-style-type: none"> <li>2.1. The expansion of the abalone facility will include the following:</li> </ol> </li> <li>3. This Directorate as the following comments on the draft BAR: <ol style="list-style-type: none"> <li>3.1. Since a new entity owns the existing facility, an amendment application must be submitted to the Department to transfer the rights and obligations of the EA issued on 3 March 2009 (Reference: E12/2/3/1-E2/11-0262/07).</li> </ol> </li> </ol>	<p>3.1. Amendment application is in process, see proof of submission attached as <b>Appendix M</b>.</p>	<p>-</p>

	<p>3.2. The issues highlighted by CapeNature must be addressed, especially their comments regarding the requirement for a biodiversity offset must be addressed</p> <p>3.3. A Georeferenced map of all the proposed components for the expansion must be provided for the preferred alternative.</p> <p>4. The applicant Regulatory Requirements:</p> <p>4.1. Proof of the notifications sent to registered I&amp;APs for the commenting purposes must be included in the BAR.</p> <p>4.2. A dated photograph of erecting a site notice must be provided.</p> <p>4.3. Proof of placing an advertisement must be provided.</p> <p>4.4. Any new representations and comments received in connection with the application must be included in the BAR.</p> <p>4.5. Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the BAR.</p> <p>4.6. The minutes of any meetings held by the environmental assessment practitioner (“EAP”) with I&amp;AP’s and other role players which record the views of the participants must be included in the BAR.</p> <p>4.7. Please be advised that the signed and dated applicant declaration is required to be submitted with the BAR during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.</p> <p>4.8. In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the BAR during the formal application process for decision-making.</p> <p>4.9. You are furthermore reminded that the BAR must contain all the information outlined in Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended).</p> <p>5. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.</p> <p>6. This Department reserves the right to revise or withdraw its comments and request further information based on any information received.</p>	<p>3.2. Responses completed as above</p> <p>3.3 Architect drawn layouts have been added</p> <p>4.1. Proof of PPP contained under <b>Appendix F.</b></p>	
Paul Slabbert	Email dated 27 June 2025	Registered as I&AP	-

	<p><b>Subject:</b> IN PROCESS BAR: ROMANSBAAI ABALONE EXPANSION - Register as I&amp;AP</p> <p>Hi Michelle</p> <p>Pls register PHS Consulting as an I&amp;AP on this project.</p> <p>I know that PPP is completed, we just need to be in the loop for any aspects in this project going forward, like possible additional round of PPP or the EA etc.</p> <p>Thanks,</p>		
<p><b>PUBLIC PARTICIPATION 3:</b> 29 August 2025 to 01 October 2025</p>			
<p>Rhett Smart</p>	<p>Email dated 19 September 2025</p> <p>Revised Basic Assessment Report for the Proposed Expansion of the Romansbaai Abalone Farm, Remainder of Portion 2 of Farm Klipfonteyn 711, Gansbaai</p> <p>CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments.</p> <p>The Basic Assessment Report and appendices have been updated to address concerns related to discrepancies in the alternative layout plans presented and the Biodiversity Offset Applicability Assessment has been replaced by a Biodiversity Offset Report which proposes two potential offsets.</p> <p>Other concerns raised have been adequately addressed, including confirmation that the game species occurring on the site belong to neighbouring Romans Bay Estate with the relevant CapeNature approvals, who requested that the fences between the properties are removed, and the coastal and marine impact report has been updated to include a description of the affected environment.</p> <p>Development Layout</p> <p>The layout alternative which was selected as the preferred alternative layout in the Pre-Application phase (Alternative 2) and the current preferred alternative (Alternative 4) are presented as layouts compiled by a draughtsman and include the dimensions of the development components in m<sup>2</sup>. The layout plans are</p>	<p>Noted. However, the Biodiversity Offset Report is no longer applicable since mitigation hierarchy has been reapplied.</p> <p>Noted.</p> <p>Noted.</p>	

	<p>therefore considered accurate and address concerns previously raised. The preferred alternative layout compiled by the draughtsman is included in the botanical assessment addendum thereby providing evidence that the same layout is referred to.</p> <p>We wish to note that the table comparing the dimensions of the three alternative development layouts in Appendix B3 differs from the layout plan for Alternative 1 whereby the table indicates that grow-out platforms are each 1.5 ha whereas the layout plan indicates that the grow-out platforms are each 1.75 ha. If the layout plan is accurate, it confirms that Alternative 1 has the largest development footprint of three alternatives and remains least preferred of the three alternative layouts as recommended.</p> <p>We recommend that should the application be authorised, the co-ordinates of the vertices for each of the five development components should be provided as is standard practice for environmental authorisations issued by the competent authority.</p> <p><b>Biodiversity Offset Report</b></p> <p>The Biodiversity Offset Report includes a discussion of the investigation of the mitigation hierarchy which is the starting point before a biodiversity offset can be contemplated. The progressive amendment of the development layout until the current preferred layout was derived provides evidence of investigating avoidance, based on the high sensitivity areas identified in the botanical assessment and minimization whereby the current preferred layout has reduced the size of the grow-out areas and seawater reservoir. Detailed accurate alternative layout plans as discussed above were required to adequately evaluate whether avoidance and minimization were adequately investigated. Additional mitigation measures are recommended in the three biodiversity specialist assessments to further reduce the residual impact. A motivation is provided for the encroachment of the minimized reservoir into the high sensitivity areas due to the requirement for this facility to be located on a high point on the property to allow for gravity flow of water.</p> <p>The biodiversity offset is therefore only required for the 0.8 ha extent of the reservoir, as the botanical assessment had separated out the impact assessment according to the development components. The offset ratio which was applied is 10:1 (area conserved: area lost). The vegetation type referred to in the Biodiversity Offset Report is Southwestern Strandveld, however the ratios which</p>	<p>Noted and amended.</p> <p>Noted.</p> <p>Comment is noted. The vegetation referred to in the Basic Assessment report is Overberg Dune Strandveld vegetation, which was the vegetation type applicable during when the project started. The</p>	
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	<p>have been applied are for Overberg Dune Strandveld, listed as endangered, which is still the official vegetation type occurring on the site. An explanation should be provided that the vegetation is mapped as Southwestern Strandveld in the current draft beta National Vegetation Map, however the threat status of this vegetation type has not yet been determined and the 2018 National Vegetation Map is still the official version, therefore the offset should be calculated based on the statistics for Overberg Dune Strandveld. It should further be noted that the full extent of Overberg Dune Strandveld will be incorporated into Southwestern Strandveld and Grootbos Strandveld (Sean Privett pers. comm.).</p> <p>The proposed ratio is supported as the National Biodiversity Offset Guideline (the guideline) indicates that it should be based either on the threat status or a combination of the ecosystem extent and protection level, whichever is higher. Using the latter, no offset is required for Overberg Dune Strandveld, however the endangered threat status dictates an offset ratio of 10:1 and is further confirmed in Annexure A of the guidelines. The area which needs to be conserved must therefore ideally consist of 8 ha of intact Overberg Dune Strandveld.</p> <p>Two alternative offset options are presented, namely a monetary contribution which is the preferred option and an on-site offset. The preferred option of a monetary contribution consists of a financial contribution towards alien clearing on an existing conservation area which lacks sufficient resources to adequately manage alien invasive plants. As stated, this option was presented by the botanical specialist and was strongly supported over the option of securing an additional area for conservation. It should be noted that one of the motivations is that Overberg Dune Strandveld is threatened because of alien invasive species, meanwhile there is a large percentage remaining and in the conservation estate.</p> <p>The proposal is that the Grootbos Foundation can be the recipient of the funds as</p>	<p>Biodiversity offset is no longer applicable on this project.</p> <p>The comment is noted. The mitigation hierarchy was reapplied through consultation with the botanical specialist, who confirmed that a formal biodiversity offset is no longer applicable due to the Low-Medium residual impact associated with the construction of the seawater reservoir after mitigation measures were reconsidered.</p> <p>The mitigation measure applied involves a strategic intervention in the form of a financial contribution toward alien invasive vegetation clearing, which will support ecological restoration within nearby conservation areas. This contribution will be implemented through collaboration with the Grootbos Foundation, thereby contributing to improved ecological functioning and the conservation of the Overberg Dune Strandveld vegetation type within the broader landscape.</p> <p>Noted. As above.</p>	
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	<p>the organisation carries out alien clearing on properties within the broader Gansbaai region, including nature reserves and other conservation areas. Correspondence from Grootbos Foundation in Appendix A indicates a fund which has been set aside for this purpose. The correspondence provides an overview of the operations of the Grootbos Foundation, however it does not provide a plan of operations for the expenditure of the funds.</p> <p>Reference is made to the meeting with Cape Nature, however the report does not reflect that it was clearly stipulated that a financial contribution towards a strategic offset would need to demonstrate alignment with the guidelines. The guidelines state that removal of alien invasive species is a legal requirement and therefore does not satisfy the additionality principle of offsetting (pg 42). However as stipulated in Section 7.6.2., the funds for an offset would encompass both funds for securing the site (e.g. land purchase, legal fees, declaration costs etc.) and funds for ongoing management (e.g. invasive species alien control, firebreaks, erosion control etc.). A strategic offset would consist of an aggregation of funds towards these objectives.</p> <p>A strategic offset requires a detailed plan regarding the proposed areas which will be targeted for protected area expansion as well as define the areas which can qualify towards the strategic offset. A number of role-players will need to be on-board in addition to the primary implementing agent, including authorities. Therefore, setting up the strategic offset will require more resources than an individual offset at the outset, however once set up the process will be streamlined for those who contribute. Precedents which can be referred to are the Atlantis Land Bank, the Cape Metro South East Strandveld Conservation Implementation Plan (CIP) and the Saldanha Strategic Offset. The motivation behind these strategic offsets also has relevance for this case whereby aggregating a number of small offsets into one large conservation area which can be well resourced and managed can have a much better outcome in terms of biodiversity conservation than attempting to manage small, isolated fragments of habitat with more limited overall biodiversity value, particularly within an urban setting.</p> <p>It is for this reason that CapeNature was willing to consider this option, however the proposal requires much more detailed planning and proposal with buy-in from relevant stakeholders before it can be considered further. It will also have to demonstrate adherence to the guidelines. Informal communication with the competent authority has indicated that the monetary contribution option is not supported. If this option is to be explored further, the application should be</p>	<p>Noted.</p> <p>The botanical specialist has applied the mitigation hierarchy which resulted to low-medium residual impact. Therefore, a biodiversity offset is no longer applicable.</p> <p>The offset is no longer applicable in this case. The residual impact for the construction of the seawater reservoir is low-medium negative.</p> <p>Noted.</p>	
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	<p>withdrawn so that a more detailed proposal that adheres to the guidelines can be developed. We further recommend that the term strategic offset is used rather than monetary contribution.</p> <p>If the current application is to be concluded, we recommend that the option of an on site offset should be implemented. There is more than the 8 ha quantum of intact Overberg Dune Strandveld available on the property to secure the offset. With regards to the selection of the 8-ha area, the current proposal as included in the Biodiversity Offset Report is supported as it includes most of the southern high sensitivity node and extends northwards to the northern high sensitivity node. The proposed area also connects to the open space areas on Roman Bay Estate. We would support if all high sensitivity areas were included beyond the 8-ha offset quantum. The initial offset proposal consisting of a narrow-elongated area along the eastern and northern boundaries was not supported as it only included a small proportion of the high sensitivity area and narrow elongated areas are not preferred for conservation areas due to edge effects.</p> <p>While CapeNature indicated that the 8 ha on site offset would not be considered a priority for the CapeNature stewardship programme, we did not indicate that it is not feasible, however we encouraged that other alternatives should also be investigated where partners in conservation can assist. With regards to the option of a conservation servitude, it is agreed that Grootbos Foundation and Overberg Renosterveld Trust would not be able to assist with this site. It should however be noted that CapeNature is investigating servitudes as an option. The site can also be considered within the CapeNature Stewardship Programme.</p> <p>Consultation with the Overstrand Municipality indicates that they do not support spot zoning of the conservation area as an option. An alternative which would however be supported is an amendment to the site development plan (SDP) which indicates the conservation area. To CapeNature's knowledge the proposed expansion in any case still needs approval in terms of the municipal planning by-law whereby the SDP needs to be amended.</p> <p>Section 7.4.2. of the guidelines indicate that there are a host of mechanisms for securing biodiversity offsets, however the most common are declaration of a NEM:PAA Protected Area, conservation servitudes and purchasing credits from a recognised biodiversity offset bank. The Biodiversity Offset Report includes consideration of these three options. The section states that the site needs to be secured for biodiversity in the long term and ideally protected into perpetuity. It further states "The above mechanisms may require that the applicable land use,</p>	<p>The botanical specialist has applied the mitigation hierarchy which resulted to low-medium residual impact. Therefore, a biodiversity offset is no longer applicable.</p> <p>As above.</p> <p>Noted.</p>	
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	<p>town-planning or zoning scheme be amended to ensure that the biodiversity offset site may be/ is used for conservation purposes.”</p> <p>The option of indicating the conservation area on the SDP would need to ensure that the site is managed for conservation purposes, which is not a standard requirement. A conservation management plan would need to be included along with the SDP. It is noted that a biodiversity management plan is proposed in the Biodiversity Offset Report linked to the SDP as well as annual monitoring/audit reports. We would recommend that ideally the offset should meet the criteria for a legally protected area or an Other Effective Area-based Conservation Measure (OECM) as per the IUCN requirements for countries obtaining conservation targets.</p> <p>Another point to consider is that the landowner and his neighbour have existing obligations with CapeNature regarding the management of game on the property. It should be noted that game farms in terms of relevant conservation legislation were intended to be investigated as potential OECMs, particularly from a national level, however there were concerns that many game farms have management objectives more aligned with intensive livestock farming than biodiversity conservation.</p> <p>We recommend that should the option of an on-site offset be selected, a condition of approval should be that the mechanism for securing the biodiversity offset will be decided upon by the CapeNature Stewardship Review Committee (or alternatively an ad hoc meeting with the chairperson of the Stewardship Review Committee). This will provide for sufficient time for deciding upon an appropriate mechanism, which must also adhere to the guidelines. We recommend that there is consultation with both CapeNature and the Overstrand Municipality prior to the site being presented to the review committee. We do not support that the application should proceed without an offset.</p> <p>Conclusion</p> <p>In conclusion, CapeNature recommends that should the option of an on-site offset be selected, a condition of approval should be included that the mechanism to secure the site must be determined by the CapeNature Stewardship Review Committee. Should the option of contribution towards a strategic offset be selected, we recommend that a more detailed proposal is required that aligns with the guidelines. We are satisfied that all other comments have been adequately addressed.</p>	<p>A biodiversity offset is no longer applicable for the proposed development.</p> <p>As above</p>	
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	<p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>		
<p><b>Western Cape Government of Infrastructure (Roads) Application Manager:</b></p>	<p><b>Email dated 22 September 2025</b></p> <p><b>Application for the submission of a property environmental study for comment - App No: 2025-09-0091</b></p> <p>Dear Lornay Environmental Consulting</p> <p>The message below refers to your application for the submission of a property environmental study for comment (Application No - 2025-09-0091) submitted to the Western Cape Government on 2025/08/27:</p> <p>Properties related to the application :</p> <ul style="list-style-type: none"> <li>• Portion 2 of Farm KLIP FONTEYN 711, CALEDON</li> </ul> <p>Supporting documents submitted with the application :</p> <ul style="list-style-type: none"> <li>• Basic Assessment Report - (IN-PROCESS-FINAL-BAR-290825.pdf)</li> <li>• Power of Attorney Letter - (appointment letter.pdf)</li> <li>• Site Development Plan - (APP-B4-ALTERNATIVE-4-PREFERRED.pdf)</li> <li>• Application Cover Letter - (email correspondence.pdf)</li> <li>• Application Cover Letter - (Notice of PPP 3 Romansbaai Abalone Farm 290825.pdf).</li> </ul> <p>The matter is receiving attention, and further communication will be addressed to you as soon as circumstances permit.</p>	<p>Noted. No further actions required.</p>	<p><b>22/09/25</b></p>
<p><b>Mercia J Liddle</b></p>	<p><b>Email dated 26 September 2025</b></p> <p><b>Subject: RE: Notice of ADDITIONAL IN-PROCESS NEMA PPP   Proposed Expansion of Romansbaai Abalone Farm, Gansbaai</b></p> <p>Dear Ms Naylor,</p> <p>The SD: Coastal Management has no further comments on the subject matter, and our previous comments remain.</p> <p>Kind Regards</p>	<p>Comment noted. No further actions required</p>	

<p><b>Rulien Volschenk (ODM)</b></p>	<p>Mercia Liddle Email dated 01 October 2025</p> <p><b>RE: PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON REMAINDER OF PORTION 2 OF THE FARM 711, GANSBAAI</b> <b>DEA&amp;DP REFERENCE: 16/3/3/6/7/1/E2/10/1628/23</b></p> <p>The Environmental Management Services Department of the Overberg District Municipality acknowledges receipt and review of the final Basic Assessment Report and Environmental Management Programme.</p> <p>With reference to the comments submitted by this department on 23 June 2025, the municipality is satisfied with the information as presented. Cognisance is taken of the additional specialist inputs which include the Coastal and Marine Impact Report and the update addendum to the Botanical Assessment. The department support the recommendations made in these reports to mitigate environmental impact.</p> <p>The Overberg District Municipality reserves the right to amend its comments and to request further information should any additional relevant documentation or details become available.</p> <p>Yours faithfully,</p>	<p>Noted. No further actions required.</p>	
<p><b>D'mitri Matthews (DEADP)</b></p>	<p>Email dated 01 October 2025</p> <p>COMMENT ON THE REVISED DRAFT BASIC ASSESSMENT REPORT ("BAR") SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998) ("NEMA") ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) ("EIA") FOR THE PROPOSED EXPANSION OF THE ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI</p> <ol style="list-style-type: none"> <li>1. The revised draft BAR 29 August 2025, as received by the Directorate: Development Management Region 1 (hereinafter referred to as "this Directorate") on the same day, refers.</li> <li>2. Following review of the information submitted to this Department, the Department notes the following:             <ol style="list-style-type: none"> <li>2.1 The expansion of the abalone facility will include the following:</li> </ol> </li> <li>3. Departmental comments on the draft BAR:             <ol style="list-style-type: none"> <li>3.1 The biodiversity offset for the proposed development must be finalised with</li> </ol> </li> </ol>	<p>The biodiversity offset is no longer applicable for the project since mitigation hierarchy has</p>	

	<p>consultation with CapeNature prior to the submission of the final BAR, since this aspect is an essential aspect to the decision-making process. If this cannot be achieved, it is recommended to withdraw the application and finalise the biodiversity offset prior to submitting a new application.</p> <p>4. The applicant Regulatory Requirements:</p> <p>4.1 Proof of the notifications sent to registered I&amp;APs for the commenting purposes must be included in the BAR.</p> <p>4.2 A dated photograph of erecting a site notice must be provided.</p> <p>4.3 Proof of placing an advertisement must be provided.</p> <p>4.4 Any new representations and comments received in connection with the application must be included in the BAR.</p> <p>4.5 Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the BAR.</p> <p>4.6 The minutes of any meetings held by the environmental assessment practitioner (“EAP”) with I&amp;AP’s and other role players which record the views of the participants must be included in the BAR.</p> <p>4.7 Please be advised that the signed and dated applicant declaration is required to be submitted with the BAR during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.</p> <p>4.8 In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the BAR during the formal application process for decision-making.</p> <p>4.9 You are furthermore reminded that the BAR must contain all the information outlined in Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended).</p> <p>5. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.</p> <p>6. This Department reserves the right to revise or withdraw its comments and request further information based on any information received.</p>	<p>been reapplied.</p> <p>Noted.</p> <p>Noted.</p>	
<p><b>Western Cape Department of Infrastructure:</b></p>	<p><b>Letter dated 06 October 2025</b></p> <p><b>PROPOSED EXPANSION OF ROMANSBAAI ABALONE, REMAINDER OF PORTION 2</b></p>	<p>Noted. No actions required.</p>	<p><b>06/10/25</b></p>

<p><b>Roads; (Vanessa Stoffels)</b></p>	<p><b>OF FARM NO.711, CALEDON: COMMENTS ON BASIC ASSESSMENT REPORT</b></p> <p>1. Your e-mail to this Branch dated 28 August 2025 refers.</p> <p>2. The subject property is located 150m south of Gansbaai and takes access off Divisional Road 1214.</p> <p>3. This Branch offers no objection to the issuing of Environmental Authorisation in terms of the National Environmental Management Act 107 of 1998.</p>		
<p><b>PPP 4: 30 March 2026</b></p>			
<p><b>Basson Geldenhuys (DPW)</b></p>	<p><b>Email dated 30 March 2026</b></p> <p>Dear Michelle</p> <p>The matter below refers.</p> <p>Could you please provide me with the following documentation:</p> <ul style="list-style-type: none"> <li>• The current lease for the pumphouse and pipeline;</li> <li>• The approved plans for the expansion of the pumphouse and pipeline, including an aerial map clearly indicating the proposed expansion.</li> </ul> <p>Kindly also arrange for a hard copy of the EIA application to be delivered to our office for my attention.</p> <p>Please confirm who the case officer is at DEADP.</p> <p>Kind regards</p>	<p>Requested documents were sent.</p>	<p><b>30/03/26</b></p>
<p><b>Mercia J Liddle (DEADP: CMU)</b></p>	<p><b>Email dated 15 April 2026</b></p> <p>Good day,</p> <p>The Sub-Directorate: Coastal Management has no further comments on the subject matter.</p> <p>Kind Regards</p>	<p>Noted, no further actions required.</p>	<p><b>15/04/26</b></p>

<p><b>Chester Arendse (Overstrand Municipality)</b></p>	<p><b>Letter dated 30 April 2026</b></p> <p><b>RE: Notice of Public Participation   Romansbaai Abalone Farm, Farm 711 Portion 2, Gansbaai.</b></p> <p>Your email dated 30th March 2026, please find attached comments from the Overstrand Environmental Management &amp; Conservation Division on the public participation process, on the Final Basic Assessment Report for the Proposed Expansion of Romansbaai Abalone Farm on Portion 2 of the Farm No. 711, Gansbaai, Caledon Rd.</p> <p>A well-drafted report was submitted, and all the aspects were noted. Part of that, the following points were highlighted and noted:</p> <ul style="list-style-type: none"> <li>Alternative 4 emerged as the most environmentally and operationally balanced solution chosen through specialist involvements. This alternative sees the reduction in the proposed production area's footprint from 3 ha to 2 ha and the shifting of the platform to areas of low to medium ecological sensitivity.</li> </ul> <p><b>Botanical Assessment</b></p> <p>The primary ecological impacts identified as likely during the construction phase include:</p> <ul style="list-style-type: none"> <li>Loss of vegetation in areas mapped as Low, Medium, and High botanical sensitivity, including parts of an Endangered ecosystem (Southwestern Strandveld);</li> <li>Direct loss of five plant Species of Conservation Concern;</li> <li>Permanent transformation of approximately 0.8 ha of indigenous vegetation in the seawater reservoir footprint resulting in a Medium negative impact prior to mitigation and low medium after mitigation has been applied.</li> <li>The biodiversity offset is no longer considered applicable for the project. The area that was previously assessed as having a Medium residual impact has been reassessed following the reapplication of the mitigation hierarchy. Through the identification and implementation of additional mitigation measures, the botanical specialist confirmed that</li> </ul>	<p>Noted. The new preferred layout is Alternative 5 which addresses all the concerns raised during PPP4.</p> <p>Noted.</p>	<p><b>30/04/26</b></p>
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	<ul style="list-style-type: none"> <li>• Reduction in development footprint, minimizing the loss of endangered vegetation type.</li> <li>• Production area is situated within low and medium botanical areas, avoiding complete loss of indigenous vegetation within high botanical sensitive areas.</li> <li>• Location of the components next to the existing operation area minimizes the extent of the environmental impacts.</li> <li>• The placement of new infrastructure (e.g., pipelines and pumphouse expansion) adjacent to existing operations avoids further habitat fragmentation and minimizes the need to disturb previously undisturbed areas.</li> <li>• The installation of a solar PV array reduces the long-term reliance on fossil fuels and contributes to a more sustainable operational model, supporting broader climate change mitigation efforts.</li> <li>• The proposed expansion is anticipated to create employment opportunities during both construction and operational phases, contributing positively to the local economy. Negative impacts:             <ul style="list-style-type: none"> <li>• Despite efforts to avoid high-sensitivity areas, the development will still result in the loss of vegetation within low to medium sensitivity zones, which may contribute to habitat degradation if not properly managed.</li> <li>• Temporary but unavoidable impacts such as dust generation, noise, and increased human activity during the construction phase may disturb local fauna and flora and require strict management through the EMPr. It should be noted the Overstrand Municipal EM&amp;C does support this application on the basis that the applicant adheres to all the aspects listed in the Draft report to ensure that the impact on the surrounding environment is minimized or avoided. It should be noted that the response from all relevant I&amp;AP's are noted and that the applicant should adhere to all.</li> </ul> </li> </ul> <p>The Municipality reserves the right to revise these comments based on the availability of new information.</p>		
<p><b>Rulien Volschenk (ODM)</b></p>	<p><b>Letter dated 04 May 2026</b></p> <p><b>RE: PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON REMAINDER OF PORTION 2 OF THE FARM 711, GANSBAAI, WESTERN CAPE PROVINCE</b></p> <p>The Overberg District Municipality's Department of Environmental Management Services takes cognisance of the Final Basic Assessment Report for the development of the proposed expansion of Romans Baai Abalone Farm on</p>	<p>Noted</p>	<p><b>04/05/26</b></p>

	<p>remainder of Portion 2 of the Farm 71, Gansbaai, Western Cape Province.</p> <p>Based on the changes since the initial basic assessment of the project the municipality noted the:</p> <ul style="list-style-type: none"> <li>• Reduction of development footprint from approximately 9.6 ha (Alternative 1 and 2) to 6.9 ha (Alternative 4-preferred)</li> <li>• Reduction of the seawater reservoir footprint from 2 ha to 0.8 ha.</li> <li>• Amendment of project drivers from solely market expansion to include operational cost reduction and energy security, particularly via solar PV and gravity-fed seawater use.</li> <li>• Refinement of layout to avoid areas of highest botanical sensitivity, including milkwood thickets and limestone outcrops.</li> </ul> <p>The Overberg District Municipality has no objection towards the proposed development and supports Alternative 3 as the preferred alternative, for the following reasons:</p> <ul style="list-style-type: none"> <li>• The proposed development appropriately applies the mitigation hierarchy, reducing the impacts on Endangered Overberg Dune/Southwestern Strandveld d, avoiding sensitive ecological features such as milkwood thickets.</li> <li>• In alignment with municipal planning instruments (IDP &amp; SDF), the proposed development achieves a balanced outcome between environmental protection and socio-economic benefits.</li> </ul> <p>The Overberg District Municipality note the presence of invasive alien plant species on portion of the subject property, as identified in the specialist assessment and confirmed during the application process, In this regards, the property owner is reminded of their ongoing legal obligations, in terms of the National Environmental Management: Biodiversity Act (NEMBA), 2004 (Act No. 10 of 2004) and the Conservation of Agricultural Resources Act (CARA), 1983 (Act No. 43 of 1983) to control and eradicate invasive alien plant species and to prevent their spread across the property.</p> <p>The ODM reserves the right to revise their comments and request further information based on any information that may be received.</p> <p>Yours sincerely.</p>	<p>Noted.</p> <p>The mitigation hierarchy was reapplied, and this involved the reduction of the seawater reservoir from 8000m<sup>2</sup> to 7000m<sup>2</sup>.</p> <p>Noted.</p> <p>Invasive Alien clearing on the property is being undertaken.</p>	
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<p><b>Rhett Smart (Cape Nature)</b></p>	<p><b>Letter dated 04 May 2026</b></p> <p><b>Final Basic Assessment Report for the Proposed Expansion of the Romansbaai Abalone Farm, Remainder of Portion 2 of Farm Klipfonteyn 711, Gansbaai (DEA&amp;DP ref no: 16/3/3/1/E2/10/1035/25).</b></p> <p>CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments.</p> <p>The current public participation process is the fourth round of public participation. A number of concerns have been addressed in the iterations of the Basic Assessment Report (BAR) and appendices, with the only outstanding issue consisting of the biodiversity offset. To reiterate, the biodiversity offset is required due to the impact rating of medium significance after mitigation in the botanical assessment addendum (25 July 2025) for the seawater reservoir. The National Biodiversity Offset Guidelines (“the guidelines”) require that a biodiversity offset must be investigated if the residual impact (impact after mitigation) is rated as medium negative or higher.</p> <p>It is noted in the introduction to the Final BAR that the demand for abalone has decreased and therefore the potential expansion is currently being put on hold. It further states that electricity costs are high, therefore the solar array is still proposed for implementation for off-grid electricity supply. The full development proposal is however still part of the application in case the abalone market recovers.</p> <p>An additional botanical specialist input is provided following the concerns raised regarding the proposed biodiversity offset in the previous round of comments. The two options which were presented in the biodiversity offset report were a monetary contribution or an on-site offset. The recommendation for the monetary contribution was based on the recommendation in the botanical addendum that conserving more of the same vegetation type which is well protected, namely Overberg Dune Strandveld would not result in a substantial contribution towards biodiversity, but rather that investment in clearing of invasive alien plant species within this vegetation type would result in a more substantial contribution towards biodiversity conservation. In this regard, the main reason for the endangered threat status is invasive alien plant species. The monetary contribution was proposed to be provided to a non-profit organization</p>	<p>Noted. The mitigation hierarchy was reapplied for the residual impact of medium associated with the seawater reservoir area. The footprint area of the reservoir was reduced from 8000m<sup>2</sup> under Alternative 4 to 7000m<sup>2</sup> under the current preferred layout Alternative option. Therefore, the residual impact associated with the seawater reservoir has been reduced to low-medium negative, and as a result <b>no biodiversity offset is required.</b></p> <p>These options are no longer applicable to this application. As indicated above, the mitigation hierarchy was reapplied which resulted to low-medium negative impact for the proposed seawater reservoir. Therefore, no biodiversity offset or strategic offset is required.</p>	<p><b>04/05/26</b></p>
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	<p>that undertakes clearing of invasive alien species, however there was no proposal for the specific expenditure of the funds and the concept in general did not comply with the National Biodiversity Offset Guidelines as then proposed. The monetary contribution was not supported by CapeNature.</p> <p>An 8-ha area which meets the offset ratios as per the guidelines was identified on site which could be conserved as an on-site offset. CapeNature supported that this proposal would meet the requirements of the guidelines, however we were in support of the recommendation by the botanical specialist that this would not make any meaningful contribution to the conservation of this vegetation type nor biodiversity conservation in general. The proposal was presented at the pilot Landscape South Offset Stewardship Screening Review on 3 February 2025. The purpose is to review potential biodiversity and wetland offsets prior to the CapeNature Stewardship Review to screen out sites that are not worthy of stewardship in terms of biodiversity value. The proposed 8 ha on site offset was not considered worthy of biodiversity stewardship and was recommended that contribution towards a cumulative strategic offset would be a more feasible option that will contribute towards biodiversity conservation.</p> <p>The additional botanical specialist input motivates that due to the intractability of the two proposed offsets, the impact ratings have been reviewed taking into consideration the reduced size of the reservoir to 0.8 ha and the well conserved status of the vegetation type and the residual impact is reduced from medium to medium-low. As a result, there is no requirement for a biodiversity offset. The previous proposed monetary contribution is put forward as a potential strategic offset.</p> <p>We wish to note that neither the size of the reservoir nor the protection status of the vegetation type have changed since the previous botanical addendum and we wish to recommend that the intractability of identifying an offset is not an acceptable motivation for changing the impact ratings. The botanical addendum assessed the impact significance in a table which took into account several criteria, namely extent, duration, intensity and probability. Section 6.2 of the guidelines which relates to impact significance indicates that significance is a combination of consequence and likelihood, whereby consequence is a combination of extent, duration and intensity. The criteria which were used in the botanical addendum therefore comply with the guidelines. The criteria for assessing impact significance are consistent with other guidelines such as the Species Environmental Assessment Guidelines, the draft provincial offset guidelines etc.</p>		
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	<p>With regards to the impact table in the botanical addendum, the rating of the extent of the impact for the development of the reservoir as local and regional could be queried, as the extent of the reservoir relative to the remaining extent of Overberg Dune Strandveld is insignificant and could be motivated to only be local. It is not however evident that a quantitative method was used to determine the significance. We further note that guidelines refer to significance in relation to vegetation threat status used in the 2012 methodology for threat status calculation focused on remaining extent and not the current multi-variable IUCN methodology.</p> <p>The correspondence from the non-profit organisation has been amended to refer to a particular property which is targeted for alien clearing. The property is the Remainder of Portion 2 of Farm 215 (referred to as “brown dog farm”), located east of the Kraaibosch Dam, in the vicinity of Baardskeerderbos. The vegetation type referred to for the property is Agulhas Sand Fynbos, listed as critically endangered, however the National Vegetation Map indicates the site as Overberg Sandstone Fynbos, listed as endangered, with small patches of Elim Ferricrete Fynbos (endangered) and Western Coastal Shale Band Vegetation (endangered in the west). The proposal therefore is an improvement from the previous proposal in that a specific property is targeted, but it is not framed within the context of a biodiversity offset.</p> <p>Regardless, if there is no requirement for a biodiversity offset as determined through the residual impact significance, the proposed monetary contribution would not be relevant to the outcome of the application, as it is not linked to the environmental impacts incurred by the development. We further do not consider the proposed monetary contribution to fall within the initial steps of mitigation, namely avoid, minimize and mitigate/restore, all of which would apply to actions which take place on the impacted property. The monetary contribution would fall within the definition of a trade-off or compensation.</p> <p>In conclusion, if the revised assessment of the residual impacts for terrestrial biodiversity is accepted, a biodiversity offset is not required, and the impact significance of the proposed development will be within the acceptable thresholds provided the other recommended mitigation measures are implemented. The current motivation for the change in impact significance is however not accepted and would need to be motivated in relation to initial methodology for determining the impact significance whereby there may be additional information or an aspect which was overlooked or misinterpreted.</p>	<p>The mitigation hierarchy was reapplied for the residual impact of medium associated with the seawater reservoir area. The footprint area of the reservoir was reduced from 8000m<sup>2</sup> under Alternative 4 to 7000m<sup>2</sup> under the current preferred layout Alternative option. Therefore, the residual impact associated with the seawater reservoir has been reduced to low-medium negative, and as a result no biodiversity offset is required.</p>	
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	<p>Should the change in impact significance not be accepted by the competent authority we recommend either of the two following options:</p> <ul style="list-style-type: none"> <li>• The development application is authorised (assuming non-biodiversity impacts are acceptable) but excludes the seawater reservoir from the authorisation. The project description indicates that only the solar array is being considered for development in the near future, therefore once/if the circumstances change such that the seawater reservoir is proposed for development, it can be included in an amendment application or separate application. By that stage a strategic offset may be set up and in place (unlike the current proposal), similar to the other operational strategic offset precedents e.g. Atlantis Land Bank, Saldanha (Besaansklip) Strategic Offset. The revised proposal still does not meet these requirements and would require buy-in from additional stakeholders.</li> <li>• The development is authorised with an on-site offset consisting of the 8 ha as indicated in the layout plan below. The on-site offset does not qualify as a stewardship site therefore the conservation area can be a requirement in terms of the environmental authorisation. A conservation management plan would need to be a requirement for the conservation area. There are precedents for conservation areas which do not have a status other than a requirement in terms of the EA.</li> </ul> <p>We further wish to note that the application for a Sea Shore Lease for the expansion of the seawater intake pump house has been submitted which will be considered further once/if an environmental authorisation is issued.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>These options are no longer applicable to this application. As indicated above, the mitigation hierarchy was reapplied which resulted to low-medium negative impact for the proposed seawater reservoir. Therefore, no biodiversity offset or strategic offset is required.</p> <p>As above, a biodiversity offset is no longer applicable.</p> <p>Noted.</p>	
<p><b>D'mitri Matthews (DEA&amp;DP: Development Management)</b></p>	<p><b>Letter dated 08 May 2026</b></p> <p><b>COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT ("BAR") SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998) ("NEMA") ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED EXPANSION OF THE ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI</b></p>		<p><b>08/05/26</b></p>

1. The Draft BAR March 2026, as received by the Directorate: Development Management Region 1 (hereinafter referred to as “this Directorate”) on 27 March 2027, refers.
2. Following review of the information submitted to this Directorate, the Directorate notes the following:

Description	Volume	Size(m <sup>2</sup> )
New production area/ grow out	150 tons (wet weight)	20000
Line seawater reservoir	41 000 m <sup>2</sup>	8000
Solar array	4MW	40000
Pumphouse		140
4 additional pipelines		1200
Total development footprint		69 340 (6.9 ha)

**3. Departmental comments on the draft BAR:**

**3.1. Biodiversity Offset**

3.1.1. It is noted that the requirement with respect to a biodiversity offset has not been resolved.

3.1.2. CapeNature has indicated in comment (dated 4 May 2026) that the recommendation by the botanical specialist for an on-site offset of 8ha would not make any meaningful contribution to the conservation of this vegetation type nor biodiversity conservation in general. The comment further indicated that the proposed 8 ha on-site offset was not considered worthy of biodiversity stewardship. Clarity in this regard is required, as an offset is deemed necessary; however, it is also stated that the on-site vegetation is not conservation worthy and is not considered suitable for biodiversity stewardship.

The mitigation hierarchy was re-applied; the size of the seawater reservoir has been reduced to 7000m<sup>2</sup> under the revised layout Alternative 5 resulting to low-medium negative impact. Therefore, a biodiversity offset is no longer applicable.

Following receipt of CapeNature's recommendations, further engagements were undertaken with CapeNature, DEADP, the Environmental Assessment Practitioner, and the botanical specialist, which resulted in the reapplication of the mitigation hierarchy and the development of a new preferred layout Alternative 5. Under this revised layout, the seawater reservoir footprint has been further reduced from 8 000 m<sup>2</sup> to 7 000 m<sup>2</sup>, and the reservoir has been repositioned in closer proximity to the existing reservoir infrastructure. This repositioning ensures that the seawater reservoir is now predominantly situated

	<p>3.1.3. CapeNature further indicated that neither the size of the reservoir nor the protection status of the vegetation type have changed since the previous botanical addendum and that the intractability of identifying an offset is not an acceptable motivation for changing the impact ratings.</p> <p>3.1.4. The matter regarding the appropriate offset, or whether an offset is required, must be further investigated, and a motivation must be provided as to the appropriate mechanism that will be implemented to manage the biodiversity impacts associated with the reservoir.</p> <p><b>3.2. Alternatives</b></p> <p>3.2.1. Since the site identified for the placement of the reservoir is regarded as sensitive from a botanical perspective, it is advised that further technology alternatives be investigated.</p> <p>3.2.2. Placing the reservoir on raised platforms could be considered to minimise impacts.</p>	<p>within areas of Low to Medium botanical sensitivity, thereby tangibly minimising the extent of vegetation loss within the High botanical sensitivity area. The botanical specialist in his addendum (Appendix G1d) has confirmed that under Alternative 5, less than 35% of the reservoir footprint falls within the High sensitivity area a material improvement relative to previous layout iterations and that the overall residual botanical impact is assessed as Low to Medium negative. On this basis, no Biodiversity Offset or off-site conservation contribution is required.</p> <p>As above</p> <p>As indicated above, the biodiversity offset is no longer required.</p> <p>The mitigation hierarchy was fully and progressively applied to the reservoir component through successive reductions in the development footprint, from 20 000 m<sup>2</sup> (2.0 ha) under Alternatives 1 and 2, to 8 000 m<sup>2</sup> (0.8 ha) under Alternative 4, and further to 7 000 m<sup>2</sup> (0.7 ha) under the new preferred Alternative 5. In addition, the reservoir has been repositioned as close as possible to the existing reservoir infrastructure under Alternative 5, ensuring that less than 35% of the reservoir footprint now falls within the High botanical sensitivity area. It is therefore submitted that all reasonable and feasible technology and layout alternatives for the seawater reservoir have been thoroughly investigated and</p>	
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that the preferred Alternative 5 represents the most environmentally balanced solution achievable within the constraints of the project's operational requirements.

**4. The applicant Regulatory Requirements:**

- 4.1. Proof of the notifications sent to registered I&APs for the commenting purposes must be included in the BAR.
- 4.2. A dated photograph of erecting a site notice must be provided.
- 4.3. Proof of placing an advertisement must be provided.
- 4.4. Any new representations and comments received in connection with the application must be included in the BAR.
- 4.5. Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the BAR.
- 4.6. The minutes of any meetings held by the environmental assessment practitioner ("EAP") with I&AP's and other role players which record the views of the participants must be included in the BAR.
- 4.7. Please be advised that the signed and dated applicant declaration is required to be submitted with the BAR during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.
- 4.8. In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the BAR during the formal application process for decision-making.
5. You are furthermore reminded that the BAR must contain all the information outlined in Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended).
6. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.
7. This Directorate reserves the right to revise or withdraw its comments and request further information based on any information received.

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<b>PPP 5 Final BAR June 2026</b>			



REGISTER FOR INTERESTED AND AFFECTED PARTIES						
PROJECT: Portion 2 of the Farm 711						
NAME:	ORGANISATION:	POSTAL ADDRESS:	TEL:	EMAIL:	COMMENT:	DATE & REF:
<b>E.A Lowings on Behalf of Heritage and Aesthetic committee</b>	Heritage and Aesthetic committee			<a href="mailto:elowings@overtstrand.gov.za">elowings@overtstrand.gov.za</a>	<p><b>Letter dated 11 April 2024</b></p> <p>Gansbaai: Erf 711 PORTION 2 OF FARM KLIPFONTEIN: PROPOSED ADDITIONS TO ABALONE FARM: TP APPLICATION FORM FROM J KAPLAN (HPOZ)</p> <p>DISCUSSION</p> <p>Comment:</p> <p>HIA authorised by Lornay Environmental Consulting dated April 2024 scrutinized. Supported.</p> <p>HWC to provide electronic drawing and minute to <a href="mailto:elowings@overtstrand.gov.za">elowings@overtstrand.gov.za</a></p>	<b>11 April 2024</b>

					<p>Actions:</p> <p>Submit to Heritage Western Cape.</p>	
<b>David Mostert</b>	Private			<a href="mailto:david@mosterts.co.za">david@mosterts.co.za</a>	<p>Email dated 10 October 2024</p> <p><b>Subject: Re: Notice of Public Participation   Proposed Expansion of Romansbaai Abalone Farm   Ptn RE2/711, Gansbaai, Caledon RD</b></p> <p>Morning Michelle</p> <p>Please register the Romansbaai HOA as an "Interested and affected party"</p> <p>Thanks</p> <p>David</p>	<b>10 October 2024</b>
<b>Dr MGM</b>	Erf 70			<a href="mailto:bolusmgm@telkomsa.net">bolusmgm@telkomsa.net</a>	<p><b>Email dated 10 October</b></p> <p><b>Subject: RE: Notice of Public Participation   Proposed Expansion of Romansbaai Abalone Farm   Ptn RE2/711, Gansbaai, Caledon RD</b></p> <p>Dear Ms Naylor</p> <p>Thank you for attached mail.</p> <p>This is rather an alarming development for us as owners of Erf 70, which is the immediate adjoining erf on Romansbaai! Could you please provide more detail on the proposed expansion with regard to:</p> <ol style="list-style-type: none"> <li>1. Timelines (start and duration of build)</li> <li>2. Area of expansion ie to the east or west, further inland or out to sea. A layout of proposed plan would be good to see.</li> </ol>	<b>10 October 2024</b>

					<p>3. Possible visual impact with height of proposed structures, roads, etc. We note solar installation - at what level would these be?</p> <p>4. Potential noise pollution and ocean water quality impact – would there still be the need for generators?</p> <p>We thank you for your time and await your speedy reply anxiously!</p> <p>Kind regards</p> <p>Mike and Doro Bolus Owners of erf 70, Romansbaai</p>	
Vanessa Stoffels	Department of Infrastructure - Roads			<a href="mailto:vanessa.Stoffels@westerncape.gov.za">vanessa.Stoffels@westerncape.gov.za</a>	<p>Letter dated 11 October 2024</p> <p>RE: Notice of Public Participation   Proposed Expansion of Romansbaai Abalone Farm   Ptn RE2/711, Gansbaai, Caledon RD</p> <p>Dear Michelle</p> <p>We acknowledge receipt of your email regarding the abovementioned matter and wish to confirm that the matter is receiving attention.</p>	11 October 2024
<b>Chester Arendse</b>	Overstrand Municipality			<a href="mailto:carendse@overstrand.gov.za">carendse@overstrand.gov.za</a>	<p><b>Email dated 07 November 2024</b></p> <p>Good afternoon, Michelle.</p> <p>Hope that this mail finds you well.</p> <p>With regards to the application of the expansion of Romansbaai Abalone Farm   Farm 711 Ptn 2, Gansbaai, the Environmental Management &amp; Conservation</p>	<b>07 November 2024</b>

					<p><u>Division has no objection towards this application.</u></p> <p>Taken into account that all the necessary and relevant documents are submitted to the DEA&amp;DP for their approval and reconsideration, the only condition from our office is that the applicant meet the necessary requirements in accordance with the Environmental Impact Assessment (EIA) regulations, as stipulated under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the 2014 NEMA EIA Regulations (as amended) as published in Government Gazette No. 38282, Government Notice R983, R984, and R985, on 4 December 2014.</p> <p>Hope that the above is in order.</p> <p>Regards</p>	
Mercia Liddle	DEADP:CMU			<p><a href="mailto:Mercia.Liddle@westerncape.gov.za">Mercia.Liddle@westerncape.gov.za</a></p>	<p><b>Email dated 07 November 2024</b></p> <p><b>RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI, CALEDON ROAD.</b></p> <p>Good Day Madam,</p> <p>Your request for comment from the Sub-directorate: Coastal Management on the above-mentioned pre-application basic assessment report received on 09 October 2024, refers.</p> <p><b>1. CONTEXT</b></p> <p>1.1. The Integrated Coastal Management Act, 2008 (Act</p>	<p><b>07 November 2024</b></p>

					<p>No. 24 of 2008) (“NEM: ICMA”) is a Specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”). The NEM: ICMA sets out to manage the nation’s coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment. In terms of Section 38 of the NEM: ICMA, the Department of Environmental Affairs and Development Planning (‘the Department’) is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the “Management of public launch sites in the coastal zone (GN No. 497, 27 June 2014) “Public Launch Site Regulations”.</p> <p><b>1.2. The Department, in pursuant of fulfilling its mandate, is</b> implementing the Provincial Coastal Management Programme (“PCMP”). The PCMP is a five (5) year strategic document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the Province. The Department has developed the next generation PCMP that includes priority objectives for the next 5 years. This PCMP was adopted on 19 May 2023 and is available upon request.</p> <p>1.3. A key priority of the PCMP is the Estuary Management Programme, which is implemented in accordance with the NEM: ICMA and the National Estuarine Management Protocol (“NEMP”). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The Department is in the process of</p>	
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				<p>approving a series of Estuarine Management Plans.</p> <p>1.4. The facilitation of public access to the coast is an objective of the NEM: ICMA as well as a Priority in the WC PCMP. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 (“PCASP”) and commissioned coastal access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NEM: ICMA. The PCASP as well as the coastal access audits are available upon request.</p> <p><b>2. COMMENT</b></p> <p>2.1 The sub-directorate: Coastal Management (“SD: CM”) has reviewed the information as specified above and have the following commentary: 2.1.1. The proposal entails the expansion of the existing production and grow out area to increase the production output by 300 tons / annum in order to meet the growing market demands on Farm 2/711. The SD: CM notes that the existing pumphouse is said to increase in size to allow for the abstraction of seawater, additionally seawater lines will also be used to transport the seawater from the farm. A lined seawater reservoir is also proposed to temporarily hold seawater which can be used during peak electricity tariff periods or during electricity outages.</p> <p>2.1.2. The applicant accurately noted the subject property in relation to critical biodiversity and ecological support areas in accordance with the</p>	
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				<p>Western Cape Biodiversity Spatial Plan 2017.</p> <p>2.1.3. The applicant has depicted the subject property relation the Coastal Protection Zone (“CPZ”) as defined in Section 16 of the NEM: ICMA and it should be noted that the purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes, including the risk of sea level risks. Due to the subject property’s location within the CPZ, Section 63 of the NEM: ICMA must be considered where an authorisation is required in terms of Chapter 5 of the NEMA. Furthermore, Section 62 of the NEM: ICMA obliges all organs of state that regulates the planning of land to apply that legislation in a manner that gives effect to the purpose of the CPZ. As such, Section 63 of the NEM: ICMA must be considered by local authorities for land use decision making.</p> <p>2.1.4. The applicant adequately considered the subject property in relation to the Overberg District Coastal Management Line (“CML”). The technical delineation of the CML was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk flooding, wave run-up modelling, <i>inter alia</i> and was delineated in conjunction with and supported by organs of state. The principal purpose of the CML is to protect coastal public property, private property, and public safety; to protect the coastal protection zone; and to preserve the aesthetic value of the coastal zone. The use of CMLs is of particular importance in response to the effects of</p>	
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				<p>climate change, as it involves both the quantification of risks and pro-active planning for future development.</p> <p>2.1.5. The SD: CM confirms that the majority of the proposed expansion on Farm 2/711 will occur landward of the CML however a portion of the pipeline will occur seaward of the CML, below the highwater mark and within the littoral active zone. The SD: CM notes the very nature of this pipeline requires it to be located in this area and that the bulk infrastructure including the production area for the expansion is strategically placed on elevated ground above the 10m-contour line and the new production area beyond the 30m-contour line. It is noted that this proposed layout specifically considered climate change, sea-level rise, storm surges and coastal erosion.</p> <p>2.1.6. The SD: CM also notes that the applicant is in the process of obtaining a lease agreement with CapeNature for a section of the channel that is located within the littoral active zone.</p> <p>2.1.7. The SD: CM notes from the Pre-App DBAR that the expansion of the abalone farm will require the abstraction of more seawater which will be facilitated through the expansion of the pumphouse and thus result in an increase in effluent water discharge. According to the Pre-App DBAR ecologically, the operation of the abalone farm can be considered to be a low impact activity with negligible impact on the environment compared with other land-based agricultural activities.</p> <p>2.1.8. The effluent water, which is circulated seawater and gets discharged back into the marine environment, has been found to have a negligible to zero impact on the marine environment. Be advised that the SD: CM</p>	
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				<p>does not support any activities that will alter the seawater temperature, as such the SD: CM advises the applicant to have appropriate measures in place to ensure that temperature changes would not negatively affect the receiving environment.</p> <p>2.1.9. According to the Western Cape Provincial Coastal Access Audit for the Garden Route Municipal District (2019), the subject stretch has ample vehicle access to the coast to the coast. Be advised that in accordance with Section 13 of the NEM: ICMA, the proposed development and associated activities may in no way impede the general public’s ability to access coastal public property now or in the future. Furthermore, the applicant should be informed that they may not create any formal or informal walkways/pathways to the coast through the littoral active zone, with any future developments on the subject property as this is an active area that performs an important ecological function.</p> <p>2.1.10. It is further noted that the discharge is undertaken in line with the DFFE General Discharge Authorisation (“GDA”) issued to the applicant in terms of Section 69(2) of the NEM: ICMA and no amendment to the GDA is required to accommodate the increased seawater discharge.</p> <p>2.1.11. The applicant indicated that coastal access will not be affected during the construction or operational phases of the proposed expansion and access to the coast will be retained as the general public currently has unrestricted access along the subject coastline.</p> <p>2.1.12. Considering the location of the subject property, the applicant must be informed of risk</p>	
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					<p>pertaining to the loss of property should the highwater mark of the sea move inland of the property boundary. In this regard, Section 14 of the NEM: ICMA and the <a href="#">Advisory Note from the Office of the Chief Surveyor-General</a> dated 15 October 2021, is applicable.</p> <p>2.1.13. The SD: CM notes that the proposed expansion of the Romansbaai Abalone Farm falls within the realm of aquaculture which was identified as one of the components of the rural economy in the Western Cape Provincial Spatial Development Framework. It is further noted in the DBAR that aquaculture is deemed as a compatible activity that does not compromise biodiversity, farming activities or cultural and scenic landscapes as the development fits into the context of rural landscapes while contributing to the economic growth of these areas.</p> <p>2.1.14. Based on all the abovementioned items, the SD: CM does not object to the proposed expansion of the Romansbaai Abalone Farm (Farm 2/711) as it aligns with the PSDF, Priority Areas of the PCMP (2022) as well as the MSDF (2024) and Municipal IDP (2020).</p> <p>3. The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: <i>“...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment...”</i> together</p>	
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					<p>with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.</p> <p>4. The SD: CM reserves the right to revise or withdraw its comments and request further information from you based on any information that may be received.</p>	
<b>Rhett Smart</b>	Cape Nature			<a href="mailto:rsmart@capenature.co.za">rsmart@capenature.co.za</a>	<p>Email dated 07 November 2024</p> <p>Pre-Application Basic Assessment Report for the Proposed Expansion of the Romansbaai Abalone Farm, Remainder of Portion 2 of Farm Klipfonteyn 711, Gansbaai</p> <p>CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.</p> <p>Desktop Information</p> <p>The application is for the expansion of an existing aquaculture facility. We wish to note that the conditions of approval for both environmental and municipal planning approvals for the establishment of the facility and the first expansion remain relevant. The property contains Critical Biodiversity Area 1 (CBA)</p>	<p><b>Ref:</b> <b>LS14/2/6/1/7/2/711-2_aquaculture_Gansbaai</b> <b>Date:</b> <b>07 Nov 2024</b></p>

					<p>in the north-east corner as mapped in the Western Cape Biodiversity Spatial Plan (BSP) with the remainder consisting of Other Natural. We wish to note that the BSP has been updated and the final version will be gazetted within the next few months. In the updated version of the BSP, the property is mapped as CBA 1 apart from (some) existing development footprints.</p> <p>The vegetation type mapped for the property is Overberg Dune Strandveld which is listed as endangered in the revised 2022 listing. This vegetation type was previously listed as least threatened and the increase in the threat status is likely one of the reasons for the increase in the amount of CBA on the site. We further wish to note that there have been recent amendments to the National Vegetation Map, which includes the introduction of five new strandveld types which have been mapped with associated descriptions (SANBI 2024). In the updated map, the property is mapped as Southwestern Strandveld (Cowling et al 2023). Threat statuses have not been determined for the new vegetation types.</p> <p>Screening Tool and Site Sensitivity Verification Report</p> <p>The screening tool results indicate very high sensitivity for terrestrial biodiversity and aquatic biodiversity, high sensitivity for animal species and medium sensitivity for plant species. The site sensitivity verification report indicates that a botanical assessment will be undertaken which addresses the terrestrial biodiversity and plant species themes.</p> <p>For animal species, it states that the site is already impacted by the existing facility and therefore a specialist study is not required. It refers to the site being stocked with small antelope, however the</p>	
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				<p>botanical assessment refers to large game species. The two species flagged as high sensitivity are black harrier (<i>Circus maurus</i>) and African Marsh Harrier (<i>Circus ranivorus</i>) with several species flagged as medium sensitivity. While the lack of wetlands means that it is unlikely that African Marsh Harrier is present, the intact strandveld is suitable habitat for Black Harriers although the surrounding urban development does reduce the suitability. CapeNature therefore recommends that as a minimum an animal species compliance statement is undertaken. We recommend that problem causing animals for the aquaculture facility should also be addressed e.g. gulls.</p> <p>For aquatic biodiversity, the response is that there are no freshwater features mapped for the site or which were found during site visits by the environmental assessment practitioner and the botanist. We wish to note that if the proposed development footprint was used for the screening tool, the results would have indicated a low sensitivity, as the very high sensitivity is in the north-western corner of the property outside the footprint. CapeNature is satisfied that an aquatic biodiversity assessment is not required.</p> <p><b>Botanical Assessment</b></p> <p>The botanical assessment reports that the fieldwork was undertaken in a sub-optimal time of year, namely autumn, however there is a high confidence in the findings and recommendations due to the dominance of perennial species in this habitat and good knowledge of the area. The vegetation occurring on site is confirmed to consist of Overberg Dune Strandveld. The threat status of this vegetation type is queried due to the high percentage remaining extent and under formal protection. The revised threat status is as a</p>	
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				<p>result of the methodology used for the 2022 revised threat status adapted from the IUCN methodology and is related to the level of alien invasive species infestation, however the queries from the specialist are acknowledged as valid.</p> <p>We recommend that the botanical assessment should review the revised mapping of the 2024 beta National Vegetation Map and include a discussion in this regard in the botanical assessment. The assessment should further indicate whether this results in any changes regarding the outcome of the assessment. CapeNature can be contacted for access to the referenced literature if required.</p> <p>The vegetation occurring on site is considered to generally be in a good condition with a very low level of occurrence of alien invasive species. The sensitivity mapping of the expansion footprint to the east of the existing facility indicates high sensitivity in the north and south and medium sensitivity in the central section, with low sensitivity in the areas subject to edge effects from the existing facility. The mapping of the BSP is queried with the recommendation that all the habitat east of the existing facility should be mapped the same as per the sensitivity mapping. In this regard, the update to the BSP should be referred to as discussed above.</p> <p>Five species of conservation concern (one subspecies level) were recorded on the site although none are endangered or critically endangered. The two near threatened species are common across the site and the other vulnerable species of scattered occurrence. As the fieldwork was undertaken in a sub-optimal time of year, ideally this should be supplemented by a</p>	
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					<p>spring survey. If additional fieldwork is not undertaken this needs to be motivated and should indicate the likelihood of any species occurring on the footprint and recommend appropriate precautionary mitigation measures. We wish to highlight that the botanical assessment for the previous expansion dated March 2008 can be used to supplement the findings from the current study (while taking into consideration changes that have since occurred) and was undertaken by the same specialist.</p> <p>It should be noted that the protocols require that the Species Environmental Assessment Guideline must be adhered to for the plant species theme. The Species Environmental Assessment Guideline indicates that the site ecological importance (SEI) must be calculated for any SCCs encountered. We therefore recommend that the botanical assessment must be amended to include the SEI calculations (SANBI 2020).</p> <p>Condition 18 of the environmental authorisation for the expansion required that the mitigation measures in the botanical assessment must be complied with (included as Appendix A to the EA) and are still relevant for the current application. Although we will not repeat the mitigation measures, we wish to note the reference to a limestone outcrop and milkwood thickets which must be avoided, and which are not referred to in the current botanical assessment, and therefore presumably outside of the current proposed expansion footprint. Search and rescue of <i>Lampranthus fergusoniae</i> was recommended and is one of the SCCs which were encountered in the current botanical assessment. In general, CapeNature recommends that an audit of the existing EA should be undertaken before the current application is considered for approval.</p>	
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				<p>There are two alternative layouts presented, however the layout assessed in the botanical assessment differs from both and is assumed to have been a previous version which was screened out. The significance of the impact of the loss of habitat for each of the project components is assessed for the botanical assessment layout, and in all cases the significance remained the same both before and after mitigation, with the motivation that there is little that can mitigate the loss of habitat and SCCs.</p> <p>The impact significance after mitigation is used to determine the requirement for a biodiversity offset. A biodiversity offset is necessary to remedy residual impacts of medium significance or higher after following the mitigation hierarchy. In this regard, Phase 2 and the dam are of medium and medium to high significance respectively and therefore a biodiversity offset would be required for the loss of habitat in these two footprints.</p> <p>We wish to note that spillage of seawater and associated salinisation of the affected habitat should be included as another potential impact associated with the seawater dam. It is noted that the assessment took into account that the vegetation would only be brush-cut within the footprint of the solar photovoltaic array and therefore would not result in complete loss of vegetation and therefore does not exceed the thresholds despite being partly located within the high sensitivity area.</p> <p>However, the two development layouts presented in the Basic Assessment Report (BAR) differ from the layout assessed in the botanical assessment and therefore the impact significance would need to be re-assessed for both layouts. It is also essential that the</p>	
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				<p>mitigation hierarchy is followed and must include investigation of alternative locations for project components which result in an impact significance of medium or higher.</p> <p>The proposed mitigation measures are supported. The applicant must confirm that the mitigation measures associated with the solar PV array can be implemented. We also recommend that the impacts associated with the solar PV array should also be evaluated in the context of the alternative of connecting to the local electricity grid.</p> <p>It should be noted that the original approval for the aquaculture facility which was for consent use included a condition of approval that the development of the site should be confined to the area on the site plan and the remainder should be managed as a nature reserve. The approval was granted by the Overberg Regional Services Council in terms of the Land Use Planning Ordinance (LUPO) in 1996 prior to the gazetting of the National Environmental Management Act (NEMA) when conservation measures needed to be included in the planning approvals. We note that we referred to this condition in our comment on the municipal planning application, however conditions related to biodiversity conservation are more appropriate to NEMA applications since its promulgation. We therefore recommend that the existing condition must be taken into account and comment obtained from the Overstrand Municipality Spatial Planning component in this regard. This existing condition would then link in with any biodiversity offset requirements.</p> <p>Coastal and Marine Environment</p>	
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				<p>A major gap in the screening tool is the coastal and marine environment. The proposed project includes an expansion of the pumphouse which abstracts water from the sea. The impact on the coastal and marine ecosystems must be evaluated in a separate specialist study.</p> <p>The increase in capacity will result in an increase in the volumes of water abstracted and effluent discharged. According to the BAR, the discharge volumes are within the General Discharge Authorisation in terms of the National Environmental Management: Integrated Coastal Management Act (NEM:ICMA) and no amendments are required. We wish to query the legislation which would be relevant for storage of seawater, as storage of freshwater is a water use in terms of the National Water Act. We therefore recommend that comment must be obtained from Department of Fisheries, Forestry and the Environment (DFFE) Oceans and Coasts, Department of Environmental Affairs and Development Planning (DEA&amp;DP) Coastal Management and the Breede Olifants Catchment Management Agency (BOCMA) regarding the abstraction and storage of seawater and discharge of effluent. Any additional legislative processes should proceed concurrently with the Basic Assessment process. The Western Cape Nature Conservation Board trading as CapeNature Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Colin Johnson, Mr Paul Slack</p> <p>Structures below the high water mark of the sea require a Sea Shore Lease from CapeNature in terms of the Sea Shore Act. The expansion of the pumphouse is located well below the high water mark as indicated on</p>	
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					<p>the DFFE and DEA&amp;DP Coastal Viewers and therefore requires a Sea Shore Lease. The Sea Shore Lease application will only be processed once an environmental authorisation is issued, however it can be applied for before then. Any other structures on the property which are below the high water mark and which currently don't have a Sea Shore Lease should be included in the application.</p> <p>Conclusion        In conclusion, CapeNature recommends that the following must be addressed before the application can be considered for approval:        The botanical assessment should be amended to: Assess the impact significance of the two layout alternatives included in the BAR including the individual project components and determine whether a biodiversity offset is required for any project components.        Ideally an additional spring survey must be conducted, unless adequately motivated.        The updated BSP and National Vegetation Map must be discussed and used to inform the assessment.        The SEI must be calculated for the plant SCCs.</p> <p>Where the impact significance of project components exceeds offset thresholds additional locations with a lower impact must be investigated in accordance with the mitigation hierarchy.        The animal species theme must be addressed by a specialist in accordance with the protocols.        A coastal and marine ecological specialist study must be undertaken to assess the impacts associated with the expansion of the pumphouse, abstraction of seawater and discharge of effluent.        The existing NEMA and municipal planning approvals need to be taken into account before the current</p>	
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					<p>application is considered for approval. Existing conditions remain relevant unless an amendment is applied for.</p> <p>Regards</p>	
<b>D'mitri Matthews</b>	DEA&DP			D'mitri.Matthews@westerncape.gov.za	<p><b>Email dated 08 November 2024</b></p> <p><b>COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (“BAR”) SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998) (“NEMA”) ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) (“EIA”) FOR THE PROPOSED EXPANSION OF THE ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI</b></p> <ol style="list-style-type: none"> <li>1. The draft BAR dated 2 October 2024, as received by the Directorate: Development Management Region 1 (hereinafter referred to as “this Directorate”) on 9 October 2024, refers.</li> <li>2. Following review of the information submitted to this Department, the Department notes the following: <ul style="list-style-type: none"> <li>o The expansion of the abalone facility will include the following:</li> </ul> </li> <li>3. Increase in Production Capacity <ul style="list-style-type: none"> <li>The expansion will be executed in two phases, each targeting an annual production increase of 150 tons (wet weight).</li> <li><b>Phase 1:</b></li> </ul> </li> <li>4. Additional production area: 17500 m<sup>2</sup> (1.75 ha)</li> <li>5. Production additions:</li> <li>6. Production capacity increase: 150 tons (wet weight)</li> <li>7. Number of tanks: 1 850</li> </ol>	<b>08 Nov 2024</b>

					<p>8. Number of baskets: 12 950          9. Seawater usage: 2 400 m<sup>3</sup>/hour          10. Aeration fans / blower room: 4 units          11. Split/grading station: 1 unit</p> <p style="text-align: center;"><b>Phase 2:</b></p> <p>12. Additional production area: 17500 m<sup>2</sup> (1.75 ha)          13. Production additions:</p> <ul style="list-style-type: none"> <li>○ Production capacity: 150 tons (wet weight)</li> <li>○ Number of tanks: 1 850</li> <li>○ Number of baskets: 12 950</li> <li>○ Seawater usage: 2 400 m<sup>3</sup>/hour</li> <li>○ Aeration fans blower room: 4 units</li> <li>○ Split/grading station: 1 unit</li> </ul> <p>Construction of a lined seawater reservoir:          Storage capacity: 41 000 m<sup>3</sup>          Surface area: 20 000 m<sup>2</sup> (2 ha)          Coverage footprint: 20000 m<sup>2</sup> (2 ha)</p> <p>Solar Power Array:          Power generation capacity: 4 MW (backup)          Coverage footprint: 40000 m<sup>2</sup> (4 ha)</p> <p>Expansion of the existing pumphouse</p> <ul style="list-style-type: none"> <li>• The existing pumphouse will be expanded by approximately 140 m<sup>2</sup> to accommodate additional infrastructure for increased water intake. A total of 4 new pumps and 4 pipelines will be installed at the pumphouse.             <ul style="list-style-type: none"> <li>▪ 1 new pump and 1 new pipeline will be fitted within the existing pumphouse.</li> </ul> </li> <li>•             <ul style="list-style-type: none"> <li>▪ 3 new pumps and 3 pipelines will be installed within the proposed expanded pumphouse.</li> </ul> </li> </ul>	
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				<ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>• Coverage footprint: 140 m<sup>2</sup></li> <li>• Installation of additional pipelines:           <ul style="list-style-type: none"> <li>• 4 new pipelines will be installed from the pumphouse to connect the new lined seawater reservoir directly to the production area:               <ul style="list-style-type: none"> <li>• Each pipeline will be 600 meters long and 500 mm in diameter.</li> <li>• The combined water extraction rate will be 1600 m<sup>3</sup> per hour.</li> <li>• Pipeline installation will not require major ground excavation, as they will be laid alongside the existing pipeline in a previously disturbed area</li> </ul> </li> </ul> </li> <li>• Seawater Intake and Discharge Systems           <p style="margin-left: 40px;">The expansion of the abalone farm will require the abstraction of more seawater which will be facilitated through the expansion of the pumphouse. The additional seawater intake will therefore result in an increase in effluent water discharge.</p> </li> </ul> <p>Departmental comments on the draft BAR:</p> <p>3.1 The applicant must ensure that the proposed expansion does not contradict any specific conditions that are contained in the Environmental Authorisation issued on 3 March 2009 (Reference: E12/2/3/1-E2/11-</p>	
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					<p>0262/07).</p> <p>3.2 Since a new entity owns the existing facility, an amendment application must be submitted to the Department to transfer the rights and obligations of the EA issued on 3 March 2009 (Reference: E12/2/3/1-E2/11-0262/07).</p> <p>3.3 An extensive list of activities has been included as part of the proposed expansion. The Environmental Assessment Practitioner must filter this list to include only the relevant listed activities applicable to the proposed expansion.</p> <p>3.4 It is noted that the recommendations of the botanical specialist regarding the offset have not been included in the Environmental Management Programme (“EMPr”). It is therefore requested to provide reasons/motivations why this recommendation has not been included as part of the mitigation measures, since there will be unavoidable impacts within an ecosystem listed as critically endangered, in terms of Section 52 of the National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004) (“NEMBA”).</p> <p>The applicant Regulatory Requirements: 4.1 Proof of the notifications sent to registered I&amp;APs for the commenting purposes must be included in the BAR.</p> <p>4.2 A dated photograph of erecting a site notice must be provided.</p> <p>4.3 Proof of placing an advertisement must be provided.</p>	
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					<p>4.4 Any new representations and comments received in connection with the application must be included in the BAR.</p> <p>4.5 Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the BAR.</p> <p>4.6 The minutes of any meetings held by the environmental assessment practitioner (“EAP”) with I&amp;AP’s and other role players which record the views of the participants must be included in the BAR.</p> <p>4.7 Please be advised that the signed and dated applicant declaration is required to be submitted with the BAR during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.</p> <p>4.8 In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the BAR during the formal application process for decision-making.</p> <p>4.9 You are furthermore reminded that the BAR must contain all the information outlined in Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended).</p>	
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					<p>2. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.</p> <p>2. This Department reserves the right to revise or withdraw its comments and request further information based on any information received.</p> <p>Yours faithfully,</p>	
<b>Michelle Pretorius</b>	DFFE	Forestrust Building Foreshore Martin Hammersc hlag way CAPE TOWN	(021) 402 3413  066 4711 318	<a href="mailto:MPretorius@dfpe.gov.za">MPretorius@dfpe.gov.za</a>	<p><b>Email dated 18 November 2024</b></p> <p><b>Subject: RE: Notice of Public Participation   Proposed Expansion of Romansbaai Abalone Farm   Ptn RE2/711, Gansbaai, Caledon RD</b></p> <p>Dear Michelle</p> <p>Thanks for the notice please register myself other colleagues will send their own registration requests.</p> <p>Kindest Regards</p>	<b>18 November 2024</b>
<b>Vanessa Stoffels –</b>	Dol		021 483 4669	<a href="mailto:Vanessa.Stoffels@westerncape.gov.za">Vanessa.Stoffels@westerncape.gov.za</a>	<p><b>Email received 19 November 2024</b></p> <p>Attention: Ms M Lornay Dear Madam</p> <p><b>PROPOSED EXPANSION OF ROMANSBAAI ABALONE, REMAINDER OF PORTION 2 OF FARM 711, GANSBAAI: COMMENTS ON PRE-APPLICATION BASIC ASSESSMENT REPORT</b></p> <p>1. Your email to this Branch dated 09 October 2024 refers.</p> <p>2. The subject property is located 150m south of</p>	<p><b>Date:</b> 19 November 2024 <b>Ref:</b> DOI/CFS/RN/LU/REZ/SUB-21/297 (Application no: 2024-10-0065)</p>

					<p>Gansbaai and takes access off Divisional Road 1214.</p> <p>3. This Branch offers no objection to the issuing of Environmental Authorisation in terms of the National Environmental Management Act 107 of 1998.</p> <p>Yours Sincerely</p>	
<b>Michelle Pretorius</b>	DFFE			<p><a href="mailto:MPretorius@dffe.gov.za">MPretorius@dffe.gov.za</a></p> <p><a href="mailto:FDaya@dffe.gov.za">FDaya@dffe.gov.za</a></p> <p><a href="mailto:MJezile@dffe.gov.za">MJezile@dffe.gov.za</a></p> <p><a href="mailto:AOsborne@dffe.gov.za">AOsborne@dffe.gov.za</a></p>	<p>Email dated 24 January 2025</p> <p>Subject: Re: Notice of Public Participation   Proposed Expansion of Romansbaai Abalone Farm   Ptn RE2/711, Gansbaai, Caledon RD</p> <p>Dear Michelle</p> <p>Compliments of the season to you for 2025, I was just catching up on emails and came across your email.</p> <p>I see that your original email sent in Oct 2024 was not received due to the incorrect email address for myself . However, your follow up email of Nov 2024 caught me in a very busy time, and I was not able to review the documents.</p> <p>Please can you update your database to include my colleagues in Environmental interaction's cc'd herein, who are to review EIAs for aquaculture. I have since moved to the Phakisa Delivery unit and so no longer comment on EIAs.</p> <p>Kindest regards Michelle</p>	
<b>Cor Van der Walt</b>	<b>Department of Agriculture</b>			<a href="mailto:Cor.VanderWalt@westerncape.gov.za">Cor.VanderWalt@westerncape.gov.za</a>	<b>Email dated 04 February 2025</b>	<b>04 February 2025</b>

					<p><b>PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM: DIVISION CALEDON PORTION 2 IF THE FARM NO. 711</b></p> <p>Your application of 09 October 2024 has reference.</p> <p>The Western Cape Department of Agriculture (WCDoA) has no objection to the proposed application.</p> <p>Please note:</p> <ul style="list-style-type: none"> <li>• Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.</li> <li>• The Department reserves the right to revise initial comments and requests further information based on the information received.</li> </ul> <p>Yours sincerely Mr CJ van der Walt LAND USE MANAGER: LANDUSE MANAGEMENT</p>	
<b>IN PROCESS PPP</b>						
<b>Alexis Osborne</b>	<b>DFFE</b>			<p><a href="mailto:AOsborne@dffe.gov.za">AOsborne@dffe.gov.za</a></p> <p><a href="mailto:MJezile@dffe.gov.za">MJezile@dffe.gov.za</a></p> <p><a href="mailto:FDaya@dffe.gov.za">FDaya@dffe.gov.za</a></p> <p><a href="mailto:anjobeni@dffe.gov.za">anjobeni@dffe.gov.za</a></p> <p><a href="mailto:MPretorius@dffe.gov.za">MPretorius@dffe.gov.za</a></p>	<p><b>Email dated 13 June 2025</b></p> <p><b>RE: APPLICATION FOR A PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON REMAINDER OF PORTION 2 OF THE FARM 711, GANSBAAI, WESTERN CAPE.</b></p> <p>The Directorate: Sustainable Aquaculture Management of the Department of Forestry, Fisheries and the Environment (“DFFE”) has reviewed the Basic Assessment Report and associated reports for the Proposed Expansion of Romansbaai Abalone Farm on Portion 2 of the Farm No. 711, Gansbaai, Western Cape.</p>	<b>13 June 2025</b>

					<p>The comments of the DFFE are as follows:</p> <p>8. The DFFE, Branch: Fisheries Management has a mandate for the development and management of aquaculture in South Africa, please register the Directorate: Sustainable Aquaculture Management as an Interested and Affected Party (I&amp;AP) to be included for further communication go forward.</p> <p>9. Under <b>SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOL</b>: 4 Policies (Page 24-25), the <i>National Environmental Management Act (NEMA)</i> and its associated regulations, as well as the <i>Marine Living Resources Act (MLRA)</i>, have been omitted from the list of key legislation applicable to the operation. Please ensure that the MLRA, along with the relevant policies must include that are applicable for Marine Aquaculture permit and Right. The applicant must submit the revised and approved Environmental Management Programme (EMPr) (Reference: EMP/RB/Rev3) to the DFFE Sub-Directorate: Aquaculture Authorisations for monitoring and record-keeping purposes.</p> <p>10. Precautions must be taken to ensure that incoming seawater remains uncontaminated during construction activities near or upstream of the intake, particularly in relation to the pumphouse expansion. Disturbance of sediments in this area may release heavy metals and other pollutants. Additionally, effluent discharge must be carefully managed to prevent cross-contamination with the intake water, considering nearshore current dynamics.</p> <p>11. The applicant must ensure that the lined seawater reservoir proposed as part of the expansion</p>	
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				<p>does not introduce harmful chemicals from the lining materials, which could pose risks to food safety and/or aquatic animal health. Additionally, the design should prevent the formation of dead zones (i.e. areas with poor water circulation) that could promote the growth of pathogenic microorganisms, leading to further challenges.</p> <p>12. The DFFE further notes that the proposed expansion will increase the farming production by 150 tons (wet weight) of abalone annually, however, it is important that the expansion includes additional hygiene management, biosecurity controls, staff training, and waste management to prevent risks associated with over stocking, cross-contamination, and pathogen proliferation.</p> <p>13. The installation of a 4 MW solar array is supported as it enhances the sustainability of the farm's operations and reduces reliance on grid-supplied electricity. This measure aligns with best practice in sustainable aquaculture infrastructure design and management.</p> <p>14. EMPr: 10.1.6 Waste – The drafting of a Site-specific Waste Management Plan is supported, and it is advised that prior approval be obtained from the Local Municipality for disposal of biological waste and also ensure that Marine Aquaculture permit conditions are followed whenever there is mass mortality on the farm and that this is reported the DFFE accordingly.</p> <p>The Directorate supports the proposed expansion in principle, provided that the applicant commits to enhanced environmental management, robust biosecurity controls, and the mitigation of risks to marine and coastal systems. Ongoing monitoring and compliance with environmental authorisation conditions will be critical to ensuring that the</p>	
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					<p>expansion contributes positively to the sustainable growth of aquaculture in the region.</p> <p>Please note that the Directorate Sustainable Aquaculture Management reserves the right to review and/or provide additional comments in future. Enquiries may be directed to the contacts provided at the top of this correspondence.</p>	
<b>Mercia Liddle</b>	DEADP; BIODIVERSITY AND COASTAL MANAGEMENT			<a href="mailto:Mercia.Liddle@westerncape.gov.za">Mercia.Liddle@westerncape.gov.za</a>	<p><b>Email dated 17 June 2025</b> (same comment)</p> <p><b>RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI, CALEDON ROAD.</b></p> <p><b>Good Day Madam,</b></p> <p>Your request for comment from the Sub-directorate: Coastal Management on the above-mentioned pre-application basic assessment report received on 09 October 2024, refers.</p> <p><b>3. CONTEXT</b></p> <p>3.1. The Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“NEM: ICMA”) is a Specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”). The NEM: ICMA sets out to manage the nation’s coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment. In terms of Section 38 of the NEM: ICMA, the Department of</p>	<b>17 June 2025</b>

					<p>Environmental Affairs and Development Planning ('the Department') is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the "Management of public launch sites in the coastal zone (GN No. 497, 27 June 2014) "Public Launch Site Regulations".</p> <p>3.2. The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme ("PCMP"). The PCMP is a five (5) year strategic document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the Province. The Department has developed the next generation PCMP that includes priority objectives for the next 5 years. This PCMP was adopted on 19 May 2023 and is available upon request.</p> <p>3.3. A key priority of the PCMP is the Estuary Management Programme, which is implemented in accordance with the NEM: ICMA and the National Estuarine Management Protocol ("NEMP"). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The Department is in the process of approving a series of Estuarine Management Plans.</p> <p>3.4. The facilitation of public access to the coast is an objective of the NEM: ICMA as well as a Priority in the WC PCMP. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 ("PCASP") and commissioned coastal access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal</p>	
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					<p>access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NEM: ICMA. The PCASP as well as the coastal access audits are available upon request.</p> <p><b>4. COMMENT</b></p> <p>4.1. The sub-directorate: Coastal Management (“SD: CM”) has reviewed the information as specified above and have the following commentary:</p> <p>4.1.1. The proposal entails the expansion of the existing production and grow out area to increase the production output by 300 tons / annum in order to meet the growing market demands on Farm 2/711. The SD: CM notes that the existing pumphouse is said to increase in size to allow for the abstraction of seawater, additionally seawater lines will also be used to transport the seawater from the farm. A lined seawater reservoir is also proposed to temporarily hold seawater which can be used during peak electricity tariff periods or during electricity outages.</p> <p>4.1.2. The applicant accurately noted the subject property in relation to critical biodiversity and ecological support areas in accordance with the Western Cape Biodiversity Spatial Plan 2017.</p> <p>4.1.3. The applicant has depicted the subject property relation the Coastal Protection Zone (“CPZ”) as defined in Section 16 of the NEM: ICMA and it should be noted that the purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes,</p>	
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					<p>including the risk of sea level risks. Due to the subject property's location within the CPZ, Section 63 of the NEM: ICMA must be considered where an authorisation is required in terms of Chapter 5 of the NEMA. Furthermore, Section 62 of the NEM: ICMA obliges all organs of state that regulates the planning of land to apply that legislation in a manner that gives effect to the purpose of the CPZ. As such, Section 63 of the NEM: ICMA must be considered by local authorities for land use decision making.</p> <p>4.1.4. The applicant adequately considered the subject property in relation to the Overberg District Coastal Management Line ("CML"). The technical delineation of the CML was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk flooding, wave run-up modelling, inter alia and was delineated in conjunction with and supported by organs of state. The principal purpose of the CML is to protect coastal public property, private property, and public safety; to protect the coastal protection zone; and to preserve the aesthetic value of the coastal zone. The use of CMLs is of particular importance in response to the effects of climate change, as it involves both the quantification of risks and pro-active planning for future development.</p> <p>4.1.5. The SD: CM confirms that the majority of the proposed expansion on Farm 2/711 will occur landward of the CML however a portion of the</p>	
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					<p>pipeline will occur seaward of the CML, below the highwater mark and within the littoral active zone. The SD: CM notes the very nature of this pipeline requires it to be located in this area and that the bulk infrastructure including the production area for the expansion is strategically placed on elevated ground above the 10m-contour line and the new production area beyond the 30m-contour line. It is noted that this proposed layout specifically considered climate change, sea-level rise, storm surges and coastal erosion.</p> <p>4.1.6. The SD: CM also notes that the applicant is in the process of obtaining a lease agreement with CapeNature for a section of the channel that is located within the littoral active zone.</p> <p>4.1.7. The SD: CM notes from the Pre-App DBAR that the expansion of the abalone farm will require the abstraction of more seawater which will be facilitated through the expansion of the pumphouse and thus result in an increase in effluent water discharge. According to the Pre-App DBAR ecologically, the operation of the abalone farm can be considered to be a low impact activity with negligible impact on the environment compared with other land-based agricultural activities.</p> <p>4.1.8. The effluent water, which is circulated seawater and gets discharged back into the marine environment, has been found to have a negligible to zero impact on the marine environment. Be advised that the SD: CM does not support any activities that will alter the seawater temperature, as such the SD: CM advises the applicant to have appropriate measures in place to ensure that temperature</p>	
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					<p>changes would not negatively affect the receiving environment.</p> <p>4.1.9. According to the Western Cape Provincial Coastal Access Audit for the Garden Route Municipal District (2019), the subject stretch has ample vehicle access to the coast to the coast. Be advised that in accordance with Section 13 of the NEM: ICMA, the proposed development and associated activities may in no way impede the general public's ability to access coastal public property now or in the future. Furthermore, the applicant should be informed that they may not create any formal or informal walkways/pathways to the coast through the littoral active zone, with any future developments on the subject property as this is an active area that performs an important ecological function.</p> <p>4.1.10. It is further noted that the discharge is undertaken in line with the DFFE General Discharge Authorisation ("GDA") issued to the applicant in terms of Section 69(2) of the NEM: ICMA and no amendment to the GDA is required to accommodate the increased seawater discharge.</p> <p>4.1.11. The applicant indicated that coastal access will not be affected during the construction or operational phases of the proposed expansion and access to the coast will be retained as the general public currently has unrestricted access along the subject coastline.</p> <p>4.1.12. Considering the location of the subject property, the applicant must be informed of risk pertaining to the loss of property should the highwater mark of the sea move inland of the property boundary. In this regard, Section</p>	
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					<p>14 of the NEM: ICMA and the Advisory Note from the Office of the Chief Surveyor-General dated 15 October 2021, is applicable.</p> <p>4.1.13. The SD: CM notes that the proposed expansion of the Romansbaai Abalone Farm falls within the realm of aquaculture which was identified as one of the components of the rural economy in the Western Cape Provincial Spatial Development Framework. It is further noted in the DBAR that aquaculture is deemed as a compatible activity that does not compromise biodiversity, farming activities or cultural and scenic landscapes as the development fits into the context of rural landscapes while contributing to the economic growth of these areas.</p> <p>4.1.14. Based on all the abovementioned items, the SD: CM does not object to the proposed expansion of the Romansbaai Abalone Farm (Farm 2/711) as it aligns with the PSDF, Priority Areas of the PCMP (2022) as well as the MSDF (2024) and Municipal IDP (2020).</p> <p>4.1.15. The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: <i>"...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment..."</i> together with Section 58 of the</p>	
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					<p>NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.</p> <p>4.1.16. The SD: CM reserves the right to revise or withdraw its comments and request further information from you based on any information that may be received.</p>	
<b>Rulien Volschenk</b>				<p><a href="mailto:rvolschenk@odm.org.za">rvolschenk@odm.org.za</a></p>	<p><b>Letter dated 23 June 2025</b></p> <p><b>RE: PROPOSED EXPANSION OF ROMANBAAI ABALONE FARM ON REMAINDER OF PORTION 2 OF THE FARM 711, GANSBAAI</b></p> <p>DEADP REFERENCE: 16/3/3/6/7/E2/10/1628/23</p> <p>The Environmental Management Services Department of the Overberg District municipality acknowledges the receipt and review of the draft Basic Assessment Report and Environmental Management Programme.</p> <p>According to the 2017 Western Cape Biodiversity Spatial Plan (WCBSP), the majority of the property is designated as an Other Natural Area (ONA), while the smaller portion within the demarcated zone for photovoltaic (PV) development is classified as a Critical Biodiversity Area (CBA). However, recently the WCBSP has been reviewed and the area is now categorise as CBA.</p> <p>The Overberg Municipality's Spatial Development Framework clearly define Spatial Planning Categories (SPCs) to reflect how the area should be developed spatially to ensure sustainability. These SPCs are linked with the Biodiversity Spatial Plan Categories as defined in the WCBSP.</p>	<b>23 June 2025</b>

				<p>Critical Biodiversity Areas (CBAs) are designated as Core 1 under the Spatial Planning Categories. The primary management objective for these areas is to maintain in a natural or near-natural state, ensuring no further loss of natural habitat. Where degradation has occurred, restoration efforts should be undertaken . Only low-impact, biodiversity-sensitive land uses are considered appropriate within these zones.</p> <p>Other Natural Areas (ONAs) fall under the Buffer 2 category, where the focus is on minimizing habitat and species loss while preserving ecosystem functionality through strategic, landscape-level planning.</p> <p>The proposed development is located within the Overberg Dune Strandveld, an ecosystem officially classified as Endangered. According to the Overberg District Municipality’s Spatial Development Framework, the preservation of vulnerable ecosystems must be a key consideration. Mitigation measures recommended specialist reports, aimed at conserving areas of ecological significance, area supported. Further expansion that could place species of conservation concern at greater risk should note be pursued.</p> <p>In accordance with the National Biodiversity Management : Biodiversity Act (2004) and the Conservation of Agricultural Resources Act (1983), landowners are legally obligated to manage invasive species present on their properties. As part of effective mitigating, all listed alien and invasive species must be removed , followed by the routine maintenance to prevent regrowth. To safeguard sensitive ecosystems from further degradation, a comprehensive alien management plan should be developed and</p>	
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					<p>implemented across the entire property.</p> <p>The Overberg District Municipality reserves the right to amend its comments and to request further information should any additional relevant documentation or details become available.</p>	
<b>Rhett Smart</b>	<b>Cape Nature</b>			<a href="mailto:rsmart@capenature.co.za">rsmart@capenature.co.za</a>	<p><b>Email dated 24 June 2025</b></p> <p><b>Draft Basic Assessment Report for the Proposed Expansion of the Romansbaai Abalone Farm, Remainder of Portion 2 of Farm Klipfonteyn 711, Gansbaai</b></p> <p>CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments.</p> <p>Additional specialist studies have been undertaken, and the botanical assessment has been amended in accordance with the comments provided on the Pre-Application Basic Assessment Report (BAR). The need for a biodiversity offset has been evaluated.</p> <p><b>Botanical Assessment</b></p> <p>The botanical assessment has updated the desktop mapping to include mention of the updated 2023 Western Cape Biodiversity Spatial Plan (BSP) and the draft updates in the beta National Vegetation Map. The 2023 BSP is considered more accurate for this site with the affected area mapped as Critical Biodiversity Area 1 (CBA) and the determination that draft change of the vegetation mapping from Overberg Dune Strandveld (endangered) to Southwestern Strandveld (not assessed) does not have any effect on the assessment or recommendations.</p>	<b>24 June 2025</b>

				<p>The motivation for not calculating the site ecological importance (SEI) is noted. We wish to advise that the recommendation is in accordance with the protocols which state for terrestrial plant species specialist assessment that “2.3. The assessment must be undertaken in accordance with the Species Environmental Assessment Guideline”. The Species Environmental Assessment Guideline refer to a “a standardised metric for identifying site-based ecological importance for species” which is the SEI. The constraints related to quantitative data and level of accuracy within the scope of a specialist study for a Basic Assessment process are however acknowledged and an estimate would be accepted. The estimated percentage of the global population for each of the Species (Taxa) of Conservation Concern (SCCs) within the development footprint are presented each of which is estimated to be &lt;1%.</p> <p>The revised botanical assessment assessed the development alternatives which were presented in the Pre-Application BAR, as the previous version of the botanical assessment assessed a different layout. However, the layouts as indicated in the botanical assessment are not the same as those included within the Pre-Application BAR. The extent of the solar array is much larger than that indicated in Appendix B2 which was the previously preferred alternative. The extent of the solar array for the new preferred layout is also much larger than the previous preferred layout. The layout plans have the logo of the environmental assessment practitioner (EAP), therefore it is not evident that these are not the layout plans designed by the project team with accurate delineation. The lack of accurate and consistent layout plans for each alternative for evaluation by the specialists and</p>	
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					<p>authorities is a concern.</p> <p>To more clearly illustrate the inaccurate spatial delineation of the layouts we wish to refer to the previous preferred layout and current preferred layout below (Figures 1&amp;2). As a reference, the solar array is presented as 4 ha/40 000 m<sup>2</sup> for both alternatives, however is spatially much larger in the current layout. The total footprint for the current preferred layout is much smaller (6.9 ha) than the previous preferred layout (9.6 ha), however this is not evident from the spatial depiction (footprints as stated in the BAR).</p> <p>Notwithstanding the above, the revised botanical assessment assessed the purported alternatives presented in the Pre-Application BAR, although it is not known which of the two spatial depictions is accurate/more accurate. With regards to the location of the SCCs, Alternative 1 is preferred as Phase 2 of the expansion area for Alternative 2 impacted on the all the SCCs but Phase 2 for Alternative 1 impacted on none. Alternative 1 was not the preferred alternative in the Pre-Application BAR. In the impact assessment, Phase 2 is rated as medium negative for Alternative 2 as it was for the initial layout, however for Alternative 1 it is reduced to low negative. The location of the seawater reservoir remains the same for all alternatives and therefore remains medium-high negative. The residual impact significance therefore remains above the threshold requiring a biodiversity offset, although it is motivated that an alien clearing offset is preferred to securing more of the same vegetation type according to the offset ratios.</p> <p>An addendum to the botanical assessment is provided which evaluates the current preferred alternative. This</p>	
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				<p>would align to Figure 2 above, although no diagrams are provided in the addendum therefore it cannot be certain which layout was presented to the botanical specialist. The addendum only refers to the reduction in the footprint size of the revised layout as indicated in the Draft BAR. The reduction is assumed to be a reduced version of Alternative 2 and as a result, Phase 2 is reduced to low-medium negative and the seawater reservoir to medium negative. Medium negative is still within the threshold requiring a biodiversity offset, however it is motivated that a smaller quantum is required compared to the previous preferred alternative.</p> <p>In response to the queries regarding the previous approval for expansion, confirmation is provided that the proposed expansion area does not encroach into the milkwood thicket or limestone outcrop. Appendix K includes an audit of the existing EA with no findings of non-compliance. Confirmation is provided that there are adequate design and mitigation measures to prevent the potential impact of discharge of saline water from the seawater reservoir into the natural habitat. Confirmation is also provided that the mitigation measures for the solar array will be implemented, including retention of indigenous vegetation under the solar panels. The measure included in the Environmental Management Programme Report (EMPr) is that the vegetation under the solar panels will be maintained at a height of between 30 cm and 100 cm.</p> <p><b>Terrestrial Animal Compliance Statement</b></p> <p>The terrestrial animal compliance statement was</p>	
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					<p>undertaken in accordance with CapeNature comments. A field survey of the site was undertaken with 11 locality points indicated with associated photographs. Three main faunal habitats were identified, namely natural fynbos, short disturbed fynbos pasture and built-up areas, the latter consisting of the existing development footprint on site. All faunal species which were observed on site are listed with occurrence records in the three habitats, and with the largest percentage consisting of birds.</p> <p>A total of 7 SCCs were flagged in the screening tool as high or medium sensitivity. None of these species were observed on site. One additional species (Cape dwarf chameleon – <i>Bradypodion pumilum</i>) was added based on desktop information. Black Harrier (<i>Circus maurus</i>) and Cape dwarf chameleon are considered to potentially occur on site, however none of the species flagged are assessed to potentially experience an impact of higher than low significance.</p> <p>There was only one SCC observed on site, namely bontebok (<i>Damaliscus pygargus pygargus</i>), although more accurately a subspecies of conservation concern. Bontebok is a large mammal game species, and the species was almost certainly introduced to the property along with other game species. The only other game species referred to in the animal species compliance statement is the Burchell’s zebra (plains zebra), although the botanical assessment also referred to eland and springbuck. The bontebok was only found on the short, disturbed fynbos pasture. Although bontebok have been introduced there is a Biodiversity Management Plan (BMP) for the subspecies, for which the aim is to manage the meta-population with the subpopulations mainly consisting</p>	
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				<p>of introductions due to the inability for natural dispersal within the natural distribution range since it is occupied mainly by intensive agriculture farms. According to the BMP, the property is within the natural distribution range of the species however the map doesn't indicate a population record at the site location (Cowell &amp; Birss 2017). Historically the subspecies occurred in a roughly triangular area between Elgin and Heidelberg and south to the Breede River mouth, Cape Agulhas and the Bot River Estuary (Skead 2011). The preferred habitat of the species does not however correlate the primary strandveld habitat occurring across the site, but rather the managed pasture areas for this site (it primarily occurred within renosterveld). As a result of the BMP and the management of the meta-population within the natural distribution range, bontebok should be included as one of the taxa assessed.</p> <p>The recommendation of the terrestrial animal species compliance statement is that the development proposal is acceptable as the impacts are of low or very low significance, and the preferred alternative which will result in the least clearance of vegetation is preferred. As mentioned, bontebok should also be included in the assessment and the habitat suitability should also be taken into account. It should be noted that the brush-cutting of vegetation under the solar panels is likely to favour the bontebok, unless the solar panels act as a behavioural deterrent for the species. Compliance with provincial legislation with regards to game is separate from this process.</p> <p><b>Coastal and Marine Impact Report</b></p> <p>A coastal and marine impact report has been compiled</p>	
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				<p>to address impacts on the coastal and marine environment, which as CapeNature highlighted is not addressed within the screening tool. The study identified several impacts in both the construction and operational phase and each impact is assessed. The impacts during the construction phase are: disturbance to coastal habitat; blasting; vehicle and pedestrian traffic; erosion and turbidity; and during the operational phase: abstraction of seawater; discharge of effluent; genetic impacts and disease; and disturbance during maintenance. Some of these impacts are rated as high or medium significance prior to mitigation, however all can be reduced to low significance after mitigation. There are a number of mitigation measures proposed all of which must be considered essential and included in the EMPr.</p> <p>While the impact assessment of the coastal and marine impact report is considered comprehensive, there is no description provided regarding the coastal habitat which will be affected. With regards to the National Biodiversity Assessment coastal ecosystem types, the ecosystem at the location of the pump station is Agulhas Exposed Rocky Shore. The location is classified as CBA Restore as reflected on the Department of Forestry, Fisheries and Environment (DFFE) Coastal Viewer (NMU 2023). It does however appear that the development footprint has already been disturbed by the existing infrastructure.</p> <p><b>Biodiversity Offset Applicability Assessment</b></p> <p>The biodiversity offset applicability assessment provides an overview of the botanical and animal species studies. We wish to note that biodiversity offsets can also be applicable to the coastal and marine environment, and we are aware of at least one</p>	
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					<p>precedent which was investigated, but would not be relevant in this case. The only residual impact after mitigation which is of medium negative significance or higher and therefore within the threshold for a biodiversity offset is the loss of terrestrial habitat for the proposed seawater reservoir.</p> <p>The study refers to the conclusions of the botanical assessment regarding the proposed offset, which states that the affected vegetation type, Overberg Dune Strandveld, is already well conserved and there is a large remaining extent, however the main threat is alien invasive species. It is therefore motivated that conserving more of this vegetation type will have less of a positive outcome for biodiversity than implementing an offset targeted at clearing alien invasive species. The conclusion provided is that a biodiversity offset is not applicable for this site.</p> <p>By applying the National Biodiversity Offset Guidelines, CapeNature does not support this conclusion. Firstly, the biodiversity offset applicability assessment has not demonstrated detailed investigation of the mitigation hierarchy of avoid, minimize, mitigate/restore and only then investigate an offset for the residual impact if it is of medium significance or higher. The primary flaw in this regard is the inconsistent and inaccurate layout plans provided which have not permitted an accurate determination of the options of avoid and minimize. The layout plans need to be provided by the project engineers and architects with detailed plans that would also be submitted to the Overstrand Municipality for building plan approval. The plans should include co-ordinates of the development components.</p>	
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				<p>Should it still be confirmed that a biodiversity offset is required after a detailed investigation of the alternatives with accurate detailed layout plans, the biodiversity offset must comply with the National Biodiversity Offset Guidelines. While the motivation provided by the botanical specialist that alien clearing would be the best option is backed by sound logic, the offset would still need to be framed within the context of the guidelines and be supported by the best available science – an arbitrary financial contribution towards alien clearing would not be supported. We also wish to note that there should be sufficient natural habitat remaining on the property should an on-site offset be considered.</p> <p><b>Conclusion</b></p> <p>CapeNature does not support the Biodiversity Offset Applicability Assessment and wishes to raise concern regarding the inaccuracies and inconsistencies in the layout plans for the alternatives presented in both Appendix B and the specialist studies. The layout plans should be provided by the project team as would be submitted for the building plans. A thorough investigation of the mitigation hierarchy must be undertaken using the accurate layout plans and if a biodiversity offset is required, it must comply with the National Biodiversity Offset Guidelines.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	
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<p><b>D'mitri Matthews</b></p>	<p><b>DEADP</b></p>			<p>D'mitri.Matthews@wes tercape.gov.za</p>	<p><b>Email dated 26 June 2025</b></p> <p><b>COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (“BAR”) SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998) (“NEMA”) ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) (“EIA”) FOR THE PROPOSED EXPANSION OF THE ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI</b></p> <p>7. The Draft BAR dated 19 May 2025, as received by the Directorate: Development Management Region 1 (hereinafter referred to as “this Directorate”) on 20 May 2025, refers.</p> <p>8. Following review of the information submitted this Directorate notes the following:</p> <p>8.1. The expansion of the abalone facility will include the following:</p> <p>9. This Directorate as the following comments on the draft BAR:</p> <p>9.1. Since a new entity owns the existing facility, an amendment application must be submitted to the Department to transfer the rights and obligations of the EA issued on 3 March 2009 (Reference: E12/2/3/1-E2/11-0262/07).</p> <p>9.2. The issues highlighted by CapeNature must be addressed, especially their comments regarding the requirement for a biodiversity offset must be addressed</p> <p>9.3. A Georeferenced map of all the proposed components for the expansion must be provided for the preferred alternative.</p> <p>10. The applicant Regulatory Requirements:</p>	<p><b>26 June 2025</b></p>
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					<p>10.1. Proof of the notifications sent to registered I&amp;APs for the commenting purposes must be included in the BAR.</p> <p>10.2. A dated photograph of erecting a site notice must be provided.</p> <p>10.3. Proof of placing an advertisement must be provided.</p> <p>10.4. Any new representations and comments received in connection with the application must be included in the BAR.</p> <p>10.5. Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the BAR.</p> <p>10.6. The minutes of any meetings held by the environmental assessment practitioner (“EAP”) with I&amp;AP’s and other role players which record the views of the participants must be included in the BAR.</p> <p>10.7. Please be advised that the signed and dated applicant declaration is required to be submitted with the BAR during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.</p> <p>10.8. In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the BAR</p>	
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					<p>during the formal application process for decision-making.</p> <p>10.9. You are furthermore reminded that the BAR must contain all the information outlined in Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended).</p> <p>11. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.</p> <p>12. This Department reserves the right to revise or withdraw its comments and request further information based on any information received.</p>	
Paul Slabbert				<a href="mailto:paul@phsconsulting.co.za">paul@phsconsulting.co.za</a>	<p><b>Email dated 27 June 2025</b></p> <p><b>Subject: IN PROCESS BAR: ROMANSBAAI ABALONE EXPANSION - Register as I&amp;AP</b></p> <p>Hi Michelle</p> <p>Pls register PHS Consulting as an I&amp;AP on this project.</p> <p>I know that PPP is completed, we just need to be in the loop for any aspects in this project going forward, like possible additional round of PPP or the EA etc.</p> <p>thanks</p>	<b>27 June 2025</b>
<b>IN PROCESS PPP (PPP 3)</b>						
<b>Rhett Smart</b>	<b>Cape Nature</b>			<a href="mailto:rsmart@capenature.co.za">rsmart@capenature.co.za</a>	<p><b>Email dated 19 September 2025</b></p> <p>Revised Basic Assessment Report for the Proposed Expansion of the Romansbaai Abalone Farm, Remainder of Portion 2 of Farm Klipfonteyn 711, Gansbaai</p>	<b>19 September 2025</b>

					<p>CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments.</p> <p>The Basic Assessment Report and appendices have been updated to address concerns related to discrepancies in the alternative layout plans presented and the Biodiversity Offset Applicability Assessment has been replaced by a Biodiversity Offset Report which proposes two potential offsets.</p> <p>Other concerns raised have been adequately addressed, including confirmation that the game species occurring on the site belong to neighbouring Romans Bay Estate with the relevant CapeNature approvals, who requested that the fences between the properties are removed, and the coastal and marine impact report has been updated to include a description of the affected environment.</p> <p>Development Layout</p> <p>The layout alternative which was selected as the preferred alternative layout in the Pre-Application phase (Alternative 2) and the current preferred alternative (Alternative 4) are presented as layouts compiled by a draughtsman and include the dimensions of the development components in m<sup>2</sup>. The layout plans are therefore considered accurate and address concerns previously raised. The preferred alternative layout compiled by the draughtsman is included in the botanical assessment addendum thereby providing evidence that the same layout is referred to.</p> <p>We wish to note that the table comparing the</p>	
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					<p>dimensions of the three alternative development layouts in Appendix B3 differs from the layout plan for Alternative 1 whereby the table indicates that grow-out platforms are each 1.5 ha whereas the layout plan indicates that the grow-out platforms are each 1.75 ha. If the layout plan is accurate, it confirms that Alternative 1 has the largest development footprint of three alternatives and remains least preferred of the three alternative layouts as recommended.</p> <p>We recommend that should the application be authorised, the co-ordinates of the vertices for each of the five development components should be provided as is standard practice for environmental authorisations issued by the competent authority.</p> <p>Biodiversity Offset Report</p> <p>The Biodiversity Offset Report includes a discussion of the investigation of the mitigation hierarchy which is the starting point before a biodiversity offset can be contemplated. The progressive amendment of the development layout until the current preferred layout was derived provides evidence of investigating avoidance, based on the high sensitivity areas identified in the botanical assessment and minimization whereby the current preferred layout has reduced the size of the grow-out areas and seawater reservoir. Detailed accurate alternative layout plans as discussed above were required to adequately evaluate whether avoidance and minimization were adequately investigated. Additional mitigation measures are recommended in the three biodiversity specialist assessments to further reduce the residual impact. A motivation is provided for the encroachment of the minimized reservoir into the high sensitivity areas due to the requirement for this facility to be located on a high point on the property to allow for gravity flow of water.</p>	
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				<p>The biodiversity offset is therefore only required for the 0.8 ha extent of the reservoir, as the botanical assessment had separated out the impact assessment according to the development components. The offset ratio which was applied is 10:1 (area conserved: area lost). The vegetation type referred to in the Biodiversity Offset Report is Southwestern Strandveld, however the ratios which have been applied are for Overberg Dune Strandveld, listed as endangered, which is still the official vegetation type occurring on the site. An explanation should be provided that the vegetation is mapped as Southwestern Strandveld in the current draft beta National Vegetation Map, however the threat status of this vegetation type has not yet been determined and the 2018 National Vegetation Map is still the official version, therefore the offset should be calculated based on the statistics for Overberg Dune Strandveld. It should further be noted that the full extent of Overberg Dune Strandveld will be incorporated into Southwestern Strandveld and Grootbos Strandveld (Sean Privett pers. comm.).</p> <p>The proposed ratio is supported as the National Biodiversity Offset Guideline (the guideline) indicates that it should be based either on the threat status or a combination of the ecosystem extent and protection level, whichever is higher. Using the latter, no offset is required for Overberg Dune Strandveld, however the endangered threat status dictates an offset ratio of 10:1, and is further confirmed in Annexure A of the guidelines. The area which needs to be conserved must therefore ideally consist of 8 ha of intact Overberg Dune Strandveld.</p> <p>Two alternative offset options are presented, namely a</p>	
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					<p>monetary contribution which is the preferred option and an on-site offset. The preferred option of a monetary contribution consists of a financial contribution towards alien clearing on an existing conservation area which lacks sufficient resources to adequately manage alien invasive plants. As stated, this option was presented by the botanical specialist and was strongly supported over the option of securing an additional area for conservation. It should be noted that one of the motivations is that Overberg Dune Strandveld is threatened because of alien invasive species, meanwhile there is a large percentage remaining and in the conservation estate.</p> <p>The proposal is that the Grootbos Foundation can be the recipient of the funds as the organisation carries out alien clearing on properties within the broader Gansbaai region, including nature reserves and other conservation areas. Correspondence from Grootbos Foundation in Appendix A indicates a fund which has been set aside for this purpose. The correspondence provides an overview of the operations of the Grootbos Foundation, however it does not provide a plan of operations for the expenditure of the funds.</p> <p>Reference is made to the meeting with CapeNature, however the report does not reflect that it was clearly stipulated that a financial contribution towards a strategic offset would need to demonstrate alignment with the guidelines. The guidelines state that removal of alien invasive species is a legal requirement and therefore does not satisfy the additionality principle of offsetting (pg 42). However as stipulated in Section 7.6.2., the funds for an offset would encompass both funds for securing the site (e.g. land purchase, legal fees, declaration costs etc.) and funds for ongoing</p>	
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				<p>management (e.g. invasive species alien control, firebreaks, erosion control etc.). A strategic offset would consist of an aggregation of funds towards these objectives.</p> <p>A strategic offset requires a detailed plan regarding the proposed areas which will be targeted for protected area expansion as well as define the areas which can qualify towards the strategic offset. A number of role-players will need to be on-board in addition to the primary implementing agent, including authorities. Therefore, setting up the strategic offset will require more resources than an individual offset at the outset, however once set up the process will be streamlined for those who contribute. Precedents which can be referred to are the Atlantis Land Bank, the Cape Metro South East Strandveld Conservation Implementation Plan (CIP) and the Saldanha Strategic Offset. The motivation behind these strategic offsets also has relevance for this case whereby aggregating a number of small offsets into one large conservation area which can be well resourced and managed can have a much better outcome in terms of biodiversity conservation than attempting to manage small, isolated fragments of habitat with more limited overall biodiversity value, particularly within an urban setting.</p> <p>It is for this reason that CapeNature was willing to consider this option, however the proposal requires much more detailed planning and proposal with buy-in from relevant stakeholders before it can be considered further. It will also have to demonstrate adherence to the guidelines. Informal communication with the competent authority has indicated that the monetary contribution option is not supported. If this option is to be explored further, the application should be</p>	
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					<p>withdrawn so that a more detailed proposal that adheres to the guidelines can be developed. We further recommend that the term strategic offset is used rather than monetary contribution.</p> <p>If the current application is to be concluded, we recommend that the option of an on site offset should be implemented. There is more than the 8 ha quantum of intact Overberg Dune Strandveld available on the property to secure the offset. With regards to the selection of the 8 ha area, the current proposal as included in the Biodiversity Offset Report is supported as it includes most of the southern high sensitivity node and extends northwards to the northern high sensitivity node. The proposed area also connects to the open space areas on Roman Bay Estate. We would support if all high sensitivity areas were included beyond the 8 ha offset quantum. The initial offset proposal consisting of a narrow elongated area along the eastern and northern boundaries was not supported as it only included a small proportion of the high sensitivity area and narrow elongated areas are not preferred for conservation areas due to edge effects.</p> <p>While CapeNature indicated that the 8 ha on site offset would not be considered a priority for the CapeNature stewardship programme, we did not indicate that it is not feasible, however we encouraged that other alternatives should also be investigated where partners in conservation can assist. With regards to the option of a conservation servitude, it is agreed that Grootbos Foundation and Overberg Renosterveld Trust would not be able to assist with this site. It should however be noted that CapeNature is investigating servitudes as an option. The site can also be considered within the CapeNature Stewardship</p>	
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					<p>Programme.</p> <p>Consultation with the Overstrand Municipality indicates that they do not support spot zoning of the conservation area as an option. An alternative which would however be supported is an amendment to the site development plan (SDP) which indicates the conservation area. To CapeNature’s knowledge the proposed expansion in any case still needs approval in terms of the municipal planning by-law whereby the SDP needs to be amended.</p> <p>Section 7.4.2. of the guidelines indicate that there are a host of mechanisms for securing biodiversity offsets, however the most common are declaration of a NEM:PAA Protected Area, conservation servitudes and purchasing credits from a recognised biodiversity offset bank. The Biodiversity Offset Report includes consideration of these three options. The section states that the site needs to be secured for biodiversity in the long term and ideally protected into perpetuity. It further states “The above mechanisms may require that the applicable land use, town-planning or zoning scheme be amended to ensure that the biodiversity offset site may be/ is used for conservation purposes.”</p> <p>The option of indicating the conservation area on the SDP would need to ensure that the site is managed for conservation purposes, which is not a standard requirement. A conservation management plan would need to be included along with the SDP. It is noted that a biodiversity management plan is proposed in the Biodiversity Offset Report linked to the SDP as well as annual monitoring/audit reports. We would recommend that ideally the offset should meet the criteria for a legally protected area or an Other</p>	
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					<p>Effective Area-based Conservation Measure (OECM) as per the IUCN requirements for countries obtaining conservation targets.</p> <p>Another point to consider is that the landowner and his neighbour have existing obligations with CapeNature regarding the management of game on the property. It should be noted that game farms in terms of relevant conservation legislation were intended to be investigated as potential OECMs, particularly from a national level, however there were concerns that many game farms have management objectives more aligned with intensive livestock farming than biodiversity conservation.</p> <p>We recommend that should the option of an on-site offset be selected, a condition of approval should be that the mechanism for securing the biodiversity offset will be decided upon by the CapeNature Stewardship Review Committee (or alternatively an ad hoc meeting with the chairperson of the Stewardship Review Committee). This will provide for sufficient time for deciding upon an appropriate mechanism, which must also adhere to the guidelines. We recommend that there is consultation with both CapeNature and the Overstrand Municipality prior to the site being presented to the review committee. We do not support that the application should proceed without an offset.</p> <p>Conclusion</p> <p>In conclusion, CapeNature recommends that should the option of an on-site offset be selected, a condition of approval should be included that the mechanism to secure the site must be determined by the CapeNature Stewardship Review Committee. Should the option of contribution towards a strategic offset be selected, we</p>	
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					<p>recommend that a more detailed proposal is required that aligns with the guidelines. We are satisfied that all other comments have been adequately addressed.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	
<b>Application Manager:</b>	<b>Department of Infrastructure: Roads.</b>			<p><a href="mailto:applications@westerncaperoadsinfrastructure.org.za">applications@westerncaperoadsinfrastructure.org.za</a></p> <p><a href="mailto:vanessa.stoffels@westerncape.gov.za">vanessa.stoffels@westerncape.gov.za</a></p>	<p><b>Email dated 22 September 2025</b></p> <p><b>Application for the submission of a property environmental study for comment - App No: 2025-09-0091</b></p> <p>Dear Lornay Environmental Consulting</p> <p>The message below refers to your application for the submission of a property environmental study for comment (Application No - 2025-09-0091) submitted to the Western Cape Government on 2025/08/27:</p> <p>Properties related to the application :</p> <ul style="list-style-type: none"> <li>• Portion 2 of Farm KLIP FONTEYN 711, CALEDON</li> </ul> <p>Supporting documents submitted with the application :</p> <ul style="list-style-type: none"> <li>• Basic Assessment Report - (IN-PROCESS-FINAL-BAR-290825.pdf)</li> <li>• Power of Attorney Letter - (appointment letter.pdf)</li> <li>• Site Development Plan - (APP-B4-ALTERNATIVE-4-PREFERRED.pdf)</li> <li>• Application Cover Letter - (email correspondence.pdf)</li> <li>• Application Cover Letter - (Notice of PPP 3 Romansbaai Abalone Farm 290825.pdf).</li> </ul>	<b>22 September 2025</b>

					The matter is receiving attention, and further communication will be addressed to you as soon as circumstances permit.	
<b>Mercia J Liddle</b>	<b>DEADP: CMU</b>			<a href="mailto:Mercia.Liddle@westerncape.gov.za">Mercia.Liddle@westerncape.gov.za</a>	<p><b>Email dated 26 September 2025</b></p> <p><b>Subject: RE: Notice of ADDITIONAL IN-PROCESS NEMA PPP   Proposed Expansion of Romansbaai Abalone Farm, Gansbaai</b></p> <p>Dear Ms Naylor,</p> <p>The SD: Coastal Management has no further comments on the subject matter, and our previous comments remain.</p> <p>Kind Regards</p> <p>Mercia Liddle</p>	<b>26 September 2025</b>
<b>Rulien Volschenk</b>				<a href="mailto:rvolschenk@odm.org.za">rvolschenk@odm.org.za</a>	<p><b>Email dated 01 October 2025</b></p> <p><b>RE: PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON REMAINDER OF PORTION 2 OF THE FARM 711, GANSBAAI</b> <b>DEA&amp;DP REFERENCE: 16/3/3/6/7/1/E2/10/1628/23</b></p> <p>The Environmental Management Services Department of the Overberg District Municipality acknowledges receipt and review of the final Basic Assessment Report and Environmental Management Programme.</p> <p>With reference to the comments submitted by this department on 23 June 2025, the municipality is satisfied with the information as presented. Cognisance is taken of the additional specialist inputs</p>	<b>01 October 2025</b>

					<p>which include the Coastal and Marine Impact Report and the update addendum to the Botanical Assessment. The department support the recommendations made in these reports to mitigate environmental impact.</p> <p>The Overberg District Municipality reserves the right to amend its comments and to request further information should any additional relevant documentation or details become available.</p> <p>Yours faithfully,</p>	
<b>D'mitri Matthews</b>	<b>DEADP</b>			D'mitri.Matthews@westerncape.gov.za	<p><b>Email dated 01 October 2025</b></p> <p>COMMENT ON THE REVISED DRAFT BASIC ASSESSMENT REPORT ("BAR") SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998) ("NEMA") ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) ("EIA") FOR THE PROPOSED EXPANSION OF THE ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI</p> <p>1. The revised draft BAR 29 August 2025, as received by the Directorate: Development Management Region 1 (hereinafter referred to as "this Directorate") on the same day, refers.</p> <p>2. Following review of the information submitted to this Department, the Department notes the following:</p> <p>2.1 The expansion of the abalone facility will include the following:</p> <p>3. Departmental comments on the draft BAR:</p> <p>3.1 The biodiversity offset for the proposed development must be finalised with consultation with CapeNature prior to the submission of the final BAR, since this aspect is an essential aspect to the decision-</p>	<b>01 October 2025</b>

					<p>making process. If this cannot be achieved, it is recommended to withdraw the application and finalise the biodiversity offset prior to submitting a new application.</p> <p>4. The applicant Regulatory Requirements:</p> <p>4.1 Proof of the notifications sent to registered I&amp;APs for the commenting purposes must be included in the BAR.</p> <p>4.2 A dated photograph of erecting a site notice must be provided.</p> <p>4.3 Proof of placing an advertisement must be provided.</p> <p>4.4 Any new representations and comments received in connection with the application must be included in the BAR.</p> <p>4.5 Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the BAR.</p> <p>4.6 The minutes of any meetings held by the environmental assessment practitioner (“EAP”) with I&amp;AP’s and other role players which record the views of the participants must be included in the BAR.</p> <p>4.7 Please be advised that the signed and dated applicant declaration is required to be submitted with the BAR during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.</p>	
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					<p>4.8 In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the BAR during the formal application process for decision-making.</p> <p>4.9 You are furthermore reminded that the BAR must contain all the information outlined in Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended).</p> <p>5. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.</p> <p>6. This Department reserves the right to revise or withdraw its comments and request further information based on any information received.</p>	
<b>Western Cape Department of Infrastructure: Roads</b>	<b>Vanessa Stoffels</b>			<a href="mailto:Vanessa.Stoffels@westerncape.gov.za">Vanessa.Stoffels@westerncape.gov.za</a>	<p><b>Letter dated 06 October 2025</b></p> <p><b>PROPOSED EXPANSION OF ROMANSBAAI ABALONE, REMAINDER OF PORTION 2 OF FARM NO.711, CALEDON: COMMENTS ON BASIC ASSESSMENT REPORT</b></p> <p>1. Your e-mail to this Branch dated 28 August 2025 refers.</p> <p>2. The subject property is located 150m south of Gansbaai and takes access off Divisional Road 1214.</p> <p>3. This Branch offers no objection to the issuing of Environmental Authorisation in terms of the National Environmental Management Act 107 of 1998.</p>	<b>06 October 2025</b>
<b>PPP 4</b>						
<b>Basson Geldenhuys</b>	<b>DPW</b>			<a href="mailto:Basson.Geldenhuys@dpw.gov.za">Basson.Geldenhuys@dpw.gov.za</a>	<p><b>Email dated 30 March 2026</b></p> <p>Dear Michelle</p> <p>The matter below refers.</p>	<b>30 March 2026</b>

					<p>Could you please provide me with the following documentation:</p> <ul style="list-style-type: none"> <li>• The current lease for the pumphouse and pipeline;</li> <li>• The approved plans for the expansion of the pumphouse and pipeline, including an aerial map clearly indicating the proposed expansion.</li> </ul> <p>Kindly also arrange for a hard copy of the EIA application to be delivered to our office for my attention.</p> <p>Please confirm who the case officer is at DEADP. Kind regards</p>	
<b>Mercia J Liddle</b>	<b>DEA&amp;DP: CMU</b>			<a href="mailto:Mercia.Liddle@westerncape.gov.za">Mercia.Liddle@westerncape.gov.za</a>	<p><b>Email dated 15 April 2026</b></p> <p>Good day,</p> <p>The Sub-Directorate: Coastal Management has no further comments on the subject matter.</p> <p>Kind Regards</p>	<b>15 April 2026</b>
<b>Chester Arendse</b>	<b>Overstrand Municipality</b>			<a href="mailto:carendse@overstrand.gov.za">carendse@overstrand.gov.za</a>	<p><b>Letter dated 30 Aril 2026</b></p> <p><b>RE: Notice of Public Participation   Romansbaai Abalone Farm, Farm 711 Portion 2, Gansbaai.</b></p> <p>Your email dated 30th March 2026, please find attached comments from the Overstrand Environmental Management &amp; Conservation Division on the public participation process, on the Final Basic Assessment Report for the Proposed Expansion of Romansbaai Abalone Farm on Portion 2 of the Farm</p>	<b>Letter dated 30 Aril 2026</b>

					<p>No. 711, Gansbaai, Caledon Rd.</p> <p>A well-drafted report was submitted, and all the aspects were noted. Part of that, the following points were highlighted and noted:</p> <ul style="list-style-type: none"> <li>Alternative 4 emerged as the most environmentally and operationally balanced solution chosen through specialist involvements. This alternative sees the reduction in the proposed production area's footprint from 3 ha to 2 ha and the shifting of the platform to areas of low to medium ecological sensitivity.</li> </ul> <p><b>Botanical Assessment</b></p> <p>The primary ecological impacts identified as likely during the construction phase include:</p> <ul style="list-style-type: none"> <li>Loss of vegetation in areas mapped as Low, Medium, and High botanical sensitivity, including parts of an Endangered ecosystem (Southwestern Strandveld);</li> <li>Direct loss of five plant Species of Conservation Concern;</li> <li>Permanent transformation of approximately 0.8 ha of indigenous vegetation in the seawater reservoir footprint resulting in a Medium negative impact prior to mitigation and low medium after mitigation has been applied.</li> <li>The biodiversity offset is no longer considered applicable for the project. The area that was previously assessed as having a Medium</li> </ul>	
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					<p>residual impact has been reassessed following the reapplication of the mitigation hierarchy. Through the identification and implementation of additional mitigation measures, the botanical specialist confirmed that the residual impact associated with the loss of the Overberg Dune Strandveld vegetation type due to the construction of the seawater reservoir has been reduced to a Low-Medium negative impact.</p> <p><b>Animal Species Compliance Statement:</b></p> <ul style="list-style-type: none"> <li>The compliance statement confirmed the absence of sensitive animal species and habitats on the site. Based on a combination of desktop research and field verification, no species requiring further assessment were identified.</li> </ul> <p><b>Visual Impact Assessment:</b></p> <ul style="list-style-type: none"> <li>The overall visual impact of the proposed abalone farm expansion is low and not of such a nature that it will result in a deterioration of the cultural landscape. No mitigation measures are therefore deemed necessary.</li> <li>In summary, the 2025 expansion application has been developed with full consideration of the existing NEMA and municipal planning approvals. All relevant conditions from the 2008 assessments, 2009 Environmental Authorization, and 2013 amendment correspondence remain applicable and are adhered to. The application for consent use and amendment of the site development plan</li> </ul>	
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					<p>will be undertaken</p> <ul style="list-style-type: none"> <li>It is also noted that the botanical sensitivity of the site, indicates two patches of high botanical sensitivity. These areas are primarily located within the proposed photovoltaic (PV) array area and the footprint for the new seawater reservoir. Recognizing the ecological importance of these sensitive areas, the design of the new preferred alternative, Alternative Layout 4, has been refined to reduce environmental impacts. Alternative Layout 4 shifts the proposed production area, including the grow-out tanks, into areas of low and medium botanical sensitivity, avoiding the mapped high-sensitivity patches wherever possible. Compared to previous alternatives, the development footprint in Alternative Layout 4 has been significantly reduced.</li> </ul> <p>The EM&amp;C agree that Alternative 4 will be the referred lay-out to be implemented, due to the following:</p> <p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>Reduction in development footprint, minimizing the loss of endangered vegetation type.</li> <li>Production area is situated within low and medium botanical areas, avoiding complete loss of indigenous vegetation within high botanical sensitive areas.</li> <li>Location of the components next to the existing operation area minimizes the extent of the environmental impacts.</li> <li>The placement of new infrastructure (e.g., pipelines and pumphouse expansion)</li> </ul>	
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					<p>adjacent to existing operations avoids further habitat fragmentation and minimizes the need to disturb previously undisturbed areas.</p> <ul style="list-style-type: none"> <li>• The installation of a solar PV array reduces the long-term reliance on fossil fuels and contributes to a more sustainable operational model, supporting broader climate change mitigation efforts.</li> <li>• The proposed expansion is anticipated to create employment opportunities during both construction and operational phases, contributing positively to the local economy.</li> </ul> <p>Negative impacts:</p> <ul style="list-style-type: none"> <li>• Despite efforts to avoid high-sensitivity areas, the development will still result in the loss of vegetation within low to medium sensitivity zones, which may contribute to habitat degradation if not properly managed.</li> <li>• Temporary but unavoidable impacts such as dust generation, noise, and increased human activity during the construction phase may disturb local fauna and flora and require strict management through the EMPr. It should be noted the Overstrand Municipal EM&amp;C does support this application on the basis that the applicant adheres to all the aspects listed in the Draft report to ensure that the impact on the surrounding environment is minimized or avoided. It should be noted that the response from all relevant I&amp;AP's are noted and that the applicant should adhere to all.</li> </ul> <p>The Municipality reserves the right to revise these comments based on the availability of new information.</p>	
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<p><b>Rulien Volschenk</b></p>	<p><b>Overberg District Municipality</b></p>			<p><a href="mailto:rvolschenk@odm.org.za">rvolschenk@odm.org.za</a></p>	<p><b>Letter dated 04 May 2026</b></p> <p><b>RE: PROPOSED EXPANSION OF ROMANSBAAI ABALONE FARM ON REMAINDER OF PORTION 2 OF THE FARM 711, GANSBAAI, WESTERN CAPE PROVINCE</b></p> <p>The Overberg District Municipality’s Department of Environmental Management Services takes cognisance of the Final Basic Assessment Report for the development of the proposed expansion of Romans Baai Abalone Farm on remainder of Portion 2 of the Farm 71, Gansbaai, Western Cape Province.</p> <p>Based on the changes since the initial basic assessment of the project the municipality noted the:</p> <ul style="list-style-type: none"> <li>• Reduction of development footprint from approximately 9.6 ha (Alternative 1 and 2) to 6.9 ha (Alternative 4-preferred)</li> <li>• Reduction of the seawater reservoir footprint from 2 ha to 0.8 ha.</li> <li>• Amendment of project drivers from solely market expansion to include operational cost reduction and energy security, particularly via solar PV and gravity-fed seawater use.</li> <li>• Refinement of layout to avoid areas of highest botanical sensitivity, including milkwood thickets and limestone outcrops.</li> </ul> <p>The Overberg District Municipality has no objection towards the proposed development and supports Alternative 3 as the preferred alternative, for the following reasons:</p> <ul style="list-style-type: none"> <li>• The proposed development appropriately applies the mitigation hierarchy, reducing the impacts on Endangered Overberg</li> </ul>	<p><b>04 May 2026</b></p>
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					<p>Dune/Southwestern Strandveld d, avoiding sensitive ecological features such as milkwood thickets.</p> <ul style="list-style-type: none"> <li>• In alignment with municipal planning instruments (IDP &amp; SDF), the proposed development achieves a balanced outcome between environmental protection and socio-economic benefits.</li> </ul> <p>The Overberg District Municipality note the presence of invasive alien plant species on portion of the subject property, as identified in the specialist assessment and confirmed during the application process, In this regards, the property owner is reminded of their ongoing legal obligations, in terms of the National Environmental Management: Biodiversity Act (NEMBA), 2004 (Act No. 10 of 2004) and the Conservation of Agricultural Resources Act (CARA), 1983 (Act No. 43 of 1983) to control and eradicate invasive alien plant species and to prevent their spread across the property.</p> <p>The ODM reserves the right to revise their comments and request further information based on any information that may be received.</p> <p>Yours sincerely.</p>	
<b>Rhett Smart</b>	<b>Cape Nature</b>			<a href="mailto:rsmart@capenature.co.za">rsmart@capenature.co.za</a>	<p><b>Letter dated 04 May 2026</b></p> <p><b>Final Basic Assessment Report for the Proposed Expansion of the Romansbaai Abalone Farm, Remainder of Portion 2 of Farm Klipfonteyn 711, Gansbaai (DEA&amp;DP ref no: 16/3/3/1/E2/10/1035/25).</b></p>	<b>04 May 2026</b>

					<p>CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments.</p> <p>The current public participation process is the fourth round of public participation. A number of concerns have been addressed in the iterations of the Basic Assessment Report (BAR) and appendices, with the only outstanding issue consisting of the biodiversity offset. To reiterate, the biodiversity offset is required due to the impact rating of medium significance after mitigation in the botanical assessment addendum (25 July 2025) for the seawater reservoir. The National Biodiversity Offset Guidelines (“the guidelines”) require that a biodiversity offset must be investigated if the residual impact (impact after mitigation) is rated as medium negative or higher.</p> <p>It is noted in the introduction to the Final BAR that the demand for abalone has decreased and therefore the potential expansion is currently being put on hold. It further states that electricity costs are high, therefore the solar array is still proposed for implementation for off-grid electricity supply. The full development proposal is however still part of the application in case the abalone market recovers.</p> <p>An additional botanical specialist input is provided following the concerns raised regarding the proposed biodiversity offset in the previous round of comments. The two options which were presented in the biodiversity offset report were a monetary contribution or an on-site offset. The recommendation for the monetary contribution was based on the recommendation in the botanical addendum that</p>	
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				<p>conserving more of the same vegetation type which is well protected, namely Overberg Dune Strandveld would not result in a substantial contribution towards biodiversity, but rather that investment in clearing of invasive alien plant species within this vegetation type would result in a more substantial contribution towards biodiversity conservation. In this regard, the main reason for the endangered threat status is invasive alien plant species. The monetary contribution was proposed to be provided to a non-profit organization that undertakes clearing of invasive alien species, however there was no proposal for the specific expenditure of the funds and the concept in general did not comply with the National Biodiversity Offset Guidelines as then proposed. The monetary contribution was not supported by CapeNature.</p> <p>An 8 ha area which meets the offset ratios as per the guidelines was identified on site which could be conserved as an on-site offset. CapeNature supported that this proposal would meet the requirements of the guidelines, however we were in support of the recommendation by the botanical specialist that this would not make any meaningful contribution to the conservation of this vegetation type nor biodiversity conservation in general. The proposal was presented at the pilot Landscape South Offset Stewardship Screening Review on 3 February 2025. The purpose is to review potential biodiversity and wetland offsets prior to the CapeNature Stewardship Review to screen out sites that are not worthy of stewardship in terms of biodiversity value. The proposed 8 ha on site offset was not considered worthy of biodiversity stewardship and was recommended that contribution towards a cumulative strategic offset would be a more feasible option that will contribute towards biodiversity</p>	
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				<p>conservation.</p> <p>The additional botanical specialist input motivates that due to the intractability of the two proposed offsets, the impact ratings have been reviewed taking into consideration the reduced size of the reservoir to 0.8 ha and the well conserved status of the vegetation type and the residual impact is reduced from medium to medium-low. As a result, there is no requirement for a biodiversity offset. The previous proposed monetary contribution is put forward as a potential strategic offset.</p> <p>We wish to note that neither the size of the reservoir nor the protection status of the vegetation type have changed since the previous botanical addendum and we wish to recommend that the intractability of identifying an offset is not an acceptable motivation for changing the impact ratings. The botanical addendum assessed the impact significance in a table which took into account several criteria, namely extent, duration, intensity and probability. Section 6.2 of the guidelines which relates to impact significance indicates that significance is a combination of consequence and likelihood, whereby consequence is a combination of extent, duration and intensity. The criteria which were used in the botanical addendum therefore comply with the guidelines. The criteria for assessing impact significance are consistent with other guidelines such as the Species Environmental Assessment Guidelines, the draft provincial offset guidelines etc.</p> <p>With regards to the impact table in the botanical addendum, the rating of the extent of the impact for the development of the reservoir as local and regional could be queried, as the extent of the reservoir relative</p>	
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					<p>to the remaining extent of Overberg Dune Strandveld is insignificant and could be motivated to only be local. It is not however evident that a quantitative method was used to determine the significance. We further note that guidelines refer to significance in relation to vegetation threat status used in the 2012 methodology for threat status calculation focused on remaining extent and not the current multi-variable IUCN methodology.</p> <p>The correspondence from the non-profit organisation has been amended to refer to a particular property which is targeted for alien clearing. The property is the Remainder of Portion 2 of Farm 215 (referred to as “brown dog farm”), located east of the Kraaibosch Dam, in the vicinity of Baardskeerderbos. The vegetation type referred to for the property is Agulhas Sand Fynbos, listed as critically endangered, however the National Vegetation Map indicates the site as Overberg Sandstone Fynbos, listed as endangered, with small patches of Elim Ferricrete Fynbos (endangered) and Western Coastal Shale Band Vegetation (endangered in the west). The proposal therefore is an improvement from the previous proposal in that a specific property is targeted, but it is not framed within the context of a biodiversity offset.</p> <p>Regardless, if there is no requirement for a biodiversity offset as determined through the residual impact significance, the proposed monetary contribution would not be relevant to the outcome of the application, as it is not linked to the environmental impacts incurred by the development. We further do not consider the proposed monetary contribution to fall within the initial steps of mitigation, namely avoid, minimize and mitigate/restore, all of which would</p>	
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					<p>apply to actions which take place on the impacted property. The monetary contribution would fall within the definition of a trade-off or compensation.</p> <p>In conclusion, if the revised assessment of the residual impacts for terrestrial biodiversity is accepted, a biodiversity offset is not required, and the impact significance of the proposed development will be within the acceptable thresholds provided the other recommended mitigation measures are implemented. The current motivation for the change in impact significance is however not accepted and would need to be motivated in relation to initial methodology for determining the impact significance whereby there may be additional information or an aspect which was overlooked or misinterpreted.</p> <p>Should the change in impact significance not be accepted by the competent authority we recommend either of the two following options:</p> <ul style="list-style-type: none"> <li>• The development application is authorised (assuming non-biodiversity impacts are acceptable) but excludes the seawater reservoir from the authorisation. The project description indicates that only the solar array is being considered for development in the near future, therefore once/if the circumstances change such that the seawater reservoir is proposed for development, it can be included in an amendment application or separate application. By that stage a strategic offset may be set up and in place (unlike the current proposal), similar to the other operational strategic offset precedents e.g. Atlantis Land Bank, Saldanha (Besaansklip)</li> </ul>	
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					<p>Strategic Offset. The revised proposal still does not meet these requirements and would require buy-in from additional stakeholders.</p> <ul style="list-style-type: none"> <li>The development is authorised with an on-site offset consisting of the 8 ha as indicated in the layout plan below. The on-site offset does not qualify as a stewardship site therefore the conservation area can be a requirement in terms of the environmental authorisation. A conservation management plan would need to be a requirement for the conservation area. There are precedents for conservation areas which do not have a status other than a requirement in terms of the EA.</li> </ul> <p>We further wish to note that the application for a Sea Shore Lease for the expansion of the seawater intake pump house has been submitted which will be considered further once/if an environmental authorisation is issued.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	
<b>D'mitri Matthews</b>	<b>DEA&amp;DP: Development Management</b>			<a href="mailto:Dmitri.Matthews@westerncape.gov.za">Dmitri.Matthews@westerncape.gov.za</a>	<p><b>Letter dated 08 May 2026</b></p> <p><b>COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT ("BAR") SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998) ("NEMA") ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED EXPANSION OF THE ROMANSBAAI ABALONE FARM ON PORTION 2 OF THE FARM NO. 711, GANSBAAI</b></p>	<b>08 May 2026</b>

				<p>8. The Draft BAR March 2026, as received by the Directorate: Development Management Region 1 (hereinafter referred to as “this Directorate”) on 27 March 2027, refers.</p> <p>9. Following review of the information submitted to this Directorate, the Directorate notes the following:</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Volume</th> <th>Size(m<sup>2</sup>)</th> </tr> </thead> <tbody> <tr> <td>New production area/ grow out</td> <td>150 tons (wet weight)</td> <td>20000</td> </tr> <tr> <td>Line seawater reservoir</td> <td>41 000 m<sup>2</sup></td> <td>8000</td> </tr> <tr> <td>Solar array</td> <td>4MW</td> <td>40000</td> </tr> <tr> <td>Pumphouse</td> <td></td> <td>140</td> </tr> <tr> <td>4 additional pipelines</td> <td></td> <td>1200</td> </tr> <tr> <td>Total development footprint</td> <td></td> <td>69 340 (6.9</td> </tr> </tbody> </table> <p><b>10. Departmental comments on the draft BAR:</b></p> <p><b>10.1. Biodiversity Offset</b></p> <p>10.1.1. It is noted that the requirement with respect to a biodiversity offset has not been resolved.</p> <p>10.1.2. CapeNature has indicated in comment (dated 4 May 2026) that the recommendation by the botanical specialist for an on-site offset of 8ha would not make any meaningful contribution to the conservation of this vegetation type nor biodiversity conservation in general. The comment further indicated that the proposed 8 ha on-site offset was not considered worthy</p>	Description	Volume	Size(m <sup>2</sup> )	New production area/ grow out	150 tons (wet weight)	20000	Line seawater reservoir	41 000 m <sup>2</sup>	8000	Solar array	4MW	40000	Pumphouse		140	4 additional pipelines		1200	Total development footprint		69 340 (6.9
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					<p>of biodiversity stewardship. Clarity in this regard is required, as an offset is deemed necessary; however, it is also stated that the on-site vegetation is not conservation worthy and is not considered suitable for biodiversity stewardship.</p> <p>10.1.3. CapeNature further indicated that neither the size of the reservoir nor the protection status of the vegetation type have changed since the previous botanical addendum and that the intractability of identifying an offset is not an acceptable motivation for changing the impact ratings.</p> <p>10.1.4. The matter regarding the appropriate offset, or whether an offset is required, must be further investigated, and a motivation must be provided as to the appropriate mechanism that will be implemented to manage the biodiversity impacts associated with the reservoir.</p> <p><b>10.2. Alternatives</b></p> <p>10.2.1. Since the site identified for the placement of the reservoir is regarded as sensitive from a botanical perspective, it is advised that further technology alternatives be investigated.</p> <p><b>10.2.2.</b> Placing the reservoir on raised platforms could be considered to minimise impacts.</p> <p><b>11. The applicant Regulatory Requirements:</b></p> <p>11.1. Proof of the notifications sent to registered I&amp;APs for the commenting purposes must be included in the BAR.</p> <p>11.2. A dated photograph of erecting a site notice must be provided.</p> <p>11.3. Proof of placing an advertisement</p>	
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					<p>must be provided.</p> <p>11.4. Any new representations and comments received in connection with the application must be included in the BAR.</p> <p>11.5. Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the BAR.</p> <p>11.6. The minutes of any meetings held by the environmental assessment practitioner (“EAP”) with I&amp;AP’s and other role players which record the views of the participants must be included in the BAR.</p> <p>11.7. Please be advised that the signed and dated applicant declaration is required to be submitted with the BAR during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.</p> <p><b>11.8.</b> In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the BAR during the formal application process for decision-making.</p> <p>12. You are furthermore reminded that the BAR must contain all the information outlined in</p>	
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					<p>Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended).</p> <p>13. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.</p> <p>This Directorate reserves the right to revise or withdraw its comments and request further information based on any information received.</p>	
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