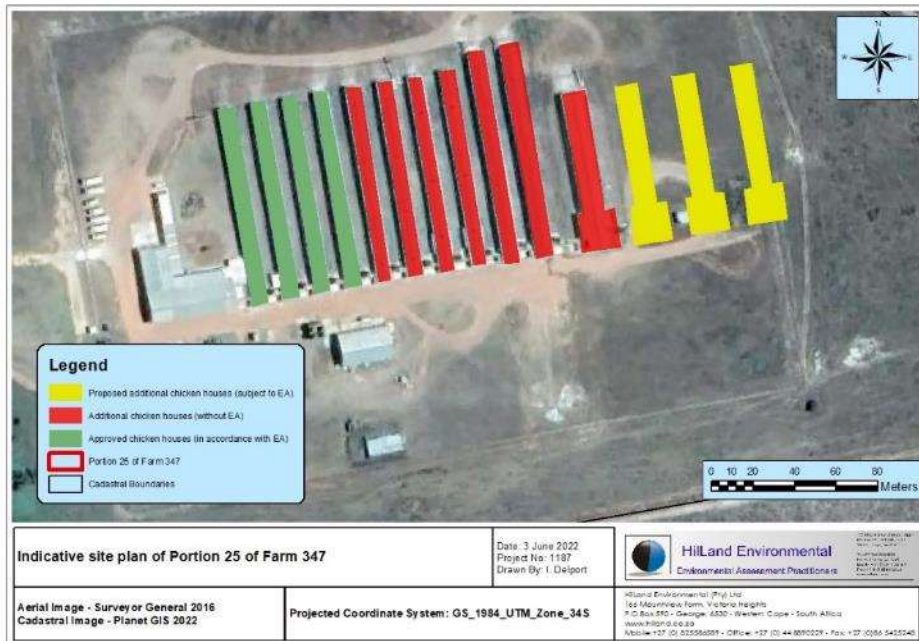


SITE SENSITIVITY VERIFICATION REPORT (SSVR)

For

PORTION 25 OF FARM 347, ZWARTEBOSCH, HUMANSDORP



| | |
|--------------------------|---------------------------------|
| Submitted by | HilLand Environmental (Pty) Ltd |
| HilLand reference | HUM22.1187.03 |
| Date | 15 September 2022 |
| Client | Dagbreek Eiers |

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Site Sensitivity Verification Report for Dakbreek Eiers, Humansdorp

Submitted to:

Eastern Cape – Economic Development, Environmental Affairs and Tourism – submission with Section 24G Application

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INTRODUCTION

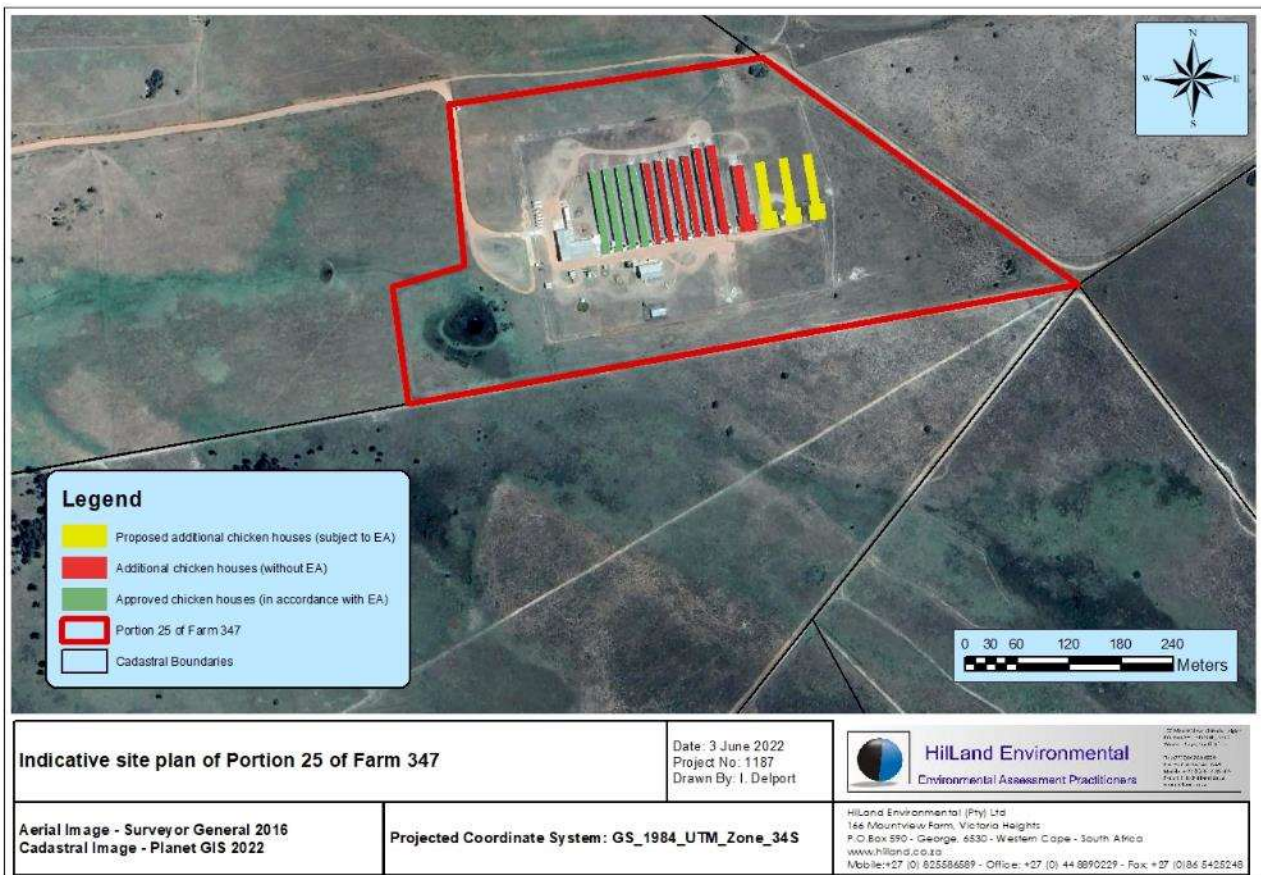
The "Protocols for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes ("the protocols") were promulgated in Government Notice No. 320, published in Government Gazette No. 43110 on the 20th of March 2020 and which came into effect on the 9th of May 2020. The Protocols are allowed for in terms of Sections 25(5)(a) and (h) and 44 of the National Environmental Management Act, 1998 (as amended) (Act No. 107 of 1998) ("NEMA").

Based on the National Screening Tool report various Themes and specialist reports are indicated, and the Site Verification of the themes identified in the Screening Tool Report is required to inform the process and assessment going forward. Site verification is undertaken in accordance with the various protocols.

This site sensitivity verification report forms part of the Section 24G application for the egg-laying facility on Portion 25 of Farm 347, Humansdorp.

Environmental Authorisation was granted for the establishment of an egg production facility on the property. The facilities were completed in 2005.

Due to an increase in demand for egg production, the landowner expanded the facility over the years within the area already assessed and in line with all the industry standards and protocols. The owner did not realise that the expansion of the facility within the area assessed initially required further NEMA Environmental Authorisation and therefore a S24G rectification is now required.



SCREENING TOOL RESULTS AND VERIFICATION

The DFFE screening tool report was generated for the following activities (08 August 2022):

- Agriculture_Forestry_Fisheries | Animal Production

The following development environmental sensitivities have been highlighted in the report and has been verified accordingly:

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

Verification of these sensitivities:

Agriculture theme (high sensitivity).

Reasons for sensitivity:

Sensitivity Features:

| Sensitivity | Feature(s) |
|-------------|--|
| High | Old Fields;Land capability;06. Low-Moderate/07. Low-Moderate/08. Moderate |
| High | Annual Crop Cultivation / Planted Pastures Rotation;Land capability;06. Low-Moderate/07. Low-Moderate/08. Moderate |
| Medium | Land capability;06. Low-Moderate/07. Low-Moderate/08. Moderate |

Based on the protocol an agricultural impact assessment will be required unless information gathered from the site sensitivity verification differs from the designation of “very high” or “high” agricultural sensitivity, and it is found to be of a “medium” or “low” sensitivity. If “low” or “medium” sensitivity – an agricultural compliance statement must be included unless indicated otherwise by the Department of Agriculture.

- **Site sensitivity verification for agriculture:**

The property historically was used for agriculture, cultivation for grazing of cattle, before the establishment of the authorised egg laying facilities. The facility is a well-known egg production company that provides eggs to various businesses in the area.

The facility is an existing agricultural activity that will continue as such. The need for an agricultural impact assessment is disputed as the proposal is the continuation of the agricultural use of the property. Retaining the facilities and the proposed final expansion will result in positive agricultural growth on the property and of the business in an area already approved for this agricultural use.

Animal species theme (high sensitivity).

In accordance with the protocol, on a site identified as being of "very high" or "high" sensitivity for animal species, a terrestrial animal species specialist assessment is required. Where information gathered from the site sensitivity verification differs from the screening tool designation of "very high" or "high" for animal species sensitivity and it is found to be of a "low" sensitivity, then a terrestrial animal species compliance statement will be required.

Reasons for high sensitivity and sensitivity verification:

| Sensitivity | Species | Preferred habitat | Sensitivity verification |
|-------------|--|--|--|
| High | Aves - <i>Circus ranivorus</i> African marsh harrier | It generally favours inland and coastal wetlands. | Preferred habitat not supported on the property. The small dam in the south, western corner remains unaffected. |
| High | Aves – <i>Neotis denhami</i> Denham's bustard | They can be found in a considerable range of secondary habitats including dense shrubland, light woodland, farmland, dried marsh and arid plains | Should this species be present on the property or in the surrounding area of farmland, the remainder of the property not covered by the egg-laying facilities and surrounding farmlands are considered to be sufficient habitat and the laying facility does not impact on their range. |
| High | Aves - <i>Polemaetus bellicosus</i> Martial eagle | Preference of open woods and woodland edges, wooded savannah and thornbush habitats. | Preferred habitat & vegetation type not supported on the property (consisting of transformed farmland). The egg laying facility does not impact on their range. |
| High | Aves – <i>Circus maurus</i> Black harrier | Preference of montane fynbos, renosterveld and strandveld habitats During autumn and winter - karoo and grassland habitats. | Fynbos preferences not supported on the property. Should this bird occur on the property during winter, sufficient habitat is provided by the remainder of the property not covered by the facility and surrounding farmlands. The egg laying facility does not impact on their range |
| High | Aves – <i>Bradypterus sylvaticus</i> Knysna Warbler | Preference of dense tangled scrub of forest edges on or relatively near the coast. | Preferred habitat not supported on the property. The egg laying facility does not impact on their range |
| High | Aves – <i>Eupodotis senegalensis</i> White-bellied/Barrow's Korhaan | Preference of grassland and open woodland habitats. | Should this species be present on the property consisting of farmland, the remainder of the property not covered by the egg-laying facilities and surrounding farmlands are considered to be sufficient habitat. The egg laying facility does not impact on their range. |
| Medium | Aves – <i>Afrotis afra</i> Southern black korhaan | Preference of semi-arid habitats such as shrub-lands and savannahs | Preferred habitat not supported on the property. The egg laying facility does not impact on their range. |
| Medium | Aves – <i>Tyto capensis</i> African grass owl | Preference of moist grassland and open savanna. | Should this species be present on the property consisting of farmland, the remainder of the property not covered by the egg-laying facilities and surrounding farmlands are considered to be sufficient habitat. |

| | | | |
|--------|---|---|---|
| | | | The egg laying facility does not impact on their range. |
| Medium | Mammalia – <i>Chlorotalpa duthieae</i> Duthie's golden mole | Its natural habitats are subtropical or tropical moist lowland forests, moist savanna, temperate grassland, arable land, pastureland, plantations, rural gardens, urban areas, and introduced vegetation. | Should this species be present on the property consisting of farmland, the remainder of the property not covered by the egg-laying facilities and surrounding farmlands are considered to be sufficient habitat. The egg laying facility does not impact on its range. |
| Medium | Sensitive species 8 Small antelope | Preference of forest habitats. | Habitat not supported on the property. The egg laying facility does not impact on its range. |
| Medium | Invertebrate – <i>Aneuryphymus montanus</i> Yellow-winged Agile Grasshopper | "amongst partly burnt stands of evergreen Sclerophyll in rocky foothills" (Brown 1960). | Habitat not supported on the property. The egg laying facility does not impact on its range. |

Based on the above sensitivity verification, the preferred habitat type of most of the sensitive species are not supported on the property. They were not encountered in the original biodiversity assessments undertaken for the EA issued in 2005.

Should any of these listed sensitive species preferring grasslands be present in the area in general, there is sufficient habitat available on the remainder of the property and in the surrounding farmlands that the egg laying facility will have no impact on their ranges.

It should be noted that the property is transformed cultivated agricultural land.

The high sensitivity for animal species is therefore **disputed** and should be low. No additional assessment is deemed to be necessary as the initial assessments informed the original decision in 2005.

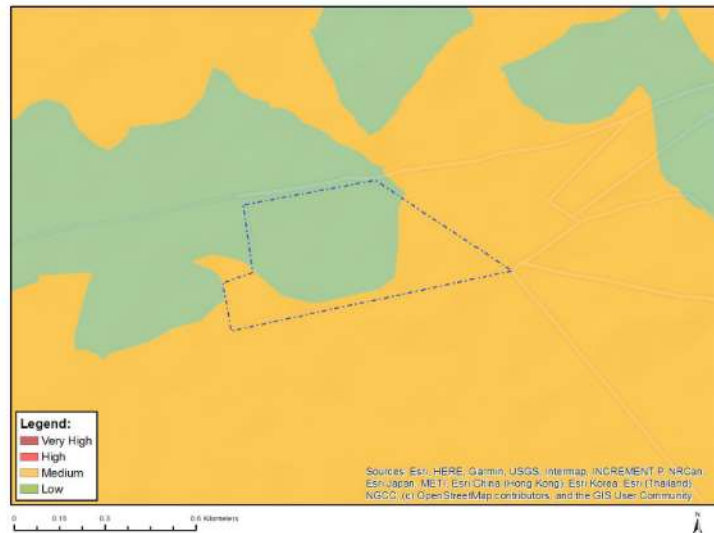
Plant species theme (medium sensitivity).

Reason for medium sensitivity:

Sensitivity Features:

| Sensitivity | Feature(s) |
|-------------|--|
| Low | Low Sensitivity |
| Medium | <i>Argyrobium crassifolium</i> |
| Medium | <i>Argyrobium trifoliatum</i> |
| Medium | <i>Indigofera hispida</i> |
| Medium | <i>Lebeckia gracilis</i> |
| Medium | <i>Lotononis acuminata</i> |
| Medium | Sensitive species 812 |
| Medium | <i>Erica humansdorpensis</i> |
| Medium | <i>Erica glandulosa</i> subsp. <i>fourcadei</i> |
| Medium | <i>Erica glandulosa</i> subsp. <i>breviflora</i> |
| Medium | <i>Gymnosporia elliptica</i> |
| Medium | <i>Agathosma gonaquensis</i> |
| Medium | Sensitive species 315 |

| | |
|--------|----------------------------|
| Medium | <i>Aristea nana</i> |
| Medium | <i>Bobartia macrocarpa</i> |
| Medium | Sensitive species 609 |
| Medium | Sensitive species 654 |



Sensitivity mapping for plant species

In accordance with the protocol the presence or absence of the sensitivity species must be inspected by a specialist. None of these species were recorded in the initial assessment that was done to inform the original EA in 2005.

- Sensitivity verification

Based on the sensitivity mapping, the sensitivity for plant species must be low for the application area. This can be confirmed as none of these sensitive species were present prior to the establishment of the egg-laying facilities. The property was historically cultivated and used for agricultural purposes and as such is totally transformed with no remaining natural indigenous vegetation. This is evident on the 2003 and 2022 Google Earth aerial images:



2003 Google Earth aerial image showing the transformed state of the property that consisted of cultivated agricultural land used for cattle grazing



2022 Google Earth aerial image showing the current state of the property (fully transformed as it was in 2003, with the exception of the established facility)

The medium sensitivity for sensitive plant species is **disputed** and should be low – no further assessments are deemed necessary.

Terrestrial biodiversity theme (very high sensitivity).

Reason for sensitivity:

Sensitivity Features:

| Sensitivity | Feature(s) |
|-------------|------------------------------|
| Very High | Critical biodiversity area 1 |
| Very High | Critical biodiversity area 2 |
| Very High | Ecological support area 1 |
| Very High | Ecological support area 2 |
| Very High | FEPA Subcatchments |

Sensitivity Features:

| Sensitivity | Feature(s) |
|-------------|---|
| Very High | Freshwater ecosystem priority area quinary catchments |

In accordance with the protocol, a terrestrial & aquatic biodiversity assessment will be required.

- Site sensitivity verification

As discussed above, the site was assessed prior to the original EA and was confirmed to be a cultivated transformed agricultural land. As such, the additional facilities did not / will not have an impact on any sensitive CBA / ESA's. Surrounding land uses includes agricultural habitats as such no corridors are impacted on. The CBA and ESA mapping is incorrect for the property and did not take the cultivation and existing use into account. The CBA and ESA mapping should be corrected for the area.

The property does not support any natural watercourses/wetland areas. The small dam mapped as artificial (it is a man-made dam) has not been impacted on by the egg laying facility (approved or expanded) on the property.



Based on the historic transformed state of the property, the sensitivity rating for both terrestrial and aquatic biodiversity is **disputed** and should be low and no further assessment is deemed necessary.

Archaeological and cultural heritage theme and paleontological theme (very high sensitivity and low sensitivity).

Reasons for sensitivity:

Archaeological and cultural heritage theme:

Sensitivity Features:

| Sensitivity | Feature(s) |
|-------------|-----------------|
| Low | Low sensitivity |

Palaeontology theme:

| Sensitivity | Feature(s) |
|-------------|---|
| Low | Features with a Low paleontological sensitivity |

Based on the general protocol a site sensitivity verification must be undertaken by the EAP or specialist.

- **Site sensitivity verification for archaeological, cultural heritage and paleontological resources:**

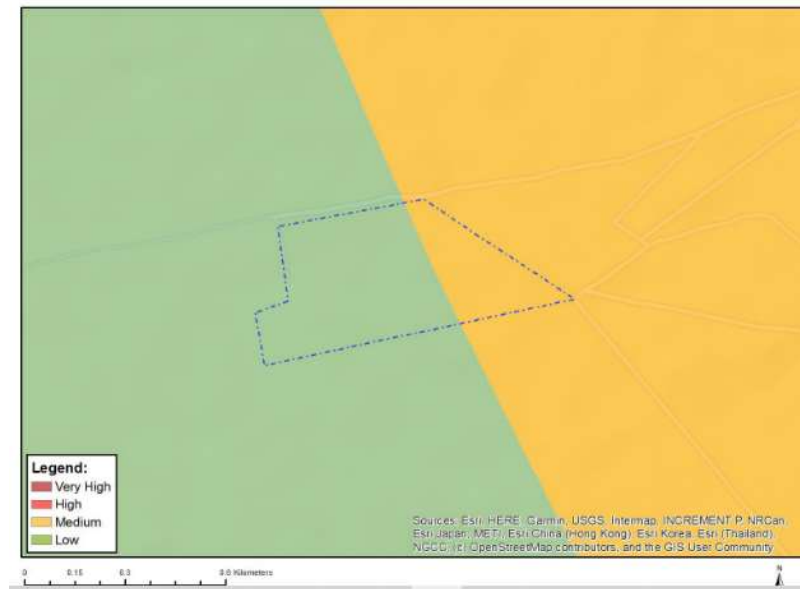
Historic transformation of the property through agricultural activities is evident since prior to the establishment of the facility. The low sensitivity is therefore confirmed and no further assessment is required.

Civil aviation theme (medium sensitivity)

Reasons for sensitivity:

Sensitivity Features:

| Sensitivity | Feature(s) |
|-------------|---|
| Low | Low sensitivity |
| Medium | Between 8 and 15 km of other civil aviation aerodrome |



Map of site sensitivity

- Site sensitivity assessment for civil aviation theme

Based on the site sensitivity mapping, only the eastern section of the property forms part of a 'medium' sensitivity while the western section is low. The sensitivity is based on the distance the property is located from a civil aerodrome. The facility is in line with the Municipal building regulations as such it has no impact on civil aviation. The sensitivity for the facility is therefore low and no further assessment is deemed necessary.

- Defence theme (low sensitivity)

The proposal will not impact on the defence theme as such no further assessments will be required and sensitivity should remain "low".

SPECIALIST ASSESSMENTS

Based on the site sensitivities identified, the screening tool identified the following specialist assessments. A motivation is provided at each of the assessments not undertaken.

- **Landscape/visual impact assessment** – the expansion of the facility was established on transformed agricultural land surrounded by agricultural uses. The original facility is approved and the expansion of the facility is in line with municipal guidelines and building regulations. There is no change to the visual character of the site. The facility is therefore in line with the existing land use and surrounding areas. It also does not block any views. The need for a landscape/visual impact assessment is therefore disputed.

- **Archaeological and cultural heritage impact assessment & paleontological assessment** – the sensitivity was rated and confirmed to be low. No assessments were required during the authorisation process of the first 4 houses and no resources were discovered during construction. No further assessment was deemed necessary.
- **Terrestrial biodiversity impact assessment** – based on the historic use and transformation of the property no sensitive terrestrial biodiversity is supported on the property. The need to a terrestrial biodiversity impact assessment is therefore disputed.
- **Aquatic biodiversity impact & hydrology assessment** – the only water resource present on the property is the small farm dam in the southwestern corner. This dam remains unaffected. Based on this the need for an aquatic / hydrology assessment is disputed.
- **Traffic impact assessment** – the property is accessed by provincial roads, the R330 and access driveway. The property is in a rural area surrounded by agricultural farms. The operation of the facility therefore will not impact on the traffic of the area. The need for a traffic impact assessment is therefore disputed. The municipality have not required any traffic studies to inform their approval of the facility or the expansion. The use is agricultural production and the roads in the area are designed for agricultural purposes.
- **Socio-economic assessment** – the operation of the facility, the expansion that took place and the proposed future expansion have had various positive socio-economic impacts. Based on the positive impacts, the need for a socio-economic assessment is disputed.
- **Ambient air quality impact assessment** – the property is in an isolated area, with the nearest homestead approximately 1km away. No complaints with regards to smell have been received during the operation of the facility. The facility operated according to the industry standards and protocols. It is recommended that mitigation measures as per the EMPr is implemented and procedure for manure collection must remain as per the approved standard of operation. The need for ambient air quality impact assessment is based on this, disputed.
- **Plant species assessment** – the property has been historically used for agricultural cultivation and grazing purposes. As assessed in the original application, no sensitive species were noted on the property which only consisted of cultivated grazed agricultural land. The site sensitive from the original application did not change and the additional facilities did not/will not result in the disturbance of the listed plant species (not recorded on the site). The need for a plant species assessment is therefore disputed based on the transformed state of the property.
- **Animal species assessment** – as assessed above, the preferred habitat types of most of the sensitive species are not supported on the property directly. Should the species preferring grasslands be present in the area, sufficient habitat is provided on the remainder of the property and in the surrounding farmlands. It should be noted that the property is transformed cultivated agricultural land which was assessed prior to the initial approval in 2005. Based on the transformed state of the property, the need for an animal species assessment is disputed.