ANNEXURE I 1: SITE SENSITIVITY VERIFICATION REPORT

SITE SENSITIVITY VERIFICATION REPORT FOR:

THE PROPOSED DECOMMISSIONING OF AN AQUACULTURE FACILITY ON FARM NO. 1259, MALMESBURY DIVISION

SCREENING REPORT FOR AN ENVIRONMENTAL AUTHORIZATION AS REQUIRED BY THE 2014 EIA REGULATIONS – PROPOSED SITE ENVIRONMENTAL SENSITIVITY

EIA Reference number:

Project name: DECOMMISSIONING OF AN AQUACULTURE FACILITY AND REDEVELOPMENT OF A PORTION OF FARM 1259, MALMESBURY RD AT PATERNOSTER

Project title: BASIC ASSESSMENT REPORT

Date screening report generated: 03/01/2024 08:48:30

Applicant: Paternoster Groepbelange Ltd

Compiler: Dupré Lombaard (EAPASA: 2019/304) for Virdus Works Environmental (Pty) Ltd

Compiler signature: .....

Application Category: Agriculture_Forestry_Fisheries|Aquaculture|Marine|Indigenous

Report terms of the Protocols for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes (Government Notice No. 320 of 20 March 2020).

Western Cape Department of Environmental Affairs and Development Planning Reference: TBC

24 November 2025

Amended report 03 February 2026

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Applicant: **Paternoster Groepbelange Ltd Reg. No. 1984/009223/06** Represented by: Mr JF Pienaar Telephone: +27 22 752 2616 / +27 82 340 9294 E-mail: kobus@paternostergroep.co.za Address: 1 Kreeftegang, Paternoster, 7381, South Africa	**EAP:** **Virdus Works Environmental (Pty) Ltd Reg. No. 2019/133896/07** Represented by: Mr Dupré Lombaard SACPLAN: B/8076/1998 // EAPASA: 2019/304 Mobile: +27 82 895 6362 E-mail: dupre.lombaard@virdus.com Address: 3rd Floor, Time Square, Elektron Street, Techno Park, Stellenbosch, 7600, South Africa

1. INTRODUCTION

The proposed redevelopment of an existing aquaculture facility on Farm 1259, Malmesbury RD to allow for the rezoning of the property for mixed-use business and residential accommodation purposes complementary of the abutting waterfront development on Erf 2063, Paternoster requires Environmental Authorisation (EA) as it entails the decommissioning[1] of the existing aquaculture facility on the site.

The Minister of Forestry, Fisheries and the Environment (DFFE) published Regulations Laying Down the Procedure to be Followed for the Adoption of Spatial Tools or Environmental Management Instruments, in Government Notice No. 542 of 5 April 2019 in terms of the National Environmental Management Act, 1998, Act 107 of 1998 (NEMA). In terms thereof, prior to making any application for activities listed in terms of the Environmental Impact Assessment (EIA) Regulations, 2014 or undertaking any assessment of a subject site, the environmental sensitivities of the site have to be determined by the use of the environmental screening tool. Such screening report has been prepared for the decommissioning of the aquaculture facility on a 1,21 ha portion of Farm 1259, which has an area of 3,12 ha.

The Minister further published requirements for undertaking of site sensitivity assessments and verification thereof where environmental authorisation is required in terms of NEMA EIA Regulations. In terms of the Site Sensitivity Verification Requirements where a Specialist Assessment is Required but no Specific Assessment Protocol has been Prescribed, the current land use and environmental sensitivity of the subject site must be confirmed by a site sensitivity verification. The Assessment Protocol determines that where any part of the site is indicated as having a "high" or "very high" sensitivity, the requirements prescribed for such sensitivity must be followed, unless the site sensitivity verification report (SSVR) can show that the required specialist assessment is not required.

[1] ***"decommissioning"*** *means to take out of active service permanently or dismantle partly or wholly, or closure of a facility to the extent that it cannot be readily re-commissioned;* Environmental Impact Assessment Regulations Listing Notice 1 of 2014 as amended.

In terms of the Protocol, the appointed independent environmental assessment practitioner (EAP) may prepare the SSVR, as is presented herewith.

1.1 Details of the EAP

Virdus Works Environmental (Pty) Ltd, Reg No. 2019/133896/07 assigned the project to Dupré Lombaard as registered EAP and planner (EAPASA 2019/304 / SACPLAN B/8076/1998) following appointment by the Paternoster Group. Dupré Lombaard has been in environmental practice since 2000. Since then, he has prepared and submitted many environmental authorisation applications and undertaken assessment and management processes.

Education and training
M.Sc. (Earth Sciences), 2000 – 2002 (cum laude) - University of the Western Cape. Focus on Fluvial Geomorphology, Hydrogeology, GIS, and Environmental Law.
M.A. (Geography), 1985 – 1989 - University of the Orange Free State. Research in Urban Geography.
Honns. B.A. (Geography), 1981 – 1982 - University of South Africa.
B.Mil. (Economics and Geography), 1978 – 1980 - Military Academy (Faculty of Military Science, University of Stellenbosch).

Other certified training courses
Introduction to nature conservation, 1979 - Cape Provincial Administration.
Transport and traffic engineering, 1991- SA Institute for Town and Regional Planners.
Project Management for Environmental Managers, 2009 - University of the Free State.
Integrated Water Resource Management, 2010 - University of the Western Cape.
Accredited Green Building Professional, 2010 – Green Building Council of South Africa.
SAMTRAC (SHEQ), 2010 - National Occupational Safety Association.
Municipal Minimum Competency Training, 2014 - University of Stellenbosch.
Commercial Mediation, 2016 - University of Cape Town.

Membership of professional and registration bodies
Registered Planner - SA Council for Town and Regional Planners since 1998 (B/8076/1998).
Registered Environmental Assessment Practitioner - Environmental Assessment Practitioners Association of South Africa since 2021 (2019/304).
Member of IAIA SA since 2001 (member 1060).

1.2 Details of the site

The site is a part of Remainder Farm 1259, Malmesbury RD in Paternoster. It forms a part of the larger waterfront area (Erf 2063) with access off Kreeftegang. It was until recently used for aquaculture purposes, currently only for crayfish holding tanks. The farm has an area of 3,12ha. The existing buildings and aquaculture facilities on the site are in buildings with a combined floor area of approximately 4 200m² and cover an area of roughly 1,2ha.

Site locality: SG Code: C04600000000125900000 / Location: Lat: 32° 48' 25.295'' S | Lon: 17° 53' 0.29'' E.

Figure 1: Farm 1259 locality

The crayfish factory was built when the Paternoster Visserye company was established in the early 1960's and it remained in full operation until its closure in 2019. On average 300 migrant labourers and 500 Paternoster locals were employed at the factory that processed more than 30 000 crayfish per day in the season. To process the crayfish, most of which were sold fresh (live) to European buyers, they had to be kept alive in tanks filled with sea water from delivery to packing.

The old factory consists of a large concrete building with an asbestos-cement roof. Inside the building there are twenty concrete tanks (2m² and 1m deep) holding 40m³ of fresh sea water. The tanks are arranged in two rows, with each tank in the row a little lower than the tank next to it. The building was built on land that slopes down to the sea. Water was extracted from the sea on the Bekbaai (western) side of the facility and into the two highest tanks from where the water overflowed into the lower tanks, in sequential order, and finally the water ran back into the sea. When crayfish were held in the tanks fresh sea water was constantly pumped into the tanks. In this way several thousand crayfish could be kept alive for a week or more to be purged (cleaned of any food matter) and exported live.

Figure 2: Farm 1259 decommissioning site locality

Figure 3: Farm 1259 aquaculture setup

1.3 Screening report details of the site

The site screening report returned the following outcome:

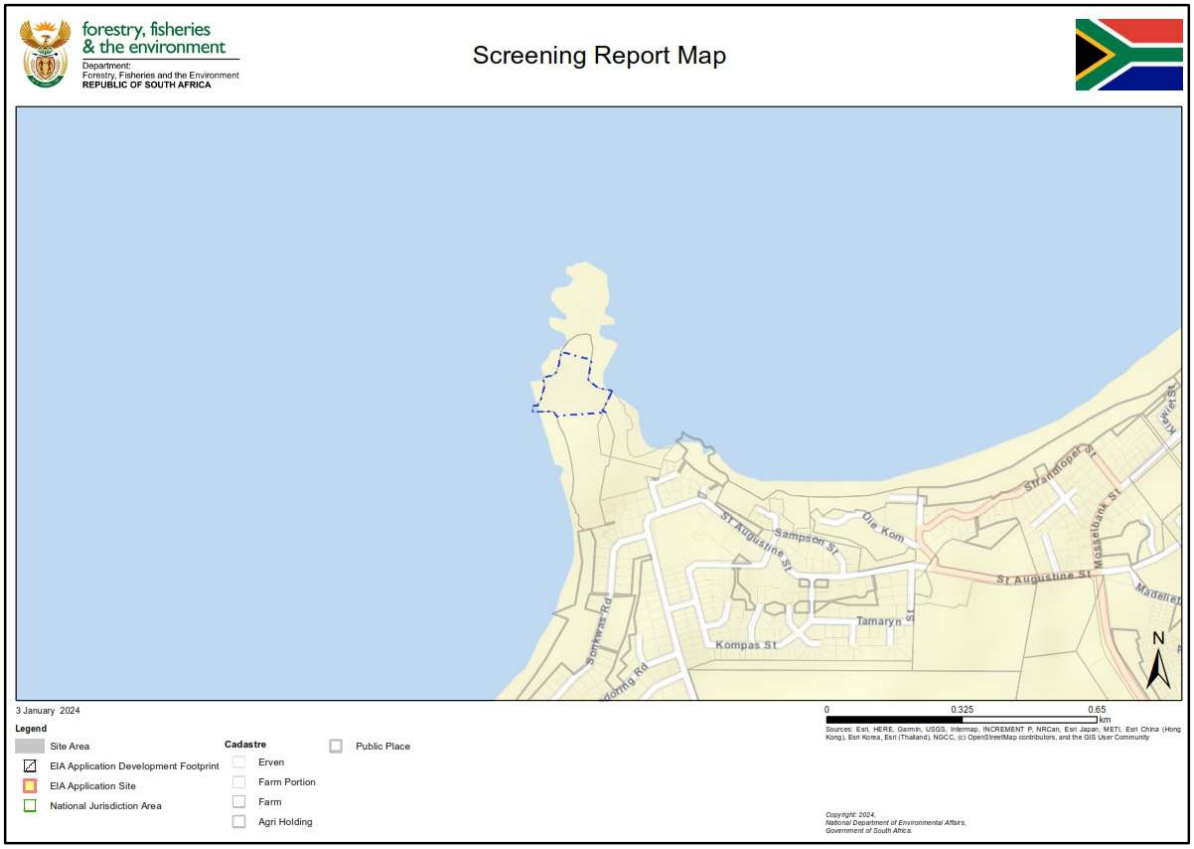

Figure 4: Site screening report map

The following summary of the development site environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

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

Based on the selected classification, and the known impacts associated with the proposed development, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.

1.3.1 Marine Impact Assessment; and

1.3.2 Socio-economic Assessment.

2. SITE VERIFICATION

2.1 Animal Species Theme

Rating: Low.

Agreement with the rating in general but recommended that it be negligible or very low in view of the complete transformation of the habitat.

No animals other than rats, mice, and moles were observed on the site during site visits, inclusive of site visits by SACNASP registered ecologists.

The site is completely transformed and used for industrial (aquaculture) purposes and the site therefore will not contain species that are sensitive to habitat transformation or the decommissioning of the facility and the change in use.

2.2 Aquatic Biodiversity Theme

Rating: Low.

Agreement with the rating in general but recommended that it be negligible or very low in view of the application to decrease activity levels.

The decommissioning of the facility and the change in use within the transformed site will have no effect on the aquatic environment. No water resources occur on or near the site. It is also unlikely that groundwater resources would be affected, given the site locality on the peninsula.

2.3 Archaeological and Cultural Heritage Theme

Rating: Very High.

Agreement with the rating in general but recommended that it be medium or low in view of the existing buildings and transformation of the land.

The site is covered by more than 4 200m² of buildings and it is completely transformed and used for industrial (aquaculture) purposes. The decommissioning occurs inside of the existing buildings and no change to the buildings is recommended. Nonetheless, the surrounding area is rich in cultural heritage, as shell middens and other artefacts are often found in the immediate vicinity. The site is also located within 2km of a Grade II Heritage site.

Heritage Western Cape has issued a permit and agrees with the lower rating.

2.4 Civil Aviation Theme

Rating: High.

Disagree with the rating. It is recommended that it be negligible or very low in view of the existing use and distance to any civil aviation infrastructure.

There are no landing strips or airfields within 15km of the site. The nearest airfield, located between Vredenburg and Saldanha, has a runway oriented north-south and it does not align towards the site. The Langebaan Air Force Base and Flying School airfield is even further away, and its runways likewise do not align to the site.

2.5 Defence Theme

Rating: Low.

Agreement with the rating. It is recommended that it be negligible or very low in view of the existing use and distance to any defence infrastructure.

The site is not located close to any national key point, or strategic infrastructure and the intended use thereof does not pose a threat to national security.

2.6 Plant Species Theme

Rating: Low.

Agreement with the rating in general but recommended that it be negligible or very low in view of the complete transformation of the habitat.

No vegetation of significance was observed on the site during the site visits by the SACNASP registered ecologists. The site is completely transformed and used for industrial (aquaculture) purposes and the site therefore does not contain significant patches of natural vegetation, consisting of Langebaan Dune Strandveld.

2.7 Terrestrial Biodiversity Theme

Rating: Very High.

Disagree with the rating. It is recommended that it be negligible or very low in view of the complete transformation of the habitat.

As indicated above, the site is completely transformed and used for industrial (aquaculture) purposes. Even though the site falls within a Critical Biodiversity Area (CBA) and Ecological Support Area (ESA), and it should accordingly be maintained in a healthy ecological condition (natural or semi-natural state) to meet biodiversity targets, the proposed activity (decommissioning and reuse of existing buildings) poses no threat to the biodiversity of the surrounding area and no vegetation of significance occurs on the site.

Figure 5: Site photographs illustrating transformation

3. ANALYSIS

3.1 Desktop

The desktop assessment of the site sensitivity indicates some parts thereof being of critical biodiversity value, as illustrated below on the extract from Cape Farm Mapper.

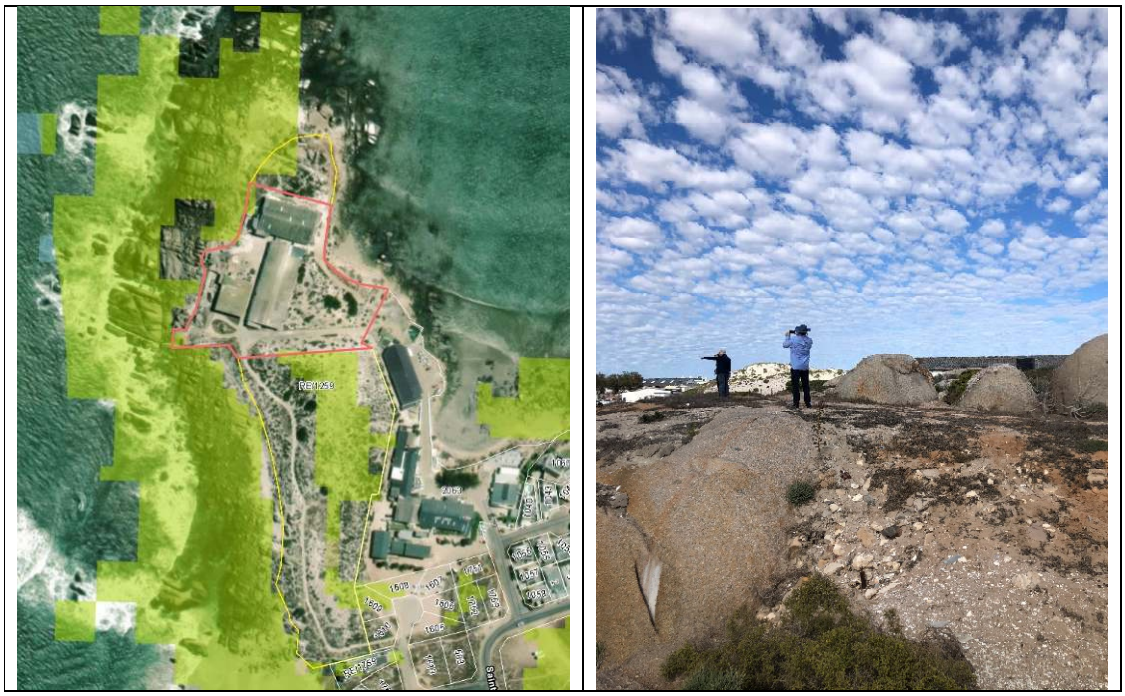

Figure 6: CBA mapping and site check illustrating transformation

3.2 Site assessment

The following studies by Nicolaas Hanekom, Pri.Sci.Nat (Ecology) 400274/11 (Phone: 0769636450 // Email: nicolaas@enviro-eap.co.za), done in August 2021 for the "*Redevelopment of an aquaculture facility and surrounding erven into a tourist complex*" were considered.

3.2.1 Terrestrial Biodiversity Impact Assessment;
3.2.2 Terrestrial Animal Species Compliance Statement; and
3.2.3 Terrestrial Plant Species Impact Assessment.

The outcome of the biodiversity assessment is:
" *The sampling and analysis of the site, provides suitable data and results to present an informed decision on the local ecology and terrestrial biodiversity features. The lists of species for the site are based on those observed at the site as well as those likely to occur in the area based on their distribution and habitat preferences. This represents a sufficiently conservative and cautious approach. During the site visit, the different biodiversity features, habitat, vegetation and landscape units present were identified and recorded in the field. Walk-through-surveys were conducted of representative habitats and areas of interest and species observed were recorded. Searches for listed species of conservation concern at the site were conducted, but none were observed which required the recording of their location. Active searches for reptiles and amphibians were also conducted within habitats likely to harbour or be important for such species. The presence of sensitive habitats such as wetlands or pans and unique edaphic environments, such as rocky outcrops or quartz patches, will not be impacted or affected.*

The proposed development on the site will have relatively little terrestrial biodiversity and ecological impact on sensitivity areas and the surrounding terrestrial biodiversity features provided that appropriate mitigation measures included in the impact table above are included in the EMPr and adhered to.

No additional survey or further assessment is in the authors view recommended.

Provided that activities are restricted to the property and development areas, as well as the mitigation measures to reduce the impacts of the activities are implemented, then the activities are not likely to result in long-term degradation of the receiving environment or significant net loss of terrestrial biodiversity."

4. SPECIALIST STUDIES REQUIRED

4.1 Marine Impact Assessment

The requirement for a specialist study is based on the standard screening tool assumption (algorithm) that a development will occur, i.e., some form of transformation and higher intensity of use, i.e., increased potential for impact. The screening tool does not allow for specification of a decommissioning, i.e., a reduction in the activity related to the marine environment and a decrease in the potential impact.

The sea water pumped into, circulated through the facility, and released back into the sea will reduce more or less by 80%. This reduction is already effective, as the total volume of crayfish kept in the facility is already less than 10% of the capacity of the facility due to the lowering in the quotas for harvesting crayfish and the disuse of the facility.

A marine impact assessment will therefore not be undertaken, as the outcome of the EA is a predictable lowering of any potential impact.

4.2 Socio-economic Assessment

A socio-economic assessment was prepared for the original application, assessing the effects of the outcome of the decommissioning, namely the redevelopment of the site as a tourist facility. This specialist assessment has been updated to consider the smaller scale project relevant to the reuse of the existing buildings only.

As above, the screening tool algorithms are set up for increased activity and potential impacts, not for reduction. It is obvious that the decommissioning will theoretically result in a lower economic benefit for the local community, but in this instance it is not caused by the decommissioning. The cause of the decline in economic benefit is the decline in the crayfish resource and the allowable catch (quota).

The socio-economic impact assessment will form part of the basic assessment process.

4.3 Archaeological and Cultural Heritage Impact Assessment

Due to the provisions of Section 38 of the National Heritage Resources Act, 1999, Act 25 of 1999, authorisation is required for the redevelopment of the site due to the rezoning of more than 10 000m² from an industrial zone to a business zone. The requirement for the authorisation application is a heritage permit, which is not required in terms of the screening tool but has already been obtained from Heritage Western Cape as the competent authority. HWC thus agreed that the site sensitivity from heritage perspective is very low to negligible.

5. CONCLUSION

In view of the above, two specialist assessments are recommended for the basic assessment process. The recommended specialist assessments are not those required by the screening tool report but are of relevance to the authorisation application.

There are valid reasons for not undertaking the recommended marine impact assessment and it is recommended that its exclusion be accepted by the competent authority.