

SITE SENSITIVITY VERIFICATION STATEMENT
PROPOSED WASTEWATER TREATMENT FACILITY AND ASSOCIATED INFRASTRUCTURE ON REMAINDER FARM 695 AND REMAINDER OF PORTION 12 OF FARM RIETFONTEIN 175, BONNIEVALE, WESTERN CAPE

All applications submitted after the 4th October 2019 are legally required to include a screening report generated by the online Department of Environmental Affairs (DEA) Screening Tool. Protocols for the reporting of certain environmental themes must also be taken into account.

In this instance, specialist studies informed a pre-application BAR in 2019. These studies will be used and/or expanded upon to inform the Draft BAR, post submission of the application form.

The table below serves to:

- Verify sensitivities identified in the screening report as it relates to the preferred alternative;
- Confirm/ refute the various specialist inputs called for in terms of the screening report;
- Indicate the reporting requirements for the specialists, where known at this point in time.

This site sensitivity verification is based on a site visit that was undertaken by the EAP on 25 February 2022, as well as initial inputs from specialists, as detailed below.

SENSITIVITY AND SPECIALIST INPUT IDENTIFIED IN TERMS OF THE DEA SCREENING TOOL	VERIFICATION OF SENSITIVITY AND MOTIVATION ON THE NEED FOR SPECIALIST INVESTIGATION
Medium sensitivity agricultural theme necessitating an agricultural compliance statement (in accordance with the protocol prescribed in GNR 320).	While the site is zoned for agriculture, the preferred location has not been used for extensive agriculture of late. The WWTW is proposed inside an old small dam and surrounding area that was used for collecting, retaining and irrigation of effluent from the Lactalis factory. The proposal will however constitute a change in land use, and hence, a specific written request for comment will be submitted to the Department of Agriculture in this regard. An Agricultural Compliance Statement will be undertaken if called for by the Department of Agriculture.
High sensitivity animal species theme necessitating a Terrestrial Biodiversity Assessment and an Animal Species Assessment (in accordance with the protocols prescribed in GNR 1150).	There is no natural faunal habitat remaining in the footprint of the preferred alternative. This will be confirmed by the botanist. The screening tool's high sensitivity rating for this theme is based on the potential presence of one SCC, namely the Black Harrier (Endangered). It is well documented that this species nests in tall vegetation and this is entirely lacking on site. The species does not breed in transformed and cultivated lands, although it may forage in these environments (Curtis et al. 2004). The proposed WWTW and related infrastructure will present a minor reduction in the area available for this species to forage on (if it even utilises the site for this purpose), however, the remainder of the site and surrounds present ample foraging conditions in similarly transformed and cultivated lands. As such, the proposal will not impact on this SCC. The site presents no important or unique habitat for animal species, and hence, have no sensitivity in relation to this theme. Therefore, it is submitted that no animal species assessment / faunal impact assessment is required.
Very high sensitivity aquatic biodiversity theme necessitating an aquatic biodiversity impact assessment (in accordance	There are a number of watercourses that could be affected by the proposal, of which the Breede River and relevant tributaries are most significant. As such, the site has sensitivity in relation to aquatic biodiversity and an Aquatic Biodiversity Impact Assessment is required. The 2019 report was prepared by a specialist that is not

with the protocol prescribed in GNR 320).	registered with SACNASP. A new assessment (which may draw on information from the 2019 report) will be undertaken by Dean Ollis of Inland Water consultancy. The Freshwater Impact Assessment will meet the reporting requirements of the Aquatic Biodiversity protocol.
Medium sensitivity civil aviation theme which needs a Civil Aviation Compliance Statement in terms of the protocol (GNR320)	It is acknowledged that the site falls within an area identified by the screening report to be within 8 – 15 km of "other civil aviation aerodrome". The nature and height of the proposal is such that it will in no way have an influence on the airspace or civil aviation aspects in the area. Therefore, there is no site-specific sensitivity in this regard and hence, no specialist assessment will be undertaken.
Low sensitivity defence theme which needs no further inputs in terms of the protocol (GNR320)	The EAP agrees with the low sensitivity rating for this theme. The proposed facility will not compromise the ability of the defence force to defend the area against any unrest / threats on security. The site therefore holds no defence sensitivity, and therefore no further investigations are deemed necessary. This is aligned with the protocol requirement that prescribes no further requirements for areas identified to have low sensitivity in the defence theme.
Very High sensitivity terrestrial biodiversity theme and Medium sensitivity Plant Species theme, necessitating a Terrestrial Biodiversity Impact Assessment and Plant Species Assessment (in accordance with the protocols prescribed in GNR 320 and GNR 1150).	The indigenous vegetation type in this area, namely Breede Shale Renosterveld has been removed by in the historical construction of the farm dam and ploughing of furrows where the effluent from the Lactalis factory was historically dispersed. The proposed pipeline would be along a disturbed track where there is no longer any renosterveld vegetation and where the habitat now has very low botanical sensitivity. This was determined by Dave McDonald (Bergwind Botanical Tours and Surveys) in 2019. This specialist will update his 2019 report to consider any change in conditions since that time, and to meet the reporting requirements of the protocols prescribed in GNR320 and GNR1150 in relation to botany (with some comment on faunal aspects).
High sensitivity archaeological and cultural heritage theme, and very high sensitivity palaeontology theme. The screening report indicates the need for an Archaeological and Cultural Heritage Impact Assessment as well as a Palaeontology Impact Assessment.	A NID was prepared by a heritage practitioner in 2019 and submitted to HWC. In May 2019, confirmation was received from Heritage Western Cape that the NID is accepted and that no further studies are required. This determination will remain valid as heritage aspects will not be affected by the short timeframe since the pre-application phase was undertaken for this project.
The need for a socio-economic impact assessment	The EAP can adequately account for the socio-economic impacts of the factory and effluent treatment facility and adequately capture and consider sentiments from neighbours / potentially affected parties. No specialist inputs warranted.
The need for a hydrological impact assessment.	The site has existing surface- and groundwater abstraction rights, so this aspect needn't be considered from a hydrological perspective. The appointed freshwater ecologist will determine flow aspects as it relates to the surface watercourses. The freshwater specialist did not indicate the need for further hydrological inputs in this regard. No hydrological study is therefore warranted at this point in time.
The need for an ambient air quality impact assessment.	The need for this study is presumably based on concerns regarding odour. Odour not associated with main plant. Adequate management and mitigation measures are available to avoid/limit odour impacts resulting from temporary storage of sludge prior to

	removal off site. It is the EAPs considered opinion that no specialist inputs are warranted.
The need for a health impact assessment.	<p>There are no hazardous micro or other constituents in the effluent or added in the treatment process that would have a negative impact on human or environmental health. In this regard, it is submitted that the effluent emanates from the production of food items and cleaning of food preparation equipment (exactly similar to domestic dishwashing but at a larger scale). It is therefore completely safe. There are similar plants around the world without impact on health and wellbeing of staff and surrounding land users.</p> <p>The effluent will be treated to bring the solids, salts, lipids, biological and chemical oxygen demands in line with the limits for river discharge (in this region the general limits apply). The quality of the final effluent will be monitored and meet the requirements of the GNR 36820 of 6 September 2013 as well as the 2021 approved Water Use Licence issued for the proposed facility.</p> <p>The potential for groundwater and surface water contamination as a result of effluent discharge and/or leaks was / will be assessed by relevant specialists, as per this table.</p> <p>In light of the above, the EAP believes that no further specialist inputs are warranted.</p>
The need for a geotechnical impact assessment	A geohydrological study was done (2019) and will remain valid. The findings will be included in the Draft BAR.
-	GEOSS has undertaken a groundwater impact assessment in 2019 which will remain valid. This study will be included in the Draft BAR.

The site conditions and sensitivity ratings as verified above are clearly evident in the photographs below.



Plate 1: WWTW site, showing small dam basin



Plate 2: Existing access road adjacent to small dam



Plate 3: View from the western boundary of the site facing in a westerly direction down the valley



Plate 4: View from the western boundary of the site facing southwest



Plate 5: View of dam basin and access road



Plate 6: View of the dam basin where WWTW is proposed



Plate 7: Previously cultivated area downslope of the dam for associated pipeline infrastructure (previously irrigated by Lactalis effluent)



Plate 8: area east of the small dam where Lactalis effluent was irrigated in the past

