

## **EXECUTIVE SUMMARY**

### **INTRODUCTION**

The project proponent, The JN Venter Beleggings Trust, proposes to develop a portion of Portions 2, 3, 4 and the Remainder of Farm 191, Coega Kammas Kloof, for the establishment of citrus orchards and various annual crops, including associated infrastructure (roads, lay down areas and irrigation Infrastructure). It is proposed that ~1054ha will be transformed across the four properties for the establishment of the agricultural development and form a single agricultural unit, hereafter referred to as **Umzi Wabantu**. The area under assessment measures approximately 2170ha in combined extent and is currently zoned as Agriculture 1. In order to convey irrigation water to the proposed development the proponent proposes to install irrigation pipelines (3 × ø500mm) from a new off-take point on the LSRWUA canal on Farm 714. The pipelines are proposed to be installed across the Sundays River and along service roads and fence lines on several farms for a distance of approximately 23.2km. The following properties will be affected by the proposed pipeline route:

- Farm 714
- Portion 3 of Farm Buck Kraal No.558
- Remainder of Farm 633
- Farm 682 (Koedoeskloof)
- Farm 681
- Portion 6 of Farm Buck Kraal No. 558
- Portion 1 of Farm 653
- Remainder of 653, Known as Ikamva Lethu
- Portion 2 of Farm 653
- Remainder of Farm 189

In addition, the pipeline is required to be installed in the road reserve of MN50603 and MR00470 for approximately 3 kilometres. The nearest boundary of the Addo Elephant National Park is located approximately 8.5km from the properties under assessment (Umzi Wabantu) and 8.3km from the pipeline corridor.

A corridor with a working width of 8 metres is proposed to be cleared for the installation of the pipeline, resulting in the clearance of ~18.5ha. It is further proposed that a new off-stream water storage dam, with a storage capacity of ~213 000m<sup>3</sup> (~6.6ha footprint), will be constructed on the Remainder of Farm 653, known as Ikamva Lethu, in order to ensure sufficient water supply for the proposed agricultural development. The total area proposed to be cleared for the installation of the pipeline as well as the storage dam is thus estimated to be ~25ha. The exact dimensions of and location of both the pipeline route and dam will be confirmed through this assessment process.

The total area that is proposed for clearing on Umzi Wabantu as well as the water transfer infrastructure is therefore 1079 ha.

The combined development footprint, including associated infrastructure, will be determined by the outcome of the various specialist assessments forming part of this Full Scoping and Environmental Impact Assessment (Scoping and EIA) Process.

In future, and subject to a separate environmental assessment process the proponent proposes to transform an approximate 90-hectare portion of Coega Kammas Kloof to accommodate a proposed poultry broiler house facility (~80ha), including a proposed new dam (~3.5ha) and a solar photo voltaic facility (~6.6ha). The proposed logistical services area will provide joint services to the proposed Umzi Wabantu Citrus Development proposed to be located on portions of Coega Kammas Kloof as well as the adjacent Portions 2, 3 and 4 of Farm 191 and the poultry facility, should such receive environmental authorisation.

In terms of the NEMA EIA Regulations 2014 (as amended), published in GN R326, 327, 325 and 324, promulgated under Chapter Five of the National Environmental Management Act (Act 107 of 1998) (NEMAA), and published in Government Gazette 40772 on the 7 April 2017, the project requires full Scoping and Environmental Impact Assessment (Scoping and EIA), prior to the commencement of any activities on the site due to, amongst others, activities listed in Listing Notice 2 (GN R325), namely:

*"15. The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for -..."*

Chapter Four of this report provides details of the listed activities which require Environmental Authorisation. The project proponent has appointed Public Process Consultants as the independent Environmental Assessment Practitioner (EAP) to undertake the Scoping and EIA for the project. The competent authority who must consider and decide upon this application is the Provincial Department of Economic Development, Environmental Affairs and Tourism (DEDEAT), Sarah Baartman Region.

## **PROJECT OVERVIEW**

Subject to the outcome of the assessment process, specialist studies, technical input and consultation process, the project applicant, JN Venter Beleggings Trust, intends to utilise the agricultural potential of the land for the establishment of citrus orchards and various annual crops. Umzi Wabantu measures ~2170ha in extent and is zoned Agriculture I. It is anticipated that a portion of Umzi Wabantu will not be deemed suitable for development, subject to the recommendations by the various specialists, as well as technical input (aquatic resources and associated buffers, areas required to meet biodiversity targets, soil suitability, slope etc). The area to be developed will be informed by the outcome of the various specialist assessments through the assessment process.

The proposed agricultural development on Umzi Wabantu can be divided into the following phases, which are outlined in more detail in the sections below:

- Preconstruction
- Construction
- Operational

### **Preconstruction Phase**

Prior to the commencement of construction activities on the site a preconstruction phase (planning) is required. The proposed crops and fruit to be produced on site will be for both the international, as well as local markets and juicing.

For the planting of fruits and vegetables, seed must be booked in advance and is then imported to a certified nursery for a crop-dependent grow-out period. During this period, seeds are germinated and grown to either seedling or sapling stage, depending on the crop. Thereafter, seedlings and saplings are planted with respect to the harvesting season that applies to each crop. Thus, site preparation needs to be completed prior to the planting times relevant to the crops.

The preconstruction phase for securing the block seed and growing of the seedlings and saplings occurs in parallel to site preparation, which is outlined below. Thus, the timing between the purchase of the seed, grow-out period and preparation of the site for the planting of fruits and vegetables, is critical.

The preconstruction phase for securing the foundation block seed and growing of the saplings occurs in parallel to site preparation which is outlined below.

### **Construction Phase**

The project will entail the clearing of vegetation, levelling of the site, construction of laydown areas, a logistical services area, and the installation of the drip irrigation system, as well as the establishment of the bulk irrigation infrastructure (i.e., pipeline and dam), prior to the planting of the saplings or seedlings. Once the site is prepared, citrus orchards and annual fruit and vegetable crops will be established (refer to the operational phase of the development). It is anticipated that vegetation clearing, landscaping, site preparation and planting will be done both by hand and with the aid of suitable earth moving equipment (excavators, bulldozers, TLBs). No workers' accommodation will be provided on site during the construction phase.

Site preparation will entail the following activities on site:

- Clearing of indigenous vegetation;
- Landscaping and levelling the site for citrus orchards and annual fruit and vegetable crops, as well as to provide runoff control and stormwater management;

- Establishment of internal unpaved service roads and laydown areas;
- Construction / realignment of access roads and logistical services area;
- Installation of irrigation water transfer pipes onto the Umzi Wabantu property from the LSRWUA canal offtake point on Farm 714, including:
  - Three ø600mm HDPE pipes across the Sundays River;
  - Three ø500mm PVC pipes for the remainder of the 23.2km route
- Construction of the proposed off-stream water storage dam (~213 000m<sup>3</sup>; ~6.6ha footprint), on Ikamva Lethu (RE/653)
- Installation of internal water reticulation of varying diameters;
- Planting of orchards and windbreaks (if necessary).
- Preparing and plant fields for annual crops and windbreaks (if necessary)

Site preparation takes approximately a year to complete (dependant on the size of the site) but must be completed to coincide with the planting season, which, for citrus, occurs annually between September to March.

### **Operational Phase**

Once the site is suitably prepared, the area will be utilised for the establishment of citrus orchards and various annual crops for both local and international markets, with some fruit being sent for processing (juicing) or sold to local markets.

Equipment required for the new operations will be stored on site in sheds / warehouses to be constructed as part of the proposed logistical services area. The following operational phase activities are associated with the project:

- Utilisation of the additional services and administration facilities provided by the proposed logistical services area.
- Water for the development will be supplied from the LSRWUA canal, from a new off-take point on Farm 714 via a balancing dam on Remainder of Farm 653 known as Ikamva Lethu, via three ø500mm uPVC pipelines over a distance of 23.2 km; and
- It is anticipated that a number of additional seasonal and permanent employment opportunities will be created by the project.

For more detail regarding the project description see Chapter Two of the Report.

### **AFFECTED ENVIRONMENT**

The vegetation on the properties surrounding Umzi Wabantu to the north appears to be largely near natural with evidence of some game grazing. Vegetation on the properties located to the north-east and east, appears to be largely degraded presumably associated with domestic livestock and game grazing. A portion of the farm adjacent to the eastern boundary of Umzi Wabantu, Farm 717, has been modified for cultivation of citrus orchards, pivot irrigation, Eskom powerlines and rangelands. On the properties south-east, south and south-west of Umzi Wabantu clearing is evident, mostly attributed to the mining activities of PPC Cement SA (Pty) Ltd., however, the majority of the property appears to be near-natural Bontveld. These properties also include the production of renewable energy from wind turbines which can be seen from the R335 as well as from Umzi Wabantu. RE/190 is designated as the Grassridge Private Nature Reserve. The properties south-west, west, and north-west of the farm seems to be largely intact natural vegetation (Bontveld and Sundays Valley Thicket) with some evidence of modification (cut lines, vehicle tracks and clearings).

The site visits and preliminary input from the terrestrial biodiversity specialist, confirmed that the vegetation on site is predominantly Sundays Valley Thicket and Koedoeskloof Karroid Thicket as described according to the NBA 2018 and VegMap 2018 mapping resources, and a portion in the north-eastern corner of RE/191 has been identified as Sundays Spekboom Thicket.

The vegetation on the area under assessment tends to be intact and in good condition with some indicators of degradation due to game grazing, as well as internal roads, vehicle tracks, and two municipal main water pipelines.

A site visit on the 31 July 2019, 10 September 2021, and 01 December 2021, as well as a review of the relevant aerial imagery, and the NFEPA planning framework, have assisted in the identification of aquatic features in the

vicinity. In terms of NFEPA wetlands, a number of wetland types have been identified in the area within 500m of Umzi Wabantu, as well as along the proposed pipeline corridor. Along the northern section of the pipeline corridor, these include a Channelled valley-bottom wetland, where the proposed pipeline will cross the Sundays River, as well as, three Channelled Valley-bottom wetlands, two Unchanneled valley-bottom wetlands, and one Valleyhead seep wetland. The presence and extent of aquatic features within the area under assessment will be assessed by an aquatic biodiversity specialist during the EIA phase of the assessment.

These onsite observations were supplemented by the review of relevant aerial imagery and planning frameworks for Umzi Wabantu and are subject to assessment by a Terrestrial, as well as an Aquatic Biodiversity specialist during the EIA Phase of the assessment.

For further information regarding the affected environment see Chapter Three of the Report.

## **ALTERNATIVES**

The following alternatives are being considered in this assessment process:

- No-Go alternative
- Property/ Location alternatives
- Land-Use alternatives
  - Grazing/ game
  - Citrus orchard and crop establishment
- Layout alternatives (development footprints)

The preferred layout/ development footprint for the proposed project will be determined by specialist, as well as technical input in the EIA phase of the assessment.

## **OVERVIEW OF THE ASSESSMENT PROCESS AND PUBLIC PARTICIPATION**

This Scoping and EIA Process is being implemented in four phases, the details of which are outlined in Chapter Four of this report:

- Pre-Application Scoping Phase (**WE ARE HERE**)
- Application and Scoping Phase
- Environmental Impact Assessment Phase
- Decision Making and Appeal Period

Public Process Consultants has been appointed as the independent Environmental Assessment Practitioner (EAP) to conduct the Scoping and EIA, including Public Participation for the proposed development. Notice of Intention to commence with Scoping and EIA, dated 19 October 2021, was submitted to the competent authority, DEDEAT, Sarah Baartman Region as well as all identified Interested and Affected Parties (I&APs) and affected/juristic Organs of State and State Departments.

In order to commence the legislated portion of the Scoping and EIA process, an Application Form for Environmental Authorisation in terms of the NEMA EIA Regulations, 2014 (as amended) is being prepared and will be submitted to the competent authority prior to the release of the Consultation Scoping Report (CSR) for the legislated 30-day consultation period. All registered I&APs will be notified in writing of the release of the CSR for the legislated 30-day comment period.

The Final Scoping Report (FSR), together with the Plan of Study (PoS) for EIA, will be prepared for submission to the Provincial DEDEAT for their decision-making, within 44 days of submission of the Application Form. The FSR will include all the comments received from I&APs during the Project Announcement Phase, as well as the review of the Draft Consultation Scoping Report (Draft CSR) and CSR. Should DEDEAT accept the Scoping Report and approve the PoS for EIA, the assessment process will enter into the EIA Phase.

For further detail regarding the Scoping Phase of the assessment process, including Public Participation, see Chapter Four of the Report. For further detail regarding the Plan of Study (PoS) for EIA, see Chapter Six of the Report.

### Identification of Issues

Issues and concerns identified for inclusion in the Scoping Report that require specialist assessment in the EIA phase have been identified using the following methods:

- Site Visits.
- Preliminary input from specialists.
- Review of existing conservation planning frameworks and environmental management tools
- Scoping of issues and concerns with I&APs, including authorities and affected/ juristic Organs of State and State Departments, through correspondence received (emails, comment forms) in response to the project announcement.

Based on issues identified thus far in the process, the table below indicates the specialist studies/ input required for the EIA Phase of the Assessment Process:

Specialist Study	Broad Scope of Assessment	Proposed Specialist
Biodiversity Specialist Assessment	An assessment of the potential impacts on vegetation and fauna (desktop), as well as the delineation of sensitive No-Go areas; and the determination of suitable buffer zones. To include an assessment of the impacts on aquatic features identified on the site and within a 500m radius, including wetlands and watercourses as well as along the pipeline route. To determine the Present Ecological State of the site and confirm the mapping of CBAs and ESAs, as included in various biodiversity planning frameworks (e.g., ECBCP and NFEPA mapping resources). To provide recommendations for management/ mitigation of residual impacts.	Ms Jaclyn Smith (Aquatic Biodiversity Assessment)  Mr Jamie Pote (Terrestrial Biodiversity Assessment)
Phase 1 Paleontological Impact Assessment	To determine the presence of significant palaeontological features on site and the impact of the proposed development thereon. To provide recommendations for management/ mitigation of residual impacts.	Dr John Almond, Natura Viva
Phase 1 Archaeological Impact Assessment	To determine the presence of archaeological features on site and assess the potential impacts on these features. To provide recommendations for management/ mitigation of residual impacts.	Kobus Reichert, Eastern Cape Heritage Consultants
Traffic Impact Assessment	To determine the impact of additional trip generation on the public road network, as well as the suitability and safety of the existing and proposed new access point.	Cary Hastie, Engineering Advice & Services
Visual Impact Assessment	To determine the Visual Impacts of the proposed agricultural development and associated infrastructure on the surrounding areas including any changes to the "sense of place" and visual landscape.	Graham A Young, Graham Young Landscape Architect
Soil Suitability Assessment	To determine the agricultural potential of the soils for citrus production and provide amelioration measures for soil limiting factors. Desktop slope analysis.	Dr Freddie Ellis Soil Specialist
TECHNICAL TEAM		
Irrigation Infrastructure and Dam design	To estimate the quantity of water required for irrigation. To confirm associated irrigation infrastructure (including drip/ micro irrigation) layout, including pipe diameters and length.  To determine the dam location, dimensions storage and design as well as associated infrastructure (i.e., spillway, wall height)	Bertus Smuts, Surplan

The full specialist Terms of Reference (ToR) are contained in Chapter Six of the Report. The results of the specialist studies and other relevant project information will be integrated into the Draft Environmental Impact Assessment Report (Draft EIA Report).

### **Current Stage in the Process**

The project is currently at the stage where a Draft CSR including the PoS for EIA (Chapter Six) is being released for a 30-day authority and I&AP review period which will extend from **28 March 2022 to the 04 May 2022**. This step in the process will be followed by the submission of the Application Form to the competent authority, the inclusion of the comments received from I&APs during this comment period, into the CSR, and the legislated 30-day comment period on the CSR.