## **APPENDIX L3:** Comments and Responses Report

# PROPOSED EXTENSION OF MOSSDUSTRIA AND THE ESTABLISHMENT OF A RACEWAY ON THE REMAINDER OF PORTION 8 OF THE FARM RIETVALLEY 225, MOSSEL BAY, WESTERN CAPE PROVINCE

## COMMENTS AND RESPONSES REPORT

FINAL EIA REPORT

OCTOBER 2026



NEMAI CONSULTING

GIBB ENVIRONMENTAL

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# 1 INTRODUCTION

GIBB Environmental (Pty) Ltd (GIBB), now part of Nemai Consulting (Pty) Ltd, has been appointed by the Mossel Bay Local Municipality (MBLM) as the independent Environmental Assessment Practitioner (EAP) to manage the application process for Environmental Authorisation (EA) for a proposed development in Mossdustria, Mossel Bay. GIBB has been appointed to undertake the application process for the EA, contingent on a Scoping and Environmental Impact Reporting (S&EIR) Process. This pertains to the proposed expansion of Mossdustria, which will include a motorsport arena and a renewable energy facility on the remaining part of Portion 8 of Farm Rietvalley 225, situated in Mossel Bay, Western Cape Province, South Africa (the Project).

# 2 SCOPING AND ENVIRONMENTAL IMPACT REPORTING PROCESS

An Application for EA is being undertaken for the proposed Project according to the process prescribed in the Environmental Impact Assessment (EIA) Regulations of 2014, published under Government Notice (GN) No. 982 in Gazette No. 38282 of 4 December 2014 and amended by GN 326 of 7 April 2017 published in Gazette No. 40772 (the “EIA Regulations”). The EIA Regulations were promulgated under the National Environmental Management Act (Act No. 107 of 1998) (NEMA). In terms of the NEMA, the lead decision-making authority for the environmental assessment is the Western Cape Department of Environmental Affairs and Development Planning (DEADP).

An S&EIR is being undertaken for this project, based on the triggering of activities listed in terms of the NEMA and the EIA Regulations.

# 3 COMMENTS AND RESPONSES REPORT

This Comments and Responses Report (CRR), which accompanies the final EIA Report, serves to record the comments received from authorities and Interested and Affected Parties (I&APs) to date during the course of the process. This CRR also attempts to address these comments through responses and input provided by the Applicant, project team, EAP and environmental specialists (as relevant).

The CRR has been continuously updated during the course of the S&EIR Process.

## 4 COMMENTS AND RESPONSES – Review of Draft Scoping Report

The draft Scoping Report was lodged for public review from **23 October until 23 November 2025**. At the request of the DEADP, the 30-day public review process of the draft Scoping Report was repeated from **9 March** to **9 April 2026**. In addition, DEADP, as the competent authority, issued a Notice of Suspension of Application in respect of this project on **12 March 2026**, in terms of the EIA Regulations. The suspension was administrative in nature and related to procedural matters associated with the EIA process. The suspension was lifted by DEADP on **25 March 2026**, and the remaining portion of the 30-day public comment period on the draft Scoping Report closed on **21 April 2026**.

The comments received during the 2025 and 2026 review period are captured below.

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| **Comments Received 23 October 2025 to 23 November 2025** | | | | | |
| 1. | **Email:**<br>Ek is n eiendoms eienaar in Mosselbaai omgewing en wil graag registreer as belanghebbende.<br>Kan u asb. alle komunikasie na die epos ook stuur aangaande aangehegte.<br><br>English translation: “I am a property owner in the Mossel Bay area and would like to register as an interested party. Could you please also send all communication regarding the attached to my email.” | **Email:**<br>Nico Fivaz. Managing Director Cape Con Property Developers Western Cape (Pty) Ltd | Email (24/10/2025) | Nemai Consulting | Baie dankie vir u e-pos en belangstelling in die voorgestelde projek. Ek registreer u as 'n belanghebbende party. U kan die konsep Omvangsverslag aflaai by die onderstaande webtuiste:<br>https://nemai.co.za/downloads/<br><br>English translation: “Thank you very much for your email and interest in the proposed project. I have registered you as a stakeholder. You can download the draft Scoping Report from the website below:<br>https://nemai.co.za/downloads/ |
| 2. | **Email:**<br>Thank you for your submission to HWC regards to the above application. Please see attached response for your records.<br><br>**Letter:**<br>The matter above has reference.<br>Heritage Western Cape is in receipt of the above matter received. This matter was discussed at the Heritage Officers meeting held on 20 October 2025. | **Email:**<br>Stephanie-Anne Barnardt-Delport. Specialist Heritage Officer (Archaeologist) Heritage Western Cape. | Email (22/10/2025)<br><br>Letter (22/10/2025) | Nemai Consulting | Thank you very much for the email.<br><br>I acknowledge receipt of the attached letter and response from Heritage Western Cape (HWC). |

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| | You are hereby notified that, since there is no reason to believe that the proposed extension of Mossdustria and establishment of a motorsport raceway and associated facilities on Erf 6, Mossdustria and Remainder of Rietvalley 225/8, Mossel Bay, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required. HWC Chance Finds and Accidental Finds Procedures to be included in the EMPr and Environmental Authorization.<br><br>However, should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and Heritage Western Cape must be notified without delay.<br><br>This letter does not exonerate the applicant from obtaining any necessary approval from any other applicable statutory authority.<br>HWC reserves the right to request additional information as required.<br>Should you have any further queries, please contact the official above and quote the case number. | | | | |
| 3. | **Email:**<br>Aangeheg ons kommentaar.<br>English translation: “Attached our comments”<br><br>**Letter:**<br>CKI conduct the slaughter and processing of ostriches for meat and leather for the export market. To ensure productive use of our slaughter facility, ostriches are brought to and offloaded at the holding pens on occasional Saturdays, and most Sundays, ready and rested for slaughter Monday morning.<br><br>It is obvious that during motorsport activities a lot of noise will be generated. Looking at the GPS co-ordinates of the development layout, using Point 8 of the motorsport zone and point 8 of the industrial expansion zone, it is clear that the nearest point of the motorsport track will turn 187m from the edge of the ostrich holding pens.<br><br>Ostriches by nature are easily frightened, particularly when danger is audible, but the source is not obviously visible to them or approach them at a fast pace. | **Email:**<br>Francious de Wet, Managing Director of Cape Karoo International. | Email (30/10/2025)<br><br>Comment Sheet (30/10/2025) | Nemai Consulting | Thank you for your comments.<br><br>You are correct that a Noise Assessment Study will be included in the Environmental Impact Report (EIR), along with the other specialist studies identified during the Scoping Phase for the proposed Project.<br><br>A 30-day Public Participation Period will be held for the draft EIR, and you will receive notification once the review period begins. We encourage you to review the relevant studies during this time, and any comments or concerns submitted will be addressed accordingly. |

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| | The noise from motorsport, specially the intermittent and cyclic manner of the emitted sound as the vehicles changes direction and the sudden approaches will be disturbing to them.<br><br>As the pens are designed for temporary holding, they have limited space to run when frightened, resulting in injuries and thus devaluation of meat and leather with resulting reduction in income.<br><br>CKI have very strict animal welfare regulations that we have to comply with to be able to export to international markets. Any disturbance of the birds in the pens that will be deemed by international auditors as poor animal welfare will have far reaching consequences for CKI.<br><br>It is stated in section 4.10 of the application that a noise assessment was done and results will be included in the forthcoming Draft EIR.<br><br>None of our management group are aware of such a study being done, nor that any competent employee of our abattoir was approached for comment regarding noise impact on the ostriches in the holding pens.<br><br>Can we ask for a copy of the report as without it is difficult to comment on the only issue that will influence us about this development. | | | | |
| 4. | **Email:**<br>My apology for the delay in submitting CapeNature's comments, with the year end approaching we are inundated by applications for comment. I have attached our comments for the application and previous consultations regarding the applicability of a biodiversity offset. If you require anything else from CapeNature, please do not hesitate to contact me.<br><br>**Letter:**<br>CapeNature would like to thank you for the opportunity to review the above report. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application. CapeNature wishes to make the following comments:<br><br>According to the Western Cape Biodiversity Spatial Plan (Pool-Stanvliet et.al. 2017) the property has Critical Biodiversity Areas (CBA 1&2: Terrestrial), Ecological Support Areas (ESA 1: Aquatic and ESA 2: Restore), and Other Natural Areas. The fine-scale vegetation map describes the vegetation as Hartenbos River & Floodplain, Petrosa Inland Pans, Petrosa Fynbos-Renosterveld, and Proteus Fynbos-Renoster-Thicket (Vlok and de Villiers 2007). The National Biodiversity Assessment | Megan Simons, CapeNature | Email (27/11/2025)<br><br>Letter A (27/11/2025)<br>Letter B (27/11/2025) | Brian Collotty (Biodiversity Specialist) and Nemai Consulting | We acknowledge receipt of CapeNature's comments dated 27 November 2025 and appreciate the detailed input provided regarding the draft Scoping Report for the proposed extension of Mossdustria and the establishment of a raceway on the Remainder of Portion 8 of Farm Rietvalley 225. All comments have been noted and will be fully addressed during the Environmental Impact Assessment (EIA) phase.<br><br>We acknowledge and concur with the sensitive environmental features referred to by CapeNature (Critical Biodiversity Areas (CBA 1 & 2: Terrestrial), Ecological Support Areas (ESA 1: Aquatic and ESA 2: Restore), Other Natural Areas, the Endangered vegetation type and sensitive Aquatic features). These have been considered in the Scoping Report as well as in the Terrestrial |

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| | (Skowno et al. 2018) mapped the vegetation unit as Hartenbos Dune Thicket which is Endangered (NEM:BA,2022) and North Langeberg Sandstone Fynbos which is Least Concerned (SANBI 2022).<br><br>The proposed site is within Quaternary Catchment K10A, a non-perennial river is to the southeast which is associated with the seep wetland on the neighbouring property. Furthermore, another seep wetland is in the corner of the southwest which spans over the neighbouring properties.<br><br>CapeNature has reviewed the application and has the following comments:<br><br>1. CapeNature notes the botanist's (Mark Berry) concerns regarding inconsistent vegetation mapping, which is a known challenge throughout much of the Mossel Bay region. According to the specialist, the vegetation on site appears more representative of Albertinia Sand Fynbos, Langeberg Sandstone Fynbos, and Mossel Bay Shale Renosterveld.<br><br>2. The cumulative impact assessment currently focuses only on the proposed development's impacts within the property boundary. It does not consider cumulative habitat loss/impacts resulting from existing developments or other developments in the surrounding area that have already received Environmental Authorisation (EA). These must be fully assessed and addressed in the Environmental Impact Report (EIR).<br><br>3. Section 3.3 of the Draft Scoping Report may give the impression that CapeNature contributed to the development of layout alternatives. For clarity, CapeNature was invited to pre-consultation meetings with GIBB Environmental and Nemai Consulting at the end of 2021 and again in early 2025, during which the project was presented to us for comment. During these engagements, CapeNature highlighted the findings of the 2006 report by Jan Vlok, who recorded numerous species of conservation concern. The findings of the report by Mark Berry (2020), concluded similar observations. CapeNature also emphasised the need for a spring botanical survey, as supported in the Berry report. Discussions were held regarding the potential for a | | | | Site Sensitivity Verification (SSV) conducted by Dr. Colloty in 2022 (Appendix D) and will be assessed further in the EIA hase.<br><br>As per CapeNature's comments:<br><br>1. As outlined in the Scoping Report, the EIA phase will include the completion of all relevant specialist studies, including a Terrestrial Biodiversity Impact Assessment (fauna and flora), an Aquatic Biodiversity Impact Assessment and the other specialist studies identified. These studies will incorporate the latest available information, including reviewing the findings from the 2020 Report from Mark Berry and the 2006 Report from Jan Vlok. These studies will directly respond to the comments from CapeNature, and will be made available for public and authority review as part of the draft Environmental Impact Report (EIR).<br><br>2. The EIR will incorporate various specialist studies' impact assessments to determine the overall cumulative impacts.<br><br>3. Thank you for the provided clarity. The appointed Terrestrial Ecology specialist has confirmed that multiple site visits have already been undertaken across different seasons to ensure a robust understanding of the site's ecological characteristics. An additional summer survey will also be conducted (January 2026 – February 2026) to further strengthen the dataset and address concerns regarding seasonal variability, |

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| | biodiversity offset; however, CapeNature's correspondence (attached) outlines our reasons for not supporting an offset for this site.<br><br>4. The Vlok (2006) report identified seasonal wetlands (Fig.1) and several species of conservation concern, concluding that no mitigation measures would adequately prevent negative environmental impacts. The two seasonal wetlands in the eastern portion of the property overlap with areas of medium to high sensitivity. The property's seasonally wet characteristics support highly localised species, including *Disa hallackii* (EN), *Haworthia pygmaea* var. *argenteo-maculosa* (CR), and *Satyrium muticum* (CR).<br><br>5. The Berry (2020) report did not map the seasonal wetlands; however, it did identify medium- to high-sensitivity areas (Fig.2) containing high-quality vegetation and threatened plant species requiring protection. Additional species of conservation concern recorded include: *Aspalathus obtusifolia* (VU), *Cephalophyllum diversiphyllum* (NT), *Cullumia carlinoides* (NT), and *Polygala pubiflora* (VU). Regional endemics such as *Protea lanceolata*, *Bobartia robusta*, *Trichodiadema cf. fergusoniae*, and *Tulista minima* were also recorded, with the latter two noted as rare in the area.<br><br>6. CapeNature recommends that the applicant consult with both Jan Vlok and Mark Berry regarding their findings and the species of conservation concern. A spring botanical survey is strongly supported and must be undertaken. A freshwater assessment is also required to confirm and map the seasonal wetlands.<br><br>7. In 2008, the property was assessed by CapeNature's Stewardship Review Committee. At that time, Mossel Bay Municipality proposed using the area for a cemetery or extending the neighbouring light industrial zone. The site was found to contain vegetation in good to excellent condition, with threatened vegetation types, SCCs, and wetlands—qualifying it for consideration as a Contract Nature Reserve. A recommendation was also made to investigate the geological structure. | | | | species of conservation concern, and the delineation of sensitive habitats.<br><br>4. Refer to response no. 3 above.<br><br>5. Refer to response no. 3 above.<br><br>6. Refer to response no. 3 above.<br><br>7. The sensitivity of the site will be assessed further during the EIA phase, it is noted that a portion of the site has been set aside as a conservation area.<br>Further details regarding geotechnical conditions of the site will be included in the EIA report.<br><br>8. CapeNature's concern is acknowledged regarding the long-term management of the proposed conservation area. The identification, protection, and appropriate management of remaining Renosterveld fragments are recognised as key considerations. The possible opportunities for coordinated conservation will be assessed in more detail during the EIA phase and discussed with relevant stakeholders.<br><br>9. Specific note will be made of the Petrosa Inland Pans and will be brought to the attention of the Ecological Specialist undertaking the Terrestrial- and Aquatic Impact Assessments. Additionally, the Terrestrial and Aquatic Impact Assessments during the EIA phase will indicate the buffer zones around sensitive features (including the conservation area |

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| | 8. It is currently unclear who will manage the proposed conservation area. Remaining renosterveld fragments typically have high conservation value and must be treated as threatened and prioritised for protection. The applicant should consider engaging with neighbouring landowners. The neighbouring property to the east has received EA requiring the protection of 15 ha of Renosterveld to the south. This may provide an opportunity for collaborative conservation management and the establishment of an ecological corridor.<br><br>9. The Petrosa Inland Pans should be included within the conservation area. The conservation area must be rezoned for conservation purposes only, with no development permitted. An appropriate buffer must be established between the conservation area and the proposed development, and all watercourses must be adequately buffered.<br><br>10. Given the proposed raceway and associated solar PV facility, CapeNature recommends that a faunal assessment be undertaken. A noise impact assessment may also be necessary.<br><br>11. CapeNature further recommends Breede-Olifants Catchment Management Agency (BOCMA) provide comment on the applicability of a Water Use Authorisation in terms of the National Water Act (NWA). Inputs can also be obtained from BOCMA regarding the seasonal wetlands.<br><br>In conclusion, CapeNature currently does not support the proposed development. Key concerns relate to discrepancies in specialist findings and the need for further consultation with the botanists. A spring survey must be completed, and the seasonal wetlands must be fully assessed before the application can be reconsidered.<br><br>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received. | | | | and waterbodies) as determined by the Specialist.<br><br>10. Refer to response no. 1 above.<br><br>11. All specialist findings will be integrated into the draft EIR that will be made available for public and authority review. This will allow Breede-Olifants Catchment Management Agency (BOCMA) the opportunity to review and comment on the comprehensive assessment before final decision-making.<br><br>All specialist findings, including updated vegetation mapping, wetland verification, cumulative impact considerations, and recommendations regarding conservation management, will be integrated into the Draft EIR.<br><br>This will allow CapeNature and other stakeholders the opportunity to review and comment on the comprehensive assessment before final decision-making.<br><br>We appreciate CapeNature's continued engagement in this process and remain committed to ensuring that all biodiversity-related considerations are thoroughly and transparently assessed during the EIA phase. |
| **Comments Received February 2026 to 21 April 2026** | | | | | |
| 5. | **Email:**<br>Please find attached the comment from this Department regarding the aforementioned subject. | Mr. Francois Naude and | Email (24/02/2026) | Nemai Consulting | An online meeting was held between Nemai Consulting and DEADP 24 February 2026 to |

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| | **Letter:**<br>1. The submission made regarding the above-mentioned proposal, compiled by your appointed Environmental Assessment Practitioner (EAP), Mr. Donavan Henning (EAPASA Registration Number: 2020/1217) of from GIBB Environmental (Pty) Ltd. and received by the Directorate: Development Management (Region 3) hereinafter referred to as "this Directorate" and on 24 October 2025 refers.<br><br>2. This Department has no record that a standalone application form (in the format determined by the competent authority) was submitted to this Department in accordance with Regulation 16 of the Environmental Impact Assessment Regulations, 2014 (Government Notice No. R.982 of 4 December 2014, as amended) ("EIA Regulations, 2014"). Therefore, as the administrative norm has not been followed by the EAP, this Department did not have a reasonable opportunity to review the Application Form in terms of Regulation 17 and comply with Regulation 3(6) of the EIA Regulations, 2014.However, it is noted that a copy of an application form was appended as Appendix B to the merged draft Scoping Report that was submitted on 24 October 2025. Although such information may be appended to the Scoping Report, it is highly irregular to submit the application form in such a manner, which does not comply with Regulation 16. In further support of the regulatory framework, please be reminded that since the onset of the requirement for applications in terms of the previous EIA Regulations, an administrative norm has been established and implemented by this Department to receive Application Forms, and the required appendices, as a standalone document. Therefore, a valid application has not yet been registered on the NEAS and the documents received thus far have not been processed.<br><br>3. Considering the above, please be advised that should you wish to pursue the application, a new application process would have to be initiated. Therefore, a new Application Form would have to be | Ms. Shireen Pullen, DEADP. | Letter (24/02/2026)<br><br>Letter (27/02/2026) | | discuss the letter received from DEADP dated 24/02/2026, and a way forward.<br><br>Subsequently a separate submission of only the Application Form was made 27 February 2026 to DEADP with a cover letter.<br><br>**Letter:**<br>GIBB Environmental (Pty) Ltd, which was subsequently acquired by Nemai Consulting (Pty) Ltd, was appointed as the independent Environmental Assessment Practitioner (EAP) by the Mossel Bay Local Municipality (MBLM) to apply for Environmental Authorisation for the proposed extension of the Mossdustria industrial area, establishment of an alternative energy facility (solar photovoltaic facility) and development of a motorsport facility on the Remainder Portion 8 of Farm Rietvalley 225, Mossel Bay, in the Western Cape Province (the Project). Based on the listed activities triggered by the Project, a Scoping and Environmental Impact Reporting process needs to be conducted.<br>The proposed development entails the extension of the Mossdustria industrial area, establishment of a solar photovoltaic facility and a motorsport facility (approximately 90 ha in extent). Cables of 11 kV in capacity will connect the development to an existing municipal substation on Portion 6 of Farm 225 within Mossdustria.<br><br>Given the strict timeframes prescribed by the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), for submission of the Final Scoping Report, the EAP kindly requests that the Department's Case Officer, Mrs Shireen Pullen, contact the EAP as soon as possible to enable the submission of the Draft Scoping Report.<br>In line with the project programme, the Draft Scoping Report is intended to be made |

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| | submitted and the application process prescribed in Part 3 of Chapter 4 of the EIA Regulations, 2014 must be followed.<br><br>4. Guidance on the nature and extent of any of the processes that may or must be followed or decision support tools that must be used in order to comply with the NEMA and the EIA Regulations, 2014:<br><br>5. Please ensure that the new application form (and supporting information) which must be submitted to this Department complies with the following requirements:<br>The new application—<br>• is properly completed and that it contains all the information required in the application form;<br>• is accompanied by the documents as required in the application form and in terms of the Environmental Impact Assessment Regulations, 2014 (Government Notice R.982 of 4 December 2014, as amended) ("EIA Regulations, 2014");<br>• conforms to the instructions or guidance provided by the competent authority to the submission of the application, or<br>• conforms to the requirements of the EIA Regulations, 2014, any protocol or minimum information requirements relevant to the application as identified and gazetted by the Minister in a government notice.<br><br>6. Once a new application form has been summitted to this Department, and found to be in order, the Department will confirm that the EAP may continue with the assessment process to which the application must be subjected. Kindly afford this Directorate a reasonable period (preferably a 10-day period reckoned from the date of submission of the application form) to check if the application form is in order and provide advice where applicable or appropriate, before the Draft Scoping Report is submitted in terms of Regulation 21. However, considering the strict timeframes prescribed by the EIA Regulations, 2014 for the submission of the Scoping report, the EAP should when submitting the application form, request in the cover letter that the case | | | | available for a 30-day public review period from 9 March to 9 April 2026. |

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| | officer contact the EAP as soon as possible, and the EAP must also indicate when they intend to submit/make the Draft SR available for public participation process (PPP), for example on a date within the 10-day period. It is also important for the EAP to contact the office after submitting the application form and to speak to the case officer to discuss the situation (this is usually the same officer who has been assigned the case previously, namely Mrs Shireen Pullen (Shireen.Pullen@westerncape.gov.za).<br><br>7. Public Participation Process - It is also noted that the legal advertisement to notify all potential interested and affected parties, was placed in a local newspaper on 9 July 2021, which is approximately 5½ years ago. This Department is concerned that the potential interested and affected parties may have changed substantially during this period, and that a 5-year-old notice does not comply with the relevant requirements to ensure an inclusionary public participation process will be followed. Prior to embarking on the new application process, you have the opportunity to demonstrate how the current public participation process undertaken to date complies with Regulation 41 in order for this Directorate to determine the additional Public Participation requirements.<br><br>8. Roles and Responsibilities of the appointed EAP - This Directorate notes from the reports and Appendix B of the Draft Scoping Report, that the person appointed as the Environmental Assessment Practitioner (EAP) is Donovan Henning (EAPASA Reg. 2020/1217) from Gibb International (Pty) Ltd.; however, the correspondence has been submitted by Marilie Pretoruis, furthermore, the Draft Scoping Report indicates that Marlie Pretorius is one of the authors who has prepared the reports. It is noted from the EAPASA register that a Dr. Marilie Pretorius is registered as a Candidate EAP (EAPASA Reg. 2024/8345). This information is not included in the reports or application form, so an assumption must be made that this is the same person. It is further of concern that the Site Sensitivity Verification Report has been prepared (author) by the Candidate EAP, Marlie Pretorius. This is contrary to the requirements of the relevant Protocols. Please be reminded that the appointed Environmental | | | | |

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| | Assessment Practitioner ("EAP") must manage all aspects of the application and ensure compliance with the EIA Regulations, 2014 to compile and submit the Scoping Report ("SR") and Environmental Impact Assessment Report ("EIR") to the competent authority for decision-making. In this regard, please be advised that in terms of Regulation 14(1) of the section 24H Registration Authority Regulations, 2016 that only a person registered as an EAP may perform tasks in connection with an application for an environmental authorisation. Furthermore, Regulation 14(6) of said Regulations states that when acting under supervision of a registered EAP, a registered Candidate EAP may assist with the performance of tasks in connection with an application for an environmental authorisation contemplated in Chapter 5 of the National Environmental Management Act, 1998 ("NEMA"), read with the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations, 2014").While it is acknowledged that a registered EAP, Mr. Donovan Henning (EAPASA Reg. 2020/1217) has signed an EAP declaration, it appears that Mr. Henning has acted as a "review EAP" and not as the person who holds the primary responsibility for the performance of tasks. Whereas a "Review EAP" has a specific meaning in the context of the EIA Regulations, 2014, care must be taken when such statement is used in respect of the section 24H Registration Authority Regulations, 2016.This aspect must be corrected in the new application process, and each document/report must clearly demonstrate how the Candidate EAP may have assisted the EAP, without taking the primary responsibility for the performance of such tasks.<br><br>9. The Department awaits the submission of the application form as prescribed by Regulation 16 of the EIA Regulations, 2014.<br><br>10. Please note that it is prohibited in terms of Section 24F of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") for a person to commence with a Listed Activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity. Offences in terms of the NEMA and the Environmental Impact Assessment Regulations, 2014, will render the offender liable for criminal prosecution. | | | | |

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| | 11. Kindly quote the above-mentioned reference number in any future correspondence in respect of this application.<br><br>12. The Department reserves the right to revise initial comments and request further information based on any new or revised information received. | | | | |
| 13. | **Email:**<br>Please find attached correspondence from this Department regarding the aforementioned subject.<br><br>**Letter:**<br>1. The above-mentioned document submitted on your behalf by your appointed Environmental Assessment Practitioner (EAP), Mr. Donavan Henning (EAPASA Registration Number: 2020/1217) as assisted by the registered Candidate EAP, Dr Marilie Pretorius (EAPASA Registration Number: 2024/8345) from GIBB Environmental (Pty) Ltd. and received by the Directorate: Development Management (Region 3) hereinafter referred to as "this Directorate" on 27 February 2026 refers.<br><br>2. The application form appears to be in order in accordance with regulation 16. This letter serves as an acknowledgment of receipt of the aforementioned document by this Department on 27 February 2026.<br><br>3. It is understood that the proposal entails the extension of Mossdustria industrial area and establish an alternative energy and motorsport facility on the Remainder Portion 8 of Farm Rietvalley 225. The extension will include industrial development with associated infrastructure to the extent of approximately 3 ha); alternative energy production area (solar PV facility) to the extent of approximately 22ha, including a substation, battery energy storage system, overhead powerlines and ancillary buildings and infrastructure); a conservation area with the extent of approximately 15 ha; and a motorsport arena including tracks, parking, ablution facilities, training facilities, fuel storage (5000 litres), 80 workshops, pavilions and associated infrastructure to the extent of approximately 38 ha. | Francois Naudé, Control Environmental Officer: Environmental Impact Management Services, DEADP | Email A (04/03/2026)<br><br>Letter (04/03/2026) | Nemai Consulting | We acknowledge receipt of correspondence<br><br>Please note that all points will be addressed in the draft Scoping Report, containing all the information outlined in Appendix 2 of the EIA Regulations, 2014.<br><br>Reference nr 16/3/3/2/D6/29/0001/26 will be utilised in all future correspondence. |

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| | 4. Roles and Responsibilities - Please remind your EAP that the requirements in terms of the Environmental Management Act (Act No. 107 of 1998) ("NEMA") and the Environmental Impact Assessment Regulations, 2014 (as amended) ("EIA Regulations, 2014) must be complied with in respect of the application for Environmental Authorisation. Also be reminded that the appointed Environmental Assessment Practitioner ("EAP") must manage all aspects of the application and ensure compliance with the EIA Regulations, 2014 to compile and submit the Scoping Report ("SR") and Environmental Impact Assessment Report ("EIR") to the competent authority for decision-making. In this regard, please be advised that in terms of Regulation 14(1) of the section 24H Registration Authority Regulations, 2016 that only a person registered as an EAP may perform tasks in connection with an application for an environmental authorisation. Furthermore, Regulation 14(6) of said Regulations states that when acting under supervision of a registered EAP, a registered Candidate EAP may assist with the performance of tasks in connection with an application for an environmental authorisation contemplated in Chapter 5 of the National Environmental Management Act, 1998 ("NEMA"), read with the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations, 2014").<br><br>5. Applicable listed activities- Only the listed activities applied for can be considered for authorisation. Kindly note that the onus remains on the applicant to ensure that all the applicable listed activities are applied for and assessed as part of the Scoping & EIA Process.<br><br>6. Scoping Requirements- The Scoping Report must contain all the information outlined in Appendix 2 of the EIA Regulations, 2014. Failure to submit any information prescribed in Appendix 2 of GN No. R. 982 may result in Environmental Authorisation being refused. The Scoping and EIA phases of the EIA process are two distinctly separate phases, each having its own requirements and reports to be submitted. The Department will not accept Scoping and EIA Reports where the processes or information of the two phases were combined into a single process or report. The Department awaits the submission of the draft Scoping Report for comment as prescribed by Regulation | | | | |

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| | 21 of the EIA Regulations, 2014. In accordance with Regulation 21, the Department hereby stipulates that the Scoping Report must be submitted to this Department for decision within 44 days from the date of receipt of the application by the Department, calculated from 27 February 2026. If the Scoping Report is not submitted within the prescribed timeframe, the application will lapse in terms of Regulation 45 of the EIA Regulations, 2014 and your application file will be closed. Should you then wish to pursue the application again, a new application process would have to be initiated. A new Application Form would have to be submitted and the prescribed application fee would have to be paid. The Scoping and EIA phases of the EIA process are two distinctly separate phases, each having its own requirements and reports to be submitted. The Department will not accept Scoping and EIA Reports where the processes or information of the two phases were combined into a single process or report.<br><br>7. Public Participation Process- It is noted that a public participation process was undertaken as part of the pre-application process. The public participation undertaken in terms of Regulation 41 thus far is deemed to be acceptable for this application; however, the EAP must ensure that for the duration of this application, the site notices [Regulation 41(2)(a)] remain at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of the site where the activity to which the application or proposed application relates is or is to be undertaken. The EAP must also comply with all other public participation process requirements (inter alia Regulation 21 (1) must still be complied with). It is also noted that the details of the persons notified had been redacted / blacked out. Although this Directorate is aware of the requirements of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013 (POPIA), when submitting the copy of Registered I&AP register and reports / documents to the Competent Authrotity, the EAP must ensure that this detail is visible and legible. The redacted documents have made it near impossible for the reviewer to determine compliance with Public Participation requirements. Please ensure that this Directorate receives a list with all least names of the parties notified during PPP (refer to Regulation 42). | | | | |

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| | 8. The National Web based Environmental Screening Tool Report ("STR") and Site Verification Report submitted as part of the application form. Despite the previous concern raised regarding Dr. Marlie Pretorius (Candidate EAP) being listed as the author of the Site Sensitivity Verification Report (SSVR), Ms. Pretorius is still listed as one of the authors of the SSVR and this is contrary to the requirements of the relevant Protocols. It therefore remains unclear how the Candidate EAP may have assisted the EAP, without taking the primary responsibility for the performance of such tasks. Please clarify.<br><br>9. Government Policies and Plans, Guidelines, Environmental Management Instruments: Government Policies and Plans, Guidelines, Environmental Management Instruments: You are advised that when undertaking the EIA process, it is the responsibility of the EAP and Specialists to take into account all the government policies and plans, guidelines, environmental management instruments and other decision making instruments in respect of the application. process or the kind of activity which will be the subject of the application, including the guidelines, information documents or circulars developed by this Department which include inter alia, the following:<br>• Guideline for determining the scope of specialist involvement in EIA processes, June 2005.<br>• Guideline for the review of specialist input in the EIA process, June 2005.<br>• Guideline for Environmental Management Plans (June 2005).<br>• Guideline for involving visual and aesthetic specialists in the EIA process, June 2005.<br>• Guideline for involving heritage specialists in the EIA process, June 2005.<br>• Guideline for involving social assessment specialists in the EIA process, February 2007.<br>• Guideline for involving economists in the EIA process, June 2005.<br>• Western Cape Provincial Spatial Development Framework, November 2014 (as amended) | | | | |

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| | • DEA (2017), Guideline on Need and Desirability, Department of Environmental Affairs (DEA), Pretoria, South Africa (ISBN: 978-0-9802694-4-4)<br><br>10. Alternatives - Be advised that in terms of the EIA Regulations and NEMA the investigation of alternatives is mandatory. It must be noted that alternatives are not limited to site alternatives. It may also include, but is not limited to lay-out alternatives, design, operational and technology alternatives, etc. You are therefore strongly advised to consider alternatives to avoid potential impacts. The final BAR must comparatively assess the feasible and reasonable alternatives in order to select the best practicable environmental option. All identified alternatives must be comparatively assessed, including the cumulative impact of all identified alternatives, even if it is only the no-go and the preferred alternatives.<br><br>11. Synchronisation- The application form states that Section 21 (c) and (i ) water uses may be applicable to the proposal. Please be reminded that the National Environmental Management Laws Amendment Act, Act 2 of 2022 (NEMLAA), came into effect on 30 June 2023. This Act added sub-section 24C(11) to the National Environmental Management Act, Act 107 of 1998, as amended (NEMA) which requires that "a person who requires an environmental authorisation which also involves an activity that requires a licence or permit in terms of any of the specific environmental management Acts (i.e., NWA), must simultaneously submit those applications to the relevant competent authority or licensing authority, as the case may be, indicating in each application all other licences, authorisations and permits applied for". Failure to synchronise the processes may prejudice the application. In light of the above, you are hereby reminded that the processes required for water use authorisation and the Heritage authorisation must be synchronised with the EIA application as to ensure that these processes duly inform one another. Failure to do so may prejudice the success of this application.<br><br>12. The Department awaits the submission of the Scoping Report (SR) as prescribed by Regulation 21 of the EIA Regulations, 2014. In | | | | |

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| | accordance with Regulation 21, the Department stipulates that the SR must be submitted to this Department for decision within 44 days from the date of receipt of the application by the Department, to be reckoned from 27 February 2026. If the SR is not submitted within the prescribed timeframe, the application will lapse in terms of Regulation 45 of the EIA Regulations, 2014 and your file will be closed. Should you wish to pursue the application again, a new application process would have to be initiated. A new Application Form would have to be submitted and the prescribed application fee would have to be paid again (if applicable).<br><br>13. Please note that it is prohibited in terms of Section 24F of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") for a person to commence with a Listed Activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity. Offences in terms of the NEMA and the Environmental Impact Assessment Regulations, 2014, will render the offender liable for criminal prosecution.<br><br>14. Kindly quote the above-mentioned reference number in any future correspondence in respect of this matter.<br><br>15. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received. | | | | |
| 14. | **Email:**<br>Please find attach comments from the WCDoA: LUM.<br><br>**Letter:**<br>Although, Remainder of the Portion 8 of the Farm Rietvalley No. 225, Mossel Bay, is considered having medium potential agricultural land and a part of it being cultivated for dryland crop production, the farm falls within the approved development area for industrial and related development, as strategic development zone for Mossel Bay. Therefore, the Western Cape Department of Agriculture has no objection to the extension of the underlined Mossdustria and the establishment of a raceway on the Remainder of Portion 8 of the Farm Rietvalley No. 225, Mossel Bay.<br>Please note: | Brandon Layman, Administrative Assistant, Land Use Management, DEADP | Email B (04/03/2026) | Nemai Consulting | Thank you very much, Mr Layman,<br><br>Your comments will be included in the Comments and Response Report. |

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| | • Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.<br>• The Department reserves the right to revise initial comments and request further information based on the information received. | | | | |
| 16. | **Email:**<br>Ons as die Gourikwa Khoisan stamhuis bring onder u aandag dat indien enige Inheemse histories eartefakte, grafte, rotstekeninge op beoogde grond vir ontwikkeling is Die Eerste Inheemse Nasie ingelig en ingetrek word. Verder dat die Eerste Inheemse nasie so ver as moontlik sal deel uit maak in n mate van hierdie Ontwikkeling.<br><br>English translation:<br>"We, as the Gourikwa Khoisan tribal house, bring to your attention that if any Indigenous historical artifacts, graves, rock paintings are on the intended land for development, The First Indigenous Nation must be informed and involved. Furthermore, the First Indigenous Nation should participate as much as possible to a degree in this Development." | Chief Barry Jacobs, Gourikwa Khoi-San Stamhuis | Email A (09/03/2026) | Nemai Consulting | Baie dankie vir u terugvoer en belangstelling in die projek. U kommentaar word in ag geneem en sal ingesluit word in die fi nale Omvangsverslag.<br><br>English translation:<br>"Thank you very much for your feedback and interest in the project. Your comments are taken into consideration and will be included in the final Scope Report." |
| 17. | **Email:**<br>Water use authorisation to be applied for where necessary through the DWS Regional Office | Pieter Ackerman, Chief Landscape Architect Department of Water and Sanitation. | Email B (09/03/2026) | Nemai Consulting | Thank you for your response. It will be included in the comments and response report |
| 18. | **Email:**<br>Please see attached HWC comment.<br>HWC previous comment still stands. | Stephanie-Anne Barnardt-Delport, Specialist Heritage Officer, HWC. | Email (11/03/2026) | Nemai Consulting | Refer to response in row no. 2 above. |
| 19. | **Email:**<br>NOTICE OF SUSPENSION OF APPLICATION: APPLICATION FOR ENVIRONMENTAL AUTHORISATION FOR THE PROPOSED EXTENSION OF MOSSDUSTRIA AND THE ESTABLISHMENT OF A RACEWAY ON THE REMAINDER OF PORTION 8 OF THE FARM RIETVALLEY 225, MOSSEL BAY, WESTERN CAPE PROVINCE.<br>Please find attached the comment from this Department regarding the aforementioned subject.<br><br>**Letter:**<br>1. The following has reference:<br>(a) The application submitted on by your appointed Environmental Assessment Practitioner (EAP), Mr. Donavan Henning (EAPASA No.: 2020/1217) and assisted by the registered Candidate EAP, Dr Marilie | Mr. Francois Naude, Ms. Shireen Pullen and Mr. Gavin Benjamin, DEADP. | Email (12/03/2026)<br><br>Letter (12/03/2026)<br><br>Letter (16/03/2026) | Nemai Consulting | **Email:**<br>Please find attached a letter containing our responses to the Notice issued by the Department.<br><br>We remain available to engage further with the Department and to provide any additional clarification that may be required.<br><br>**Letter:**<br>This letter serves as a written response to the Notice of Suspension of Application (the "Notice") issued by the Western Cape Department of Environmental Affairs and |

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| | Pretorius (EAPASA No. 2024/8345) from GIBB Environmental (Pty) Ltd. and received by the Directorate: Development Management (Region 3) ("this Directorate") on 4 March 2026.<br>(b) The Draft Scoping Report ("SR") submitted by the registered Candidate EAP, Dr Marilie Pretorius (EAPASA No. 2024/8345) on behalf of your appointed Environmental Assessment Practitioner (EAP), Mr. Donavan Henning (EAPASA No.: 2020/1217) from GIBB Environmental (Pty) Ltd. and received by this Directorate on 9 March 2026.<br>(c) The meeting held on 24 February 2026 attended by officials from this Directorate, officials from Mossel Bay Municipality as well as your appointed EAP and the Candidate EAP.<br>(d) The guidance provided to you and the respective appointed EAP's in the correspondence issued by this Directorate on 30 November 2021 (DEA&DP Ref. 16/3/3/6/7/2/D6/29/0180/21) and more recently on 24 February 2026 (DEA&DP Ref. 16/3/3/6/4/2/1/D6/29/0403/25) regarding the roles and responsibilities of the appointed EAP.<br><br>2. In accordance with Regulation 3(6) of the Environmental Impact Assessment Regulations, 2014 (Government Notice No. R.982 of 4 December 2014, as amended) ("EIA Regulations, 2014"), this letter also serves as an acknowledgment of receipt of the Draft Scoping Report by the Department on 09 March 2026. Note: Notwithstanding the fact that title of the Scoping Report refers to "Final Scoping Report" the document is deemed to be a draft document received in terms of Regulation 21(1) of the EIA Regulations, 2014, and is hereinafter referred to as such.<br><br>3. This Directorate has reviewed the information submitted on 9 March 2026 by the Candidate EAP. The review of the information has revealed the following issues of concern:<br><br>3.1 Please be advised that matters regarding the proposed public participation process for the Scoping Phase; and the roles and responsibilities of the EAP, have been identified which may prejudice the success of your application for environmental authorisation. The issue regarding the roles and responsibilities of the appointed EAP were raised during the meeting held on 24 February 2026 and highlighted in the correspondence which was issued on 24 February 2026 (DEA&DP Ref. 16/3/3/6/4/2/1/D6/29/0403/25).<br><br>3.2 Sub-regulation 3(6); 21(1) and 40(1)(b) clearly prescribe that the public participation process to which the Draft Scoping Report must be subjected, must be for a period of at least 30-days. The Draft Scoping Report received on 9 March 2026 does not specify the 30-day commenting period to which | | | | Development Planning (DEA&DP) ("the Department") on 12 March 2026 in respect of the above-mentioned application.<br><br>At the outset, we want to express our commitment to ensuring that the Environmental Impact Assessment (EIA) process is conducted in full compliance with the EIA Regulations of 2014, as amended. The intention of this response is to cooperate constructively with the Department in order to resolve the matters that have given rise to the suspension.<br><br>A. Roles of the Registered Environmental Assessment Practitioner (EAP) and Candidate EAP<br>It is hereby confirmed that Donavan Henning (the registered EAP), holds primary responsibility for the EIA process in terms of Regulation 12 and 13 of the EIA Regulations of 2014, as amended, as well as Regulation 14 of the Section 24H Registration Authority Regulations of 2016. Assistance has been provided by Marilie Pretorius (the Candidate EAP) under the direct supervision and oversight of the registered EAP.<br><br>Page viii of the Draft Scoping Report lists Donavan Henning (the registered EAP) as the author of the document together with Kate Flood and Umeshree Naicker, who are registered EAPs that previously contributed to the report. While the Draft Scoping Report also lists Marilie Pretorius (Candidate EAP) as one of the authors, this will be corrected in the Final Scoping Report to accurately reflect that her role was limited to assisting the registered EAP with the compilation of the report, under supervision. |

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| | it must be subjected, an no cover letter is attached to the Scoping Report proving such details. However, a separate e-mail notice has been received from the Candidate EAP on 9 March 2026, titled "GE39111 Notice of Review of Draft Scoping Report for the proposed extension of Mossdustria and the establishment of a raceway on the remainder of portion 8 of the Farm Rietvalley 225, Mossel Bay, Western Cape Province" wherein it is stated that the Scoping Report will be available for comment from 09 March 2026 to 09 April 2026. The e-mail notice contains a "Comments Sheet" which clearly states that the contact person is Marilie Pretorius and all enquiries must be forwarded to the Candidate EAP. Considering the reckoning of days/periods prescribed in Regulation 3 of the EIA Regulations, 2014, the period from 09 March 2026 to 09 April 2026 is reckoned to be a period of only 28-days and therefore does not conform to the regulatory minimum period of 30-days.<br>Please note that all the provisions of Regulation 3 must be considered when reckoning the specific period, therefore considering–<br>• Sub-regulation 3(1) - the 30-day period must be reckoned as from the start of the day following the receipt of the documents on 9 March 2026 (i.e., start counting on 10 March 2026) to the end of the last day of the period, namely Thursday, 9 April 2026. Please be reminded that the SR document and notice were both received on 9 March 2026; and<br>• Sub-regulation 3(5) - the timeframe 09 March 2026 to 09 April 2026 is affected by three (3) public holidays1, and therefore the timeframe must be extended by the number of public holiday days falling within that timeframe.<br>It is apparent from the information received that the person managing the application has not properly considered the regulatory requirements contemplated in Regulation 21 as well as Reguation 3 and 40 of the EIA Regulations, 2014. It must be emphasised that the prescripts for the public participation process must be complied with meticulously to not only ensure that the process is lawful, reasonable and procedurally fair, but that the final decision (administrative action) also complies with these aspects.<br><br>3.3 Roles and Responsibilities of the appointed EAP- In accordance with Regulation 12(a) of the EIA Regulations, 2014, an applicant must appoint an EAP to manage the application for Environmental Authorisation. Please be reminded that as of 8 August 2022, the person appointed to hold the primary responsibility for the planning, management, co-ordination, and execution of the tasks contemplated in Regulation 14 of the Section 24H Registration Authority Regulations, 2016 (Government Notice 849 dated | | | | Although the site and newspaper notices provide the contact details of the Candidate EAP, it is confirmed that all notices were reviewed and approved by the registered EAP prior to publication. Furthermore, the planning, oversight, and implementation of the public participation process were undertaken under the supervision and direction of the registered EAP, who retains full responsibility for ensuring compliance with the regulatory requirements in this regard.<br><br>B. Incorrection Version of Draft Scoping Report Reviewed by the Department<br>The dedicated folder on the Directorate's OneDrive / Sharepoint for this application contains 4 folders, which comprise the Application Form, submission of previous versions of the Scoping Report, as well as the submission of the Draft Scoping Report on 6 March 2026. Evidence confirming the aforementioned submission date includes the following:<br>1. The dedicated folder on the Directorate's OneDrive / Sharepoint for this application shows that the date that the file was modified is 6 March 2026, consistent with the date of submission.<br>2. Proof of the upload was forwarded to the Department by Nemai Consulting on 6 March 2026, with screenshots of the folder.<br><br>It is evident that an incorrect version of the Draft Scoping Report was reviewed and commented on by the Department, based on the following comments provided in the Notice:<br>1. On page 1 of the Notice, it is incorrectly stated that the Scoping Report refers to "Final Scoping Report". The Draft Scoping Report submitted on 6 March 2026 clearly refer to a "Draft" version of this report. |

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| | 22 July 2016, as amended) must be registered with Environmental Assessment Practitioners Association of South Africa (EAPASA). As from the 8th of August 2022, if anyone is found practicing without being registered as an EAP, such a person is engaging in fraudulent or illegal practices. Please be reminded that the appointed Environmental Assessment Practitioner ("EAP") must manage all aspects of the application and ensure compliance with the EIA Regulations, 2014 to compile and submit the Scoping Report ("SR") and Environmental Impact Assessment Report ("EIR") to the competent authority for decision-making. In this regard, please be advised that in terms of Regulation 14(1) of the section 24H Registration Authority Regulations, 2016 that only a person registered as an EAP may perform tasks in connection with an application for an environmental authorisation. It is acknowledged that Regulation 14(6) of said 24H Regulations states that when acting under supervision of a registered EAP, a registered Candidate EAP may assist with the performance of tasks in connection with an application for an environmental authorisation contemplated in Chapter 5 of the National Environmental Management Act, 1998 ("NEMA"), read with the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations, 2014").<br>This Directorate notes from the Application Form, that the person appointed as the Environmental Assessment Practitioner (EAP) is Donovan Henning (EAPASA Registration No. 2020/1217) from Gibb International (Pty) Ltd. While it is acknowledged that Mr. Donovan Henning (EAPASA Reg. 2020/1217) has signed an EAP declaration, it appears that Mr. Henning has acted as a "review EAP" and not as the person who holds the primary responsibility for the performance of the tasks for which the EAP is held responsible. Whereas a "Review EAP" has a specific meaning in the context of the EIA Regulations, 2014, care must be taken when such statement is used in respect of the section 24H Registration Authority Regulations, 2016.<br>This Directorate notes from the Application Form, that the person appointed as the Environmental Assessment Practitioner (EAP) is Donovan Henning (EAPASA Registration No. 2020/1217) from Gibb International (Pty) Ltd. While it is acknowledged that Mr. Donovan Henning (EAPASA Reg. 2020/1217) has signed an EAP declaration, it appears that Mr. Henning has acted as a "review EAP" and not as the person who holds the primary responsibility for the performance of the tasks for which the EAP is held responsible. Whereas a "Review EAP" has a specific meaning in the context of the EIA Regulations, 2014, care must be taken when such statement is used in respect of the section 24H Registration Authority Regulations, 2016. | | | | 2. On page 2 of the Notice, it is indicated that the Draft Scoping Report "…does not specify the 30-day commenting period to which it must be subjected." This is incorrect, as the review period is stated in Section 4.3 of the Draft Scoping Report submitted on 6 March 2026.<br>3. On page 3 of the Notice, reference is made to a "review EAP". On page viii of the Draft Scoping Report submitted on 6 March 2026 it is indicated that the author is Donavan Henning (the registered EAP).<br>4. The Site Sensitivity Verification Report indicates that the author is Donavan Henning (the registered EAP), as the EAP.<br>5. On page 5 of the Notice it is incorrectly stated that "…the EAP/Candidate EAP is omitting this reference number and incorrectly referencing the previous DE&ADP reference numbers in correspondence and reports". The reference number utilised on the cover page and throughout the Draft Scoping Report submitted 6 March 2026 is 16/3/3/2/D6/29/001/26.<br><br>We respectfully request that the Department reconsider the above comments, including the manner in which these comments contributed to the suspension of the application, in light of the Draft Scoping Report that was submitted on 6 March 2026.<br><br>C. Regulated Timeframes<br>The following key dates relevant to the formal EIA process are noted:<br>• The Application Form was submitted to the Department on 27 February 2026.<br>• The Draft Scoping Report was submitted to the Department on 6 March 2026.<br>• The public review period commenced on 9 March 2026. |

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| | • All documents and correspondence have been submitted by Dr. Marilie Pretorius (Candidate EAP). It is not apparent that the EAP is responsible for the execution of the tasks.<br>• The Site Sensitivity Verification Report has been prepared (authored) by the Candidate EAP, Marilie Pretorius. This is contrary to the requirements of the relevant Protocols.<br>• It appears that the Candidate EAP will be managing the entire public participation process, whereas Regulation 7 is clear that the consultation with Organs of State and State Department, is a task which falls within the ambit of the tasks for which the EAP is responsible.<br>It is noted from the EAPASA register that a Dr. Marilie Pretorius is registered as a Candidate EAP (EAPASA Reg. 2024/8345); however, neither the Application Form or Draft Scoping Report (and supporting documents) confirm this and describe the role of the Candidate EAP I relation to the appointed EAP.Notwithstanding the fact that this aspect was brought to your attention prior to the submission of the Application Form, this aspect has not been corrected, and each document/report has not clearly demonstrated that the EAP has indeed fulfilled the primary responsibility for the performance of the identified tasks and how the Candidate EAP may have assisted the EAP. As such, it is not apparent that you have indeed complied with Regulation 12.<br><br>4. In accordance with Regulation 14(1)(a) you are notified that the Competent Authority believes or has reason to believe that the EAP has not complied with the requirements of sub-regulations 13(1)(b); 13(1)(c); 13(1)(d) and/or 13(1)(e) in respect of the application, other than the requirement of independence in Regulation 13(1)(a).In light hereof the application for environmental authorisation (DEA&DP Ref. No. 16/3/3/2/D6/29/0001/26) for the proposed extension of Mossdustria and the establishment of a raceway on the Remainder of Portion 8 of the Farm Rietvalley No. 225, Mossel Bay, Western Cape Province, is suspended.<br>Further to the above—<br><br>4.1 In accordance with sub-regulation 14(1)(a), the application is suspended until 20 April 2026 to enable your EAP to utilise the period to resolve the matter in respect of the application for environmental authorisation. Note: Should the matter be resolved sooner; the Competent Authority may lift the suspension prior to 20 April 2025; however, if not the suspension period may be extended. | | | | • The Notice was received on 12 March 2026.<br><br>We are cognisant of the regulated 44 days in terms of Regulation 21(1) of the EIA Regulations of 2014, as amended, calculated from the date of submission of the Application Form to the date by which the Final Scoping Report must be submitted. At the time of receipt of the Notice on 12 March 2026, a period of 13 days had elapsed since submission of the Application Form. Accordingly, 31 days remain within the regulated timeframe for submission of the Final Scoping Report. Based on this calculation, the Final Scoping Report would be due for submission to the Department by 15 April 2026, subject to confirmation by the Department.<br><br>Furthermore, at the time of receipt of the Notice, 27 days remained of the public review period for the Draft Scoping Report.<br>The implications arising from the above are addressed in the section below.<br><br>D. Way Forward<br>In order to address the matters raised in the Notice and to enable the EIA process to proceed in a procedurally compliant manner, the following actions are proposed:<br>1. Donavan Henning (the registered EAP) will notify all Interested and Affected Parties (I&APs) of the suspension within 7 calendar days from the date of issue of the Notice. This notification will state that the current public review period has been placed on hold and will resume once the suspension is lifted. Proof of such notification will be submitted to the Department.<br>2. Donavan Henning (the registered EAP) will assume direct responsibility for managing the |

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| | 4.2 As contemplated in sub-regulation 14(1)(b), the appointed EAP is afforded an opportunity to make written representations to the competent authority regarding the suspected non-compliance with the aforementioned requirements of Regulation 13.Such written representation must include a reasoned opinion and must be submitted to the competent authority on or before 02 April 2026.<br>4.3 The Applicant / EAP is invited to submit representations on the issues that have been raised and any recommendations how to resolve the matter. Such representations must be submitted to this Department by no later than 02 April 2026.<br><br>5.On receipt of the representations, the Competent Authority will follow the procedures detailed in sub-regulation 14(5) and decide the matter.<br><br>6.You are required to notify all registered Interested and Affected Parties (I&APs) of the suspension of the application within 7 calendar days from the date of issue of this letter. The EAP must, within said 7-day period, provide proof to the competent authority of complying with this requirement.<br><br>7.Kindly quote the above-mentioned reference number (viz. DEA&DP Ref.: 16/3/3/2/D6/29/0001/26) in any future correspondence in respect of this application. It is noted that the EAP/Candidate EAP is omitting this reference number and incorrectly referencing the previous DE&ADP reference numbers in correspondence and reports.<br><br>8. Please note that the activity may not commence prior to an environmental authorisation being granted by the Department. It is an offence in terms of Section 49A(1)(a) of the NEMA for a person to commence with a listed activity unless the Competent Authority has granted an environmental authorisation for the undertaking of the activity. A person may be liable to prosecution for failing to comply with the requirements of Section 24F of the NEMA.<br><br>9. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received. | | | | public participation process. Any support by the Candidate EAP will be expressly identified as such. In this regard, all future emails to be sent by the Candidate EAP as part of the public participation process will include the following statement: “This email is sent by a Candidate Environmental Assessment Practitioner (EAP) (registration no. 2024/8345), whose work is undertaken under the supervision and oversight of the registered EAP, Donavan Henning (registration no. 2020/1217).”<br>3. If the suspension is lifted and we are notified thereof by the Department, we will inform the I&APs of the revised end date for the public review period. Should it become apparent that the regulated 44-day timeframe for submission of the Final Scoping Report cannot be met, a motivation for an extension of time in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended, will be submitted to the Department at least 7 days prior to the expiry of the applicable timeframe.<br>4. As indicated in Section 4.3 of the Draft Scoping Report, notice boards were placed at the site on 6 March 2026 in accordance with Regulation 41(2)(a)(i) of the EIA Regulations, 2014, as amended. New site notices will be placed at the same locations to inform I&APs of the extension of the public review period should the suspension be lifted.<br>5. Section 4.3 of the Draft Scoping Report further records that notices were published in English, Afrikaans, and isiXhosa in the Mossel Bay Advertiser on 6 March 2026, in accordance with Regulation 41(2)(c)(i) of the EIA Regulations, 2014, as amended. In light of this, it is not proposed to place additional newspaper notices should the suspension be lifted.<br><br>We respectfully submit that the responses provided in this letter address the matters that |

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| | | | | | resulted in the suspension. The undersigned remains available should the Department require any further clarification. |
| 20. | **Email:**<br>Kindly can you send me a OneDrive link with all the documentation for our review. | Megan Simons Land Use Scientist – Landscape East, Cape Nature | Email (18/03/2026) | Nemai Consulting | Please see the below WeTransfer link:<br>https://we.tl/t-uBZc7Tp7OcDT6tbT<br><br>Alternatively, the Report is also available at:<br>https://nemai.co.za/downloads/ |
| 21. | **Email:**<br>Can you please assist with the GPS coordinates. | Chantell Bruintjies, Transnet Freight Rail Port Elizabeth | Email (20/03/2026) | Nemai Consulting | Please see attached Appendix A of the Draft Scoping Report with Location maps and coordinates. |
| 22. | **Email:**<br>LIFTING OF SUSPENSION: APPLICATION FOR A SCOPING AND ENVIRONMENTALIMPACT REPORTING PROCESS IN TERMS OF THE NATIONAL ENVIRONMENTALMANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACTASSESSMENT REGULATIONS, 2014: PROPOSED EXTENSION OF MOSSDUSTRIA ANDTHE ESTABLISHMENT OF A RACEWAY ON THE REMAINDER OF PORTION 8 OF THEFARM RIETVALLEY 225, MOSSEL BAY, WESTERN CAPE PROVINCE<br>Please find attached the comment from this Department regarding the aforementioned subject.<br><br>**Letter:**<br>1. The Following refer:<br>1.1. The application submitted on your behalf by your appointed Environmental Assessment Practitioner (EAP), Mr. Donavan Henning (EAPASA Registration Number: 2020/1217) of from GIBB Environmental (Pty) Ltd. and received by the Directorate: Development Management (Region 3), hereinafter referred to as “this Directorate” and on 27 February 2026,<br>1.2. The draft Scoping Report received by this Directorate on 9 March 2026,<br>1.3. This Directorate’s Notice of Suspension dated 12 March 2026 and<br>1.4. The representations received by your appointed EAP on 16 March 2026. | Mr. Francois Naude, Ms. Shireen Pullen and Mr. Gavin Benjamin, DEADP | Email (22/03/2026)<br><br>Letter (22/03/2026) | Nemai Consulting | We acknowledge receipt of the Department's correspondence in respect of the lifting of the suspension. We will proceed accordingly. |

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| | 2. This letter serves as acknowledgment of receipt of the representations received from your appointed EAP on 16 March 2026.<br>3. Comment on Representation<br>This Directorate has reviewed the representations provided. The EAP must ensure that Dr. Marilie Pretorius' role is always clearly defined/ described in all reports/documents that are submitted to the competent authority for consideration. It is noted on page viii of the draft Scoping Report and numerous other sections of the draft Scoping Report that Mr. Donavan Henning (among other registered EAPs) is referenced as the Registered EAP who prepared the draft Scoping Report and accepts all responsibility as the EAP and Dr. Marilie Pretorius as the environmental consultant (registered as a Candidate EAP) who assisted with the compilation of the document; however, page viii of the Draft SR still lists Dr. Marilie Pretorius as one of the people who prepared the draft Scoping Report. Please be advised that the statement in section D.2 of the letter received from the EAP, referring to e-mail correspondence which the Candidate EAP issues pertaining to the public participation process, should rather read:<br>"This email is sent by a Candidate Environmental Assessment Practitioner (EAP) (registration no. 2024/8345), who is assisting the registered EAP, Donavan Henning (registration no. 2020/1217)."<br><br>4. Decision on the suspension of the application:<br>4.1 The Competent Authority has considered all the information mentioned above and is of the opinion that sufficient information has been provided to make an informed decision on the suspension of the application and it regards the matter as being resolved.<br>4.2 You are hereby informed that the suspension of the application is lifted from the start of Wednesday, 25 March 2026.Note: The reckoning of days must include said day.<br>4.3 The Department will acknowledge receipt and consider the draft SR in accordance with the prescribed timeframes (considering the suspension period) and advise you accordingly. The remaining period of the 30-day comment period (i..e 26-days) is reckoned to extend to the end of Tuesday, 21 April 2026.<br>4.4 The Competent Authority stipulates that the Scoping Report must be submitted to this Department for decision within 44-days from the date of receipt of the application by the Department. The remaining period is reckoned to extend to the end of Tuesday, 28 April 2026, by which date the Scoping Report in terms of Regulation 21(1) of the EIA Regulations of 2014, must be submitted to this Department.<br><br>5.In light of the above your EAP is required to notify all registered Interested and Affected Parties (I&APs) within 7 calendar days from the date of this | | | | |

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| | letter being issued, that the suspension of the application has been lifted and the actions pertaining to the public participation process. NOTE: The EAP must provide proof of complying with this requirement to the competent authority within said period.<br>To comply with the regulatory requirements, it is advised that the notice should not be issued later than 24 March 2026.<br><br>6.Please note that the activity may not commence prior to an environmental authorisation being granted by the Department. It is an offence in terms of Section 49A(1)(a) of the NEMA for a person to commence with a listed activity unless the Competent Authority has granted an environmental authorisation for the undertaking of the activity. Furthermore, it is an offence in terms of Regulation 48(1)(a) of the EIA Regulations, 2014 if a person provides incorrect or misleading information in any form, including any document submitted in terms of these Regulations to a competent authority or omits information that may have an influence on the outcome of a decision of a competent authority. Offences in terms of the NEMA or the Environmental Impact Assessment Regulations, 2014, will render the offender liable for criminal prosecution. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.<br><br>7.Kindly quote the above-mentioned reference number in any future correspondence in respect of this matter.<br><br>8.This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received. | | | | |
| 23. | **Email:**<br>I am making contact on behalf of DFR Engineers, to enquire whether you will need Electrical and/ or Mechanical Engineering Services for the abovementioned project.<br>We do a significant amount of work in the Western Cape and have been involved in a number of similar developments. Our portfolio includes:<br>• Electrical distribution, transmission, and reticulation,<br>• Electrical and Mechanical designs and infrastructure for private sector, industrial, agricultural, public sector, mining etc.<br>• Renewable energy and energy optimisation,<br>• Specialised designs such as lifts, escalators, energy farms, fire designs, | Shameemah Khan | Email (24/03/2026) | Nemai Consulting | **Email:**<br>Thank you very much for your interest in the proposed Project.<br><br>Your comments will be included in the comments and response report |

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| | • Wet services and rational fire designs,<br>• Statutory compliance and heritage projects.<br>If these services have not yet been finalised, we would appreciate the opportunity to be considered or to discuss how we could potentially get involved. I have attached our company profile for your reference.<br>Please feel free to let me know whether I can schedule a quick call to introduce ourselves | | | | |
| 24. | **Email:**<br>Find attached my public Comment as requested on the proposed raceway in Mosdustria. I also addressed the email with Comments to my respective Ward Councillor's for Ward 7, Stephan Botha and Ward 11 Nicky Le Roux. Ward 7 being Mosdustria and Ward 11 being Dana Bay, which are the affected neighbours of the proposed development.<br><br>It deems to be noted that George and Oudshoorn respectively 50 and 90 km from Mossel Bay has Oval tracks. Oval tracks and spinning areas do not set different track layouts like for instance Grandprix circuit and rally tracks. Therefore, an oval track is an oval track no different to the other. Why an additional track within an 50km radius joined to Mossel Bay by a double highway.<br><br>I have detailed my comments in the attached documents.<br><br>**Letter:**<br>Introduction:<br>As indicated above I have 1 property in Mosdustria and 3 properties in Dana Bay that could be impacted by the assessment. It is a substantial investment which could be negatively impacted by incorrect assessment. Past approvals of the Municipality has proved to be incorrectly approved such as a Fishmeal plant that was approved with conditions as a red meat rendering plant. The Conditions of approval were never met and a longer than ten year period of illegal activities at this plant took place before myself and Dana Bay residents and Mosdustria Property owners could get legal intervention to prove the plant activities did not comply with regulations and zoning. This cost us a lot of time and private monies to resolve.<br><br>The Municipality being the owner of the property has proved in the past during the above situation not to be trusted when approvals under conditions were set out. Conditions were not met and very sparse Environmental impact studies were done without considering and answering the concerns of the Public participation. | Marius van Wyk | Email (27/03/2026)<br><br>Letter (27/03/2026) | Nemai Consulting | **Email:**<br>Thank you very much for your comments.<br>It will be included and addressed in the Comments and Response Report.<br><br>Nemai Consulting takes note of the sensitive environmental features in your letter.<br><br>The following specialist studies will be undertaken during the EIR phase of the process. These studies will assist with the development of an understanding of the potential impacts of the proposed development, on both the social and biophysical environments:<br>• Wetland Assessment;<br>• Terrestrial Ecological Assessment;<br>• Landscape/Visual Impact Assessment;<br>• Archaeological and Cultural Heritage Assessment;<br>• Palaeontology Impact Assessment;<br>• Aquatic Biodiversity Impact Assessment;<br>• Noise Scoping Assessment;<br>• Risk Assessment;<br>• Socio-Economic Impact Assessment; and<br>• Avifauna impact assessment (solar PV facility). |

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| | I do urge you do seriously look carefully at this process to ensure that the interest of the property owners of Mosdustria and more so that of the Dana Bay residents are protected from bad decisions negatively impacting on property values in the future. In Mosdustria being an industrial area the concerns relate to environmental impacts ie groundwater and wetlands as identified by you already.<br><br>Although the area shown on my map below does not border on the erf earmarked for development, it is however marked on your palaeontology report map indicating a possibility of future development that has been mentioned by the municipality. The wetland in this area and the groundwater indicated here is of great concern.<br><br><br><br><br>The second concern more for the residents of Dana Bay would be noise pollution especially at night due to Temperature inversion, particularly during evening and night events, which can significantly increase noise propagation and the accompanying e Doppler effect created by the moving of vehicular traffic creating various pitches in sound.<br><br>A third concern is the sparse scoping of high octane fuel management, storage and handling posing a significant fire risk at night when other industries are idle and fire fighting capacity and the spreading thereof could impact catastophically on neighbouring properties.<br><br>Below is my detailed PUBLIC COMMENT as requested on the specific subject matters.<br><br>1. ENVIRONMENTALLY SENSITIVE AREA – NORTH OF BORDER STREET | | | | The results of the above-mentioned specialist studies will be confirmed, analysed, and interpreted to assess the potential impacts of the proposed development on the system, devise potential alternatives for select activities, and develop the necessary mitigation measures to minimise negative impacts and optimise positive ones. The specialist recommendations will be incorporated into the EMPr. The activities outlined in the project description will be assessed both individually and cumulatively with respect to the project as a whole.<br><br>With the input of specialists the issues raised will be investigated further during the EIA Phase. All of the specialist studies will be conducted in accordance with Appendix 6 of the EIA Regulations, 2014 and the National Environmental Management Act: Protocols for specialist assessment and minimum report content requirements for environmental impacts. |

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| | I refer to the Draft Scoping Report currently under your review and specifically to the area identified north of Border Street between the railway line and Border Street.<br><br>While the palaeontological study has flagged sensitivity in this area, it is evident that a comprehensive environmental assessment of this zone has not yet been undertaken at the scoping stage. As it is marked I presume future development is planned here and the scoping document will be to include this area which historically could be related to the wetlands in the are earmarked for developemnt of the raceway.<br><br>As a property owner in Border Street since 2010, I submit the following site-specific, long-term observations, which constitute material environmental information:<br>• The presence of a seasonal to semi-permanent wetland system<br>• A persistently high groundwater table, evidenced by:<br>• Permanently waterlogged areas on private property<br>• Sewer manholes consistently inundated with groundwater<br>• Sustained surface water flow after rainfall events, continuing for several days<br>• The presence of seasonal indigenous flora (“veldblomme”), indicating intact ecological functioning<br><br>1.1 In addition to the above:<br>• The area supports consistent amphibian (frog) activity, particularly after rainfall<br>• Regular breeding calls are audible, indicating reproductive use of the habitat<br><br>It is well established in ecological practice that amphibians function as sensitive bio-indicators of wetland ecosystem integrity, due to their dependence on:<br>• Clean, unpolluted water<br>• Stable hydrological regimes<br>• Undisturbed habitat conditions<br><br>1.2 Based on the combined hydrological, botanical, and faunal indicators described above, this area must be regarded, at minimum, as a potential wetland or wetland-associated system of ecological | | | | |

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| | significance. In terms of the principles of National Environmental Management Act (NEMA) and the EIA Regulations, the following applies:<br>• All potentially sensitive environmental features must be identified and assessed at the earliest stage<br>• The precautionary principle requires that uncertainty may not be used as a basis to defer or downplay risk<br>• Site-specific observations such as these trigger a duty for specialist verification<br>• Assessments would have to be seasonably spaced and related<br><br>1.3 Formal Request to Nemai Consulting<br>Accordingly, I formally request that Nemai Consulting ensure that:<br>• All potentially sensitive environmental features must be identified and assessed at the earliest stage<br>• The precautionary principle requires that uncertainty may not be used as a basis to defer or downplay risk<br>• Site-specific observations such as these trigger a duty for specialist verification<br>• Assessments would have to be seasonably spaced and related<br><br>Critical clarification:<br>Any conclusion that this area is of “low sensitivity” or “not a wetland” must be supported by field-based, seasonal specialist studies. A desktop assessment or limited site inspection would not meet acceptable EIA standards and would constitute a material gap in the scoping process.<br><br>2. NOISE IMPACT – DANA BAY AS A SENSITIVE RECEPTOR<br>The Draft Scoping Report indicates that noise impacts will be assessed in later phases. However, the current scoping appears to materially underestimate the nature and extent of potential noise impacts.<br><br>The residential area of Dana Bay, 4 km in a straight line from the proposed development, must be treated as a highly sensitive receptor. Currently noise from the Gouriqua Power turbines is heard at night times. It is constant jet engine like sound without variance in speed. This tends to be tolerated as it is a steady noise without variance. | | | | |

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| | However a oval track raceway, cars without silencers and a area where Spinning/drifting activity at rev limiting and cutout notes are varied would prove to be a challenge, especially seeing that these activities take place on Saturday Nights.<br><br>It deems to be noted that George and Oudshoorn respectively 50 and 90 km from Mossel Bay has Oval tracks. Oval tracks and spinning areas do not set different track layouts like for instance Grandprix circuit and rally tracks. Therefore an oval track is an oval track no different to the other. Why an additional track within an 50km radius joined to Mossel Bay by a double highway.<br><br>2.1 Nature of the Proposed Noise Sources<br>The proposed raceway includes:<br>• An oval racing circuit, where vehicles will operate:<br>• At sustained high revolutions<br>• In lower gears under continuous load<br>• A spinning/drifting track, where vehicles:<br>• Operate at maximum revolutions in first gear<br>• Repeatedly reach the rev limiter, generating impulsive and cyclic noise peaks<br><br>These characteristics are known to produce:<br>• Continuous high-decibel noise, and<br>• Intermittent peak noise events, which are more intrusive and disturbing than steady-state noise<br><br>2.2 Environmental Factors Affecting Noise Propagation<br>The following must be explicitly included in the assessment:<br>• Temperature inversion, particularly during evening and night events, which can significantly increase noise propagation<br>• Coastal atmospheric conditions that may enhance sound travel<br>• The Doppler effect, contributing to fluctuating and intrusive noise perception<br><br>2.3 Required Assessment Standard<br>I request that Nemai Consulting ensure that the noise impact assessment:<br>Is conducted by an independent acoustic specialist | | | | |

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| | • Is based on worst-case operational scenarios, not average conditions<br>• Explicitly includes:<br>• Spinning/drifting activities<br>• Night-time operations<br>• Peak and cumulative noise levels<br><br>Reference should be made to applicable standards, including SANS 10103.<br><br>Critical clarification:<br>Any limitation of the assessment scope (e.g. excluding certain activities or modelling only daytime conditions) would result in a systematic underestimation of impact and would not align with accepted professional or regulatory standards.<br><br>3. SOCIO-ECONOMIC IMPACT<br>The anticipated noise impacts are expected to:<br>• Negatively affect residential amenity<br>• Result in reduced property values<br>• Undermine long-term investment confidence in the Mossel Bay municipal area<br><br>These impacts must be quantified and properly assessed, not treated as secondary considerations.<br><br>4. FUEL STORAGE AND GROUNDWATER RISK<br>The proposed 15 m x 15 m fuel storage area raises significant concerns, particularly in light of the documented high groundwater conditions.<br>Motorsport activities typically involve:<br>• Transport and storage of high-octane fuels<br>• On-site fuel decanting, mechanical work, and vehicle washing<br><br>This introduces a clear risk of soil and groundwater contamination.<br><br>4.1 I request that Nemai Consulting ensure that:<br>• Detailed spill containment systems are specified<br>• Stormwater management measures are clearly defined<br>• Oil-water separation systems are included | | | | |

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| | • Design measures demonstrate suitability for high groundwater conditions<br><br>5. CONCLUSION<br>The issues raised above are based on long-term, site-specific observations and constitute material environmental information relevant to the assessment process.<br>• I respectfully request that Nemai Consulting:<br>• Incorporate these concerns into the scoping phase<br>• Ensure that all identified risks are subject to specialist, evidence-based investigation<br>• Apply the precautionary principle in line with National Environmental Management Act<br><br>Final statement:<br>These concerns cannot reasonably be dismissed without documented, field-based specialist assessment. Failure to address them adequately at this stage may result in material omissions in the Environmental Impact Assessment process.<br><br>I also address the above public comment to the Mossel Bay Ward Councillor Ward 11 Nicky le Roux and Ward 7 Councillor Stephan Botha. | | | | |
| 25. | **Email:**<br>Kindly receive the attached comments for your attention.<br><br>**Letter:**<br>The Breede-Olifants Catchment Management Agency (BOCMA) has evaluated the submitted documents and has the following comments:<br>1. Breede-Olifants Catchment Management Agency (BOCMA) hereby acknowledges receipt of your application dated 10 March 2026 for the aforementioned activity, which was received by this office on 10 March 2026. Based on an evaluation of the intended activity and the information provided, it has been determined that the proposed extension of Mossdustria and the establishment of a raceway on the remainder of portion 8 of the Farm Rietvalley 225, Mossel Bay. This office therefore supports the proposed extension of Mossdustria and the establishment of a raceway activities on the aforementioned property. | Ngobeni Tshembhani, and Jan van Staden, Breede-Olifants CMA | Email A (07/04/2026)<br><br>LetterA (07/04/2026) | Nemai Consulting | **Email:**<br>Thank you very much for your comments.<br><br>Please note that it will be included in the comments and response report and addressed.<br><br>An Aquatic Specialist will compile a Aquatic Biodiversity Impact Report during the EIA phase where BOCMA's comments will be taken into consideration and investigated further. |

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| | 2. BOCMA does not object to the proposed development subject to compliance with the following condition:<br>a. The proposed extension of Mossdustria and the establishment of a raceway on the remainder of portion 8 of the Farm Rietvalley 225, located within the jurisdiction of the Mossel Bay Local Municipality, Western Cape. will trigger Section 21 (c) & (i) water uses of National Water Act ,1998 (Act No 36 of 1998) As amended<br>3. Please note no abstraction of surface or groundwater may take place or storage of water be created without prior authorisation from this office, unless it is a Schedule 1 or Existing Lawful Use as described in Section 32 of the National Water Act, 1998 (Act No. 36 of 1998) as amended.<br>4. Please ensure that no waste or water containing waste is disposed in a manner which may detrimentally impact on a water resource without authorisation from the National Water Act, 1998 (Act 36 of 1998) and other related legislations.<br>5. The applicant should be aware that according to Section 19 (1) of the National Water Act, 1998 (Act No.36 of 1998), “an owner of land, a person in control of land or a person who occupies or uses the land on which (a) any activity or process is or was performed or undertaken; or (b) any other situation exists, which causes, has caused or is likely to cause pollution of a water resource, must take all reasonable measures to prevent any such pollution from occurring, continuing or recurring”. Any pollution incident(s) resulting from the discharge of treated effluent or any activity from the plant must be reported within 24 hours to the relevant authority.<br>6. No stormwater runoff from the application premises containing waste, or water containing waste emanating from any activity may be discharged into a water resource without prior treatment.<br>7. All requirements as stipulated in the National Water Act, 1998 (Act No. 36 of 1998) regarding water use must be adhered to.<br>8. These comments do not exempt you from complying with other relevant legislations and requirements of other governmental Departments. | | | | |

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| | BOCMA reserves the right to revise initial comments and request further information based on any additional information received. | | | | |
| 26. | **Email:**<br>ACKNOWLEDGMENT OF RECEIPT OF THE DRAFT SCOPING REPORT FOR THE PROPOSED EXTENSION OF MOSSDUSTRIA AND THE ESTABLISHMENT OF A RACEWAY ON THE REMAINDER OF PORTION 8 OF THE FARM RIETVALLEY 225, MOSSEL BAY, WESTERN CAPE PROVINCE<br>Please find attached the comment from this Department regarding the aforementioned subject.<br><br>**Letter:**<br>1. The above-mentioned document submitted by your appointed Environmental Assessment Practitioner (EAP), Mr. Donavan Henning (EAPASA Registration Number: 2020/1217) of from GIBB Environmental (Pty) Ltd and assisted by Candidate EAP, Dr. Marilie Pretorius (EAPASA Registration Number: 2024/8345) from NEMAI Consulting is hereby acknowledged by the Directorate: Development Management (Region 3 (hereinafter referred to as "this Directorate").<br><br>2.The information is currently under review and comment on the draft Scoping report will be provided by 21 April 2026 as indicated in the EAP's e-mail notice of 24 March 2026.<br><br>3.Kindly quote the above-mentioned reference number in any future correspondence in respect of this matter.<br><br>4.This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received. | Mr. Francois Naude, Ms. Shireen Pullen and Mr. Gavin Benjamin, DEADP | Email B (07/04/2026)<br><br>Letter B (07/04/2026) | Nemai Consulting | We await the Department's comments. |
| 27. | **Email:**<br>COMMENT ON THE DRAFT SCOPING REPORT FOR THE PROPOSED EXTENSION OF MOSSDUSTRIA AND THE ESTABLISHMENT OF A RACEWAY ON ERF 6 MOSSDUSTRIA AND THE REMAINDER OF PORTION 8 OF THE FARM RIETVALLEY 225, MOSSEL BAY, WESTERN CAPE PROVINCE<br>Please find attached the comment from this Department regarding the aforementioned subject.<br><br>**Letter:**<br>1.The above-mentioned document submitted on your behalf by your appointed Environmental Assessment Practitioner (EAP), Mr. Donavan | Mr. Francois Naude, Ms. Shireen Pullen and Mr. Gavin Benjamin, DEADP | Email (21/04/2026)<br><br>Letter (21/04/2026) | Nemai Consulting | Thank you for your comments<br><br>2. The EIR will clearly describe engineering services (i.e., reticulation of water, sewage and stormwater) to support the proposed development.<br><br>3. 1 The Scoping Report ("SR") contains all the information outlined in Appendix 2 of the Environmental Impact Assessment Regulations, 2014 (GN No. R. 982 of 4 December 2014, as amended) ("EIA |

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| | Henning (EAPASA Registration Number: 2020/1217) of from GIBB Environmental (Pty) Ltd and assisted by Candidate EAP, Dr. Marilie Pretorius (EAPASA Registration Number: 2024/8345) from Nemai Consulting to the Directorate: Development Management (Region 3 (hereinafter referred to as "this Directorate") refers.<br><br>2. Proposal and affected environment<br>The proposal entails the extension of the existing Mossdustria Industrial Development and the establishment of a racetrack on Erf 6, Mossdustia (SG code C05100140000000600000) and a portion of Portion 8 of the Farm Rietvalley 225 (SG code C05100000000022500008), ("the property") which, according to relevant GIS datasets contains sections of Critical Biodiversity Areas (CBA), sections of Aquatic Ecological Support Areas (ESA) and contains a mix of North Langeberg Sandstone Fynbos (Least Concern) and Hartenbos Dune Thicket (Endangered) vegetation. The proposal also includes an industrial expansion area of approximately 12-hectares, an alternative Energy Production Area of approximately 22-hectares, a Motorsport arena of approximately 38-hectares, Open Space of approximately 15-hectares, construction and laydown areas and internal roads.<br><br>It is assumed that the proposal also will include the installation of engineering services (i.e., reticulation of water, sewage and stormwater) to support the proposed development, this must be clearly described in the forthcoming reports.<br><br>3.This Directorate has reviewed the document and comments as follows:<br>3.1.The Scoping Report ("SR") must contain all the information outlined in Appendix 2 of the Environmental Impact Assessment Regulations, 2014 (GN No. R. 982 of 4 December 2014, as amended) ("EIA Regulations, 2014") and must also include the information requested in the letter dated 4 March 2026.<br><br>3.2.Project Description<br>It is noted from the Application Form that this is a strategic infrastructure project ("SIP") as contemplated the Strategic Infrastructure Development Act, 2014 (Act No. 23 of 2014). You are required to demonstrate how this project has been identified and included as a SIP in terms of said Act and provide supporting proof hereof.<br>The Plan of Study for EIA ("POS:EIA") must clearly demonstrate how this aspect has been incorporated and influences any processes. | | | | Regulations, 2014") and the information requested in the letter dated 4 March 2026.<br><br>3.2 Please note on page 5 of the Application form that it is NOT a SIP project.<br><br>3.3 Please see Section 7 of the FSR.<br><br>3.4 Please refer to page 115 of the FSR where a noise assessment is included in the Plan of Study.<br><br>3.5 Clear description of the civil engineering services will be provided in the EIR. In addition, Mossel Bay Municipality's Directorate: Technical Services will provide written confirmation of the availability of all the services for the proposed development, as well as the unallocated available capacity of the respective engineering services. This will be submitted with the EIR.<br><br>3.6 Chief Town and Regional Planner, Mr. Riaan Thompson has been added to the I&AP database and will be notified of the draft EIR review.<br><br>3.7 Please refer to section 1.7 where a detailed Table is provided based on the Guideline on Need and Desirability (DEA, 2017). Feedback will be supplemented by findings of the specialists in the EIR.<br><br>3.8 All reasonable and feasible alternatives, including the no-go alternative, will be comparatively assessed further in the EIA phase.<br><br>3.9 The DRS does not make reference to the project requiring Biodiversity Offsets. In addition, the Terrestrial and Aquatic Ecologist did not find reason for offsets during his |

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| | 3.3.The guidance on the Screening Tool Report (STR) and Site Sensitivity Verification Report (SSVR) provided in this Directorate's letter dated 4 March 2026 is still relevant and should therefore be taken into account. Further to this, the final SR must clearly demonstrate how the tasks outlined in the POS:EIA is aligned with the findings of the SSVR and guidance provided in the afore-mentioned letter.<br><br>3.4.The Directorate notes that the undertaking of a separate noise impact assessment is not one of the tasks included in the POS:EIA despite this Directorate previously highlighting this requirement. Please be advised that this is a matter which will prejudice the success of the application if not assessed.<br>Kindly ensure that the POS:EIA is amended in this regard.<br><br>3.5.At this stage it is unclear which civil engineering services will be required for the proposed development and what the alignment of link services will be. Kindly ensure that a civil engineering services report also forms part of the specialist input that must be undertaken in the EIA Phase, and that the other specialists consider the layout of such services.<br>Please be advised that the entire development footprint (i.e., preferred site) must be described and assessed. Should any development take place outside of the property, this must be clearly described and where applicable, the Application Form shall need to be updated.<br>In addition, the Mossel Bay Municipality's Directorate: Technical Services must provide written confirmation of the availability of all the services for the proposed development, as well as the unallocated available capacity of the respective engineering services. must be obtained from the Mossel Bay Municipality's and submitted to this Directorate at least with the Environmental Impact Assessment Report. However, should water, sewage and stormwater services be proposed solely by the<br><br>3.6.The Public Participation tasks highlighted in the draft SR is noted.<br>Kindly ensure that the following organs of state are consulted and afforded an opportunity to provide comment on the proposed development:<br>• The Department responsible for Strategic Infrastructure Projects (unless this is not a SIP);<br>• Chief Town and Regional Planner, Mr. Riaan Thompson from this Directorate.<br>Notwithstanding the above guidance, the EAP must consult with every organ of state that administers a law relating to a matter affecting the environment relevant to that application for an environmental authorisation. | | | | preliminary study and engagement with Cape Nature.<br><br>4. The synchronising applications in terms of other applicable legislation with the EIA process. Please note that Nemai Consulting is undertaking the WULA process.<br><br>Points 5 to 7 are noted.<br><br>8.The reference number assigned (16/3/3/2/D6/29/0001/26) will be utilised.<br><br>9.No activity will commence prior to an Environmental Authorisation being granted by the Department.<br><br>10.Refer to point 8 above |

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| | 3.7. Need and Desirability<br>Your motivation in terms of Need and Desirability for the proposed development is noted in section 1.7 of the draft SR. Please note that the need and desirability should also be informed by and aligned with the requirements as set out in the Need and Desirability Guideline which was published by the Department of Environmental Affairs (DEA) in 2017.<br>Although the motivation in terms of the need and the desirability is noted, your attention is drawn to the key questions of the aforementioned guideline. It is of outmost importance that the proponent/Environmental Assessment Practitioner specifically and explicitly demonstrate how the need and desirability considerations in the said guideline have been taken into account by comprehensively addressing these key questions in the final SR that will be submitted.<br><br>3.8 Alternatives<br>No site or location alternatives will be considered during the EIA Process It is also noted that a few lay-out alternatives are identified in the draft Scoping Report. All reasonable and feasible alternatives, including the no-go alternative, must be comparatively assessed (including the cumulative impacts) during the EIA regulations.<br><br>3.9.Clarity regarding the Biodiversity Offset<br>The proposal as described in the Draft SR does not include a clear description of how “The National Biodiversity Offset Guideline” will be considered and the applicability of a biodiversity offset, nor does the POS:EIA include a clear description of how a biodiversity offset will be considered, as required in the published in Government Notice No. 3569 of 23 June 2023. It is unclear how a Biodiversity Offset Assessment would be undertaken in the EIA Phase of the application.<br>Please clarify how this aspect will be addressed and whether a biodiversity offset will not form part of the proposal.<br>4.Synchronising applications in terms of other applicable legislation with the EIA process<br>This Directorate is aware that a Water Use License Application (“WULA”) for the relevant water use activities in terms of Section 21 of the National Water Act, Act 36 of 1998, has been commissioned by the applicant and will be managed by Upstream Consulting.<br>Please be reminded that it is now a legal requirement to synchronise the two applications. As such, you are required to include the information, reports and / or any formal correspondence from the Breede-Olifants Catchment Management Agency (“BOCMA”) in respect of the WULA in the EIAR. Please be advised that the omission of any reports/information may prejudice the success of the application for environmental authorisation. | | | | |

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| | 5.Content of the Final SR<br>5.1.The final Scoping Report must contain all the information outlined in Appendix 2 of GN No. R. 982 of 4 December 2014 and must also include the information requested in this letter.<br>5.2.Failure to submit any information prescribed in Appendix 2 of GN No. R. 982 may result in Environmental Authorisation being refused.<br><br>6.Should the final Scoping Report not be submitted within the prescribed timeframe, the application will lapse in terms of Regulation 45 of the EIA Regulations, 2014 and your application file will be closed. Should you then wish to pursue the application again, a new application process would have to be initiated. A new Application Form would have to be submitted and the prescribed application fee would have to be paid.<br><br>7.The Scoping and EIA phases of the EIA process are two distinctly separate phases, each having its own requirements and reports to be submitted. The Department will not accept Scoping and EIA Reports where the processes or information of the two phases were combined into a single process or report.<br><br>8.Kindly quote the abovementioned reference number in any future correspondence in respect of the application.<br><br>9.Please note that the activity may not commence prior to an Environmental Authorisation being granted by the Department. It is an offence in terms of Section 49A of the NEMA for a person to commence with a listed activity unless the Department has granted an Environmental Authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F and 49A of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department for prosecution. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.<br><br>10.Kindly quote the abovementioned reference number in any future correspondence in respect of the application.<br><br>11.The Department reserves the right to revise initial comments and request further information from you based on any new or revised information received. | | | | |

# 5 COMMENTS AND RESPONSES – Review of draft EIA Report

## 5.1 Comments received within the public review period

The draft EIA Report was lodged for public review from **28 August 2026 until 29 September 2026**. The comments received during the review period are captured below.

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| 1. | Please note that from 01 May 2026, all applications need to be submitted to National Department of Agriculture and not to us anymore, please find details below. Please also find attach our new Standard Operating Procedure.<br><br>DoA Helpdesk details are as follows:<br>Email: [redacted]<br>Tel: [redacted] | Mr. Brandon Layman Administrative Assistant to Ashraft Mohammed: Acting Land Use Manager Department of Agriculture – Provincial Government of the Western Cape | Email (27/08/2026) | Nemai Consulting | The I&AP Database was updated accordingly, and a notification was sent to the relevant email address. |
| 2. | Please can you provide me with HWC reference number for me to provide you with a comment.<br><br>If there was no NID trigger, please not that HWC cannot comment on matters that do not form part of our mandate. | Stephanie- Anne Barnardt-Delport Specialist Heritage Officer Department of Cultural Affairs and Sport | Email (01/09/2026) | Nemai Consulting | The Case Reference number for Heritage Western Cape (HWC) was shared. The Case Reference number is: 220520006SB06030E. |
| 3. | **Email:**<br>Please see attached HWC comment that still stands<br><br>**Letter:**<br>NOTIFICATION OF INTENT TO DEVELOP: PROPOSED EXTENSION OF MOSSDUSTRIA AND ESTABLISHMENT OF A MOTORSPORT RACEWAY AND ASSOCIATED FACILITIES ON ERF 6, MOSSDUSTRIA AND REMAINDER OF RIETVALLEY 225/8, MOSSEL BAY, SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999) | Stephanie- Anne Barnardt-Delport Specialist Heritage Officer Department of Cultural Affairs and Sport | Email (02/09/2026)<br><br>Letter (22/10/2025) | Nemai Consulting | The HWC Chance Finds and Accidental Finds Procedures were included in the Environmental Management Programme (EMPr) (refer to Annexure 1 of the EMPr).<br><br>Best practice mitigation measures were also incorporated into the EMPr for impacts associated with the construction phase of the Project (refer to Section 13.2.25 of the EMPr). |

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| | The matter above has reference.<br><br>Heritage Western Cape is in receipt of the above matter received. This matter was discussed at the Heritage Officers meeting held on 20 October 2025.<br><br>You are hereby notified that, since there is no reason to believe that the proposed extension of Mossdustria and establishment of a motorsport raceway and associated facilities on Erf 6, Mossdustria and Remainder of Rietvalley 225/8, Mossel Bay, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required. HWC Chance Finds and Accidental Finds Procedures to be included in the EMPr and Environmental Authorization.<br><br>However, should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and Heritage Western Cape must be notified without delay.<br><br>This letter does not exonerate the applicant from obtaining any necessary approval from any other applicable statutory authority.<br><br>HWC reserves the right to request additional information as required.<br><br>Should you have any further queries, please contact the official above and quote the case number. | | | | |
| 4. | **Email:**<br>ACKNOWLEDGEMENT OF RECEIPT OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED EXTENSION OF MOSSDUSTRIA AND THE ESTABLISHMENT OF A RACEWAY ON THE REMAINDER OF PORTION 8 OF THE FARM RIETVALLEY NO. 225, MOSSEL BAY<br><br>Please find attached the comment from this Department regarding the aforementioned subject. | **Email:**<br>DEADP EIA Admin George<br><br>**Letter:**<br>Mr. Steve Kleinhans<br>Head of Component: Environmental | Email and Letter (07/09/2026) | Nemai Consulting | The Department's email and letter are acknowledged, and we await comments on the draft EIA Report within the review period timeframes. |

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| | For any enquiries please contact:<br>Mr. Steve Kleinhans: [redacted]<br>Ms. Shireen Pullen: [redacted]<br><br>Please also copy the email: [redacted] in all electronic correspondence with this department regarding this application.<br><br>**Letter:**<br>ACKNOWLEDGEMENT OF RECEIPT OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED EXTENSION OF MOSSDUSTRIA AND THE ESTABLISHMENT OF A RACEWAY ON THE REMAINDER OF PORTION 8 OF THE FARM RIETVALLEY NO. 225, MOSSEL BAY<br><br>1. The Draft Environmental Impact Report dated August 2026 ('DEIR') compiled on your behalf by you appointed Environmental Assessment Practitioner ('EAP'), Mr. Donavan Henning (EAPASA NO: 2020/1217) and assisted by Candidate EAP, Ms. Wendy Ludewig (EAPASA No: 2024/8548) of Nemai Consulting as received by the Department on 27 August 2026, refers.<br><br>2. This letter serves as an acknowledgment of receipt of the Basic Assessment Report by the Department on 27 August 2026.<br><br>3. The Department will consider the DEIR and provide comment on the document within the legislated timeframe and in terms of the reckoning of days as stipulated in Regulation 3 of the Environmental Impact Assessment Regulations, 2014 ('EIA Regulations, 2014') (Government Notice No. R. 982 of 4 December 2014, as amended).<br><br>4. Please note that a listed activity may not commence prior to an environmental authorisation being granted by the Department. It is an offence in terms of Section 49A of the National Environmental Management Act, 1998 (Act no. 107 | Impact Management Services (region 3)<br>DEADP | | | |

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| | of 1998) ("NEMA") for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.<br><br>5. Kindly quote the above-mentioned reference number in any future correspondence in respect of this matter.<br><br>6. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received. | | | | |
| 5. | **Email:**<br>Please find attached CapeNature's comments on the draft EIA report. I'd appreciate it if you would acknowledge receipt.<br><br>**Letter:**<br>Dear Mr Henning<br><br>RE: GE39111: Proposed Extension of Mossdustria and the Establishment of a Raceway on the Remainder of Portion 8 of Rietvalley 225, Mossel Bay - Notification of review of draft EIA Report and draft WULA Technical Report<br>DEA&DP Reference: None provided<br><br>CapeNature thanks you for the opportunity to comment on the above draft Environmental Impact Assessment report. Please note that the comments below only pertain to the biodiversity related impacts and not to the overall desirability of the application.<br><br>**1. Proposed development**<br>The application concerns the proposed development of a 90-ha site within the urban edge, owned by Mossel Bay Municipality. The proposed development includes the following components:<br>• Industrial expansion with associated infrastructure (±12 ha), | Dr Marienne de Villiers – Senior Manager, East Landscape Conservation Intelligence Unit Cape Nature | Email and Letter (29/09/2026) | Nemai Consulting | Introductory section, no response required |

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| | • Solar photovoltaic facility with a capacity of 16 MW (±22 ha),<br>• Motorsport facility with associated infrastructure (±38 ha), and<br>• Conservation area (±15 ha).<br><br>**2. Conservation value of the site**<br>With reference to CapeNature's previous correspondence dated 7 April 2025, we wish to re-emphasise the high ecological sensitivity of this property.<br>• The site falls within designated Critical Biodiversity Areas (CBA 1 and 2, terrestrial and aquatic) and Ecological Support Areas (ESAs).<br>• It contains the Mossel Bay Shale Renosterveld vegetation type, which is listed as Critically Endangered in the 2025 National Biodiversity Assessment, and is largely unprotected.<br>• It is located within a Priority Focus Area under the National Protected Area Expansion Strategy.<br>• During CapeNature's Biodiversity Stewardship Review Committee meeting on 30 May 2008, the site's plant diversity was rated as high and its veld condition as excellent. Several threatened plant species (including three Critically Endangered and one Vulnerable species) were recorded. The committee formally recommended the stewardship status of Contract Nature Reserve. | | | | |
| 6. | **3. Recommendations for the Terrestrial Ecology Impact Assessment**<br>To ensure that the terrestrial ecology assessment accurately reflects the site's true baseline sensitivity, the specialist study must be updated to address the following data gaps:<br>• **Wetland Sensitivity.** The assessment should recognize and incorporate the two seasonal wetlands onsite, identified in the 2006 botanical specialist report produced for Mossel Bay Municipality to ensure that any potential future development on the property would have minimal negative environmental impacts on the local or regional environment. These seasonal systems are highly sensitive and support Species of | | | Dr Brian Colloty – Aquatic & Terrestrial Specialist EnviroSci (Pty) Ltd | • **Wetland Sensitivity:** The previous assessment was noted, but being 20 years prior to this delineation, several landscape wide changes / impacts had resulted in most any systems being either lost (physical and or hydrological) or altered in some form.<br>• **Plant Species of Conservation Concern (SCC):** Correct these species were noted and with the conservation area earmarked as the most reasonable way of either protecting these species or providing an area for their relocation. Based on 15 years of Plant and Rescue implementation, these species readily recover in relocated areas, especially via the use of their propagules (seed, bulbs and or corms). The remaining areas have been impacted by grazing and in particular the ostrich farming areas, that has greatly reduced vegetation cover and species diversity. |

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| | Conservation Concern (SCC), such as Satyrium muticum (Endangered).<br>• **Plant Species of Conservation Concern (SCC).** The occurrence of two threatened plant species on site was confirmed, i.e. Hermannia lavandulifolia (Vulnerable) and Erica unicolor mutica (Endangered). An Haworthia species, tentatively identified H. chlorocantha (Endangered), was also recorded, and Ruellia pilosa (Vulnerable) and Haworthia pygmaea var. argenteo-maculosa (Not Evaluated) were found in the vicinity of the site. However, other expected SCC were recorded on site during a 2006 botanical survey by Jan Vlok, a 2008 CapeNature site assessment, and more recently on iNaturalist. The latter include research-grade records of Freesia fergusoniae (Vulnerable), Selago ramosissima (Endangered) and Trichodiadema occidentale (Vulnerable).<br>• **Ecotonal and Edge Effects**. The study should account for the ecological significance of ecotonal areas and evaluate the potential edge effects that industrial and motorsport developments will have on adjacent natural zones.<br>• **Ecological Connectivity.** In Section 9.2 it is stated that "the site has been disconnected from any ecological corridors by the railway and road infrastructure, as well as through land fragmentation from industrial development and cultivation." Although existing local infrastructure introduces fragmentation, total ecological isolation should not be assumed. Some fauna and plant propagules can cross linear barriers and there is currently still connectivity with the open space area to the east (as illustrated in Figure 15).<br>• **Motorsport Acoustic Impacts.** The potential impacts of noise and vibrations from motocross activities on terrestrial biodiversity require formal evaluation. Motocross noise can feature strong, low-frequency components that penetrate dense vegetation over long distances. The assessment should investigate inter alia potential acute and chronic animal stress, displacement, communication disruption, habitat fragmentation and population isolation resulting from acoustic barriers. Although no faunal SCC were | | | | • **Ecotonal and Edge Effects:** Typically this is best practice, through the provision of ecological buffers, and it is envisaged that no impacts will occur beyond the site, with the only real natural habitats adjoining the site, being the valley to the east, which will connect to the proposed conservation area.<br>• **Ecological Connectivity:** See comment above, but in essence this is the premise of the conservation area, to maintain some form of connectivity with the valley to the east.<br>• **Motorsport Acoustic Impacts:** Correct, noise could seen as an impact on faunal communities as would light impacts. However the site is directly adjacent to an existing industrial site, with both current noise and light impact sources. It must also be considered that motorsport events are short duration events, held on weekends with only a few events per season. |
| | | | | Morné de Jager – Noise Specialist Enviro-Acoustic Research cc | The following response to **Motorsport Acoustic Impacts** has been provided by the Noise specialist in a letter that has been attached to Noise Impact Assessment as well.<br><br>**<u>Letter:</u>**<br>SPECIALIST OPINION – CAPE NATURE COMMENTS ON THE NOISE STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED MOTORSPORT DEVELOPMENT IN MOSSDUSTRIA, MOSSEL BAY, WESTERN CAPE PROVINCE<br><br>The comments of Cape Nature, as well as the EARES report no. NC-MBMP/ENIA/202606-Rev 0, are relevant.<br><br>**1. Background: Cape Nature comments on the noise study**<br>The potential impacts of noise and vibrations from motocross activities on terrestrial biodiversity require formal evaluation. Motocross noise can feature strong, low-frequency components that penetrate dense vegetation over long distances. The assessment should investigate inter alia potential acute and chronic animal stress, displacement, communication disruption, habitat fragmentation and population isolation resulting from acoustic barriers. Although no faunal SCC were recorded on site, the assessment should also consider impacts on key ecosystem service providers (such as pollinators, seed dispersers and |

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| | recorded on site, the assessment should also consider impacts on key ecosystem service providers (such as pollinators, seed dispersers and ecosystem engineers), which could have broader ecosystem implications such as shifts in plant community structure. | | | | ecosystem engineers), which could have broader ecosystem implications such as shifts in plant community structure.<br><br>**2. Reply on Comments of Cape Nature**<br>Several papers and studies report how various animals (birds, mammals, frogs, etc.) respond to anthropogenic noise, particularly impacts associated with aircraft and road traffic (Barber, Crooks, and Fristrup 2010; Shannon *et al.* 2016; Kunc and Schmidt 2019). As such, I would like to make a few points:<br>1. The proposed motorsport project is located entirely within the Mossdustria Industrial Area. The baseline acoustic environment is already well-defined and dominated by continuous anthropogenic activity, including heavy industrial operations and significant traffic noise from adjacent busy roads. Local terrestrial biodiversity and natural flora have undergone long-term habitat modification and chronic high ambient sensory pressure within and in the direct vicinity of the industrial area. This aligns with the broader literature on chronic noise exposure, which documents energetic, behavioural, and physiological costs for a wide range of terrestrial taxa in noise-altered landscapes (Barber, Crooks, and Fristrup 2010).<br>2. Unfortunately, standard noise regulations (e.g., SANS 10103) are explicitly designed to assess human annoyance and speech interference in various zoning districts. They cannot be scientifically extrapolated to infer physiological or behavioural thresholds for fauna because humans and diverse animal classes differ starkly in auditory anatomy, frequency-bandwidth sensitivity, and behavioural response mechanisms. Avian hearing research, for example, shows that bird species vary considerably in their ability to detect signals in noise, with hearing-in-noise performance ranging from levels comparable to humans to markedly poorer levels (Dooling and Popper 2007), underscoring that human-derived annoyance metrics cannot be reliably generalised across taxa.<br>3. In addition, no formalised national or international statutory noise standards, threshold limits, or legal guidelines exist to |

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| | | | | | quantify or restrict acoustic impacts on wildlife or eco-services. The ecological literature widely acknowledges this regulatory gap and instead relies on empirically derived behavioural and physiological response thresholds developed through field and laboratory research rather than statutory instruments (Shannon *et al.* 2016; Engel *et al.* 2024).<br>4. Consequently, highly sensitive faunal species or Species of Conservation Concern have likely already been displaced from this industrial hub over time, leaving behind a resilient ecological community adapted to urban and industrial noise. This pattern mirrors documented cases elsewhere, where noise-sensitive species show reduced occupancy or abandon territories near chronic noise sources while more tolerant species persist (Goodwin and Shriver 2011; Ortega 2012).<br>5. CapeNature highlights concerns regarding acute stress, displacement, and the creation of "acoustic barriers." However, literature and behavioural research on wildlife exposure to noise indicate that projected noise from motorsport activities will not trigger broad ecological failure, and it is unlikely to change the area's faunal character. Comprehensive literature indicates that terrestrial wildlife responses to acoustic change can begin at relatively low levels: experimental "phantom road" research found that bird abundance and detection declined substantially under playback noise averaging approximately 55 dB(A), with background noise above roughly 45 dB(A) already reducing detection probability within 60 m (McClure *et al.* 2013). Comparable declines in forest bird occupancy have been linked to traffic noise in the 44–57 dB(A) range (Goodwin and Shriver 2011), and alarm-call information transfer between species breaks down at noise levels around 47 dB(A) (Grade and Sieving 2016). At higher intensities, auditory threshold shifts in birds become more likely following continuous exposure above approximately 93 dB(A) sustained over long durations (Engel *et al.* 2024), |

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| | | | | | while even extended exposure to continuous noise up to 110 dB(A) is not generally associated with permanent hearing damage in birds, with affected individuals typically recovering fully within weeks (Dooling 2019).<br>6. While the motorsport activities will undeniably generate elevated peak noise levels during active racing events, these events are periodic, short-term, and intermittent, rather than continuous or chronic. Because the baseline environment is already heavily altered by industrial din, the remaining fauna consists predominantly of robust, noise-tolerant species that exhibit behavioural plasticity, such as shifting vocal amplitudes or frequency ranges to overcome masking — a response documented in birds persisting near chronic noise sources, where individuals tolerate moderate noise levels while showing avoidance only of the most intense noise zones closest to the source (Dooling and Popper 2007; Grade and Sieving 2016).<br>7. The comment emphasises potential impacts on pollinators (insects), seed dispersers (birds/small mammals), and ecosystem engineers, though research on anthropogenic noise impacts on insects such as honeybees shows that profound behavioural disruptions require intense, localised, and often continuous exposure. Foundational work found that sound levels above approximately 108 decibels were needed to elicit a stopping reaction in hive bees, with the strongest reactions occurring at specific narrow frequency bands (Frings and Little 1957). More recent vibrational studies confirm that sustained, narrow-band vibrational stimuli can immobilise honeybees for extended periods, but mobility is restored once the stimulus ceases (Bencsik *et al*. 2024), and that disruptive effects are tightly bound to specific frequency ranges rather than occurring broadly across the acoustic spectrum (Stefanec, Divoux, and Schmickl 2021). Projected sound pressure levels propagating from the motocross tracks into surrounding vegetation will drop significantly due to distance attenuation and will not reach |

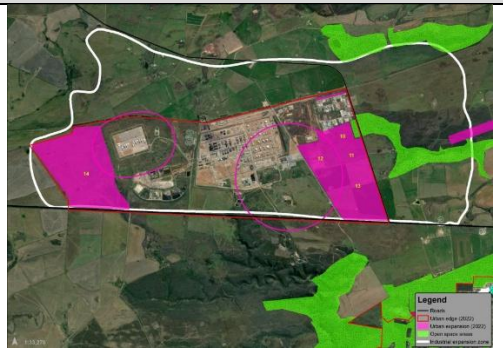
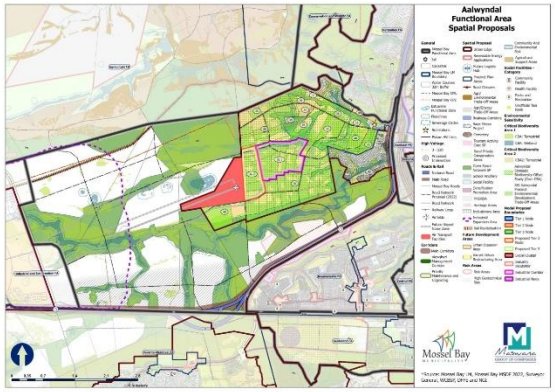
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| | | | | | these extreme, narrowly defined intensities across the wider ecosystem.<br>8. A further comment raises concern that motocross noise and vibrations may feature strong, low-frequency components capable of penetrating dense vegetation over long distances, and that this requires formal faunal evaluation. While low-frequency sound attenuates less than high-frequency sound over distance and through vegetation, this physical property alone does not establish a meaningful ecological impact pathway in this context. Low-frequency propagation is an acoustic property, not evidence of harm: the pertinent question is whether such noise reaches fauna at intensities and durations sufficient to cross established behavioural or physiological thresholds, and the exposure regime associated with motocross events does not match the conditions under which the literature has demonstrated such harm. Significant avoidance responses in birds have been documented at levels as low as 45–55 dB(A) (McClure *et al.* 2013), while auditory threshold shifts generally require continuous exposure above approximately 93 dB(A) sustained over long durations, such as 72 hours (Engel *et al.* 2024) — conditions fundamentally incompatible with short-term, intermittent racing events. Furthermore, low-frequency noise already dominates the baseline: heavy industrial machinery and road traffic are low-frequency-dominant, continuous sources operating year-round, so the acoustic threshold this comment seeks to guard against has, in effect, already been crossed by the existing environment, independent of this project. Finally, the premise that a continuous vegetation corridor exists through which low-frequency noise would propagate to meaningful ecological distances is undermined by the fact that agriculture and other anthropogenic land uses have already relatively fragmented the natural ecosystem in this landscape. The faunal community persisting within these fragments has, by necessity, already self-selected for tolerance of edge effects, habitat disturbance, and chronic background noise, |

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| | | | | | meaning the marginal risk posed by a new, intermittent low-frequency noise source is low relative to the existing, unrelated drivers already shaping faunal composition on the site (Shannon *et al.* 2016; Goodwin and Shriver 2011).<br><br>Because the transient nature of racing events prevents the formation of a permanent acoustic barrier (excluding that already created by traffic and industrial noise), the project is highly unlikely to cause habitat fragmentation or population isolation. Key ecosystem service providers will continue to function across the broader landscape during non-racing intervals, so shifts in plant community structure or systemic ecosystem failures are not anticipated.<br><br>At the projected noise levels in the surrounding area, considering the likely attenuation as well as threshold patterns as documented across available literature (e.g. Shannon *et al.* 2016; Kunc and Schmidt 2019), intermittent motorsport noise is unlikely to meaningfully impact faunal or insect species beyond the disturbance already attributable to the existing industrial and traffic noise regime.<br><br>A formal, site-specific acoustic-biodiversity assessment would be warranted in a relatively intact, low-noise environment where motocross noise would represent a novel and dominant disturbance; however, in an area where anthropogenic activities, habitat fragmentation, and chronic high-intensity noise already define the ecological baseline, intermittent noise from a motorsport arena is unlikely to alter the faunal character of the site.<br><br>If you require any further details or have any additional questions, please do not hesitate to call me on the numbers above. |
| 7. | 4. Recommendations for the Avifaunal Impact Assessment<br>The avifaunal assessment must be revised to correct baseline assumptions and expand the sampling scope.<br>• **Vegetation Classification**. The avifaunal report references Hartenbos Dune Thicket and North Langeberg Sandstone Fynbos rather than Mossel Bay Shale Renosterveld, which the terrestrial impact assessment recognizes as the best classification of the on-site vegetation. Because these vegetation types | | | Robyn Phillips – Avifaunal Specialist Cossypha Ecological | • **Vegetation Classification:** Noted, the report has been updated to include the information from the Terrestrial Biodiversity Assessment. However, the latest National Vegetation Map is the best and most up to date information available to specialists and therefore should not be considered an error. The SEI rating of the northeastern corner of the site has been revised to High following the methodology in the Species Environmental Assessment Guideline (SANBI, 2020, v4.1 2026) due to Mossel Bay |

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| | carry different national threat statuses (2025 National Biodiversity Assessment), this error might skew the resulting Biodiversity Importance and Site Ecological Importance (SEI) ratings.<br>• **Sampling Effort and Seasonality**. The national screening tool flags animal species sensitivity as High for most of the site due to the potential presence of sensitive avifauna. While a single site visit may suffice for a small solar photovoltaic footprint, it is insufficient for a complex, multi-use development exceeding 30 ha. We recommend conducting at least three site visits across different seasons to capture a representative species data set.<br>• **Motorsport Facility Impacts**. The report concentrates on the operational phase impacts of the solar photovoltaic facility and does not adequately address the impacts of the motorsport facility on avifauna, such as vehicle collision risk, fuel pollution risk, and noise disturbance. The current noise disturbance ratings of Low Negative (without mitigation) and Very Low Negative (with mitigation) should be reevaluated to account for motocross activity. | | | | Shale Renosterveld being Critically Endangered (CR). Note however that this sensitivity rating is more relevant to vegetation, and the sensitivity from an avifaunal perspective should remain Medium considering the small and fragmented area of the habitat on the site, and the disturbed surroundings of the site.<br>• **Sampling Effort and Seasonality:** According to the Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Animal Species (GN 1150 of 30 October 2020) as amended 28 July 2023, the current use of the land and the potential environmental sensitivity identified by the screening tool, of the site under consideration, must be confirmed on site by a specialist or EAP by undertaking a site sensitivity verification that will confirm the actual use of the land on the ground versus that which has been identified by the screening tool and the validity of the sensitivity rating assigned by the screening tool. This was undertaken by the specialist during the field survey, and it was confirmed that little to no important natural habitat for avifauna SSC remains on the site. According to available historical aerial imagery, the site has been used for agricultural activities since at least the 1950s, and it is evident that the site was cleared in the 1970s (as described in the report). It is the specialist's opinion (based on empirical assessment of the site) that additional site visits were not necessary due to the disturbed and modified nature of the site. The proximity to the industrial area and farming activities already present in the landscape means the site experiences regular / continuous anthropogenic disturbance including noise pollution, which would deter sensitive species. The specialist remains with the conclusion (based on empirical assessment of the site) that while SCC may pass through the site from time to time, the site comprises disturbed, secondary habitat and does not provide important permanent habitat for SCC.<br>• **Motorsport Facility Impacts:** Noted. The operational phase impacts of noise and fuel pollution have been addressed in the relevant sections of the report. It is unlikely that vehicle collision risk will be significant. Nevertheless, the significance ratings have been reconsidered with review of the Noise Impact Assessment Report and responses to comments received from Cape Nature by the noise |

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| | | | | | specialist. The intermittent and transient nature of the noise disturbance that would be created by the proposed motorsport facility, coupled with the baseline acoustic environment being dominated by continuous anthropogenic activity, including heavy industrial operations and significant traffic noise from adjacent busy roads, keeps the impact significance ratings for birds as Low Negative (without mitigation) and Very Low Negative (with mitigation). |
| 8. | **5. Recommendations for the Aquatic Impact Assessment**<br>• **Wetland Sensitivity Ratings**. Page 23 of the report states that modified or degraded wetlands were not assigned a High conservation rating. Given that wetlands are the most threatened ecosystems in South Africa, national best practice suggests that even modified systems retain high conservation priority. The channelled valley-bottom wetlands in this area are Critically Endangered and poorly protected, while the depressions are Endangered.<br>• **Hydrological Boundaries**. The mapping depicts seeps and channelled valley-bottom watercourses stopping abruptly at road boundaries. Hydropedological functions and subsurface water movements frequently continue beneath road infrastructure; this continuity must be investigated.<br>• **Catchment and Runoff Dynamics**. The site serves as a catchment area for watercourses draining east and southeast, including two non-perennial watercourses originating just within the property boundary. The proposed development will increase hardened surfaces, significantly accelerating stormwater runoff. A comprehensive Stormwater Management Plan must be a prerequisite for any authorization.<br>• **Artificial versus Natural watercourses**. The specialist designated only artificial watercourses. The possibility should be considered that these systems are natural but appear to be artificial as a result of modification and degradation.<br>• **Regulatory Pathways**. While the risk assessment suggests a General Authorisation pathway under Section 21(c) and (i) of the National Water Act (Act 36 of 1998, as amended), the scale of the development – | | | Dr Brian Colloty – Aquatic & Terrestrial Specialist EnviroSci (Pty) Ltd | • **Wetland Sensitivity Ratings:** The comment is noted, and the wetlands would have received a higher rating if there was potential to rehabilitate these areas, but these are not under the management of applicant.<br>• **Hydrological Boundaries:** This was investigated during the assessment as extension of these system is typically anticipated, but the current road infrastructure has led to a great deal of soil infill and compaction. Coring was almost impossible in these areas. It should also be noted that Channelled Valley Bottom systems are not expected in these upper slope/catchment areas, so this is also an indication of hydrological change that has occurred over time. These areas are typically seepage areas.<br>• **Artificial versus Natural watercourses:** See comment above – but this is linked to sever hydrological changes due to stormwater inputs, and drainage features this high in the catchment areas should not be this incised (i.e. previous seeps now degraded into head-cut watercourses fed only by stormwater. |
| | | | | Nemai Consulting | • **Catchment and Runoff Dynamics:** A Stormwater Management Plan (SWMP) was compiled to inform the S&EIR Process and is included as Appendix H of the EIA Report. This SWMP includes drawings of the proposed stormwater infrastructure.<br>• **Regulatory Pathways:** The Water Use License Application (WULA) Process is currently underway. Although the specialist determined the impact to wetlands to be low, discussions with the Breede-Olifants Catchment Management Agency (BOCMA) determined that a full Water Use License was applicable for this Project. The notification sent to all registered Interested and Affected Parties (I&APs) to review the draft EIA Report also included a notice to review the draft WULA Technical Report. The review period for the draft WULA Technical Report is for 60 days and ends |

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| | including wastewater and piping infrastructure – indicates that a full Water Use License Application (WULA) will be required. CapeNature maintains a position of no net loss to wetland areas. | | | | on 28 October 2026. The WULA Process applicable to this Project is outlined in Section 8 of this Report. |
| 9. | **6. Concerns regarding Conservation Area Design**<br>CapeNature is of the opinion that the proposed 15-ha Conservation Area does not adequately include and safeguard the site's primary areas of ecological importance. The proposal requires significant revision based on the following factors:<br>• **Lack of Formal Statutory Protection**. While rezoning the area to Open Space III is proposed, the application contains no formal commitment to declare this part of the site a protected area under the National Environmental Management: Protected Areas Act (NEM:PAA; Act 57 of 2003, as amended). Without a binding mechanism to prohibit future commercial infrastructure development (such as a resort footprint), long-term conservation is not guaranteed.<br>• **Fire Management Impracticality**. The terrestrial specialist report acknowledges that fire management is required to maintain the ecological integrity of the Renosterveld and Fynbos habitats, but dismisses this tool as impractical due to the site's size and its proximity to the Petro SA refinery. For the Conservation Area to be functional, it must be large enough to ensure that ecologically sound fire management can be implemented.<br>• **Exclusion of High-Sensitivity Seasonal Wetlands**. The two seasonal wetlands identified in the 2006 botanical survey carry a high conservation sensitivity are not adequately represented in the boundaries of the proposed Conservation Area. | | | Susan Human – Senior Town Planner: Spatial Planning Mossel Bay Local Municipality | **<u>Lack of Formal Statutory Protection</u>**<br>The comment is noted. A formal conservation agreement or protected area declaration would require consideration and approval by the Municipal Council. No such resolution currently exists, and, given the upcoming local government elections, the matter could only be considered by the newly constituted Council once it is established and able to consider such matters through the normal decision-making process.<br><br>Notwithstanding the absence of formal statutory protection, the application proposes several mechanisms aimed at securing the conservation function of the area. These include the designation of the area as a conservation area, the proposed zoning of the land for open space purposes, and the implementation of environmental management measures through the Environmental Management Programme. These measures are intended to guide land use and environmental management within the identified area and to limit development within those portions identified for conservation.<br><br>In addition, the area forms part of a broader ecological network recognised in municipal spatial planning frameworks. The Council-adopted 2022 Spatial Development Framework identifies the area to the east as part of the municipal open space network, while the Draft MSDF 2027 further strengthens the ecological corridor function of the area as part of the wider east-west biodiversity network. These planning instruments recognise the strategic ecological importance of the area and support its retention as part of the broader green infrastructure system. |

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| | • **Non-Alignment with Regional Spatial Planning Objectives**. The northern section of the property comprises secondary or partially degraded vegetation (CBA 2) and are largely excluded from the Conservation Area. The Western Cape Biodiversity Spatial Plan (WCBSP) explicitly mandates that these zones be managed for ecosystem functionality, proactive rehabilitation, and low-impact land use. The proposed development does not align with these objectives.<br>• **Under-representation of Ecological Transition Zones**. The layout does not adequately incorporate ecotonal areas between vegetation types, which are important for supporting local biodiversity and evolutionary processes.<br>• **Insufficient Buffering from Edge Effects**. The Conservation Area lacks adequate spatial and other buffers to protect it from the intense edge effects of the adjacent developments. Most notably, it features no barriers against the acoustic and vibrational impacts originating from the proposed motocross arena.<br>• **Impact on Vulnerable Upper Catchments**. The Conservation Area does not include the upper catchment of the Albany Thicket seep wetland and watercourse in the southeastern section of the property. This sensitive ecosystem is classified nationally as Vulnerable and poorly protected, and the current spatial design will compromise its hydrological and ecological viability. | | | | <br>*Council adopted the 2022 SDF showing the conservation area forming part of the bigger open space network.*<br><br>*Draft MSDF 2027 showing the ecological corridor of the wider east-west biodiversity network (project site to the left of the image)*<br><br>Accordingly, any decision regarding statutory protection or stewardship arrangements would need to follow the relevant legislative and municipal approval processes and would be subject to consideration by the appropriate decision-making authorities.<br><br>The Municipality has previously supported the protection of environmentally sensitive areas identified through environmental |

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| | | | | | assessment and planning processes. Examples include the protection of the Diosma Reserve and the conservation area associated with the butterfly habitat adjacent the Cemetery. In these instances, the process generally commenced with the identification and appropriate zoning of the land, followed by the necessary Council resolutions and agreements with relevant conservation authorities and stakeholders. The Municipal Council has furthermore established a Conservation NPC with the mandate to assist in protecting natural open spaces within the municipal area. Although no commitments can be made at this stage, such an entity may provide an appropriate vehicle to support the future protection and management of the identified conservation area should the necessary approvals be obtained. |
| | | | | Dr Brian Colloty – Aquatic & Terrestrial Specialist EnviroSci (Pty) Ltd | • **Fire Management Impracticality:** Additional measures such brush cutting of woody encroaching species will also be considered- See additional Cape Nature responses.<br>• **Exclusion of High-Sensitivity Seasonal Wetlands:** See responses given above for points 5: Recommendations for the Aquatic Impact Assessment.<br>• **Non-Alignment with Regional Spatial Planning Objectives:** Noted, but did the CBA delineation include any ground truthing of the site, and noting the actual or current state of the site.<br>• **Under-representation of Ecological Transition Zones:** Refer to response to **3**. Recommendations for the Terrestrial Ecology Impact Assessment: Ecotonal and Edge Effects. as this also applies.<br>• **Insufficient Buffering from Edge Effects:** As above<br>• **Impact on Vulnerable Upper Catchments:** The ecological viability would only be of concern if there were no berms, roads and or tracks that are diverting surface water runoff in the areas adjacent to the site. While any dams, pans and agricultural berms / cut off drains do allow from ground water seepage to continue. This coupled the fact the only real remaining vegetation occurs directly adjacent to the eastern boundary of the conservation areas |
| 10. | **7. Other Considerations**<br>• **Conservation Status of Mossel Bay Shale Renosterveld**. The draft EIA Report describes Mossel Bay Shale Renosterveld as Endangered, per the | | | Dr Brian Colloty – Aquatic & Terrestrial Specialist | **Conservation Status of Mossel Bay Shale Renosterveld:** Noted and was considered in the development of the layout, conserving the best habitat available within the site |

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| | national list of Threatened Terrestrial Ecosystems (DEA 2011). It is important to recognize that this vegetation type is listed as Critically Endangered in the 2025 National Biodiversity Assessment.<br>• **Description of Alternatives**. In the EIA report, it is stated that no location alternatives were considered for the proposed project but that several layout alternatives were considered during the project planning phase and were refined through consultation with the relevant specialists and commenting authorities. These alternative layouts are not included in the report.<br><br>Given the comments provided above, CapeNature objects to the proposed development on this highly sensitive site.<br><br>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received. | | | EnviroSci (Pty) Ltd | |
| | | | | Nemai Consulting | **Description of Alternatives:** Section 13.4 of the EIA Report includes the description of the alternative layouts, with Figures 70 to 73 illustrating the layouts. |

## 5.2 Comments received outside the public review period

The draft EIA Report was lodged for public review from **28 August 2026 until 29 September 2026**. The comments received outside the review period but before the submission of the final EIA Report to DEADP are captured below.

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| 11. | The trailing e-mail correspondence and our telephonic conversation refer.<br><br>As you are aware, Ms. Shireen Pullen is currently unavailable. Therefore, I am reviewing the document. It would therefore be appreciated if extension can be provided for the submission of the comment to 7 October 2026. However, the Department will endeavour to submit comment sooner if operational capacity allows.<br><br>Your favourable consideration will be appreciated.<br><br>I await your feedback in this regard. | Mr. Steve Kleinhans Control Environmental Officer : Development Management (Region 3) DEADP | Email (02/10/2026) | Nemai Consulting | We note your request for an extension to provide comments.<br><br>Please note that our concern with the extension to 07 October 2026 is such that, should extensive comments be issued, we will not have sufficient time to address the comments by the time we are required to submit the final EIA Report in terms of the EIA-regulated timeframes (submission is required by 16 October 2026). |
| 12. | The trailing e-mail correspondence refers. | Mr. Steve Kleinhans | Email (05/10/2026) | Nemai Consulting | Thank you for your email and for providing further background regarding the |

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| | We note your concern that an extension of the comment period may result in insufficient time to address extensive comments before submission of the Final EIA Report on 16 October 2026. Given that the proposal is a municipal project and which will serve the broader public interest, the reluctance to extend the timeframe for submission of comments from this Directorate is disappointing. The comment may address crucial aspects.<br><br>Please be assured that this Department always endeavours to submit comment within the legislated timeframe. However, I am compelled to reiterate the exceptional circumstances this Directorate is currently experiencing in the review of this specific case. The case officer, Ms. Shireen Pullen, was unexpectedly booked off from work since 21 September 2026 and, due to operational constraints was unable to review the EIR documentation prior to being booked off. Therefore, as the new delegated supervisor, I am attempting to review the case officer's case documents and where possible to provide the necessary comment within the available means. Unfortunately, I only became aware of this situation after the deadline had passed.<br><br>Notwithstanding your refusal to accommodate an extension, due to the importance of the application, this Directorate will still endeavour to provide comment by 9 October 2026.<br><br>While your concern regarding extensive comments and the time that may be required to respond to such comments are noted, please be reminded that there are provisions within the Environmental Impact Assessment Regulations, 2014, for the extension of time to submit reports where significant changes have been made or significant new information has been added to the reports, or where exceptional circumstances can be demonstrated.<br><br>We trust that this Directorate's written comment will receive your favourable consideration. | Control Environmental Officer : Development Management (Region 3) DEADP | | | circumstances affecting the review of the Draft EIA Report.<br><br>Kindly note that our response email did not expressly refuse the extension. It merely stated our concern that extensive comments received late in the process could impact our ability to meet the 16 October 2026submission deadline.<br><br>We acknowledge the exceptional circumstances described below and note the Department's intention to provide comments as soon as possible. The Department's comments will be carefully considered and responded to as appropriate during the finalisation of the EIA process.<br><br>We appreciate the efforts being made to complete the review under the current circumstances and look forward to receiving the Department's comments. |
| 13. | The message below refers to your application for the submission of a property environmental study for comment (Application No - 2026-10-0037) submitted to the Western Cape Government on 2026/08/26:<br><br>Properties related to the application :<br>Portion 8 of Farm RIETVALLEY 225, MOSSEL BAY<br><br>The matter is receiving attention, and further communication will be addressed to you as soon as circumstances permit. | Western Cape Government – Roads Infrastructure | Email (07/10/2026) | Nemai Consulting | We note the email; no response is required at this point. |

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| 14. | **Email:**<br>COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED EXTENSION OF MOSSDUSTRIA AND THE ESTABLISHMENT OF A RACEWAY ON THE REMAINDER OF PORTION 8 OF THE FARM RIETVALLEY NO. 225, MOSSEL BAY<br><br>Please find attached the comment from this Department regarding the aforementioned subject.<br><br>For any enquiries please contact:<br>Mr. Steve Kleinhans: [redacted]<br>Ms. Shireen Pullen: [redacted]<br><br>Please also copy the email: [redacted] in all electronic correspondence with this department regarding this application.<br><br>**Letter:**<br>COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED EXTENSION OF MOSSDUSTRIA AND THE ESTABLISHMENT OF A RACEWAY ON THE REMAINDER OF PORTION 8 OF THE FARM RIETVALLEY NO. 225, MOSSEL BAY<br><br>1. The Draft Environmental Impact Report dated August 2026 ('DEIR') compiled on your behalf by you appointed Environmental Assessment Practitioner ('EAP'), Mr. Donavan Henning (EAPASA NO: 2020/1217) and assisted by Candidate EAP, Ms. Wendy Ludewig (EAPASA No: 2024/8548) of Nemai Consulting as received by the Department on 27 August 2026, refers.<br><br>2. The Directorate: Development Management (Region 3) ('this Directorate') has reviewed the DEIR and provides the following comments: | **Email:**<br>DEADP EIA Admin George<br><br>**Letter:**<br>Mr. Steve Kleinhans Control Environmental Officer : Development Management (Region 3)<br>DEADP | Email and Letter (08/10/2026) | Nemai Consulting | Introductory section, no response required. |
| 15. | *2.1 Terrestrial Biodiversity*<br><br>It is noted that areas of high sensitivity Proteoid Fynbos Thicket and medium sensitivity Renosterveld Mesic Mosaic Proteoid Fynbos were recoded on the site. It is reported that the vegetation in the highly sensitive area is mostly still in a natural condition, although there is some invasion on the edges while the vegetation in the medium sensitive areas has been partly disturbed through brush-cutting or grazing. But could still be rehabilitated to a fully function degree. Notwithstanding that approximately 15ha will be set aside for a conservation purpose, it is noted that the | | | Dr Brian Colloty – Aquatic & Terrestrial Specialist EnviroSci (Pty) Ltd | The comment is noted by the specialist and confirms that this is also their understanding of the receiving environment in terms of its species assemblages and their respective requirements, as well as the Biodiversity planning framework concerns. Thus, a considerable effort was made to ground-truth the site over several seasons to ensure that the proposed development would not impact core functional areas. Noting that even these |

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| | proposed development still encroaches into the medium and high sensitivity areas.<br><br>While the South African Vegetation Map indicates that Hartenbos Dune Thicket (Endangered) and North Langeberg Sandstone Fynbos (Least Concern) are mapped on the property, the specialist confirms that the original natural vegetation on the site can be best classified as Mossel Bay Shale Renosterveld which has a current threat status of Critically Endangered.<br><br>A large portion of the site has been mapped as Critical Biodiversity Area ('CBA') according to the data of the Western Cape Biodiversity Spatial Plan (2023). According to the management objective of this planning unit the area must be maintained in a natural or near-natural state, with no further loss of natural habitat. Furthermore, degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate. Therefore, it must be shown how this have been considered in the impact assessment.<br><br>Furthermore, it is known that fynbos and renosterveld require periodic fire as part of their natural cycle. Fire helps maintain species diversity, stimulates the flowering and recruitment of many plants, removes accumulated dead biomass, and prevents the vegetation from becoming senescent. The exclusion of fire from the conservation area may therefore result in the loss of vegetation in the medium and long term. It is unclear whether the management of the vegetation through fire will be feasible, considering the proximity of the proposed development to the conservation area.<br><br>According to the specialist, a biodiversity offset would be implemented (as a last resort) to account for residual impacts but as a sizeable portion of the site (15ha), containing the High sensitivity habitats will remain under conservation. However, considering the lack of information regarding the feasibility of fire management or the proposed fire management measures of the proposed conservation area, it is unclear what the impact will be on the vegetation in the long term. The cumulative impact of the proposed development and exclusion of fire may therefore result in medium to high residual impact. In light of the above, the specialist must consider this in the specialist report.<br><br>It is indicated in the Terrestrial Plant and Animal Biodiversity Impact Assessment that 'all areas rated as HIGH should be excluded from the development proposal, however as this is not possible due to various | | | | areas are being impacted by illegal solid waste dumping, alien plant invasion and grazing.<br><br>Therefore, considering the no-go option, the site would slowly degrade over time. Thus, after several layout iterations, the current layout was proposed, based on the assumption that the conservation area would protect an area of the sensitive habitat in question, as well as have some connection with the adjoining sites, thus creating a form of habitat corridor in a westerly direction from the site.<br><br>Conserving any additional areas within the site, due to past land use (grazing and/or ostrich farming would require considerable rehabilitation effort; thus, the focus is to conserve viable areas that contain habitats and species of concern.<br><br>With regard to fire management, this was considered, but this would be limited regardless of the present and proposed land uses due to the site being within close proximity to the Mossgas facility.<br><br>It should be noted that burning in this vegetation unit is less frequent and that overburning is problematic. However, successful management of this vegetation unit has occurred through brush cutting and mulching of encroaching woody elements and/or selective grazing, both of which simulate fire management through proper control. The only risk is that fire produces levels of ash/nutrients, so it will be recommended that no vegetation other than alien plants is removed when brush cut. |
| | | | | Nemai Consulting | **<u>Cape Nature:</u>**<br>Cape Nature was consulted before the official public participation processes for the Project, |

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| | development & economic constraints…' It is unclear what the development and economic constraints are referred to and how these constraints make avoiding biodiversity related impact impossible. Therefore, the specialist must clarify this comment and substantiate his view.<br><br>Furthermore, you are required to obtain the input from CapeNature: Landscape East regarding the biodiversity requirements and possible offset in respect of the proposed development. Furthermore, you are also required to consult the Southern Cape Fire Protection Agency regarding the feasibility of periodic fire as a vegetation management measure. | | | | first at the end of 2021 and again in early 2025. The Project incorporated Cape Nature's recommendations and requirements from these consultations into the Project Layout assessed during the S&EIR Process, the specialist studies, the Scoping Report, and the EIA Report, where relevant.<br><br>Cape Nature is contained within the Interested and Affected Parties (I&APs) Database for the proposed Project and has been continually notified of the review of the draft reports compiled as part of the S&EIR Process.<br><br>The comments provided by Cape Nature on the draft Scoping Report were addressed accordingly in the EIA Report and the Terrestrial and Aquatic Biodiversity Impact Assessments.<br><br>The comments provided by Cape Nature on the draft EIA Report have also been responded to in this Comments and Responses Report (CRR) in rows 5 to 10 above.<br><br>**<u>Southern Cape Fire Protection Agency:</u>**<br>It is a requirement in the EMPr to develop a Conservation Area Management Plan for the Conservation Area. Based on the professional opinion of the terrestrial specialist, Dr Brian Colloty, this vegetation can be managed sufficiently without fire (refer to the response provided to Cape Nature above). However, the management requirements will be outlined in more detail in the Conservation Area Management Plan. Therefore, it has been added as a management action under the preparation of the Conservation Area Management Plan (refer to Section 13.2.22 of the EMPr) to consult with the Southern Cape Fire Protection Agency should fire be |

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| | | | | | considered as a vegetation management measure. |
| 16. | *2.2 Environmental Management Framework and Urban Areas*<br><br>It is noted that the property is located within the urban edge of the Mossel Bay Municipality and has been earmarked for urban expansion in the Mossel Bay Municipality's Spatial Development Framework (2022) SDF. However, cognisance must be taken of the Mossel Bay Municipality Environmental Management Framework and Urban Areas (2023) ('EMF'), which was adopted by the Western Cape Minister for Local Government, Environmental Affairs and Development Planning ('the Minister') in terms of Regulation 5(4) of the Environmental Management Framework Regulations, 2010 ('EMF Regulations, 2010'), as contemplated in Regulation 5(1) of the EMF Regulations, 2010, on 25 March 2025.<br><br>According to the EMF data the central-northern quadrant is mapped as Conservation Environmental Management Zone: Core 1 and the areas along the eastern and northern boundaries mapped as Controlled EMZ. The remainder of the site (ca. 30ha) is mapped as Agriculture.<br><br>In light of the above, you are required motivate how the proposed development aligns with the objectives and guidelines of the EMF. | | | Susan Human – Senior Town Planner: Spatial Planning<br>Mossel Bay Local Municipality | The site is located within the approved urban edge and forms part of the Mossdustria Industrial Expansion and Economic Development Functional Area identified in the Mossel Bay Spatial Development Framework 2022. The Motorsport Mecca has been identified by the Municipality as a catalytic economic project intended to diversify the local economy, support tourism, attract regional and national events, create employment opportunities, and stimulate investment within the Mossdustria industrial node. The proposal therefore gives effect to the spatial and economic development objectives of the SDF while promoting the efficient use of land earmarked for urban expansion within the Urban Edge. |
| | | | | Nemai Consulting | Within the Project site, the Mossel Bay Local Municipality Environmental Management Framework (MBLM: EMF) maps the central-northern quadrant as Conservation Environmental Management Zone (EMZ): Core 1, and the areas along the eastern and northern boundaries as Controlled EMZ.<br><br>However, the Terrestrial Biodiversity Impact Assessment (TBIA) included detailed field verification and ground-truthing of biodiversity features across the site. This assessment confirmed the location and extent of sensitive habitats and species of conservation concern in relation to the proposed Project footprint, mainly along the eastern edge of the development, with the sensitivity significantly decreasing as you move further west along the site (refer to the sensitivity map from the specialist contained in Figure 29 of the EIA Report). |

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| | | | | | The TBIA results informed iterative refinement of the Project layout and the incorporation of an approximately 15 ha Conservation Area. The Conservation Area was delineated to retain most of the site's identified high-sensitivity habitat and, as far as practicable, to avoid and minimise impacts on sensitive biodiversity features while accommodating the proposed development within an area identified for urban expansion.<br><br>Accordingly, the Project seeks to align the development objectives identified in the Mossel Bay Spatial Development Framework with the MBLM: EMF's biodiversity conservation objectives by protecting and long-term managing the site's most sensitive ecological areas. |
| 17. | *2.3 Noise impact on surrounding areas*<br><br>The proposal includes the development of a raceway which has the potential to create significant noise during race events. It is acknowledged that the proposed development is located within an existing industrial area; however, the Department recently authorised the Phase 1 of the Saint Blaize Global Business Services Campus adjacent (directly south) of the proposed development. The Environmental Authorisation (Ref: 16/3/3/1/D6/29/0021/24) was issued on 7 March 2025.<br><br>In light of the above, it is strongly advised that you obtain the written comment from the neighbouring developer in respect of the expected noise impacts associated with the proposed development.<br><br>Notwithstanding the above, the Directorate notes the Noise Impact Assessment undertaken to inform the DEIR. According to the assessment motor racing events associated with the proposed development has the potential to result is high significance noise impacts which may be considered disturbing to surrounding receptors, without the implementation of the proposed mitigation measures. In this regard, the Directorate notes the Mitigation Options identified in Section 11 of the report. The applicant must confirm that the identified measures are practicable and financially feasible. | | | Susan Human – Senior Town Planner: Spatial Planning Mossel Bay Local Municipality | The applicant commits to implementing the mitigation measures identified in Section 11 of the Noise Impact Assessment. These measures will be incorporated into the facility's design and operational management and included in the Environmental Management Programme (EMPr). |
| | | | | Nemai Consulting | The Saint Blaize Development is included in the Interested and Affected Parties (I&APs) Database and was notified accordingly throughout the Scoping and Environmental Impact Reporting (S&EIR) Process. This included the review period for the draft Environmental Impact Assessment (EIA) Report, which incorporated the results of the Noise Impact Assessment and included the Noise Impact Assessment as an Appendix to the EIA Report. |

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| | Noise is considered a significant issue in respect of the proposed activity, particularly the impact thereof on the surrounding land uses. Therefore, it must be ensured that the issues in this regard are adequately considered and addressed in the EIR. | | | | |
| 18. | *2.4 Bulk services requirements*<br><br>According to the information in the DEIR the proposed development requires the installation / upgrading of bulk link water and sewer infrastructure to service the proposed development. The correspondence from the Directorate: Infrastructure Services of the Mossel Bay Municipality dated 18 August 2026 is noted; however, it is unclear what the infrastructure upgrades on the existing water and sewer networks entail.<br><br>According to the DEIR potable water will be supplied via a proposed 3.5km long, 160mm diameter water main which will connect the proposed development to the to the existing municipal water reticulation network. It is understood that a pipeline with a diameter of 160mm and approximately 1.9km long will be required to convey sewage to the existing municipal infrastructure. However, no engineering plans which show the routes of the proposed infrastructure have been provided.<br><br>Furthermore, the impact of the installation of the proposed services must be considered and assessed on the EIR. The review of the specialist reports suggests that the impacts associated with the required bulk infrastructure were not considered and assessed by the specialists.<br><br>Considering the above, in terms of Regulation 8 of the Environmental Impact Assessment Regulations, 2014 ('EIA Regulations, 2014') (Government Notice No. R. 982 of 4 December 2014, as amended) you are hereby informed that failure to adequately address this issue may prejudice the outcome of your application for environmental authorisation. | | | Susan Human – Senior Town Planner: Spatial Planning Mossel Bay Local Municipality | In accordance with Appendix J of the EIA Report, any link infrastructure upgrading will be on the existing distribution network, within existing servitudes and road reserves, and will be assessed and implemented in line with overall municipal planned upgrades, should it be required. |
| | | | | Nemai Consulting | The routes that show the layout of the proposed infrastructure are provided in Figures 10 to 13 of the draft and Final EIA Reports.<br><br>In addition, the Civil Engineering Services Report in Appendix I of the draft and Final EIA Reports also includes the proposed infrastructure layout.<br><br>The EIA Report assessed the impact of the proposed infrastructure to be installed within the Project footprint, including the incorporation of the Stormwater Management Plan (refer to Appendix H) and best-practice management measures in the EMPr (refer to Appendix G). |
| | | | | Brian Colloty – Aquatic & Terrestrial Specialist EnviroSci (Pty) Ltd | The specialist was provided with the proposed Project layout at the time of surveying. The infrastructure for the proposed services associated with the Project is included in the overall Project footprint that was assessed by the specialist. The specialist was also informed that any required bulk services, if not already installed, would be located along existing servitudes and/or road networks, i.e. no new disturbances. The Mossel Bay Local Municipality Director: Infrastructure Services confirmed this in the letter provided (refer to Appendix J of the EIA Report). |

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| 19. | *2.5 Mitigation hierarchy*<br><br>The mitigation hierarchy is a structured approach used to manage environmental impacts by addressing them in a specific order of priority. Its objective is to achieve the best possible environmental outcome by preventing impacts wherever possible before considering alternative mitigation measures. In this regard, avoiding impacts must be afforded the highest priority, after which consideration may be given to impact minimisation and rehabilitation. Offsets are regarded as a measure of last resort and should not be used as a substitute for avoiding impacts in the first instance.<br><br>Considering the above, it is the responsibility of the EAP, supported by the appointed specialists, to identify, assess, and evaluate the impacts associated with a proposed development. Furthermore, the EIA process must demonstrate that the mitigation hierarchy has been appropriately applied and that all reasonable measures to avoid impacts have been considered and implemented before lower-order mitigation measures are proposed.<br><br>In light of the above, the EAP must demonstrate how the mitigation hierarchy has been applied to the proposed extension of Mossdustria and the establishment of a raceway on the Remainder of Portion 8 of the Farm Riet Valley No. 225, Mossel Bay. | | | Nemai Consulting | Section 12.8.1 of the EIA Report outlines the mitigation hierarchy and how it was applied throughout the EIA process. The mitigation hierarchy informed the alternatives assessment, specialist studies, impact assessment and development of mitigation measures for the Project.<br><br>The Project incorporated avoidance and minimisation measures through iterative refinement of the Project layout, including assessing alternative layouts and incorporating an approximately 15 ha Conservation Area to retain most of the identified high-sensitivity terrestrial habitat on site. The preferred layout was selected to reduce impacts on sensitive environmental features as far as practicable while maintaining the viability of the Project.<br><br>The findings and recommendations of the specialist studies were incorporated into the Project design, impact assessment and EMPr. The Project applied mitigation measures identified by the specialists, environmental authorities, and the EAP to avoid, reduce, rehabilitate, and manage impacts associated with the Project. The Project then assessed residual impacts following the implementation of these mitigation measures.<br><br>Accordingly, the Project applied the mitigation hierarchy through the avoidance of sensitive areas where practicable, the reduction and management of impacts through layout refinement and mitigation measures, and the incorporation of rehabilitation and ongoing management measures within the EMPr. |
| 20. | *3. Submission of Environmental Impact Report*<br><br>The EIR must contain all the information outlined in Appendix 3 of the EIA Regulations, 2014 and must also include the information requested in any | | | Nemai Consulting | Section 2 of the EIA Report contains the Document Road Map, which highlights how the EIA Report complies with Appendix 3 of the EIA Regulations. |

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| | correspondence regarding the proposed development issued by the Department. Failure to submit any information prescribed in Appendix 3 of the EIA Regulations, 2014 may prejudice the outcome of the Environmental Authorisation.<br><br>Please be reminded that in accordance with Regulation 23 of the EIA Regulations, 2014, the Department hereby stipulates that the EIR (which has been subjected to public participation) must be submitted to this Department for decision within **106 days** of the acceptance of the Scoping Report. According to the Department's records the Scoping Report was accepted on 29 June 2026. Therefore, in accordance with the reckoning of days as stipulated in Regulation 3 of the EIA Regulations, 2014, the date of submission of the EIR is reckoned to be **15 October 2026.**<br><br>However, if significant changes have been made or significant new information has been added to the EIR, the applicant/EAP must notify the Department that an additional 50 days (i.e. 156 days from receipt of the application) would be required for the submission of the EIR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information.<br><br>If the EIR is not submitted within 106 days or 156 days, where an extension is applicable, the application will lapse in terms of Regulation 45 of the EIA Regulations, 2014, and your file will be closed. Should you wish to pursue the application again, a new application process would have to be initiated. A new Application Form would have to be submitted.<br><br>**NOTE:** Furthermore, in accordance with Environmental Impact Assessment best-practice, you are kindly requested to notify all registered Interested and Affected Parties including the authorities identified in the Public Participation Plan of the submission of the FBAR and to make the document available to them. This will provide such parties an opportunity to review the document and how their issues were addressed. | | | | The recoking of days is noted, and the final EIA Report will be submitted before 15 October 2026, in accordance with the EIA Regulations.<br><br>No significant changes were made to the EIA Report; therefore, no additional days were required.<br><br>The EAP will notify all registered I&APs of the submission of the Final EIA Report, as requested by the Department. |
| 21. | 4. Please note that a listed activity may not commence prior to an environmental authorisation being granted by the Department. It is an offence in terms of Section 49A of the National Environmental Management Act, 1998 (Act no. 107 of 1998) ("NEMA") for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment. | | | Nemai Consulting | This comment is noted, and the Applicant is aware of the conditions and associated implications. |

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| 22. | 5. Kindly quote the above-mentioned reference number in any future correspondence in respect of this matter.<br><br>6. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received. | | | Nemai Consulting | The reference number will continue to be used in any future correspondence to the Department. |
| 23. | **Email:**<br>Please see the attached letter of no jurisdiction from SANRAL.<br><br>**Letter:**<br>Thank you for your email dated 27 August 2026.<br><br>It is noted that the proposed extension of Mossdustria and the establishment of a raceway on the Remainder of Portion 8 of the Farm Rietvalley 225, Mossel Bay, Western Cape Province is located more than 1000m/ 1km away from the National Route 2 Section 6.<br><br>The South African National Roads Agency SOC Limited (SANRAL) has no jurisdiction. | Vuyo Ntuli - Statutory Control Officer Western Cape Province SANRAL | Email & Letter (08/10/2026) | Nemai Consulting | The comment of no jurisdiction is noted. |