

Comments and Responses 1680 1680 Aqua Farming Droogfontein Pivot Agriculture

Mr JOSEPH MCGUIRE

Date 2025/02/17 Method Email

Comment

B&GP Kindly send me more info regarding above matter of droogfontein I am interested

Response

Good day, Thank you for your email. You have been registered as an Interested and Affected Party (I&AP) for the Aqua Farming Droogfontein project. We will provide you with additional information regarding the development and progress of the project. This include an opportunity to review and submit comments once the Basic Assessment Report is made available to the public.

Mr John Geeringh

Date 2025/06/09 Method Email

Comment

Please send me a KMZ file of the proposed development. Kind regards

Response

Good day, Kindly find the attached KMZ of the assessment area and proposed pivot areas. Please feel free to contact us if you require any further information.

Date 2025/06/09 Method Email

Comment

It does not show the pivot areas, however I do notice there are some Eskom power lines on the property. Please find attached Eskom requirements.

Response

Good day, Please find attached kml with pivot areas as well as the specific area to be assessed. I have also attached the layout of the pivots and underground cables once the development is complete in approximately 7 years. I take note the attached Eskom requirements file.

Thami Hadebe

Date 2025/02/13 Method Email

Comment

Your wayleave application with project reference number 1680/JJ/am dated 12 February 2025 has reference. Transnet Pipelines, a division of Transnet SOC Limited, is not affected by the proposal. Your awareness of the existence of Transnet’s pipeline servitudes and concern for their integrity is highly appreciated. This authorisation shall be valid for 48 months from the date - 13 February 2025.

Response

Thank you for your response. Transnet’s input and comment is much appreciated.

Date 2025/06/09 Method Email

Comment

Response

Comments and Responses 1680 1680 Aqua Farming Droogfontein Pivot Agriculture

Thami Hadebe

Dear Sir/Madam Your wayleave application with project reference number 1680/lj/JJ dated 22 May 2025 has reference. Transnet Pipelines, a division of Transnet SOC Limited, is not affected by the proposal. Your awareness of the existence of Transnet’s pipeline servitudes and concern for their integrity is highly appreciated. This authorisation shall be valid for 48 months from the date - 22 May 2025.

Good day, Thank you for your response. We take note of Transnet comments and engagement regarding the proposed project.

Ms Mmakhumo Jaola

Date 2025/05/07 Method Email

Comment

Email message: "Please see the attached letter with the comments made on the draft Scoping report submitted to the department for the above-mentioned proposed development." Letter content: "1. The final Scoping Report must be submitted in both electronic (soft copy) and printed (hard copy) formats. 2. Page 1 of the Scoping Report reflects only one listed activity for which Environmental Authorization is being sought. However, other sections of the report (e.g. page 19 of SR) and the accompanying application form reference three listed activities, in accordance with the Environmental Impact Assessment (EIA) Regulations of 2014, as amended. Should there be any changes to the listed activities applied for during the EIA process, an amended application must be submitted to the Department to ensue regulatory compliance. 3. Page 69 of the Scoping Report (SR) indicates that the desktop study conducted confirmed that there are no renewable energy projects within the proposed development area. However, Page 5 of the Screening Report further specifies that there are wind and solar developments with approved Environmental Authorisations (EAs) located within the site and in close proximity to the proposed development area. To confirm the status and validity of these Environmental Authorisations, written confirmation must be obtained. This can be done by contacting the holders of the respective EAs directly. Alternatively, information can be requested from the Department of Forestry, Fisheries and the Environmental (DFFE) by submitting a PAIA request to PSabeka@environment.gov.za 4. The inclusion and applicability of the National Environmental Management Waste Act (Act No. 59 of 2008) and the Occupational Health and Safety Act (Act No. 85 of 1993) must be assessed and duly considered. 5. The inclusion of Miss Kraft in the list of Interested and Affected Parties is acknowledged. Both a hard and a soft copy (including the KML files) of the reports to be submitted must also be provided to Miss Kraft. Department of Agriculture, Environmental Affairs, Rural Development and Land Reform: Research. Contact Person: C. Kraft Sasko Building, 90 Long Street, Private Bag X6102, Kimberley, 8300 Email address: ckraft.daerl@gmail.com 6. Please note that further information may still be requested by the Competent Authority in the EIA process. The permitting authority would like to remind you of Section 24F of the National Environmental Management Act, Act No. 107 of

Response

I hope this email finds you well. Thank you very much for your comments, please find attached the responses to the comments. Kindly note that the commenting period for the Draft Scoping Report concluded on June 23, 2025. We acknowledge that the official receipt of your comments was received after the ten-day period stipulated in Section 3(6) of the EIA Regulations, 2014. The Draft Scoping Report was submitted electronically and via courier on May 22, 2025, and therefore, the Final Scoping Report is due to be submitted on 7 July 2025, following the 44-day period as stipulated in Section 21(1) of the EIA regulations, 2014. Consequently, the Final Scoping Report has already been finalised and dispatched via courier. A digital copy of the Final Scoping Report will be sent on July 7, 2025. While the recommendations provided by DAERL could not be incorporated into the already finalised Scoping Report, they have been considered and addressed. These recommendations will be implemented, where relevant, during the subsequent Environmental Impact Assessment (EIA) phase. Thank you for your understanding and continued engagement in this process. Letter content: RE: COMMENTS ON SCOPING REPORT FOR THE PROPOSED AQUA FARMING DROOGFONTEIN PIVOT AGRICULTURAL EIA, RIVERTON, SOL PLAATJE LOCAL MUNICIPALITY, FRANCES BAARD DISTRICT MUNICIPALITY, NORTHERN CAPE PROVINCE (DAERL REF: NC/EIA/04/FB/SOL/KIM2/2025; EIMS REF: 1680) We refer to your letter dated 4 July 2025 regarding the above project. Please refer to the table on the following pages, providing responses to your comments. Kindly take note that the comments were received after the end date of the commenting period (23rd June 2025), and also after the finalisation and submission (via courier) of the Final Scoping Report. Therefore, any changes recommended by the DAERL have not been implemented in the Final Scoping Report. The comments have been considered, addressed and where relevant will be applied during the EIA phase. It should also be noted the Scoping Report for review was submitted to the department on the 22nd of May 2025 via email and courier. Thank you for your involvement in this process. Please do not hesitate to contact the EIMS Public Participation Team should you have further comments regarding the above project. Kind regards, EIMS Public Participation Team 1. The comment is noted. 2. Page 1 of the Scoping Report highlights the primary activity, whereas the Environmental Authorisation

Comments and Responses 1680 1680 Aqua Farming Droogfontein Pivot Agriculture

Ms Mmakhumo Jaola

1998, as amended, which states that no activity may commence prior to an Environmental Authorisation being granted by the Department."	(EA) application and other sections of the report (e.g., page 19) detail all three listed activities in accordance with the 2014 EIA Regulations. Since the EA application itself contains the complete list of activities for which authorisation is sought, there is no current non-compliance. The Scoping Report, in its entirety, along with the EA application, accurately reflects the scope of the project. We acknowledge that should any of the listed activities change during the EIA process, an amended application would be submitted to ensure regulatory compliance. However, based on the current documentation, all relevant activities are already accounted for and will be assessed in the EIA phase. 3. It has been confirmed with the DFFE SA Renewable energies EIA Applications Database that there are no approved Environmental Authorizations for renewable energy projects within the proposed project area. The solar and wind farms listed on the DFFE Screening tool have been identified and the relevant companies have been included in the I&AP Database and have been contacted throughout the Public Participation Process. 4. The Waste Act (Act No. 59 of 2008) and the Occupational Health and Safety Act (Act No. 85 of 1993) will be considered and assessed during the EIA phase of the application. 5. Ms. Kraft will be added to the Interested and Affected Party (I&AP) database, and a digital copy of the Final Scoping Report will be provided. Please note, a hard copy of the Final Scoping Report isn't available for distribution to Ms. Kraft because it was finalised and submitted (via courier) prior to our receipt of comments from DAERL. However, during the EIA phase, both hard and digital copies of the Draft and Final Environmental Impact Report (EIR) will be provided to Ms. Kraft. 6. This comment is noted.
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Ms Boitshepo Motsodisa

Date	2025/06/09	Method	Email
Comment	Good day, Please note that all development applications are processed via our online portal, the South African Heritage Resources Information System (SAHRIS) found at the following link: http://sahra.org.za/sahris/ . We do not accept emailed, posted, hardcopy, faxed, website links or DropBox links as official submissions. Please create an application on SAHRIS for each EA application and upload all documents pertaining to the Environmental Authorisation Application Process. As per section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA), an assessment of heritage resources must form part of the process and the assessment must comply with section 38(3) of the NHRA. If a case already exists on SAHRIS regarding the development, please upload the documents to that case using the "Make an additional submission to an existing case" in the application selector wizard https://sahris.org.za/form/application-selector . Please ensure that all documents produced as part of the EA process are submitted as part of the application. **PLEASE NOTE** An application fee is now required for all section 38 applications. Please ensure that the SAHRIS		
Response	Good day, Thank you for your email. Kindly note that the Palaeontological Desktop Assessment and Phase I Heritage Impact Assessment reports have been uploaded to the SAHRIS application for the Aqua Farming Expansion of Agriculture EIA: (Case ID: 25132).		

Comments and Responses 1680 1680 Aqua Farming Droogfontein Pivot Agriculture

Ms Boitshepo Motsodisa

application contains a proof of payment as per the notice at the following link: <https://sahris.org.za/help>. A payment of R 2 000.00 for each application is required. Please make separate payments with the specific reference numbers. Applications that do not include a proof of payment will be considered incomplete and will not be processed until proof of payment is provided. Please make use of the SAHRIS Case ID in the payment reference. e.g. 12345/38.8. Please upload the PoP using the "Make an additional submission to an existing case" in the application selector wizard <https://sahris.org.za/form/application-selector>. The case officer assigned to your case will approve the submission and begin to process the case.

Mr Jeffrey Mpolawa

Date 2025/07/14 Method Email

Comment

Good day Can you please send me the kmz file for the above project, so that we can see if Eskom infrastructure is affected or not

Response

Good day, Please see the kmz file for the proposed Aqua Farming Droogfontein BA project. Feel free to reach out to us should you have any questions or concerns. Thank you.

Jacoline Mans

Date 2025/06/05 Method Email

Comment

Email message: Attached, please find COMMENTS NC-FB-0011-2025-26. Letter content: 1. The applicant must assess and quantify the anticipated impacts on protected trees during the EIA phase. See Section 12(1)(d) of the National Forests Act, (Act No. 84 of 1998) ("NFA") and Government Notice (GN) 4496, Government Gazette No. 50291 of 13 March 2024 for the list of protected tree species. Protected trees are known to occur in the vicinity of the study site 2. Section 15(1) of the NFA states that no person may cut, disturb, damage or destroy any protected tree; or possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, or any forest product derived from a protected tree, except under a license granted by the Minister; or in terms of an exemption published by the Minister. 3. The prohibition on protected trees applies to all trees, alive and dead. It also applies to all size classes of the species listed as protected. 4. Cutting or disturbing a protected tree without a valid Forest Act Licence is a criminal offence and a transgression of the National Forests Act, 1998 (Act No. 84 of 1998) and carries a fine or imprisonment or both. 5. Protected trees with active bird nests or other significant biodiversity features may not be destroyed without a valid Fauna Permit from the provincial conservation authority, the Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land

Response

Email Response: Thank you for your e-mail. Please see attached responses to DFFE's comments. Response Letter Content: 1. The EIA phase will include a Biodiversity Impact report detailing the assessment and quantification of anticipated impacts on any protected species identified on-site. 2. During the EIA phase, a Biodiversity Impact Assessment will be undertaken by a specialist to thoroughly assess any potential impacts related to protected trees. Should any permits or licenses be required, the application process will be conducted in consultation with a biodiversity specialist and the relevant governmental department to ensure full compliance with the NFA. 3. The comment is noted and will be implemented during the EIA phase and specialist assessments. 4. The comment is noted. 5. During the EIA phase, a Biodiversity Impact Assessment will be undertaken by a specialist to thoroughly assess any potential impacts related to protected trees with active bird nests. Should any permits or licenses be required, the application process will be conducted in consultation with a biodiversity specialist and the relevant governmental department to ensure full compliance with the relevant legislation. 6. This is an extract from the Scoping Report and requires no response. 7. The comment is noted. A copy of the report will be attached as an appendix to the EIR, which will be submitted to the Forestry Office digitally. 8. The EIA phase will include Biodiversity Impact Report detailing the assessment and quantification of

Comments and Responses 1680 1680 Aqua Farming Droogfontein Pivot Agriculture

Jacoline Mans

Reform ("DAERL"), if these would be affected. 6. The applicant, Aqua Farming (Pty) Ltd, plans to develop 33 irrigation pivots for the cultivation of potatoes, onions, and various crops. The development will occur in seasons over the course of 7 years. With each phase, approximately 175 ha will be cleared for pivots. After approximately 7 years a total of 1050 ha will have been cleared. The total area assessment and application area is 1800 ha. The affected properties are Portion 16 Farm Droogfontein 62, Portion 2 of Eerste Aanleg 50, RE Bulpan 51 and RE Witpan 52. The site is located along the N12, approximately 20 km north of Kimberley and 3 km southwest of Riverton, in the Sol Plaatje Local Municipality, Frances Baard District Municipality in the Northern Cape. The center point of the site is 28°33'33.48"S and 24°45'1.94"E. The affected vegetation type is said to be Kimberley Thornveld. Irrigation water will be sourced from the Vaal River. The current water use licence allows for the abstraction of 519 152 m³/annum; however, the licence will need to be amended to include the additional farms and farm portions designated for irrigation activities. An additional 500 000m³/annum volume of water is required to irrigate the pivots to be developed over the course of 7 years. 7. The screening tool results for the Terrestrial Biodiversity theme are very high and for the plant species theme, medium. The report states that specialists impact assessment report for Terrestrial and Aquatic Biodiversity, including animal and plant species assessments will be conducted by Dr. Natalie Birch. A copy of this report must be supplied to the Forestry Office in Upington (Jmans@dffe.gov.za). 8. Page 35 (44 of 125), number 1.8.1 acknowledges limits to current knowledge, e.g. gaps, uncertainties and assumptions, stating that the "exact number and location of protected plant species within the proposed development footprint is not known. The EMPr will include a requirement for a specialist walkthrough to identify any protected species within the development footprint and to oversee the relocation of these plants, if required, prior to any developments. The next point states that "the uncertainties mentioned in 1.8.1 above will be mitigated in the EMPr..." The site sensitivity and verification report, under plant species assessment, states: "Vachellia erioloba, a Species of Conservation Concern (SCC) species in the area, were observed on-site, however, the screening tool has indicated the sensitivity level to be medium, a high sensitivity level is suggested due to the nature of the species of the plants and the nature of the project." Kindly note, the anticipated impacts on protected trees must be quantified during the EIA phase, to determine whether a Biodiversity Offset Report is required. If required, it must be submitted with the final EIR as per National Biodiversity Offset Guideline of June 2023. According to Appendix 7, the post-mitigation significance of impacts on biodiversity is rated as medium to high, thus necessitating the need for a biodiversity offset report. 9. As mentioned above, the Scoping Report (SR) states that the post-migration significance of impacts on biodiversity is medium to high, therefore it is not clear how number 1.8.3 can state that "Sufficient information was gathered prior to the onset of this process to indicate that positive impacts will outweigh low risk for the proposed project." Moreover, number 2.6.1 states that the SR is based on technical information and process description provided by the client; and the description of the baseline environment has been

anticipated impacts on any protected species identified on-site. Should a Biodiversity Offset Report be needed, it will be included as part of the FEIR. Please note that the Department of Forestry, Fisheries and the Environment (DFFE) will conduct a site visit to the proposed project area. The biodiversity specialist will accompany DFFE representatives during this visit. Following a site visit with the DFFE and the biodiversity specialist on the 7th of July, the DFFE department will confirm whether a Biodiversity Offset Report is required. 9. It should be noted the Scoping Report aims to identify potential impacts and risks at an initial stage. The Scoping Report does indicate that certain negative impacts have pre-mitigation significance scores that are relatively high. However, the report also states that "The biodiversity impacts are preliminary impacts determined by the specialist and will be further assessed and finalised during the EIA phase. The scores are therefore approximations and may change in the EIA report" (Section 8.3, p 108 of the Scoping Report). The statements "Sufficient information was gathered prior to the onset of this process to indicate that positive impacts will outweigh low risk for the proposed project.", incorrectly refers to the socio-economic benefits and not the ecological impacts. This section will be amended in the FEIR. As noted in Section 9.8 of the report, "More detailed assessment findings for each identified impact taking the above into consideration will be provided in the EIA Report and associated EMPr". This confirms that the initial findings are subject to further detailed investigation and assessment during the EIA phase. A dedicated biodiversity specialist assessment will be undertaken during the EIA phase to provide a comprehensive and definitive evaluation of these impacts 10. The statement will be amended in the FEIR to indicate the impact is anticipated to be high, to correspond with the post-mitigation impact rating. As per the previous response, more detailed assessment findings for each identified impact will be provided in the EIA Report and associated EMPr. This confirms that the initial findings are subject to further detailed investigation and assessment during the EIA phase. A dedicated biodiversity specialist assessment will be undertaken during the EIA phase to provide a comprehensive and definitive evaluation of these impacts. 11. Consultation with the landowner confirms that the farms were previously utilised for livestock grazing. Quantifying the definitive percentage of land specifically dedicated to cultivated grass feed is challenging, since indigenous grasses, also used for grazing, contribute to the overall grazing area and may not be clearly distinguishable from actively cultivated land. The land use will be confirmed in the Biodiversity Impact Assessment during the EIA phase. The report identifies "Habitat fragmentation, loss of natural vegetation and alien invasion in a Critical Biodiversity Area (CBA) 2" and "loss of species of conservation concern" as potential negative impacts that will be assessed. It is important to note that the Scoping Report is a preliminary document. A terrestrial biodiversity assessment has not yet been undertaken during the scoping phase. A comprehensive biodiversity specialist assessment will be conducted during the upcoming EIA Phase. This specialist study will confirm, delineate and quantify the extent of previously cultivated land versus natural or semi-vegetated areas within the proposed development footprint. It will also assess the ecological sensitivity of these areas and provide a definitive understanding of the land cover types. 12. Comment is noted and will be taken into

Comments and Responses 1680 1680 Aqua Farming Droogfontein Pivot Agriculture

Jacoline Mans

obtained from specialist studies and a desktop analysis. Later in the report it is stated that “no irreplaceable loss of resources is expected”. The statement is therefore based on assumption and not a fact. 10. The DFFE screening tool results indicate that the project area falls within Critical Biodiversity Area (CBA) 1 and CBA 2. Number 1.11 states that “overall, the proposed project will result in the loss of natural vegetation, however the impact is anticipated to be low.” This does not correspond with the post-mitigation impact ratings on biodiversity displayed in figure 2 above, Appendix 7 of the SR. It is also in contrast to the statement in the site sensitivity and verification report under the heading terrestrial biodiversity impact assessment, “the project’s activities will have a severe impact on the terrestrial biodiversity....” These contradictions must be explained. 11. Number 2.5.10 of the SR states that the “proposed pivots will mostly be located on old lands (previously cultivated area) within the property”. Kindly confirm what percentage of the planned pivots will be located on previously cultivated lands? Looking at some of the photographs and the aerial google image (date unknown) displayed in figure 5 below, it seems as if significant portions of the site look quite pristine. Moreover, number 2.5.15 states the “proposed locality is natural semi-vegetated and in the middle of agricultural land.” 12. Number 1.13 of the SR describes the positive and negative cumulative ecological / biophysical impacts, stating “the proposed pivot development is consistent with the surrounding land use activities in the area. Because of this and the small scale no significant negative cumulative impacts are expected.” Transforming 1050 ha natural vegetation is quite significant and not ‘small scale’. 13. Number 1.11 of the SR states that during the Environmental Impact Assessment (EIA) phase, a comprehensive biodiversity specialist assessment will be conducted. This assessment aims to evaluate the potential impacts of the proposed project on local fauna and flora. Particular attention will be given to the project's proximity to known breeding zones of protected species to ascertain and quantify any potential adverse effects. Number 7.6 refers to fauna and flora, stating “a number of protected plant species have the potential to occur on site. These are species protected in terms of the National Forest Act 1998 and the Northern Cape Nature Conservation Act, Schedule 1 & 2. A specialist assessment is being undertaken to determine the impacts...” Furthermore, “two avifaunal species with high sensitivity, namely Aves-Neotis ludwigii and Aves-Gyps africanus, and two with medium sensitivity namely Aves-Sagittarius serpentarius and Aves-Gyps africanus. The specialist has additionally noted substantial activity of the White Backed Vulture, Aves-Gyps africanus, which are critically endangered. Additionally, the proposed project area is located approximately 3 km from the Dronfield Important Bird Area (IBA). Known vulture nesting sites exist within the study area.” Given the presence of protected Camel thorn trees on site, known to be used as breeding sites of critically endangered White-backed vulture, removing the trees would destroy the habitat of numerous listed avifauna, classified as vulnerable, endangered and critically endangered, therefore it is recommended that an avifauna specialist study be conducted by a suitably qualified specialist and that the Endangered Wildlife Trust (Ronelle Visagie, RonelleV@ewt.org.za or Gareth Tate, gareth@ewt.org.za) be contacted, because they

consideration for the final Scoping Report. 13. An assessment of impacts on listed species is incorporated within the biodiversity assessment, which will be appended to the Environmental Impact Report (EIR). Dr Birch is a qualified avifauna specialist and was accompanied during the site by Rikus Roodt. The Endangered Wildlife Trust (EWT) has been invited to register as an Interested and Affected Party (I&AP) for the project, with initial invitations extended to bradleyg@ewt.org.za and eia@ewt.org. Furthermore, the email addresses provided in the comment will be included in the I&AP database. 14. As outlined in the report, Sections 1.3, 7.6, 8.3, 9.2, and 9.3, a Biodiversity Assessment will be undertaken by the relevant specialist during the EIA phase. Therefore, the identified impacts and proposed mitigation measures in the Scoping Report are preliminary and high-level. These will be comprehensively addressed and finalised within the EIR upon completion of the biodiversity assessment undertaken by the specialist, and will be incorporated in the EMP to be submitted for public review and approval by the Department. 15. As per the previous response, a Biodiversity Assessment will be undertaken by the relevant specialist during the EIA phase. Therefore, the identified impacts and proposed mitigation measures in the Scoping Report are preliminary and high-level. These will be comprehensively addressed and finalised within the EIR upon completion of the biodiversity assessment undertaken by the specialist, And will be incorporated in the EMP to be submitted for public review and approval by the Department. 16. During the EIA phase, a Biodiversity Impact Assessment will be undertaken by a specialist to thoroughly assess any potential impacts, including cumulative, related to protected trees and trees with active protected bird species nests. Should any permits or licenses be required, the application process will be conducted in consultation with a biodiversity specialist and the relevant governmental department to ensure full compliance with the relevant legislation. If it is determined by the department that an off-set report is required, it will be submitted with the EIR. 17. At this stage of the application, it was not yet known if it will be required. However, it is stated in the SR, that it might be needed and will be determined in the EIR. 18. The comment is noted, and the email is included in the I&AP database. The department will be notified once the EIR (which includes the Terrestrial Biodiversity Impact Assessment report) will be available for review and where it can be accessed. 19. An avifauna impact assessment is undertaken as part of the biodiversity assessment by a suitably qualified specialist, which will be included as an appendix to the EIR. The EWT was invited to register as I&APs, however, the details provided in comment 13 will be added to the I&AP database. 20. A site-visit is scheduled to take place with DFFE representatives and the biodiversity specialist, upon which confirmation will be provided on the requirement for a Biodiversity Offset Report. Where relevant, protected tree species will be assessed and quantified during the EIA phase. 21. The comment is noted and as explained above, the full impact will be assessed by suitably qualified specialists and the best practicable environmental option will be provided / advised by the specialist in consultation with the EAP and the applicant, with appropriate mitigation measures recommended, during the EIA phase. This will be submitted to the competent authority for informed decision making. 22. The comment is noted, and the relevant permits and licences will

Comments and Responses 1680 1680 Aqua Farming Droogfontein Pivot Agriculture

Jacoline Mans

are monitoring White-backed vultures in the province, for input and feedback. 14. Page 80 of the SR refers to impact during construction and mitigation. Under impact “habitat fragmentation, loss of natural vegetation, and alien invasion in a CBA 1 and CBA2,” the suggested mitigation measures are “habitat protection, biodiversity protection, wildlife protection”. Kindly elaborate on how this could be achieved in practice and what the landowner must do to protect the habitat, biodiversity and wildlife. It is not clear how the habitat and biodiversity can be protected, given the proposed activity entails clearing 1050 ha of vegetation. 15. The SR states “smaller fauna will inevitably be killed during land clearing activities as these activities will destroy their habitat. In addition to unintentional killing of fauna, some faunal species, particularly herpetofaunal species, are often intentionally killed as they are thought to be dangerous.” Therefore, the proposed mitigation of “habitat protection” does not make sense if habitats will be destroyed. 16. The SR confirms that “the clearing of vegetation will result in the loss of some protected flora”. It further states “A search and rescue operation should be performed prior to clearing, it is however not a feasible or practical option regarding the protected trees, so it is important to ensure that trees between the pivots remain undisturbed. A permit is required if any protected trees need to be cut or removed within the development footprint.” The applicant must note that it is not a given that a Forest Act Licence will be granted for removal of protected trees, especially given the fact that it provides a habitat which is critical for the survival of the Critically Endangered Gyps africanus and other bird species of special concern mentioned in the SR. Also, the cumulative impacts of the 33 pivots over a 7-year period may be significant enough to trigger a biodiversity offset requirement. 17. In the EIA application form, number 8, “no” was ticked for authorisations required under Other National legislation, yet the SR confirmed the presence of NFA listed protected tree species which may not be disturbed without a valid Forest Act Licence under the National Forests Act, 1998 (Act No. 84 of 1998) as amended. See screenshot below. 18. A copy of the specialist Terrestrial Biodiversity Impact Assessment report must be supplied to the Forestry Branch (Jmans@dffe.gov.za) for comments. 19. An avifauna specialist study must be conducted by a suitable qualified specialist and the EWT must be consulted regarding the potential impacts on breeding sites and Gyps africanus for inputs and recommendations. 20. The potential impacts on protected tree species must be quantified during the EIA phase and if significant, a Biodiversity Offset Report must be compiled by a suitably qualified offset specialist for comments (and approval by the relevant regulating authorities) and appended to the Final EIR. 21. The DFFE is concerned about the proposed development which may have significant unavoidable impacts on protected trees, which provide habitat to critically endangered, endangered and vulnerable bird species 22. Having an Environmental Authorisation does not exempt the holder of such authorisation from complying with other applicable environmental legislation and permit and licence requirements. 23. Please quote the Reference Number NC-FB-0011-2025-26, should you wish to correspond further on this matter. Enquiries may be directed to Ms. Jacoline Mans at Jmans@dffe.gov.za, Cell 060 973 1660.

be applied for if needed. 23. The comment is noted.

Comments and Responses 1680 1680 Aqua Farming Droogfontein Pivot Agriculture

Jacoline Mans

Date	2025/06/09	Method	Email
Comment		Response	
Good Morning May you kindly forward me the .kml of the application site. Thank you in advance.		Good day, Please find attached the kml of the proposed project site. Please feel free to contact us if you require any further information.	

Orefemetse Ramantsi

Date	2025/06/23	Method	Email
Comment		Response	
The email is in regards of the following project: The proposed Aqua Farming Expansion of agriculture into natural areas on the farm Droogfontein, in the Sol Plaatjie Local Municipality, Northern Cape Province. Kindly note, the Department requests a site visit for the above-mentioned applications, as per the details below: Date : The preferred week (7th - 11th of July), preferable the 10th July 2025. Proposed time : To be confirmed Reason for request : Site Verification for the Project Area of Influence (PAOI) falls within Critical Biodiversity Areas (CBA 1 and 2). Please note the following: An invitation to the site visit must be extended to the following officials from: 1. DFFE: Prioritised Infrastructure Projects : Integrated Environmental Authorisations. In addition : Please indicate the accessibility of the sites- vehicle requirements (any vehicle/ high-clearance/ 4x4 etc.). For any further queries, please contact me on the details below.		I hope you are well. Apologies for the delay in responding to your email. I have confirmed that the ecology specialist will be able to attend the proposed site visit with you on the 10th of July. I am currently confirming with the landowner for the 10th of July to arrange site access as well. I will have a response for you by tomorrow morning, as well as any other additional information. If there is anything else don't hesitate to contact me, thank you very much.	

Canny Mosebjadi

Date	2025/02/12	Method	Email
Comment		Response	
Thank you for the EIA notification, may you kindly resend the attachments to e*****@caa.co.za and delist all other SACAA email addresses on your database. Kindly save and send your environmental impact analysis reports/meeting requests and request for comments to e*****@caa.co.za, going forward please.		Thank you for your email. You request and suggestions have been understood. We have now deactivated all other CAA email addresses listed on our database.	

Ms Nompumelelo Lekalakala

Date	2025/06/09	Method	Email
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Comments and Responses 1680 1680 Aqua Farming Droogfontein Pivot Agriculture

Ms Nompumelelo Lekalakala

Comment	Response
Dear Sir/Madam DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation on the 22nd of May 2025 to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs***** and Ms ***** (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers. Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dffe.gov.za for attention of Mr *****.	Good day, Thank you for your email. We acknowledge receipt, including the comments provided and the allocation of Case Officers. Please find attached the KML and Locality Map for the assessment site. Should you have any comments or queries, please don't hesitate to reach out.

Mr Liam Whitlow

Date	2025/09/02	Method	Telephone
Comment	Response		
I am just testing the stakeholder system.	Checking		