



Appendix G: S24G application – Comments and Response Report

November 2025

Proposed mixed use / light industrial development on RE/ 139 Farm Zandhoogte

Mossel Bay District Municipality

Consultation number: 14/2/4/1/D6/29/0016/25 (Saphire investments)

This document records the details of the public participation process and records any comments received from Interested and Affected Parties (IAPs) in terms of the EIA regulations of the National Environmental Management Act (Act 107 of 1998) as well as the responses provided by the Environmental Impact Assessment Practitioner and the proponent.

A public participation process is being carried out in accordance with Section 24J of the NEMA; the following activities have been carried out:

- Notice of proposed application for EA and registration of IAPs:
 - Placing two posters close to the site to inform the public of the process.
 - Emailing notice to organs of state, landowners and potential IAPs of the intended S24G application
 - Placing an advertisement in the Mossel Bay Advertiser on 27 September 2024
 - Allowing for a 30-day registration and initial comment
- Registration of IAPs: : 27 September to 28 October 2024**
- Record of registration and initial comments received in response to the notices

The draft section 24G application form report has been distributed to registered IAPs for a 30-day review and comment period.

Review and comment period: 27 August – 29 September 2025

The final signed S24G application including all comments received to date (November 2025), will be distributed for a 30-day review:

10 November – 10 December 2025

All comments received as well as responses provided by the Environmental Impact Assessment Practitioner and the proponent has been recorded throughout the process. Comments have been addressed in the assessment process; all comments and responses are provided in this report.

After the second review and comment period the final S24G application will be submitted to the competent authority for decision making.

See the following attached appendices for details of public participation activities carried out:

- Appendix G1: Notices, Adverts and Background information document
- Appendix G2: Full Register of interested and affected parties
- Appendix G3: Registrations, Comments and Responses
- Appendix G4: Proof of Notice and registration distributed
- **Appendix G5: Proof of distribution of draft S24G application report and appendices**
- **Appendix G6: Summary of meeting with DEADP**



Comments and Response Report, November 2025

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
Comments received on draft s24g application: 27 August – 29 September 2025				
Department of Environmental Affairs and Development Planning Mbali Ntshangase Mbali.Ntshangase@westerncape.gov.za Tel: 021 483 3696 Ziyaad Allie Administration Officer on the following details: Ms Nabeelah Khan (Sub-Directorate: Rectification) email: Nabeelah.Khan@westerncape.gov.za, 24G Consultation: 14/2/4/1/D6/29/0016/25	26 September 2025	24G Consultation: 14/2/4/1/D6/29/0016/25 Pre-Application – Information Requirements letter INFORMATION REQUIREMENTS OF THE POTENTIAL SECTION 24G APPLICATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998) ("NEMA") FOR THE UNLAWFUL COMMENCEMENT OF LISTED ACTIVITY/IES: THE UNLAWFUL MIXED USE AND LIGHT INDUSTRIAL DEVELOPMENT ON RE/139, FARM ZANDHOOGTE, MOSSEL BAY. 1. The abovementioned consultation regarding the unlawful mixed use and light industrial development on RE/139, Farm Zandhoogte, Mossel Bay, as received by this Directorate: Rectification on the 27 August 2025, has reference.	Final S24G application and appendices for 30-day review and comment 10 November 2025	Clearing commenced in 2020 by Ideal trading. A notice was issued to Ideal Trading 301 CC on 22 October 2025 for carrying out NEMA listed activities (LN3, activity 12) without an environmental authorisation. (REFERENCE: 14/1/1/E3/9/2/3/L1270/22; ENQUIRIES: H. van Schalkwyk). A rehabilitation plan was prepared by cape EPrac in November 2022 on behalf of Ideal Trading. The rehabilitation plan was accepted on 2 July 2023 (REFERENCE: 14/1/1/E3/9/2/3/L1270/22; ENQUIRIES: H. van Schalkwyk) It is the EAPs understanding that no active rehabilitation was carried out by Ideal trading; the current landowner (Sapphire Ocean Investments (RF) (Pty) Ltd) purchased that land from Ideal Trading. Furtherance of clearing and the relevant rezoning is required for the development of storage and warehouses). The 24G Consultation assigned: 14/2/4/1/D6/29/0016/25 Environmental Authorisation is required for the following NEMA sited activities: Listing Notice 1 of 2014 Activity 27 The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. Activity 28 Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: Activity 67 Phased activities for all activities—where any phase of the activity was below a threshold but where a combination of the phases, including expansions or extensions, will exceed a specified threshold. Listing Notice 3 of 2014 Activity 12 The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
				vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. Activity 14 The development of—(ii) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs— Activity 26 Phased activities for all activities—i. listed in this Notice and as it applies to a specific geographical area, which commenced on or after the effective date of this Notice; or
		2. Please be advised that the Section 24G Fine Regulations (GN. No. 698 of 20 July 2017 (hereafter referred to as “the fine regulations”) were published on 20 July 2017. The fine regulations require that public participation be conducted prior to the submission of an application and that an application must include the representations as set out in Annexure A of the fine regulations.		Notices of the proposed application and call for registration have been placed in the newspaper, placed on site and distributed to landowners’ adjacent landowners, organs of state and identified potential interested and affected parties. The draft application has been distributed to those included in the IAP register (appendix G2 of this report); the register has been updated throughout the process and the comments and responses have been updated throughout the process. Registration of IAPs: : 27 September to 28 October 2024. Record of registration and initial comments received in response to the notices The draft section 24G application form report has been distributed to registered IAPs and organs of state for a 30-day review and comment period. Review and comment period on draft S24G application and appendices: 27 August – 29 September 2025 The final S24G application will be sent to all organs of state and registered IAPs including organs of state for an additional 21-day comment and review period. Review and comment period on final S24G application and appendices: 28 October – 21 November 2025 The updated public participation and comments and response report (this report) is included as appendix G of the Final S24G application.
		3. Please be advised that submission of a section 24G application shall in no way derogate from an investigation of any transgression in terms of the National Environmental Management Act, 1998 (Act 107 OF 1998) (“NEMA”) nor from the National Prosecuting Authority’s legal authority to institute criminal proceedings.		Noted

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		4. Based on the review of the draft application form dated August 2025, the Department would like to request the following:		
		4.1 Section B: Activity Information 4.1.1 For the draft application to be considered as meeting the requirements of an application and to receive an application reference number, page 10 and declarations must be signed and dated by both the applicant and the Environmental Assessment Practitioner (EAP).		Noted. This has been done. The final S24G application will be sent to all organs of state and registered IAPs including organs of state for an additional 21-day comment and review period. Review and comment period on final S24G application and appendices: 28 October – 21 November 2025 The updated public participation and comments and response report (this report) is included as appendix G of the Final S24G application.
		4.1.2 Activity description Kindly indicate the applicable option by stating/highlighting either 'Yes' or 'No', rather than only providing a brief description.		Noted. This has been done. The final S24G application will be sent to all organs of state and registered IAPs including organs of state for an additional 21-day comment and review period. Review and comment period on final S24G application and appendices: 28 October – 21 November 2025 The updated public participation and comments and response report (this report) is included as appendix G of the Final S24G application.
		4.2 Section C: Quantum of the Section 24g Fine 4.2.1 Part 1: Please ensure that the appropriate box is marked with an “x” and provide a comprehensive motivation for each index. The motivation must clearly outline the actual or potential impacts resulting from the activity.		This has been completed. The final S24G application will be sent to all organs of state and registered IAPs including organs of state for an additional 21-day comment and review period. Review and comment period on final S24G application and appendices: 28 October – 21 November 2025 The updated public participation and comments and response report (this report) is included as appendix G of the Final S24G application.
		4.2.2 Part 2: Please provide comprehensive explanations for the indices and not only refer to appendix.		This has been completed. The final S24G application will be sent to all organs of state and registered IAPs including organs of state for an additional 21-day comment and review period. Review and comment period on final S24G application and appendices: 28 October – 21 November 2025 The updated public participation and comments and response report (this report) is included as appendix G of the Final S24G application.
		Listed activities that are being applied for: 5.		Clearing commenced in 2020 by Ideal trading. A notice was issued to Ideal Trading 301 CC on 22 October 2025 for carrying out NEMA listed activities (LN3, activity 12) without an environmental authorisation. (REFERENCE: 14/1/1/E3/9/2/3/L1270/22; ENQUIRIES: H. van

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		A section 24G application is only relevant to listed activities that have commenced without the pre-requisite environmental authorisation. Only those activities applied for will be considered for environmental authorisation.		Schalkwyk). A rehabilitation plan was prepared by cape EPrac in November 2022 on behalf of Ideal Trading . The rehabilitation plan was accepted on 2 July 2023 (REFERENCE: 14/1/1/E3/9/2/3/L1270/22; ENQUIRIES: H.van Schalkwyk) It is the EAPs understanding that no active rehabilitation was carried out by Ideal trading; the current landowner (Sapphire Ocean Investments (RF) (Pty) Ltd) purchased that land from Ideal Trading. Furtherance of clearing and the relevant rezoning is required for the development of storage and warehouses). The 24G Consultation assigned: 14/2/4/1/D6/29/0016/25 Authorisation is required for the following NEMA sited activities: Listing Notice 1 of 2014 Activity 27 The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. Activity 28 Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: Activity 67 Phased activities for all activities—where any phase of the activity was below a threshold but where a combination of the phases, including expansions or extensions, will exceed a specified threshold. Listing Notice 3 of 2014 Activity 12 The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. Activity 14 The development of—(ii) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs— Activity 26 Phased activities for all activities—i. listed in this Notice and as it applies to a specific geographical area, which commenced on or after the effective date of this Notice; or
		6. The applicant is thus required to ensure that all the applicable listed activities are included in the application to be submitted. In this regard, the timeframe of commencement of the listed activities and the relevant Environmental		Clearing commenced in 2020 by Ideal trading. A notice was issued to Ideal Trading 301 CC on 22 October 2025 for carrying out NEMA listed activities (LN3, activity 12) without an environmental authorisation. (REFERENCE: 14/1/1/E3/9/2/3/L1270/22; ENQUIRIES: H. van Schalkwyk). A rehabilitation plan was prepared by cape EPrac in November 2022 on behalf of Ideal Trading . The rehabilitation plan was accepted on 2

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		Impact Assessment legislative period/regime is of particular importance.		July 2023 (REFERENCE: 14/1/1/E3/9/2/3/L1270/22; ENQUIRIES: H.van Schalkwyk) It is the EAPs understanding that no active rehabilitation was carried out by Ideal trading; the current landowner (Sapphire Ocean Investments (RF) (Pty) Ltd) purchased that land from Ideal Trading. Furtherance of clearing and the relevant rezoning is required for the development of storage and warehouses). The 24G Consultation assigned: 14/2/4/1/D6/29/0016/25 Authorisation is required for the following NEMA sited activities: Listing Notice 1 of 2014 Activity 27 The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. Activity 28 Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: Activity 67 Phased activities for all activities—where any phase of the activity was below a threshold but where a combination of the phases, including expansions or extensions, will exceed a specified threshold. Listing Notice 3 of 2014 Activity 12 The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. Activity 14 The development of—(ii) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs— Activity 26 Phased activities for all activities—i. listed in this Notice and as it applies to a specific geographical area, which commenced on or after the effective date of this Notice; or
		7. Please also ensure that the similarly listed activities in terms of the current Environmental Impact Assessment Regulations, 2014 (as amended) are applied for should the listed activities not have commenced within this period.		This is not applicable; Clearing commenced in 2020 by Ideal trading. The NEMA 2014 EIA Regulations (as amended, 2017) are applicable.

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		8. The appointed Environmental Assessment Practitioner is required to provide a detailed explanation as to why the unlawfully commenced activity is still similarly listed in terms of the NEMA.		This is not applicable; Clearing commenced in 2020 by Ideal trading. The NEMA 2014 EIA Regulations (as amended, 2017) are applicable.
		Minimum requirements for every application for environmental authorisation:		
		9. You are reminded that section 24G is an application for environmental authorisation and thus an applicant must comply with the requirements of the NEMA in relation to the submission of an application for environmental authorisation and any other relevant information (section 24(1A)(e) of the NEMA). Section 24(4)(a) of the NEMA specifies the "procedures for the investigation, assessment and communication of the potential consequences or impacts of the activities on the environment" that every application for environmental authorisation must comply with.		Noted. An EMPr has been compiled and is included as Appendix I of the application. The potential environmental impact of these listed activities have been investigated, assessed, and reported in the application and accompanying appendices.
		10. Taking the above into consideration, together with the information requirements of Annexure A, Section C, Part 1 of the fine regulations related to the environmental impacts and representations to be completed by an Environmental Assessment Practitioner ("EAP"); and to be submitted together with the section 24G application; you are hereby advised that the application be informed by an environmental impact assessment.		This has been completed. The final S24G application will be sent to all organs of state and registered IAPs including organs of state for an additional 21-day comment and review period. Review and comment period on final S24G application and appendices: 28 October – 21 November 2025 The updated public participation and comments and response report (this report) is included as appendix G of the Final S24G application.
		11. When conducting such environmental impact assessment, the applicant/EAP must take into account the applicable guidelines developed by the Department, which may be downloaded from the Department's website (see above). In particular, the following are applicable: 11.1.		Applicable guidelines have been referred to during the assessment process and the EMPr has been compiled in terms of Appendix 4 of the National Environmental Management Act, No. 107 of 1998 (NEMA) Environmental Impact Assessment (EIA) Regulations of 2014.

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		Guideline for Environmental Management Plans (June 2005);		
		11.2. Guideline on Public Participation		Applicable guidelines have been referred to during the assessment process; in addition, the following is referred to: Publication of public participation guideline, 2012 published in terms of NEMA Department of Environmental Affairs (2017), Public Participation guideline in terms of NEMA EIA Regulations, Department of Environmental Affairs, Pretoria, South Africa.
		11.3. Guideline on Alternatives		Applicable guidelines have been referred to during the assessment process; the no-go alternative has been assessed as well as activity alternatives, process or technology alternatives, and site layout alternatives where applicable
		11.4. Guideline on Need and Desirability		Applicable guidelines have been referred to during the assessment process; in addition, the following is referred to: The consideration of the strategic context of the development proposal along with the broader societal needs and the public interest has been reported on and assessed and information provided to address relevant questions included in the guideline. DEA (2017), Guideline on Need and Desirability, Department of Environmental Affairs The need and desirability of the development has been considered in terms of the National NDP as well as provincial and local SDP. The development is considered to be suited to the proposed development site due to location to nearby industrial activities I the area and the change in land use from farming to industrial is considered suitable.
		11.5. Departmental guideline series for involving specialist assessments, 2005		Applicable guidelines have been referred to during the assessment process; in addition, the following is referred to: Protocols for involving specialists as required in accordance with the DFFE screening tool report. This entailed an initial site sensitivity verification by a registered specialist and / or EAP to confirm or dispute the screening tool's findings, followed by specialist reports, as required, that detail their expertise, methodology, findings, and recommendations. Relevant mitigation measures have been incorporated into the EMPr
		11.6. Other (as applicable)		Noted
		12. You are required to submit a Screening Report from the National Web based Environmental Screening Tool. The Screening Tool also		The screening tool report has been generated and included as appendix M of the application.

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		provides site specific EIA process and review information, for example, the Screening Tool may identify if an industrial development zone, minimum information requirement, Environmental Management Framework or bio-regional plan applies to a specific area. The Screening Tool identifies related exclusions and/ or specific requirements including specialist studies applicable to the site and/or development, based on the national sector classification and the environmental sensitivity of the site.		
		13. You are advised that "Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation" ("the Protocols") (Government Notice No. 320 as published in Government Gazette No. 43110 on 20 March 2020) came into effect on 09 May 2020. It is noted that the protocols are applicable to the development.		The protocols have been applied as required for the proposed development.
		13.1 According to the Protocols, prior to commencing with a specialist assessment, the current use of the land and environmental sensitivity of the site under consideration identified by the screening tool, must be confirmed by undertaking a site sensitivity verification.		Noted, the protocols have been applied, and site verification has been carried out and assessments, where required, have been carried out.
		13.2 A site sensitivity verification report in accordance with the Protocols indicating a motivation as to why certain specialist studies highlighted in the Screening Report will/will not be conducted has been provided must be included in the section 24G application.		Noted. This has been carried out and included as Table 1 in the application; the verification carried out in 2022 is included as appendix 5. Specialist verification and / or assessments carried out: • TERRESTRIAL BIODIVERSITY, ANIMAL AND PLANT SPECIES COMPLIANCE STATEMENT, Biodiversity Africa, May 2024 • AQUATIC BIODIVERSITY COMPLIANCE STATEMENT, Upstream Consulting, August 2025 • Palaeontological Assessments, Dewald Wilken, June 2025 • TRAFFIC IMPACT STATEMENT, Element Consulting Engineers, June 2025

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
				Site verification report, Benjamin Walton, September 2022
		13.3 Please note that should reasonable concerns arise from any potential interested and affected parties that require additional assessment, such assessment may be required.		Noted
		13.4 Please note that where a specialist assessment is required, but no specific environmental theme protocol has been prescribed, the level of assessment must be based on the findings of the site sensitivity verification and must comply with Appendix 6 of the NEMA EIA Regulations, 2014 (as amended).		Noted
		Public Participation Process: 14. Preliminary Advertisement 14.1. Kindly note the requirements of Regulation 8 and Annexure A, Section D of the fine regulations which stipulate that when submitting an application form, the applicant must attach proof that the application has been advertised in at least one local newspaper in circulation in the area in which the activity was commenced, and on the applicant's website, if any.		The notices, advert and Background information document is provided as appendix G1 of the PP and CRR (this report)
		14.2. Please note further that the advertisement must state that the applicant commenced a listed/ specified/ waste management activity(ies) without the necessary environmental authorisation and/or waste management licence and is now applying for ex post facto approval. The advertisement must include (a) the date, (b) the location, (c) the applicable legislative provision contravened, (d) and the listed activity(ies) commenced with without the required authorisation.		The notices, advert and Background information document is provided as appendix G1 of the PP and CRR (this report). Location: <i>A mixed use / light industrial development is proposed on RE/ 139 Farm Zandhoogte, near Groot Brakrivier, Western Cape Province. The area is approximately 18.5 hectares and located north of the N2 in Tergniet. Approximate central coordinates: 34° 3'28.02"S; 22°11'22.60"E.</i> Legislation contravened: <i>2020 approximately 2.5 ha of the property was cleared (south east corner). On 31/10/ 2022, the Western Cape Department of Environmental Affairs & Development Planning (DEADP) issued a Pre-Compliance Notice to Ideal Trading informing that the activities undertaken to develop a brickworks, are deemed to be unauthorised since vegetation was removed without prior Environmental Authorisation (EA). Clearing activities ceased; Ideal Trading was given the option to apply for retrospective authorisation (Section 24G process) or rehabilitate the area. Ideal Trading opted to rehabilitate the affected area. DEADP accepted the</i>

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
				rehabilitation plan on 7 February 2023. No further development activities have since taken place (DEADP Reference: 14/1/1/E3/9/2/3/L1270/22). Furtherance: The new landowner (Sapphire Ocean Investments (RF) (Pty) Ltd) acquired the land in 2023 and is proposing to develop a mixed use / light industrial development on the property. A Terrestrial biodiversity assessment was carried out in May 2024 on behalf of new landowner; the illegally cleared area has revegetated over the past 4 years. In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the 2014 Environmental Impact Assessment (EIA) regulations (as amended, 2017), the proposed development requires an EA to be issued by the DEADP prior to the commencement of construction for the following NEMA EIA activities: Activity 27 (GN No. R. 327; Listing Notice 1) The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation... Activity 28 (GN No. R. 327; Listing Notice 1) Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares Activity 12 (GN No. R. 324; Listing Notice 3) The clearance of an area of 300 square metres or more of indigenous vegetation ...
		14.3. Interested and affected parties (I&APs) must be provided with the details of where they can register as an I&AP and submit their comment. Please be advised that at least 20 days must be provided in which to do so. Proof of compliance with Regulation 8 of the fine regulations must be submitted together with your application.		Notices of the proposed application and call for registration have been placed in the newspaper, placed on site and distributed to landowners' adjacent landowners, organs of state and identified potential interested and affected parties. The notices, advert and Background information document is provided as appendix G1 of the PP and CRR (this report). <u>30 days registration has been provided:</u> A public participation process will be conducted in terms of the NEMA Regulation 41 of GN R. 326, 2014, as amended. All interested and affected parties (IAPs) are encouraged to participate in the process. Contact Eco Route to register and / or comment as an IAP within 30 days of this notice; Registration period: 27 September to 28 October 2024. Please provide written comments with your name, contact details and an indication of any direct business, financial, personal or other interest which you may have in the proposed development. Environmental Assessment Practitioner: Claire De Jongh (EAPASA Reg: 2021/3519) Tel: 0846074743 Fax: 086 402 9562

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
				Email: claire@ecoroute.co.za Address: PO. Box 1252 Sedgefield 6573
		14.4. Should you decide to compile a draft section 24G Application and of your own accord make it available for comment, it is recommended that the draft section 24G Application report be made available simultaneously with the Preliminary Advertisement requirement.		Notices of the proposed application and call for registration have been placed in the newspaper, placed on site and distributed to landowners' adjacent landowners, organs of state and identified potential interested and affected parties. The draft application has been distributed to those included in the IAP register (appendix G2 of this report); the register has been updated throughout the process and the comments and responses have been updated throughout the process. Registration of IAPs: : 27 September to 28 October 2024 Record of registration and initial comments received in response to the notices The draft section 24G application form report has been distributed to registered IAPs and organs of state for a 30-day review and comment period. Review and comment period on draft S24G application and appendices: 27 August – 29 September 2025 The final S24G application will be sent to all organs of state and registered IAPs including organs of state for an additional 21-day comment and review period. Review and comment period on final S24G application and appendices: 28 October – 21 November 2025 The updated public participation and comments and response report (this report) is included as appendix G of the Final S24G application.
		15. Section 24O consultation with organs of state/State departments 15.1. However, Kindly note that any public participation undertaken prior to submission of the section 24G Application report, does not exempt from compliance with section 24O of NEMA which obligates the EAP when considering an application; to consult with every State department that administers a law relating to a matter affecting the environment.		Identified organs of state have been automatically registered at the start of the EA application process. (IAP register included as appendix G2 of this report) Registration of IAPs: : 27 September to 28 October 2024 Record of registration and initial comments received in response to the notices The draft section 24G application form report has been distributed to registered IAPs and organs of state for a 30-day review and comment period. Review and comment period on draft S24G application and appendices: 27 August – 29 September 2025 The final S24G application will be sent to all organs of state and registered IAPs including organs of state for an additional 21-day comment and review period. Review and comment period on final S24G application and appendices: 28 October – 21 November 2025 The updated public participation and comments and response report (this report) is included as appendix G of the Final S24G application.

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		15.2 You are required to submit a list of organs of state to be consulted in terms of section 24O together with the complete and signed application. The list of organs of state must include their contact details with email and the relevant contact person.		Identified organs of state have been automatically registered at the start of the EA application process. (IAP register included as appendix G2 of this report) Registration of IAPs: : 27 September to 28 October 2024 Record of registration and initial comments received in response to the notices The draft section 24G application form report has been distributed to registered IAPs for a 30-day review and comment period. Review and comment period on draft S24G application and appendices: 27 August – 29 September 2025 The final S24G application will be sent to all organs of state and registered IAPs for an additional 21-day comment and review period. Review and comment period on final S24G application and appendices: 28 October – 21 November 2025 The updated public participation and comments and response report (this report) is included as appendix G of the Final S24G application.
		15.3. Copies of the section 24G application may be made available for comment to the relevant organs of state upon simultaneous submission of the application to the Department. Note: this does not qualify as the Regulation 8 public participation requirement which is required to be conducted prior to submission of an application.		Registration of IAPs: : 27 September to 28 October 2024 Organs of state were automatically registered (IAP register provided as Record of registration and initial comments received in response to the notices The draft section 24G application form report has been distributed to registered IAPs for a 30-day review and comment period. Review and comment period on draft S24G application and appendices: 27 August – 29 September 2025 The final S24G application will be sent to all organs of state and registered IAPs for an additional 21-day comment and review period. Review and comment period on final S24G application and appendices: 28 October – 21 November 2025 The updated public participation and comments and response report (this report) is included as appendix G of the Final S24G application.
		15.4. In terms of the public participation process ("PPP") to be undertaken, kindly be advised that you/the EAP must record and respond to all comments received during the public participation process. The comments and responses must be captured in a Comment and Response Report (C&RR) and must also include a description of the PPP followed.		Registration of IAPs: : 27 September to 28 October 2024 Record of registration and initial comments received in response to the notices The draft section 24G application form report has been distributed to registered IAPs for a 30-day review and comment period. Review and comment period on draft S24G application and appendices: 27 August – 29 September 2025 The final S24G application will be sent to all organs of state and registered IAPs for an additional 21-day comment and review period. Review and comment period on final S24G application and appendices: 28 October – 21 November 2025 The updated public participation and comments and response report (this report) is included as appendix G of the Final S24G application.

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		15.5 Following the initial 30-day commenting period, the application and the C&RR must be made available to registered Interested and Affected Parties and State Departments for an additional 21 days for review and/or comment, if any, advising them how their comments and concerns have been addressed, before it is submitted to the Department for consideration. Proof of notification of the additional 21-day commenting period must be appended to the final C&RR.		Registration of IAPs: : 27 September to 28 October 2024 Record of registration and initial comments received in response to the notices The draft section 24G application form report has been distributed to registered IAPs for a 30-day review and comment period. Review and comment period on draft S24G application and appendices: 27 August – 29 September 2025 The final S24G application will be sent to all organs of state and registered IAPs for an additional 21-day comment and review period. Review and comment period on final S24G application and appendices: 28 October – 21 November 2025 The updated public participation and comments and response report (this report) is included as appendix G of the Final S24G application.
		16. Kindly ensure that the section 24G application is submitted as a standalone document, separate to the accompanying appendices, and that each of the appendices is saved separately (in PDF format and is not scanned / merged).		The application will be separate from accompanying appendices.
		17. Reports must be submitted via email to the Administration Officer on the following details: Ms Nabeelah Khan (Sub-Directorate: Rectification) email: Nabeelah.Khan@westerncape.gov.za, with attached pdf versions of the report or, if too large to attach to an email, to be made available via an electronic link provided in the email that is accessible by the Directorate.		Noted
		18. You are reminded that it is an offence in terms of section 49A of the NEMA to commence with a listed activity unless the competent authority has granted environmental authorisation for the undertaking of the activity, and it is an offence to fail to comply with a directive issued in terms of NEMA. A person convicted of an offence is liable to a fine not exceeding R10 million or imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.		Noted. EA application for rectification and furtherance is in process.

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		19. Kindly quote the abovementioned reference number in any future correspondence in respect of this consultation form.		Noted
From: Mbali Ntshangase <Mbali.Ntshangase@westerncape.gov.za>	23 September 2025	Subject: 14/1/1/E3/9/2/3/L1270/22 : MIXED USE AND LIGHT INDUSTRIAL DEVELOPMENT ON RE/139, FARM ZANDHOOGTE , MOSSEL BAY Good afternoon, Claire and Janet I trust you are well. I am the case officer assigned to the matter concerning the mixed-use and light industrial development on RE/139, Farm Zandhoogte, Mossel Bay. Apologies for the delayed response, I have recently returned from leave and am attending to this case this week. I would appreciate your assistance before I provide my response formally with the following: 1. Kindly provide a link or means to access the full documentation related to this case. I currently only have access to the form, without the accompanying appendices, and I am unsure how this oversight occurred. 2. I understand that a rehabilitation plan was developed for a section of the property. Could you please confirm whether the rehabilitation process was carried out and formally closed out? Thank you in advance for your assistance. Kind regards Mbali Ntshangase EAPASA registration: 2022/5899 Environmental Officer (Specialised Production): Rectification	23 September 2025	Good day Thank you for your email. There was a rehabilitation plan prepared and approved for Ideal Trading (previous landowner) but it was never implemented; when we started the application process for the new landowner in 2023 / 2024, secondary vegetation had been established by that stage. It was also found that the area cleared without EA by Ideal trading was used extensively for agriculture and therefore, the soil and vegetation disturbed by agricultural activities in preceding ten years. Kindly find the executive summary attached. The past use and proposed use has been assessed. The link to access the draft S24G form and retrospective assessment and supporting appendices: https://ecoroute.co.za/node/121 Please let me know if you require any additional information. Thank you Kind Regards Claire

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		Department of Environmental Affairs and Development Planning Western Cape Government 1st Floor, Leeusig Building, 1 Dorp Street, Cape Town, 8000 Tel: +27 (0)21 483 3696 Email: Mbali.Ntshangase@westerncape.gov.za Website: www.westerncape.gov.za/eadp		
Andrea Beierle	02 September 2025	Good day I would like to register as an interested and affected party. I have received the document from a friend but it seems incomplete. All the appendices are missing and for instance part 6 is incomplete. I therefore dispute the validity of the period for the public participation process. Please explain and rectify. Sincerely Andrea Beierle Resident of Tergniet	02 September 2025	Good day I am unclear on what part 6 would be. Could you provide an example from the report please that would refer to such a section. All the appendices are available for review and comment https://ecoroute.co.za/node/121 Kind Regards Claire
Tshembhani Ngobeni 101 York Street, 3rd Floor Room 302, George 6530, PO Box 1205 George 6530 https://breedegouritzcma.co.za/ Enquiries: Tshembhani Ngobeni Tel: 023 346 8000 E-mail: tngobeni@bocma.co.za Reference: 4/10/3/K20A/Zandhoogte RE/139, Groot Brakrivier Date: 29 September 2025	29 September 2025	COMMENTS ON PROPOSED MIXED USE /LIGHT INDUSTRIAL DEVELOPMENT ON RE/139 FARM ZANDHOOGTE ,GROOT BRAKRIVIER, MOSSEL BAY DISTRICT MUNICIPALITY. Your application dated 27 August 2025 has reference. The Breede-Olifants Catchment Management Agency (BOCMA) has evaluated the submitted documents and has the following comments:	Final S24G application and appendices for 30-day review and comment 10 November 2025	
		1. The Breede-Olifants Catchment Management Agency (BOCMA) acknowledges receipt of your application dated 27 August 2025 for the proposed activity. This application was received by our office on the same date. Following a thorough evaluation of the proposed activity and its anticipated impact on water resources, BOCMA does not object to the amendment of the authorised mixed use / light industrial development on RE/139 Fam Zandhoogte,		Noted

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		Groot Brakrivier Mossel Bay District Municipality.		
		2. BOCMA does not object to the proposed development subject to compliance with the following condition: 2.1 The proposed activities on development of mixed use / light industrial on Re/139 Farm Zandhoogte , Groot Brakrivier Mossel Bay Municipality in the Western Cape, will trigger water uses under Sections 21 (c),and (i) of the National Water Act, 1998 (Act No. 36 of 1998), as amended.		Noted; a risk assessment has been completed, and the outcome is low risk for construction and operations. (Provided in Appendices H2a and H2b) A preapplication meeting will be requested and the relevant general authorisation will be registered with the DWS as required based on the assessment and RAM.
		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.		Noted
		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.		Mitigation measures to prevent this are included in the EMP (Appendix I). The conditions of the applicable General authorisation will be complied with.
		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		Noted

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		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.		
		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.		Noted Mitigation measures to manage stormwater generated during construction and operational phase are provided in the EMP (Appendix I).
		7. All requirements as stipulated in the National Water Act, 1998 (Act No. 36 of 1998) regarding water use must be adhered to.		Noted
		8. These comments do not exempt you from complying with other relevant legislations and requirements of other governmental Departments. The BOCMA reserves the right to revise initial comments and request further information based on any additional information received.		Noted
Western cape roads infrastructure	19 September 2025	Dear Eco Route Environmental Consultancy The message below refers to your application for the submission of a property environmental study for comment (Application No - 2025-09-0083) submitted to the Western Cape Government on 2025/08/26: Properties related to the application : ☑ Portion 0 of Farm ZANDHOOGTE 139, MOSSEL BAY Supporting documents submitted with the application : ☑ Power of Attorney Letter - (CONTRACT OF EMPLOYMENT SUBCONSULTANT - Remainder of Farm Zandhoogte No 139 - 12 May 2024 _signed.pdf) ☑ Site Layout Plan - (Appendix A - Draft S24G - Re 139 Farm Zandhoogte - Locality Maps.pdf) ☑ Site Development Plan - (Appendix B1 - Initial Site development plan and layout-final.pdf)	Final S24G application and appendices for 30-day review and comment 10 November 2025	

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		☐ Title Deed - (Appendix L - Title deeds - Re 139 Zandhoogte_0.pdf) ☐ Traffic Impact Assessment Report - (Appendix H4 - 24018 Zandhoogte Industrial Park TIA Rev1 Jun 2025 (with addenda)_compressed.pdf) ☐ Application Cover Letter - (Re_139 Zandhoogte - Executive Summary - Draft NEMA 24G Application.pdf) ☐ Application Cover Letter - (email correspondence.pdf) ☐ Environmental Impact Assessment Report - (Re_139 Zandhoogte - Draft NEMA 24G Application Form_25 August 2025_signed - converted_0.pdf) ☐ Site Layout Plan - (Appendix B2 - Preliminary SDP Alternative 2 - bulk services.pdf) ☐ Application Motivation - (Appendix B3 - 24018 Zandhoogte Industrial Park Bulk Engineering Services Report Rev1 Jun 2025 with addenda.pdf) The matter is receiving attention, and further communication will be addressed to you as soon as circumstances permit. Best Regards, Western Cape Government		
Nabeelah Khan Rectification Nabeelah.Khan@westerncape.gov.za Tel: 021 483 5827 Department of Environmental Affairs and Development Planning Z Toefy (Head of rectification)	28 August 2025	24G CONSULTATION REF: 14/2/4/1/D6/29/0016/25 Attention: Erno Janse van Rensburg TO ADVISE ON THE UNLAWFUL MIXED USE AND LIGHT INDUSTRIAL DEVELOPMENT ON RE/139, FARM ZANDHOOGTE, MOSSEL BAY 1. The documentation received by this Department, is hereby acknowledged. 2. Please be advised that the Section 24G Fine Regulations, 2017 (hereafter referred to as "the fine regulations") require that public participation be conducted prior to the submission of an application, as outlined in Regulation 8 of the fine regulations. A section	Final S24G application and appendices for 30-day review and comment 10 November 2025	A meeting was held on 1 October 2025 with the officer: the summary of the meeting is provided in Appendix G6 of this PP and CRR. The registration and advertising for the application were confirmed as completed and the next steps in the public participation process, which will commence after the signed application is submitted. This process includes a 30-day period for public comments, extendable by 21 days if significant feedback is received. The timeline for decision-making was discussed, with Mbali indicating it would depend on the case's complexity, while Shafeeq noted that an appeal could delay the decision by up to six months. The screening tool report has been generated and the relevant protocols have been followed during this assessment process.

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		24G application form must also include the information as set out in Annexure A of the fine regulations. 3. You are reminded of the G.N. No. 960 of 5 July 2019: Notice of the Requirement to Submit a Report Generated by the National Web Based Environmental Screening Tool in terms of Section 24(5)(h) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and Regulation 16(1)(b)(v) of the Environmental Impact Assessment Regulations, 2014, as amended. 4. Please note that from 04 October 2019 the submission of a Screening Report generated from the National Web Based Environmental Screening Tool is compulsory when submitting an application for environmental authorisation. 5. The Department will consider the information herein and advise you accordingly. 6. Kindly quote the abovementioned reference number in any future correspondence in respect of the pre-application/consultation process. Mrs Z Toefy Head of Rectification Directorate: Environmental Governance CC: (1) Mbali Ntshangase (DEA&DP: Rectification) Email: mbali.ntshangase@westerncape.gov.za (2) Claire De Jongh (EAP) Email: claire@ecoroute.co.za		
HWC Chane Herman	23 October 2025	Good Day Please note that your application has been assigned to Ms Chane Herman – Chane.Herman@westerncape.gov.za . She will be able to assist you further. Kind regards, HWC Admin	23 October 2025	Good day I am following up on this. Thank you Kind regards Claire

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
Stephanie Barnardt <Stephanie.Barnardt@westerncape.gov.za>	28 August 2025	Good day claire Please can you provide me with HWC reference number for me to provide you with a comment. If there was no NID trigger, please not that HWC cannot comment on matters that do not form part of our mandate. Please include your HWC reference number in future correspondence to assist in responding to your query promptly. Kindly note: Due to volume of queries I receive I may not be able to respond to you immediately, if you have not received a reply from within ten working days, please resend your query Kind regards, Application forms 2024: Applications Link Notice Stephanie-Anne Barnardt-Delport Specialist Heritage Officer (Archaeologist)(Professional ASAPA Member: 745) Heritage Western CapeTel: (+27) 021 829 3315	27 August 2025	Good day Kindly find attached Notice of intention to Develop and accompanying specialist report, proof of payment and screening tool report. I trust this is in order. Kind regards Claire
HWC Noluvo Toto Stephanie Barnardt	27 August 2025	Dear Applicant I acknowledge receipt of your permit application dated 27 August 2025. Please note that your application will be allocated to a Case Officer within 10 working days. Should you not receive correspondence after 10 working days, please contact HWC. Once assigned, the relevant Case Officer will confirm allocation of your application and advise if any further information or		

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		documentation is required, following tabling at the appropriate committee. Kindly note: - Agendas for HWC meetings are published weekly and are available at: www.hwc.org.za - From 1 September 2025, all Section 38 applications must be submitted via SAHRIS (www.sahris.org.za). HWC will no longer accept or process these applications via email. All other HWC applications and requests for reference numbers must continue to be submitted to: hwc.hwc@westerncape.gov.za Please find attached: - Notice: HWC SAHRIS NID Section 38 applications fee process - Notice: HWC Migration to SAHRIS for Section 38 applications - Notice: HWC Application Fee Increase Should you have any questions, feel free to contact our office for assistance. HWC Migration to SAHRIS HWC 2025 Committee Schedule Thanks Kind regards, HWC Admin		
Mossel Bay Municipality admin@mosselbay.gov.za	27 August 2025	Correspondence Reference: 14047879 File Reference: 15/4/34/4 ACKNOWLEDGEMENT / ONTVANGSERKENNING We acknowledge receipt of your letter regarding the abovementioned matter and wish to confirm that the matter is receiving attention. Ons erken ontvangs van u skrywe in bogemelde verband en bevestig dat die saak aandag geniet. Yours faithfully / Die uwe MOSSEL BAY MUNICIPALITY	Final S24G application and appendices for 30-day review and comment 10 November 2025	Noted

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		MOSELBAAI MUNISIPALITEIT		
Comments received during registration: 27 September to 28 October 2024				
Tshembhani Ngobeni BOCMA	9 October 2024	COMMENTS ON THE PROPOSED MIXED USE / LIGHT INDUSTRIAL DEVELOPMENT PROPOSED ON RE/139 FARM ZANDHOOGTE, MOSSEL BAY MUNICIPALITY WESTERN CAPE PROVINCE Your email submission of Tuesday, 27 September 2024 has reference.	10 October 2024	Thank you for the initial comments. I tried to send you an email yesterday, but it didn't go through for some reason. I will send you the draft assessment report when it is finalised for a 30-day comment and review period.
		The Breede-Olifants Catchment Management Agency (BOCMA) has evaluated the submitted documents and has the following comments:		
		The current information is not sufficient to make a decision.		
		This office would like to know if the proposed activity will trigger Section 21 water uses of the National Water Act, 1998 (Act 36 of 1998 as amended).	Responses is PP and CRR and addressed in the assessment:	An aquatic assessment has been carried out. Small old earthen dams occur on the property. Drainage occurs in a westerly and easterly direction from the centre of property. It is motivated that an Aquatic Biodiversity Sensitivity Assessment will not be necessary to conduct for the application process. The proposed development activities will not trigger a water use licence in terms of Section 21 (c) and (i) of the National Water Act (Act 36 of 1998).
		Does the Mossel Bay Municipality have capacity to accommodate a new development in terms of Bulk Services?		Sewage management The Average Dry Weather Flow (ADWF) created by the proposed development, in line with the above discussions, criteria and standards, is calculated at approximately 51kl/day. No sewage infrastructure will be required for storage unit areas. Sewer from the development will drain to the south-western boundary where it will connect into the main municipal sewer line flowing into the Great Brak River WWTW The Great Brak River WWTW has recently been upgraded and has sufficient capacity to accommodate this development.
		Please ensure that no water is taken from a water resource for any purpose without authorisation from the Responsible Authority.		Water Demand The bulk water Average Annual Daily Demand (AADD) for this proposed development, in line with the above discussions, design consumptions, assumptions, criteria and standards, is calculated at approximately 56kl/day. Bulk water is available for this proposed development. Bulk connection points are available from the existing 150mm / 200 mm municipal lines in place along east / west of Sandhoogte road.

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
				Bulk services are recommended to be installed prior to development of light industrial uses and warehouses. This is to ensure water, sewage and electricity is available for the remaining of the construction phase.
				The bulk services report and accompanying designs are provided as appendix B
		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.		Measures are provided in the EMPr
		No pollution of surface water or groundwater resources may occur due to any activity. Stormwater management must be addressed both in terms of flooding, erosion, and pollution potential.		Measures are provided in the EMPr
		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.		A stormwater management plan has been prepared and is provided in Appendix B. The integrated stormwater and road system form an integral part of layout planning. The system rests on three legs, namely the minor system, the major system and the emergency system. Minor storms and normal flow off are catered for in the normal road prism and piped system. Major storms are routed through a linked system of road prisms and public open spaces, using attenuation techniques. The emergency system recognizes failure of the minor and major systems and provides for emergency runoff by providing continuous overland flow routes to minimize flooding. Two internal detention ponds are proposed. The bulk services report and accompanying designs are provided as appendix B
		The BOCMA reserves the right to revise initial comments and request further information based on any additional information received.		Noted
Marie de la Rey	2024/09/28	I am a member of the Great Brak River Conservancy, serve on the committee, and would like to register as an Interested & Affected Party. Although we have been involved in Great Brak since 2016, we have been living here since 2020 and have grown to love this dorpie.	30 September 2024	Good day Marie Thank you for your email. I can confirm you have been registered for the authorisation application process. I am looking forward to your input.

Name	Date of comment / registration	COMMENT	Date of response	EAP COMMENT / RESPONSE
		We would like to see good things happen and not developments that will spoil its ambience. Thank you in advance.		
Val Thomson	28 September 2024	Good day Claire Could you kindly add my name to the list of interested and affected parties for the above public participation process Kind regards Val Thomson	30 September 2024	Good day Val I have registered you for the environmental authorisation process. Thank you Kind Regards Claire
Scott Thomson Great Brak River Conservancy	28 September 2024	Good afternoon, Please can the Great Brak River Conservancy be added as an interested party	30 September 2024	Good day Scott I have registered the Groot Brak Conservancy as an interested / affected party for this application process. Thank you Kind Regards Claire
Johan Snyman	2 October 2024	Enquired about the location of the site. Enquired about proposed development – was a shopping centre but that has moved In direct view of site Neighbour was old nursery – states it is now Oasis Pub and Grill	2 October 2024	Will send kml / kmz to open with google Earth Proposed for warehousing Located opposite WWTW and close proximity to waste site. Thank you for the phone call. I have registered you as an interested / affected party. As discussed, I am attaching the kmz / kml of the site boundary. Please send through any comments you would like to be addressed. We will send you the assessment report for 30 days review and comment once it is finalised.