



Comments and Response Report

PROPOSED DEVELOPMENT OF KINETIC CATAMARANS INDUSTRIAL FACILITY ON ERF 1339, AS WELL AS DEVELOPMENT / REDEVELOPMENT OF THE SOUTH AFRICAN SEA CADET CORPS INFRASTRUCTURE ON ERF 1316, KNYSNA, WESTERN CAPE



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SUBMITTED TO:	Leon Scheepers Rob Hayward

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STATEMENT OF INDEPENDENCE

I, **Jessica Christie** of Eco Route Environmental Consultancy, in terms of Regulation 13 of the Environmental Impact Assessment Regulations, 2014 (as amended), hereby declare that I provide services as an independent Environmental Assessment Practitioner (**EAPASA Reg: 2019/1855**) and receive remuneration for services rendered for undertaking tasks required in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), and the Environmental Impact Assessment Regulations, 2014 (as amended). I have no financial or other vested interest in the project.

EAP SIGNATURE: _____

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1. INTRODUCTION

Eco Route Environmental Consultancy has been appointed by the applicant, Kinetic Catamarans (Leon Scheepers and Rob Hayward) to ensure compliance with the regulations contained in the National Environmental Management Act (NEMA, No. 107 of 1998, as amended) and the Environmental Impact Assessment Regulations, 2014 (as amended) for the proposed activities on Erf 2924, Knysna, Western Cape.

This report serves as the Pre-Application Public Participation Process (PPP) comments and response document, accompanying the Draft - Basic Assessment Report (DBAR) to be submitted to the competent authority as start of the formal application process.

It outlines the public participation conducted during the Pre-Application BAR phase.

Take note:

- The BAR and associated appendices were available for a 30-day commenting period (Pre-application PPP: 06 November 2025 – 06 December 2025).
- All comments received during this time is included in this report.

2. REQUIREMENTS OF THE PUBLIC PARTICIPATION PROCESS (PPP) IN ACCORDANCE WITH THE ACT

Section 41 of the Environmental Impact Assessment Regulations, 2014 (as amended) specifies that a person conducting a public participation process must comply with the following minimum requirements (Table 1):

Table 1: Specification of Public Participation that must be adhered to (Environmental Impact Assessment Regulations, 2014 (as amended))

Regulation Specifications	Description to adherence
1) If the proponent is not the owner or person in control of the land on which the activity is to be undertaken, the proponent must, before applying for environmental authorisation in respect of such an activity, obtain written consent of the landowner or person in control of the land to undertake such activity on that land	The proponent (applicant) is the landowner and therefore consent is not required.
2) The person conducting a public participation process must take into account any relevant guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties on an application or proposed application which is subjected to public participation by -	
(a) Fixing a notice board at a place conspicuous to and accessible by the public at the	(i) A site notice was placed on site. (ii) There is no alternative site.

<p>boundary, on the fence or along the corridor of –</p> <ul style="list-style-type: none"> (i) The site where the activity to which the application or proposed application relates or is to be undertaken; (ii) Any alternative site 	
<p>(b) Giving written notice, in any of the manners provided for in section 47D of the Act, to –</p> <ul style="list-style-type: none"> (i) The occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site where the activity is to be undertaken and to any alternative site where the activity is to be undertaken. (ii) Owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken and any alternative site where the activity is to be undertaken. (iii) The municipal councillors of the ward in which the site and alternative site is situated and any organisation of ratepayers that the represent the community. (iv) The Municipality which has jurisdiction in the area (v) Any organ of state having jurisdiction in respect of any activity; and (vi) Any other party as required by the competent authority 	<ul style="list-style-type: none"> (i) The applicant is the owner of the site and is in control of the site. The site is vacant and there is only one site. (ii) The owners of the land adjacent to the site have been notified. (iii) The ward counsellor was notified. (iv) Knysna Municipality has been notified. (v) Please refer to Table 2 showing a list of organs of state notified. (vi) Please refer to Table 2 showing a list of all organisations, NGO's and public notified.
<p>(c) Placing an advertisement in –</p> <ul style="list-style-type: none"> (i) One Local Newspaper; or (ii) Any official Gazette that is published specifically for the purpose of providing public notices of applications or other submissions made in terms of these Regulations; 	<ul style="list-style-type: none"> (i) Knysna Plett Herald Newspaper a local free newspaper was advertised in.
<p>(d) Placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond its boundaries of the metropolitan or district</p>	<p>(d) This is not applicable to this proposed activity as there is no impact (i.e air emissions) that extends beyond the boundaries of the district municipality.</p>

<p>municipality in which it is or will be undertaken: Provided that this paragraph need not to be complied with if an advertisement has been placed in an official gazette referred to in paragraph (c)(ii); and</p>	
<p>(e) Using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to –</p> <ul style="list-style-type: none"> (i) Illiteracy (ii) Disability; or (iii) Any other disadvantages 	<p>N/A at this stage. But if required will comply.</p>
<p>3) A notice, notice board or advertisement referred to in sub regulation (2) must –</p> <p>(a) Give details of the application or proposed application which is subjected to public participation ; and</p> <p>(b) State –</p> <ul style="list-style-type: none"> (i) Whether basic assessment or S&EIR procedures are being applied to the application; (ii) The nature and location of the activity to which the application relates; (iii) Where further information on the application or proposed application can be obtained; and (iv) The manner in which and the person to whom representations in respect of the application or proposed application may be made. 	<p>The notice board was compliant with this requirement.</p>
<p>4) A notice board referred to in sub regulation (2) must –</p> <ul style="list-style-type: none"> (a) Be of a size of at least 60cm by 42cm; and (b) Display the required information in lettering and in a format as may be determined by the competent authority 	<p>The notice board was compliant with this requirement.</p>
<p>5) Where public participation is conducted in terms of this regulation for an application or proposed application, sub regulation (2)(a), (b), (c) and (d) need not be complied with again during the additional public participation process contemplated in regulations 19(1)(b) or 23(1)(b) or the public participation process contemplated in regulations 21(2)(d), on condition that –</p>	<p>This is the pre-application phase, an additional 30-day PPP will be undertaken to include all revisions for the Draft BAR.</p>

<p>(a) Such a process has been preceded by a public participation process which included compliance with sub regulation (2)(a), (b), (c) and (d); and</p> <p>(b) Written notices is given to registered I&AP's regarding where the –</p> <ul style="list-style-type: none"> (i) Revised basic assessment report or , EMPr or closure plan, as contemplated in regulation 19(1)(b); (ii) Revised environmental impact assessment report or EMPr as contemplated in regulation 23(1)(b); or (iii) Environmental impact assessment report and EMPr as contemplated in regulation 21(2)(d); (iv) <p>May be obtained, the manner in which and the person to whom representations on these reports or plans may be made and the date on which such representations are due.</p>	
<p>6) When complying with this regulation, the person conducting the public participation process must ensure that –</p> <ul style="list-style-type: none"> (a) Information containing all relevant facts in respect of the application or proposed application is made available to potential interested and affected parties; and (b) Participation by potential or registered interested and affected parties is facilitated in such a manner that all registered interested and affected parties are provided with a reasonable opportunity to comment on the application or proposed application. 	<p>These requirements have been complied with.</p>
<p>7) Where an environmental authorisation is required in terms of these Regulations and an authorisation, permit or licence is required in terms of a specific environmental management Act, the public participation processes contemplated in this Chapter may be combined with any public participation processes prescribed in terms of a specific environmental management Act, on condition that all relevant authorities agree to such a combination of processes.</p>	<p>No other permit or licenses are required at this stage.</p>

3. PUBLIC PARTICIPATION PROCESS (PPP)

This report earmarks the Public Participation Process with comments received and response thereto regarding the Pre-Application Public Participation Process (PPP) according to the National Environmental Management Act (Act 107 of 1998) (NEMA).

The 30-day Pre-Application Public Participation Process commenced on 06 November 2025 – 06 December 2025

- Site signs were erected in proximity to the proposed development area.



- According to the Regulations, the following written Notices have been provided.
 - The landowner is the applicant and as such does not need to be notified.
 - Authorities are automatically entered as Registered I&APs (unless they indicate otherwise).
 - The local authority and ward councillor have been notified.

ENVIRONMENTAL ASSESSMENT PROCESS

Notification of Public Participation:

PROPOSED DEVELOPMENT OF KINETIC CATAMARANS INDUSTRIAL FACILITY ON ERF 1339, AS WELL AS DEVELOPMENT / REDEVELOPMENT OF THE SOUTH AFRICAN SEA CADET CORPS INFRASTRUCTURE ON ERF 1316, KNYSNA, WESTERN CAPE.

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998), the National Environmental Management Act: Environmental Impact Assessment Regulations 2014, as amended, of a 30-day Public Participation Process to be undertaken under the authority of the Department of Forestry, Fisheries, and the Environment (DFFE). The Public Participation Process will run from **06 November 2025 – 06 December 2025**

DFFE Reference Number: TBC

Location: ERF 1339 and ERF 1316, KNYSNA, WESTERN CAPE.



The following EIA Listed Activities are applicable:

Government Notice No. R327 (Listing Notice 1): Listed Activity 19A

A Pre-Application Basic Assessment Report and relevant appendices will be made available to all registered Interested and Affected Parties (I&APs) for public review and comment. All relevant documents may be accessed via our website during the public participation period. Should you wish to gain further information regarding the project or wish to register as an Interested and Affected Party please contact the Environmental Assessment Practitioner (details below).

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 development. Please note that information submitted by I&AP's becomes public information. In terms of the Protection of Personal Information Act 4 of 2013 (POPIA), no personal information will be made available to the public.

Environmental Assessment Practitioner: Jessica Christie [EAPASA Reg 2019/1855]

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Eco Route
Environmental Consultancy

- Other persons and organizations were informed of the need to register as I&APs in order to be entered onto the I&AP database and to continue to receive information pertaining to this application, via an advert in the Knysna-Plett Herald.

Table 2 serves as a register for all I&APs that have been included during the public participation process. It should be noted that not all I&APs have provided input and will therefore be assumed that there is no objection.

Table 2: Interested and Affected Parties contact list

State Departments			
Name	Contact Person	Contact Details	Email
Department of Environmental Affairs and Development Planning (DEA & DP)	Danie Swanepoel	Private Bag x6509, George, 6530 044 814 2013 (T)	Danie.Swanepoel@westerncape.gov.za
DFFE Directorate: Biodiversity & Conservation	Mr Seoka Lekota	Environmental House 473 Steve Biko, Arcadia Pretoria 0083	BCAdmin@environment.gov.za
DFFE Protected Areas, Planning and Management Effectiveness	Mr Thivhulawi Nethononda	Environmental House 473 Steve Biko, Arcadia Pretoria 0083	Tnethononda@dffe.gov.za
Department of Health	Nathan Jacobs	Private Bag x6592, George, 6530 044-803 2727	Nathan.Jacobs@westerncape.gov.za
Heritage Western Cape	Noluvo Toto Stephanie Barnardt	Private Bag x9067, Cape Town, 8000 021-483 9729 (T)	Noluvo.Toto@westerncape.gov.za Stephanie.barnardt@westerncape.gov.za
Transport & Public Works / Department of Infrastructure	Vanessa Stoffels	24 th Floor, 9 Lower Burg Street, Cape Town 021 483 4669 (T)	Vanessa.Stoffels@westerncape.gov.za
Dept of Agriculture	Cor van der Walt Brandon Layman	Private Bag x1,	Cor.VanderWalt@westerncape.gov.za Brandon.Layman@westerncape.gov.za

Land Use Management		Eisenburg, 7601 021 808 5099 (T)	
Department of Water & Sanitation	John Roberts	Private Bag x16, Sanlamhof, 7532 021 941 6179 (T)	RobertsJ@dwa.gov.za
DFFE: Forestry Management	Melanie Koen	Private Bag x12, Knysna, 6570 044 302 6902 (T)	MKoen@dfpe.gov.za r mol
DFFE: Oceans and Coast	Rueben Molale		RMolale@dfpe.gov.za OCeia@environment.gov.za OCEIA@dfpe.gov.za
Coastal Management Unit, DEA&DP	leptieshaam Bekko Mercia J Liddle Hilda Hayward Ryan Apolles	Private Bag x9086, Cape Town. 8000 021 483 3370 (T) 078 744 9205 (Cell) leptieshaam Bekko)	leptieshaam.Bekko@westerncape.gov.za Mercia.Liddle@westerncape.gov.za Hilda.Hayward@westerncape.gov.za Ryan.Apolles@westerncape.gov.za

Organs of State

Breede-Olifants Catchment Management Agency	Andiswa Sam R Mphahlele SI Ndluvo	PO Box 1205, George, 6530 023 346 8000 (T) 023 347 2012 (F)	asam@bocma.co.za rmphahlele@bocma.co.za sndlovu@bocma.co.za
Cape Nature Land Use Advice	Megan Simons Colin Fordham	Private Bag x6546, George, 6530 044 802 5328 (T)	msimons@capenature.co.za cfordham@capenature.co.za
Southern Cape Fire Protection Agency	Dirk Smit	Private Bag x12, Knysna, 6570 044 302 6912 (T)	managerfpa@gmail.com
SANPARKS	Dr. Vanessa Weyer	PO Box 3542, Knysna, 6570 044 302 5600 (T)	Vanessa.Weyer@sanparks.org
SANRAL	Nicole Abrahams Rene de Kock	Private Bag x19, Bellville, 7530	AbrahamsN@nra.co.za Dekockr@nra.co.za

		021 957 4602 (T)	
South African Civil Aviation Authority	Canny Mosebjadi Mothapo	083 461 6292	environment@caa.co.za
Municipalities			
Knysna Municipality – Environmental Management	Pamela Booth Kate Southey	P.O. Box 21, Knysna, 6570	pbooth@knysna.gov.za katesouthey@gmail.com
Ward 10 Councillor Knysna Municipality	Peter Bester	P.O. Box 21, Knysna, 6570	pbester@knysna.gov.za
Knysna Municipality – Town Planning	Hennie Smit	PO Box 21, Knysna, 6530	hsmit@knysna.gov.za
Garden Route District Municipality	Dr. Nina Viljoen	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	nina@gardenroute.gov.za
Garden Route District Municipality	Mr. Lusanda Menze	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	info@gardenroute.gov.za
NGO			
Larenhill Country Estate	John Huxter	Welbedacht Laan, Welbedacht, Knysna 6571	larenhillcommittee@gmail.com
Surrounding Landowners			
Erf 19639	SA National Roads Agency	C/O Sanral Property P/Bag x928 Pretoria 0001	Penelope.Hlengwa@propwatchjv.co.za
Erf 19640	SA National Roads Agency	C/O Sanral Property P/Bag x928 Pretoria 0001	Penelope.Hlengwa@propwatchjv.co.za

Erf 19641	SA National Roads Agency	C/O Sanral Property P/Bag x928 Pretoria 0001	Penelope.Hlengwa@propwatchjv.co.za
RE/12949	SA National Roads Agency	C/O Sanral Property P/Bag x928 Pretoria 0001	Penelope.Hlengwa@propwatchjv.co.za
Erf 2925	Le Roux – Van Niekerk Family Trust / Piet van Niekerk		Plervn7@gmail.com
Erf 2923	Roodman Carolina Maria	071 881 8810	
Erf 7594	Autumn Storm Pty Ltd / Piet van Nlekerk		Plervn7@gmail.com
Erf 7595 (Eastford Street)	Isherwood Chrisopher		Chris.isherwood@gmail.com
RE/4706	SA National Roads Agency	C/O Sanral Property P/Bag x928 Pretoria 0001	Penelope.Hlengwa@propwatchjv.co.za
RE/4012 (Eastford Street)	CRABS CREEK PTY LTD	John Sayers	meyrick@global.co.za sayers.tessa@gmail.com

4. COMMENTS RECEIVED IN RESPONSE TO PRE-APPLICATION DRAFT BAR: 06 November 2025 – 06 December 2025

The following table contains all comments received during the Pre-Application Public Participation Process.

COMMENTS	RESPONSE
COMMENTS RECEIVED IN RESPONSE TO PRE-APPLICATION DRAFT BAR: 06 November 2025 – 06 December 2025	
STATE DEPARTMENTS	
Forestry, Fisheries & The Environment (DFFE) – Directorate: Biodiversity Conservation – Sibusiso Mbethe (08 December 2025)	
<p>The Department of Forestry, Fisheries, and the Environment (DFFE); Branch Oceans & Coasts (O&C) appreciates the opportunity granted to provide comments and recommendations on the Pre-application Basic Assessment Report for proposed development of the kinetic catamarans industrial facility on Erf 1339, as well as development/ redevelopment of the South African Sea Cadet Corps Infrastructure on Erf 1316, Knysna, Western Cape. This Branch will provide comments based on the provisions of the National Environmental Management Act 107 of 1998 ("NEMA") and the National Environmental Management: Integrated Coastal Management Act 24 of 2008 ("ICM Act").</p>	
<p>The Branch O&C has the mandate to ensure the holistic management of the coast, estuarine areas and maintenance of the seascapes to realise the development and use of natural resources are sustainable. The Branch further ensures that the ecological integrity, natural character, and economic, social, and aesthetic value of the coastal zone are maintained to protect people, properties, and economic activities against the impacts of dynamic coastal processes.</p>	
<p>Based on the submitted Pre-application, the Branch O&C would like to submit the following comments for your consideration:</p>	
<p>1. DFFE acknowledges that in its mandate to implement integrated coastal management in the Republic of South Africa, it is also paramount important to ensure that constitutional commitments in improving quality of life of all citizens while protecting the natural environment for the benefit of present and future generations balanced and sustainable. Development cannot subsist upon a deteriorating environmental base therefore promotion of development requires protection of the environment.</p>	<p>The comment is noted and acknowledged. This general policy statement has been recorded in the comments register and will be considered as part of the overall environmental assessment process.</p>
<p>2. The main environmental feature that DFFE: Oceans and Coast branch is paying more attention to is the estuary.</p>	<p>The comment is noted and acknowledged. This general policy statement has been recorded in the comments register and will</p>

<p>There is a Directorate that specifically deals with the estuary and in the next round of the public participation, this Directorate will provide more comments.</p>	<p>be considered as part of the overall environmental assessment process.</p>
<p>3. The potential impacts of the development to the estuary are more identified in the Aquatic Assessment specialist report therefore the mitigation measures identified are conceded.</p>	<p>The Aquatic Biodiversity Specialist Assessment adequately identifies potential impacts on the Knysna Estuary, and the mitigation measures recommended therein have been incorporated into the Environmental Management Programme (EMPr) for implementation during construction and operation.</p>
<p>4. The overlaying of Coastal Climate Change Vulnerability (CoVu) Assessment dataset depicts the proposed site to be exposed to the Estuary Flood Risk. It emerged on the discussion during site visit on the 4th December 2025 that there is no historical context in which the area was flooded. DFFE has no objection to such feedback, but the project proponent must be aware of these risks as presented by the current dataset in the Coastal Viewer. Coastal Viewer is accessible through the https://ocims.environment.gov.za/Coastal%20Viewer/.</p>	<p>The Coastal Climate Change Vulnerability (CoVu) dataset and associated estuarine flood risk information available on the Coastal Viewer are recognised. While no historical flooding of the site has been recorded, these datasets have been considered in the planning and design of the proposed development, and potential flood-related risks will be managed through appropriate design measures and operational controls as reflected in the EMPr.</p>
<p>5. During the site visit, sewer overflow on the dirty road (New Street) next to the site was highlighted. The proposed new connection to the existing overflow sewer system raises concerns to the capacity of this system to handle the new connection with an estimated 137 employees. There were no discussions or indications on the plans by municipality to handle the overflow of the sewer. If the system collapse or fails, it will highlight likely drain to the nearest stormwater pipeline and onto the Knysna estuary. It is DFFE's view that before new development (Part A) is connected, there should be engagements with the municipality on how to handle the current sewer problems and how it will handle the new connections. The report speaks of other futuristic developments such as retail, restaurants etc that will also connect to the existing</p>	<p>The concern regarding the capacity and reliability of the existing municipal sewer infrastructure is recognised. During the application phase engineering service level agreement will be included for Municipal Consideration. No direct discharge to the estuary will occur as part of the proposed development.</p>

<p>sewer system therefore the pressures are anticipated to exponentially increase.</p>	
<p>6. There is a disjuncture where specialist report indicates that "Construction of slipway must only be undertaken under dry conditions ..." but the report indicate that slipway activities are not triggered. This need to be further clarified and any launching of vessels in other areas other than the harbour must consider the Public Launch Site regulations published in GN R497 of 27 June 2014 (PLS Regulations) and consult with the Western Cape Department of Environmental Affairs and Development Planning through coastal.enquiries@westerncape.gov.za .</p>	<p>The proposed development has been amended to include the existing slipway and associated launching activities within the scope of this application for environmental authorisation.</p> <p>This approach is in line with recommendations from SANParks, who advised that inclusion of the slipway activities would be preferable in order to ensure comprehensive assessment and avoid the need for a separate future application process.</p> <p>Accordingly, references to slipway construction in the Aquatic Specialist Report are retained as part of a precautionary assessment context. The inclusion of these activities ensures that all potential impacts associated with vessel launching and slipway use are appropriately considered within a single, integrated environmental authorisation process.</p>
<p>7. There were plans discussed that the two areas, Sea Cadet and the proposed yacht factory area would be fenced off and combined into one. One of the objects of the ICM Act is to secure equitable access to the opportunities and benefits of the coastal public property (CPP), section 7A inter alia aims to improve public access to the seashore; section 13 seeks to ensure that any natural person in the Republic has a right to reasonable access to the CPP etc. The fencing and combination of these two areas into one must not in any way restrict access of the members of the public to the CPP.</p>	<p>The proposed fencing relates only to the operational and safety requirements within the developed and transformed footprint of the site. No fencing is proposed within the Coastal Public Property or in a manner that would restrict existing public access to the shoreline or estuarine edge. Public access to the Coastal Public Property will be maintained in accordance with the objectives of the Integrated Coastal Management Act.</p>
<p>8. The mitigation measures about floor drains and sewer connections, waste management spill prevention are full concurred upon. The maintenance of the vegetation along the banks and near the estuary is a welcome reaccommodation. The proposal to use solar systems is a welcome move.</p>	<p>The mitigation measures relating to floor drains, sewer connections, waste management, and spill prevention are confirmed and will be implemented as prescribed in the EMPr. The maintenance of vegetation along the estuarine edge and the incorporation of solar energy systems form part of the proposed development and are supported.</p>

<p>9. In overall, DFFE has no objection to the proposed development with full implementation of the proposed mitigation measures and consideration of the comments provided therein.</p>	<p>The comment is noted and acknowledged. This general policy statement has been recorded in the comments register and will be considered as part of the overall environmental assessment process.</p>
<p>Forestry, Fisheries & The Environment (DFFE) – Directorate: Biodiversity Conservation – Mr Seoka Lekota (12 December 2025)</p>	
<p>1. The proposed development is situated in a very highly sensitive area due to the site overlays entirely in a Protected Area. In accordance with the report, most of the development area has been largely transformed, therefore development in sensitive areas is permitted to preserve the ecological function of the area and SANParks must issue written permission per the National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003). NEMPAA section 50(5).</p>	<p>The comment is appreciated. The site is located within a Protected Area as defined under the National Environmental Management: Protected Areas Act; however, the proposed development is confined entirely to a historically transformed footprint. This approach is intended to preserve the ecological function of the surrounding area. Engagement with SANParks will be undertaken as required in terms of the applicable legislative processes.</p>
<p>2. To ensure the continued persistence of ecosystems and that national conservation targets are achieved, it is essential that impacts on very highly sensitive i.e. highly localised habitats are minimized or avoided altogether. Furthermore, the following recommendations must be considered in the final report:</p> <ul style="list-style-type: none"> • Confine all development strictly to the transformed footprint and outside the Estuarine Functional Zone (EFZ). • An alien invasive control management plan for regular monitoring and removal of invasive plant species must be implemented and prohibit all invasive alien plant species (as per NEMBA AIS Regulations). • Disturbed areas must be rehabilitated as soon as possible after construction with locally indigenous plants to enhance the conservation of existing natural vegetation on site. 	<p>The recommendations are supported and have been incorporated into the project design, specialist assessment findings, and the Environmental Management Programme (EMPr). Development is confined to the transformed footprint and outside the Estuarine Functional Zone. Measures relating to alien invasive plant control, rehabilitation, stormwater management, no-go areas, and protection of estuarine habitats and avifauna are addressed through binding EMPr requirements and will be implemented during construction and operation.</p>

<ul style="list-style-type: none"> • A construction-phase monitoring program must be developed to assess and document the impacts of infrastructure installation on local bird communities. • Avoid any encroachment into salt marsh, reedbeds, supratidal marsh or any natural estuarine vegetation. • Implement a no-go area along the lagoon edge, clearly demarcated before construction begins. • Protect estuarine birds by preventing disturbance in the salt marsh and mudflat foraging areas. • Avoid high-noise activities during peak bird breeding/foraging seasons where possible. • A stormwater management plan must be implemented to ensure all runoff is pre-treated before reaching the estuary. • Implementation of an Estuarine Buffer Protection Plan, including fencing, demarcation, and no-go areas to ensure no work, stockpiling, or access within the estuarine functional zone. 	
<p>3. Furthermore, the Directorate: Biodiversity and Conservation recommends comments from Department of Forestry, Fisheries and the Environment : Protected Areas Management Planning Directorate (MaMudau@dffe.gov.za) must be obtained due to the property is within and near the Garden Route National Park.</p>	<p>Engagement with the Department of Forestry, Fisheries and the Environment: Protected Areas Management Planning Directorate will be undertaken as part of the ongoing consultation process, given the site's proximity to the Garden Route National Park. Any comments received will be incorporated into the assessment where relevant.</p>
<p>Forestry, Fisheries & The Environment (DFFE) – Directorate: Forestry Management – Ms. TF Gwala (08 December 2025)</p>	
<p>Forestry has the following comments:</p>	
<p>1. Forestry has a co-operative governance relationship with various Authorities as well as stakeholders, and thus will take their concerns into consideration if such should arise</p>	

<p>2. Forestry request the following:</p> <ul style="list-style-type: none"> • That a site inspection be conducted together with Consultant in order to determine whether Forestry's mandate is affected or not; • Section 15 of the National Forest Act (NFA) (Act No. 84 of 1998) as amended prohibits the cutting, disturbing, damaging or destroying of protected tree species without a licence. Section 7 of the National Forest Act (NFA), act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a license. 	<p>A joint site inspection with the Forestry authority can be facilitated to confirm whether the Forestry mandate is applicable to the proposed development. The proponent confirms that no protected tree species or natural forest will be disturbed as part of the proposed activities. Should any protected trees be identified during site verification, the relevant licensing requirements in terms of the National Forests Act will be complied with.</p>
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ORGAN OF STATE

Breede-Olifants Catchment Management Agency (BOCMA) – SI Ndlovu – 08 December 2025

Reference is made to the above mentioned Pre-Application Draft Basic Assessment Report made available to Breede-Olifants Catchment Management Agency (BOCMA) for comments.

The following are BOCMA comments relating to Pre-Application Basic Assessment Report for the proposed development of Kinetic Catamarans Industrial Facility on Erf 1339 and Development/Redevelopment of the South African Sea Cadet Corps Infrastructure on Erf 1316, which should be adhered to:

<p>1. The Breede-Olifants Catchment Management Agency has reviewed the Draft Basic Assessment and Aquatic Biodiversity Impact Assessment and has no objections to the proposed development.</p>	<p>The comment is noted and acknowledged. This general policy statement has been recorded in the comments register and will be considered as part of the overall environmental assessment process.</p>
<p>2. The property is located within the Estuarine Functional Zone of the Knysna Estuary and there are no watercourses on site. An estuary is not defined as a watercourse, therefore no section 21(c) and (i) water uses are triggered, and no water use authorisation required in terms of the National Water Act, (Act No. 36 of 1998).</p>	
<p>3. The tariffs/charges for water and sanitation services that will be provided by the Water Services Provider (WSP) i.e. Knysna Municipality, must be paid directly to the municipality.</p>	

<p>4. The harvesting of rainwater and storing in tanks does not trigger any water use(s) in terms of section 21 of the National Water Act, 1998 (Act No. 36 of 1998) and it doesn't require an authorisation.</p>	
<p>5. No water shall be derived from a water resource and used on Erf 1339 & Erf 1316 without prior approval by means of a water use authorisation in terms of section 22 of the National Water Act, 1998 (Act No. 36 of 1998), if activities exceed Schedule 1 limits.</p>	
<p>6. As required by section 22 of the National Water Act, 1998 (Act No. 36 of 1998), a Water Use Authorisation is required prior to commencement with any water use activity contemplated in section 21 of National Water Act. Moreover, commencement with any water use activity without an authorisation as required by section 22 of National Water Act constitutes an offence in terms of section 151(1) (a) of the National Water Act. In terms of section 151(2) of the National Water Act, any person who contravenes is guilty of an offence and liable, on first conviction to a fine or an imprisonment of a period not exceeding five years or both such a fine and imprisonment.</p>	
<p>7. In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of National Water Act that is associated with the proposed development.</p>	
<p>8. In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of National Water Act that is associated with the proposed development.</p>	

9. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.	
10. Should you wish to apply for a water use authorisation for unregistered water uses triggered by the proposed activities, you may apply electronically by logging onto the Department of Water and Sanitation (DWS) website at http://www.dws.gov.za/e-WULAAS .	
11. Should you have further enquiries, the office can be contacted or alternatively contact Mr. Si Ndlovu at the above-mentioned contact number or on sndlovu@bocma.co.za	

South African National Parks (SANParks) – Dr Vanessa Weyer

SANParks will submit comments on this application at the Draft Basic Assessment stage.

MUNICIPALITIES

Garden Route District Municipality (GRDM) - Dr NS Viljoen

<p>1. Protected Area Mapping – Serious Concern</p> <p>The Western Cape Biodiversity Spatial Plan (WC BSP 2023) maps the entire development area inside a Protected Area. Even though the report argues that the site is transformed, the BAR does not include written confirmation from SANParks as management authority.</p> <p>The following are recommended:</p> <ul style="list-style-type: none"> • Formal SANParks approval / consent, as required under NEMPA s50(5); • A map overlay demonstrating where the actual Protected Area boundary lies versus the transformed footprint. 	<p>Engagement with SANParks is ongoing. SANParks is currently involved in matters relating to the existing Kinetic Catamarans facility and was consulted during the first round of pre-application public participation for the proposed development. SANParks indicated that comments on the proposed development will be submitted at the Draft Basic Assessment stage.</p> <p><u>A map overlay illustrating the relationship between the Protected Area boundary and the transformed development footprint will be included in the BAR to provide clarity.</u></p>
<p>2. Estuary Risk Underestimated – Need Stronger Aquatic Impact Controls</p>	<p>The proximity of the site to the Knysna Estuary and its drainage context are recognised and were the basis for commissioning the Aquatic Biodiversity Specialist Assessment. While detailed stormwater quality modelling is not considered necessary given</p>

<p>The aquatic specialist confirms the site drains directly into the Knysna Estuary and lies within FEPA/NWI datasets. The following concerns are noted:</p> <ul style="list-style-type: none"> • No detailed stormwater quality modelling; • No plan for pollution capture from fibreglass/resin-based manufacturing; • Rainwater tank overflow is mentioned, but no contamination control systems are described; • No final lagoon buffer management plan. <p>The following are recommended:</p> <ul style="list-style-type: none"> • A detailed Stormwater Pollution Prevention Plan (SPPP) for construction & operation; • Resin, chemical and fibreglass waste spill-response plan; • Confirmation of zero direct discharge into estuary; • Buffer management plan outlining vegetation, erosion prevention, and maintenance. 	<p>the fully transformed footprint and absence of direct discharge points, stormwater quality and pollution risks will be managed through design and operational controls.</p> <p><u>A Stormwater Pollution Prevention Plan (SPPP), resin and chemical spill-response measures, confirmation of zero direct discharge to the estuary, and an estuarine buffer management approach are included in the EMPr and will be implemented during construction and operation.</u></p>
<p>3. Sewer Rising Mains – High-Risk Infrastructure Constraint</p> <p>Two major municipal rising mains (350 mm & 375 mm) run through the site. The following concerns are noted:</p> <ul style="list-style-type: none"> • No structural load impact study (heavy catamarans, cranes, transport); • No protection measures or municipal sign-off; • No emergency response plan if a rising main ruptures (serious estuary pollution hazard). <p>The following are recommended:</p> <ul style="list-style-type: none"> • Civil engineering confirmation of safe loading and protection zones; • Updated servitude plan and maintenance access plan; • A Sewer Emergency Contingency Protocol. 	<p>The presence of municipal sewer rising mains traversing the site is recognised as an existing infrastructure constraint. The proposed development will obtain all required municipal service approvals prior to construction, including confirmation of conditions of connection.</p>
<p>4. Missing Specialist Studies Required by Screening Tool</p>	<p>The comment is respectfully disputed.</p>

<p>The Screening Tool required 11 specialist studies, yet only one (Aquatic) was undertaken. The following studies was not done, but are required:</p> <ul style="list-style-type: none"> • Landscape/Visual Assessment; • Archaeological & Cultural Heritage Impact Assessment; • Palaeontology Assessment; • Terrestrial Biodiversity Assessment; • Marine Impact Assessment; • Avifaunal Study; • Geotechnical Study; • Socio-economic Assessment; • Plant & Animal Species Assessments <p>It is not acceptable to skip all specialists based on internal judgement. Visual, heritage, avifauna, and geotechnical impacts remain unassessed.</p> <p>The following are recommended:</p> <ul style="list-style-type: none"> • Minimum: Visual, Heritage, Geotechnical, Marine/Estuary interface, Socio-economic; • Justification for excluding others must include formal specialist motivation letters, not EAP assumptions. 	<p>In terms of the Protocols for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes, promulgated under Government Notice No. 320 of 2020 (Government Gazette No. 43110), the outputs of the DFFE Screening Tool are required to be verified through a Site Sensitivity Verification process prior to commissioning specialist studies. The Screening Tool is a decision-support tool and does not, on its own, mandate the automatic appointment of all identified specialists.</p> <p>A Site Sensitivity Verification Report (SSVR) was compiled for this project in accordance with GN 320, confirming that, except for Aquatic Biodiversity, the site sensitivities identified by the Screening Tool are not supported by current site conditions due to the entirely transformed nature of the development footprint. The SSVR therefore constitutes the formal motivation for the exclusion of additional specialist studies, as provided for by the regulations.</p> <p>The statement that exclusions must be supported by “formal specialist motivation letters” is not a requirement of GN 320, which explicitly places the responsibility for sensitivity verification and specialist scope determination with the Environmental Assessment Practitioner.</p> <p>Notwithstanding the above, and as a measure of procedural good faith, a meeting with the Department of Forestry, Fisheries and the Environment is scheduled for 3 February 2026 to confirm the adequacy of the specialist scope applied. Based on the verified site conditions, no further specialist studies are considered necessary at this stage.</p>
<p>5. Listed Activities – Insufficient Justification</p>	<p>The comment regarding clarity is accepted. <u>The BAR will be updated to include a consolidated table clearly identifying the</u></p>

<p>The BAR lists activities but does not clearly demonstrate which construction actions trigger Listing Notice 1 (e.g., infrastructure within 100 m of estuary, rezoning, earthworks) or whether LN2 or LN3 apply.</p> <p>The following are recommended:</p> <ul style="list-style-type: none"> • Clear table: “Activity triggered → Why triggered → Evidence → Site location”; • Confirmation whether any activity falls within critical biodiversity or protected area (LN3 triggers likely). 	<p><u>listed activities triggered</u>, the specific components of the proposed development giving rise to each trigger, supporting evidence, and the spatial location of the activities. Based on the verified site sensitivities and confined, transformed footprint, no Listing Notice 2 or Listing Notice 3 activities are triggered, and no activities fall within Critical Biodiversity Areas or protected area features requiring LN3 authorisation.</p>
<p>6. Stormwater and Drainage Engineering – Too High Level</p> <p>Although the site is paved and drains to the lagoon:</p> <ul style="list-style-type: none"> • No oil/water separators are specified; • No containment for chemical spills; • No stormwater discharge point design; • No indication of pre- and post-development runoff volumes. <p>The following are recommended:</p> <ul style="list-style-type: none"> • Stormwater drawings (in/out flows); • Hydrocarbon traps, sediment traps; • Lagoon-edge erosion protection plan; • Stormwater maintenance schedule. 	<p>Stormwater management for the proposed development has been considered at an environmental assessment level, with mitigation measures secured through the EMPr. Given that the site is fully paved and drains via an existing municipal stormwater system, detailed stormwater engineering drawings, discharge point design, and runoff calculations will be finalised during the detailed design phase and subject to municipal approval prior to construction. Measures including hydrocarbon separation, spill containment, sediment control, lagoon-edge protection, and routine maintenance are addressed through the EMPr and associated management plans.</p>
<p>7. Visual Impact – Major Omission</p> <p>The building is 12 m high, located directly on the estuary edge. The 3D render is not a visual impact assessment. Lagoon-facing users (tourists, watercraft, residents) will experience major visual change.</p>	<p>The comment is respectfully disagreed with. The proposed development is located within an established industrial precinct characterised by existing large-scale buildings, paved yards, parking areas, and service infrastructure. The site is already visually transformed, and the proposed building replaces an open paved area currently used for parking and informal transport activity.</p>

<p>The following are recommended:</p> <ul style="list-style-type: none"> • A formal Visual Impact Assessment with photomontages from lagoon view-points; • Lighting plan addressing nighttime glare and estuary fauna disturbance. 	<p>The proposed building height and massing are consistent with the surrounding industrial context and will not introduce a visually discordant element into the landscape.</p> <p>Given the transformed nature of the site, the industrial setting, and the absence of high-sensitivity visual receptors, a formal Visual Impact Assessment is not considered necessary. Visual considerations have been addressed through building design, layout, and lighting controls included in the EMPr.</p>
<p>8. Sea Cadets Building – Heritage Not Assessed</p> <p>The BAR states it has community/cultural importance, but:</p> <ul style="list-style-type: none"> • No HWC NID response is included; • No heritage specialist assessment. <p>The following are recommended:</p> <ul style="list-style-type: none"> • HWC early comment; • Heritage Statement of Significance; • Assessment of redevelopment impacts. 	<p>Heritage Western Cape has been consulted regarding the Sea Cadets building. Written confirmation has been received from HWC indicating that no structures older than 60 years are present on the property and that the provisions of Section 34(1) of the National Heritage Resources Act are therefore not applicable.</p> <p>Based on this confirmation, a Heritage Impact Assessment and Heritage Statement of Significance are not required for the existing building. The development will, <u>however, follow the procedural requirements of Section 38(1)(b) of the NHRA</u>, and any further engagement required by HWC will be undertaken as part of the Basic Assessment process.</p>
<p>9. Control and Monitoring</p> <ul style="list-style-type: none"> • Construction Phase Controls <ul style="list-style-type: none"> - No vegetation removal or soil excavation within lagoon buffer; - Mandatory hydrocarbon spill kits; - Silt curtains or sandbags where drainage leads to lagoon; - No work allowed during spring high tides or storm surge events. • Operational Controls 	<p>The intent of the proposed control, monitoring, and reporting measures is supported. Construction and operational phase controls aimed at preventing pollution, protecting the estuarine edge, and managing stormwater and hydrocarbon risks are addressed through the EMPr and will be implemented accordingly.</p> <p>Measures such as spill kits, sediment control, restricted working areas, and appropriate stormwater pre-treatment are included as standard site management requirements. Monitoring and reporting will be undertaken in a manner proportionate to the scale and risk profile of the development, with ECO oversight</p>

<ul style="list-style-type: none"> - Mandatory oil-water separator on all runoff; - Monthly inspection of resin, chemical, and fibreglass handling areas; - Annual estuary water quality testing for turbidity, suspended solids, hydrocarbons; - Solar PV glare assessment if panels face the lagoon. <ul style="list-style-type: none"> • Monitoring & Reporting <ul style="list-style-type: none"> - Environmental Control Officer (ECO) on site weekly; - ECO sign-off required for foundation excavations (due to sewer mains); - Quarterly compliance reports submitted to the Authority & SANParks. 	<p>implemented during construction. Detailed monitoring frequencies and reporting requirements will be aligned with permit conditions and regulatory requirements, where applicable.</p>
<p>10. Summarised Recommendation</p> <ul style="list-style-type: none"> • SANParks written approval (Protected Area governance requirement); • All key specialist studies completed (Visual, Heritage, Geotechnical, Marine/Estuary, Socio-economic); • Submission of a full Stormwater Pollution Prevention Plan; • Sewer servitude and engineer sign-off on rising main protection; • Detailed Estuary Buffer Management Plan; • Updated Listed Activity Table with proper justification; • Confirmation of zero contamination pathways from industrial operations to the estuary; • Revised EMPr including all mitigation and monitoring commitments. 	<p>The comment is noted and acknowledged. This general summary statement has been recorded in the comments register and will be considered as part of the overall environmental assessment process.</p>

5. CONCLUSION

The pre-application public participation process undertaken for the proposed Kinetic Catamarans development has been concluded. All comments and issues raised by Interested and Affected Parties (I&APs) during this phase have been recorded, considered, and addressed as part of the pre-application Basic Assessment process. This report forms part of the documentation submitted to the Department of Forestry, Fisheries and the Environment (DFFE) in support of the application for Environmental Authorisation. A further round of public participation will be undertaken during the application phase, during which any additional comments received will be duly considered and, where applicable, incorporated into the Final Basic Assessment Report and supporting documentation prior to decision-making by the competent authority.

Annexure A: Evidence of Comments Received



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

Ref: Kinetic Catamarans Industrial Facility
Enquiries: Portia Makitla /Orefemetse Ramantsi
Tel : 012 399 9411 **Email :** pmakitla@dfpe.gov.za

Carina Leslie
EcoRoute Environmental (Pty) Ltd
Email Address: admin@ecoroute.co.za

PER E-MAIL

Dear Ms. Lesile

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT OF THE PROPOSED DEVELOPMENT OF KINETIC CATAMARANS INDUSTRIAL FACILITY ON ERF 1339, AS WELL AS DEVELOPMENT / REDEVELOPMENT OF THE SOUTH AFRICAN SEA CADET CORPS INFRASTRUCTURE ON ERF 1316, KNYSNA, WESTERN CAPE PROVINCE

The Directorate: Biodiversity Conservation has reviewed and evaluated the report.

The proposed development is situated in a very highly sensitive area due to the site overlays entirely in a Protected Area. In accordance with the report, most of the development area has been largely transformed, therefore development in sensitive areas is permitted to preserve the ecological function of the area and SANParks must issue written permission per the National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003). NEMPAA section 50(5).

To ensure the continued persistence of ecosystems and that national conservation targets are achieved, it is essential that impacts on very highly sensitive i.e. highly localised habitats are minimized or avoided altogether. Furthermore, the following recommendations must be considered in the final report:

- Confine all development strictly to the transformed footprint and outside the Estuarine Functional Zone (EFZ).
- An alien invasive control management plan for regular monitoring and removal of invasive plant species must be implemented and prohibit all invasive alien plant species (as per NEMBA AIS Regulations).
- Disturbed areas must be rehabilitated as soon as possible after construction with locally indigenous plants to enhance the conservation of existing natural vegetation on site.
- A construction-phase monitoring program must be developed to assess and document the impacts of infrastructure installation on local bird communities.
- Avoid any encroachment into salt marsh, reedbeds, supratidal marsh or any natural estuarine vegetation.
- Implement a no-go area along the lagoon edge, clearly demarcated before construction begins.
- Protect estuarine birds by preventing disturbance in the salt marsh and mudflat foraging areas.



Batho pele – putting people first

The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and/or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT OF THE PROPOSED DEVELOPMENT OF KINETIC CATAMARANS INDUSTRIAL FACILITY ON ERF 1339, AS WELL AS DEVELOPMENT / REDEVELOPMENT OF THE SOUTH AFRICAN SEA CADET CORPS INFRASTRUCTURE ON ERF 1316, KNYSNA, IN WESTERN CAPE PROVINCE

- Avoid high-noise activities during peak bird breeding/foraging seasons where possible.
- A stormwater management plan must be implemented to ensure all runoff is pre-treated before reaching the estuary.
- Implementation of an Estuarine Buffer Protection Plan, including fencing, demarcation, and no-go areas to ensure no work, stockpiling, or access within the estuarine functional zone.

Furthermore, the Directorate: Biodiversity and Conservation recommends comments from Department of Forestry, Fisheries and the Environment : Protected Areas Management Planning Directorate (MaMudau@dfpe.gov.za) must be obtained due to the property is within and near the Garden Route National Park.

In conclusion, the Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@dfpe.gov.za for the attention of Mr. Seoka Lekota.

Yours faithfully



Mr Seoka Lekota
Control Biodiversity Officer Grade B
Directorate: Biodiversity Conservation
Department of Forestry, Fisheries & the Environment
Date: 12/12/2005



REFERENCE: 4/10/2/K50B/ERF 1339 & ERF 1316, KNYSNA

DATE: 08 DECEMBER 2025

ECO ROUTE ENVIRONMENTAL CONSULTANCY

PO Box 9187

GEORGE

6530

Attention: Ms C. Leslie

RE: PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF KINETIC CATAMARANS INDUSTRIAL FACILITY ON ERF 1339, AS WELL AS DEVELOPMENT/REDEVELOPMENT OF THE SOUTH AFRICAN SEA CADET CORPS INFRASTRUCTURE ON ERF 1316, KNYSNA, WESTERN CAPE

Reference is made to the above mentioned Pre-Application Draft Basic Assessment Report made available to Breede-Olifants Catchment Management Agency (BOCMA) for comments.

The following are BOCMA comments relating to Pre-Application Basic Assessment Report for the proposed development of Kinetic Catamarans Industrial Facility on Erf 1339 and Development/Redevelopment of the South African Sea Cadet Corps Infrastructure on Erf 1316, which should be adhered to:

1. The Breede-Olifants Catchment Management Agency has reviewed the Draft Basic Assessment and Aquatic Biodiversity Impact Assessment and has no objections to the proposed development.
2. The property is located within the Estuarine Functional Zone of the Knysna Estuary and there are no watercourses on site. An estuary is not defined as a watercourse, therefore no section 21(c) and (i) water uses are triggered, and no water use authorisation required in terms of the National Water Act, (Act No. 36 of 1998).
3. The tariffs/charges for water and sanitation services that will be provided by the Water Services Provider (WSP) i.e. Knysna Municipality, must be paid directly to the municipality.
4. The harvesting of rainwater and storing in tanks does not trigger any water use(s) in terms of section 21 of the National Water Act, 1998 (Act No. 36 of 1998) and it doesn't require an authorisation.
5. No water shall be derived from a water resource and used on Erf 1339 & Erf 1316 without prior approval by means of a water use authorisation in terms of section 22 of the National Water Act, 1998 (Act No. 36 of 1998), if activities exceed Schedule 1 limits.



6. As required by section 22 of the National Water Act, 1998 (Act No. 36 of 1998), a Water Use Authorisation is required prior to commencement with any water use activity contemplated in section 21 of National Water Act. Moreover, commencement with any water use activity without an authorisation as required by section 22 of National Water Act constitutes an offence in terms of section 151(1) (a) of the National Water Act. In terms of section 151(2) of the National Water Act, any person who contravenes is guilty of an offence and liable, on first conviction to a fine or an imprisonment of a period not exceeding five years or both such a fine and imprisonment.
7. In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of National Water Act that is associated with the proposed development.
8. Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.
9. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.
10. Should you wish to apply for a water use authorisation for unregistered water uses triggered by the proposed activities, you may apply electronically by logging onto the Department of Water and Sanitation (DWS) website at <http://www.dws.gov.za/e-WULAAS>
11. Should you have further enquiries, the office can be contacted or alternatively contact Mr. SI Ndlovu at the above-mentioned contact number or on sndlovu@bocma.co.za

Yours faithfully,

pp Si Ndl.

MR. JAN VAN STADEN
CHIEF EXECUTIVE OFFICER (ACTING)



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OFFICE OF THE MUNICIPAL MANAGER

Enquiries: Dr NS Viljoen
Reference: 18/2/4/R
Date: 06 January 2026

Attention: Ms Carina Leslie
Eco Route Environmental Consultancy
PO BOX 1252
Sedgefield
6573

Email: admin@ecoroute.co.za

Cc: Eco Route Environmental Consultancy
E-mail: jessica@ecoroute.co.za; justin@ecoroute.co.za; janet@ecoroute.co.za

Mr Gerhard Otto – Manager: Disaster Management, Garden Route District
Municipality (GRDM)
E-mail: Gotto@gardenroute.gov.za

GRDM Admin / Records:
E-mail: Admin2@edendm.co.za

Dear Ms Leslie,

**NOTIFICATION OF PUBLIC PARTICIPATION: PRE-APPLICATION BASIC ASSESSMENT
REPORT - PROPOSED DEVELOPMENT OF KINETIC CATAMARANS INDUSTRIAL FACILITY ON
ERF 1339, AS WELL AS DEVELOPMENT / REDEVELOPMENT OF THE SOUTH AFRICAN SEA
CADET CORPS INFRASTRUCTURE ON ERF 1316, KNYSNA, WESTERN CAPE
DFFE REF: TBC**

The Garden Route District Municipality (GRDM) acknowledge receipt, and review, of the Pre-Application Basic Assessment Report (BAR) for the above-mentioned development proposal. We would like to thank you for providing the Municipality with the opportunity to comment on this pre-application, and would like to provide the following comments:

1. Protected Area Mapping – Serious Concern

The Western Cape Biodiversity Spatial Plan (WCBSP 2023) maps the entire development area inside a Protected Area. Even though the report argues that the site is transformed, the BAR does not include written confirmation from SANParks as management authority.

The following are recommended:

- Formal SANParks approval / consent, as required under NEMPA s50(5);
- A map overlay demonstrating where the actual Protected Area boundary lies versus the transformed footprint.

2. Estuary Risk Underestimated – Need Stronger Aquatic Impact Controls

The aquatic specialist confirms the site drains directly into the Knysna Estuary and lies within FEPA/NWI datasets. The following concerns are noted:

- No detailed stormwater quality modelling;
- No plan for pollution capture from fibreglass/resin-based manufacturing;
- Rainwater tank overflow is mentioned, but no contamination control systems are described;
- No final lagoon buffer management plan.

The following are recommended:

- A detailed Stormwater Pollution Prevention Plan (SPPP) for construction & operation;
- Resin, chemical and fibreglass waste spill-response plan;
- Confirmation of zero direct discharge into estuary;
- Buffer management plan outlining vegetation, erosion prevention, and maintenance.

3. Sewer Rising Mains – High-Risk Infrastructure Constraint

Two major municipal rising mains (350 mm & 375 mm) run through the site. The following concerns are noted:

- No structural load impact study (heavy catamarans, cranes, transport);
- No protection measures or municipal sign-off;
- No emergency response plan if a rising main ruptures (serious estuary pollution hazard).

The following are recommended:

- Civil engineering confirmation of safe loading and protection zones;

- Updated servitude plan and maintenance access plan;
- A Sewer Emergency Contingency Protocol.

4. Missing Specialist Studies Required by Screening Tool

The Screening Tool required 11 specialist studies, yet only one (Aquatic) was undertaken. The following studies was not done, but are required:

- Landscape/Visual Assessment;
- Archaeological & Cultural Heritage Impact Assessment;
- Palaeontology Assessment;
- Terrestrial Biodiversity Assessment;
- Marine Impact Assessment;
- Avifaunal Study;
- Geotechnical Study;
- Socio-economic Assessment;
- Plant & Animal Species Assessments

It is not acceptable to skip all specialists based on internal judgement. Visual, heritage, avifauna, and geotechnical impacts remain unassessed.

The following are recommended:

- Minimum: Visual, Heritage, Geotechnical, Marine/Estuary interface, Socio-economic;
- Justification for excluding others must include formal specialist motivation letters, not EAP assumptions.

5. Listed Activities – Insufficient Justification

The BAR lists activities but does not clearly demonstrate which construction actions trigger Listing Notice 1 (e.g., infrastructure within 100 m of estuary, rezoning, earthworks) or whether LN2 or LN3 apply.

The following are recommended:

- Clear table: “Activity triggered → Why triggered → Evidence → Site location”;
- Confirmation whether any activity falls within critical biodiversity or protected area (LN3 triggers likely).

6. Stormwater & Drainage Engineering – Too High Level

Although the site is paved and drains to the lagoon:

- No oil/water separators are specified;
- No containment for chemical spills;
- No stormwater discharge point design;
- No indication of pre- and post-development runoff volumes.

The following are recommended:

- Stormwater drawings (in/out flows);

- Hydrocarbon traps, sediment traps;
- Lagoon-edge erosion protection plan;
- Stormwater maintenance schedule.

7. Visual Impact – Major Omission

The building is 12 m high, located directly on the estuary edge. The 3D render is not a visual impact assessment. Lagoon-facing users (tourists, watercraft, residents) will experience major visual change.

The following are recommended:

- A formal Visual Impact Assessment with photomontages from lagoon viewpoints;
- Lighting plan addressing nighttime glare and estuary fauna disturbance.

8. Sea Cadets Building – Heritage Not Assessed

The BAR states it has community/cultural importance, but:

- No HWC NID response is included;
- No heritage specialist assessment.

The following are recommended:

- HWC early comment;
- Heritage Statement of Significance;
- Assessment of redevelopment impacts.

9. Control and Monitoring

- **Construction Phase Controls**
 - No vegetation removal or soil excavation within lagoon buffer;
 - Mandatory hydrocarbon spill kits;
 - Silt curtains or sandbags where drainage leads to lagoon;
 - No work allowed during spring high tides or storm surge events.
- **Operational Controls**
 - Mandatory oil-water separator on all runoff;
 - Monthly inspection of resin, chemical, and fibreglass handling areas;
 - Annual estuary water quality testing for turbidity, suspended solids, hydrocarbons;
 - Solar PV glare assessment if panels face the lagoon.
- **Monitoring & Reporting**
 - Environmental Control Officer (ECO) on site weekly;
 - ECO sign-off required for foundation excavations (due to sewer mains);
 - Quarterly compliance reports submitted to the Authority & SANParks.

10. Summarised Recommendations:

- SANParks written approval (Protected Area governance requirement);
- All key specialist studies completed (Visual, Heritage, Geotechnical, Marine/Estuary, Socio-economic);
- Submission of a full Stormwater Pollution Prevention Plan;
- Sewer servitude and engineer sign-off on rising main protection;
- Detailed Estuary Buffer Management Plan;
- Updated Listed Activity Table with proper justification;
- Confirmation of zero contamination pathways from industrial operations to the estuary;
- Revised EMPr including all mitigation and monitoring commitments.

Concluding Remarks:

Key environmental triggers (estuary proximity, Protected Area mapping, stormwater discharge, zoning inconsistencies, sewer servitudes) require stronger justification, additional detail, and clear commitments.

The site is already transformed and hardened; however, due to its location immediately adjacent to the Knysna Estuary, this project carries high indirect risk, and the BAR must be strengthened before proceeding to final submission.

We request that our concerns and recommendations be considered in the drafting of the Final BAR and any resulting Environmental Authorisation. The comments provided above aims to complement the specialist inputs by ensuring practical accountability, policy alignment, and transparent decision-making.

We appreciate the efforts made by Eco Route Environmental Consultancy and the applicant to ensure responsible and legally compliant development activities.

The Garden Route District Municipality reserves the right to provide comment/s or to amend initial comment/s.

Yours Sincerely



(pp) MONDE STRATU

MUNICIPAL MANAGER

GARDEN ROUTE DISTRICT MUNICIPALITY

DATE: 06 January 2026



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

Date: 08 December 2025

DFFE Reference: EDMS-267513

Enquiries: Sibusiso Mbethe

Email: OCEIA@dffe.gov.za

Telephone: (021) 493 7043

Ms Jessica Christie/ Mr Justin Brittion
6 Tinkinkie Street
Sedgefield
6573

Email: jessica@ecoroute.co.za/ justin@ecoroute.co.za

Cell Numbers: 076 514 2701/ 081 208 2170

COMMENTS ON THE PROPOSED DEVELOPMENT OF THE KINETIC CATAMARANS INDUSTRIAL FACILITY ON ERF 1339, AS WELL AS DEVELOPMENT/ REDEVELOPMENT OF THE SOUTH AFRICAN SEA CADET CORPS INFRASTRUCTURE ON ERF 1316, KNYSNA, WESTERN CAPE.

The Department of Forestry, Fisheries, and the Environment (DFFE); Branch Oceans & Coasts (O&C) appreciates the opportunity granted to provide comments and recommendations on the Pre-application Basic Assessment Report for proposed development of the kinetic catamarans industrial facility on Erf 1339, as well as development/ redevelopment of the South African Sea Cadet Corps Infrastructure on Erf 1316, Knysna, Western Cape. This Branch will provide comments based on the provisions of the National Environmental Management Act 107 of 1998 ("NEMA") and the National Environmental Management: Integrated Coastal Management Act 24 of 2008 ("**ICM Act**").

The Branch O&C has the mandate to ensure the holistic management of the coast, estuarine areas and maintenance of the seascapes to realise the development and use of natural resources are sustainable. The Branch further ensures that the ecological integrity, natural character, and economic, social, and aesthetic value of the coastal zone are maintained to protect people, properties, and economic activities against the impacts of dynamic coastal processes.

Based on the submitted Pre-application, the Branch O&C would like to submit the following comments for your consideration:



Batho pele- putting people first

1. DFFE acknowledges that in its mandate to implement integrated coastal management in the Republic of South Africa, it is also paramount important to ensure that constitutional commitments in improving quality of life of all citizens while protecting the natural environment for the benefit of present and future generations balanced and sustainable. Development cannot subsist upon a deteriorating environmental base therefore promotion of development requires protection of the environment.
2. The main environmental feature that DFFE: Oceans and Coast branch is paying more attention to is the estuary. There is a Directorate that specifically deals with the estuary and in the next round of the public participation, this Directorate will provide more comments.
3. The potential impacts of the development to the estuary are more identified in the Aquatic Assessment specialist report therefore the mitigation measures identified are conceded.
4. The overlaying of Coastal Climate Change Vulnerability (CoVu) Assessment dataset depicts the proposed site to be exposed to the Estuary Flood Risk. It emerged on the discussion during site visit on the 4th December 2025 that there is no historical context in which the area was flooded. DFFE has no objection to such feedback, but the project proponent must be aware of these risks as presented by the current dataset in the Coastal Viewer. Coastal Viewer is accessible through the <https://ocims.environment.gov.za/Coastal%20Viewer/>.
5. During the site visit, sewer overflow on the dirty road (New Street) next to the site was highlighted. The proposed new connection to the existing overflow sewer system raises concerns to the capacity of this system to handle the new connection with an estimated 137 employees. There were no discussions or indications on the plans by municipality to handle the overflow of the sewer. If the system collapse or fails, it will highlight likely drain to the nearest stormwater pipeline and onto the Knysna estuary. It is DFFE's view that before new development (Part A) is connected, there should be engagements with the municipality on how to handle the current sewer problems and how it will handle the new connections. The report speaks of other futuristic developments such as retail, restaurants etc that will also connect to the existing sewer system therefore the pressures are anticipated to exponentially increase.
6. There is a disjuncture where specialist report indicates that "*Construction of slipway must only be undertaken under dry conditions ...*" but the report indicate that slipway activities are not triggered. This need to be further clarified and any launching of vessels in other areas other than the harbour must consider the Public Launch Site regulations published in GN R497 of 27 June 2014 (PLS Regulations) and consult with the Western Cape Department of Environmental Affairs and Development Planning through coastal.enquiries@westerncape.gov.za .
7. There were plans discussed that the two areas, Sea Cadet and the proposed yachty factory area would be fenced off and combined into one. One of the objects of the ICM Act is to secure equitable access to the opportunities and benefits of the coastal public property (CPP), section 7A *inter alia* aims to improve public access to the seashore; section 13 seeks to ensure that any natural person in the Republic has a right to reasonable access to the CPP etc. The fencing and

combination of these two areas into one must not in any way restrict access of the members of the public to the CPP.

8. The mitigation measures about floor drains and sewer connections, waste management spill prevention are full concurred upon. The maintenance of the vegetation along the banks and near the estuary is a welcome reaccommodation. The proposal to use solar systems is a welcome move.
9. In overall, DFFE has no objection to the proposed development with full implementation of the proposed mitigation measures and consideration of the comments provided therein.

Kindly note that the Branch Oceans and Coasts reserve the right to revise its comments and request further information based on any additional information received. All correspondence, documentation, and/or requests (hard copy and an electronic copy) should be submitted to our office via email to OCEIA@dfpe.gov.za / or **Physical Address: Department of Forestry, Fisheries & the Environment (DFFE), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.**

Yours sincerely,



Mr Ryan Peter
Director: Coastal Development & Coordination
Department of Forestry, Fisheries, and the Environment
Date: 10/12/2025

RE: Notification of Public Participation: Pre-Application BAR - Proposed Development of Kinetic Catamarans Industrial Facility on Erf 1339 & Development/Redevelopment of Sea Cadet Corps Infrastructure on Erf 1316, Knysna, Western Cape

From Vanessa Weyer <Vanessa.Weyer@sanparks.org>

Date Tue 09 Dec 2025 15:10

To admin@ecoroute.co.za <admin@ecoroute.co.za>; Janet Ebersohn Enviro <janet@ecoroute.co.za>

Cc Elmonique Petersen <Elmonique.Petersen@sanparks.org>; Jessica Hayes <Jessica.Hayes@sanparks.org>

<
Dear Janet,

SANParks will submit comments on this application at the Draft Basic Assessment stage.

Please retain SANParks as a registered Interested and Affected Party.

Kind regards,
Dr Vanessa Weyer

Environmental Management (University of Pretoria)

Reg. EAP (EAPASA) & Reg. Pr.Sci.Nat. (SACNASP)



Dr Vanessa Weyer

Principal Planner

Garden Route National Park

+27 74 707 8199 044 302 5613

Vanessa.Weyer@sanparks.org

www.sanparks.org

Long Street, Thesen Island
Garden Route National Park
Knysna (Jetty)
6571



From: admin@ecoroute.co.za <admin@ecoroute.co.za>

Sent: 06 November 2025 12:27

To: 'Andiswa Sam' <asam@bocma.co.za>; 'Rabokale Mphahlele' <rmphahlele@bocma.co.za>; Sbonelo Ndlovu <sndlovu@bocma.co.za>; Megan Simons <msimons@capenature.co.za>; abrahamsn@nra.co.za; managerfpa@gmail.com; Vanessa Weyer <Vanessa.Weyer@sanparks.org>; Aviation Environmental Compliance <environment@caa.co.za>

Cc: Jessica <jessica@ecoroute.co.za>; 'Justin' <justin@ecoroute.co.za>; 'janet' <janet@ecoroute.co.za>

Subject: Notification of Public Participation: Pre-Application BAR - Proposed Development of Kinetic Catamarans Industrial Facility on Erf 1339 & Development/Redevelopment of Sea Cadet Corps Infrastructure on Erf 1316, Knysna, Western Cape

Good day,

Kindly find the link to the Pre-Application Basic Assessment Report and relevant appendices.

[PRE-APPLICATION BASIC ASSESSMENT REPORT - PROPOSED DEVELOPMENT OF KINETIC CATAMARANS INDUSTRIAL FACILITY ON ERF 1339, AS WELL AS DEVELOPMENT / REDEVELOPMENT OF THE SOUTH AFRICAN SEA CADET CORPS INFRASTRUCTURE ON ERF 1316, KNYSNA, WESTERN CAPE. | Eco Route](#)

ENVIRONMENTAL ASSESSMENT PROCESS

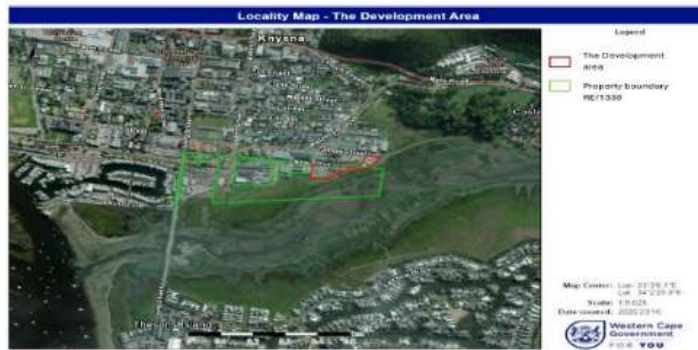
Notification of Public Participation:

PROPOSED DEVELOPMENT OF KINETIC CATAMARANS INDUSTRIAL FACILITY ON ERF 1339, AS WELL AS DEVELOPMENT / REDEVELOPMENT OF THE SOUTH AFRICAN SEA CADET CORPS INFRASTRUCTURE ON ERF 1316, KNYSNA, WESTERN CAPE.

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998), the National Environmental Management Act: Environmental Impact Assessment Regulations 2014, as amended, of a 30-day Public Participation Process to be undertaken under the authority of the Department of Forestry, Fisheries, and the Environment (DFFE). The Public Participation Process will run from **06 November 2025 – 08 December 2025**

DFFE Reference Number: TBC

Location: ERF 1339 and ERF 1316, KNYSNA, WESTERN CAPE.



The following BA Listed Activities are applicable:

Government Notice No. R327 (Listing Notice 1): Listed Activity 19A

A Pre-Application Basic Assessment Report and relevant appendices will be made available to all registered Interested and Affected Parties (I&APs) for public review and comment. All relevant documents may be accessed via our website during the public participation period. Should you wish to gain further information regarding the project or wish to register as an Interested and Affected Party please contact the Environmental Assessment Practitioner (details below).

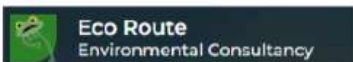
Please provide written comments with your name, contact details and an indication of any direct business, financial, personal, or other interest which you may have in the development. Please note that information submitted by I&AP's becomes public information. In terms of the Protection of Personal Information Act 4 of 2013 (POPIA), no personal information will be made available to the public.

Environmental Assessment Practitioner: Jessica Christie (EAPASA Reg 2019/1855)

www.ecoroute.co.za

Email: admin@ecoroute.co.za

Cell: 076 514 2701



Kind regards,

Carina Leslie

Personal Assistant/Admin

Office: 064 691 4394

www.ecoroute.co.za



Disclaimer: 1) Confidentiality: This email communication and any attachments sent from vanessa.weyer@sanparks.org to admin@ecoroute.co.za on 2025-12-09 15:09:28 are confidential and may contain privileged or copyright information. You may not present this message to another party without consent from the sender. If you are not admin@ecoroute.co.za please notify vanessa.weyer@sanparks.org and delete this email and you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. 2) Liability: This email is not a binding agreement and does not conclude an agreement without the express confirmation by the sender's superior or relevant authorisation of SANParks. 3) Viruses: SANParks does not certify that this email is free of viruses or defects. 4) Requested: SANParks does not consent to its employees sending un-asked for emails which contravene the law. In the event that you feel this email is such, please notify SANParks in order for the appropriate corrective action to be taken. 5) Advice: Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of SANParks. Any actions taken on the basis of this email are at the reader's own risk. 6) Other: The sender of this email is expressly required not make any defamatory statements. Any such communication is contrary to SANParks policy and outside the scope of the employment of the individual concerned. SANParks will not accept any liability in respect of such communication, and the employee responsible will be personally liable for any damages or other liability arising. Thank you. South African National Parks 643 Leyds Street, Muckleneuk, Pretoria, South Africa