

COMMENTS AND RESPONSE REPORT

COMMENT	RESPONSE
<p><u>Formal Letter: 17 October 2022</u></p> <p>Terblanche Orange (Pty) Ltd commented on the first EIA process that was conducted during 2021 and 2022 which received environmental authorisation on 15 February 2022.</p> <p>We are directly adjacent the proposed site and we are directly affected by the access to the farm Portion 5 Duma 201-JU as it runs over our property.</p> <p>The newly lodged application is of concern to us as it follows only 8 months after authorisation was received for the first application.</p> <p>Please refer to our previous comment dated 27 January 2022 on the first EIA process: "Upon meeting our neighbour we understood that he had plans to develop a much larger area what is currently applied for in the environmental application. Our concerns are therefore on what is currently on the table but also includes consideration of phased development that will be larger and have long term impacts on us". This is now exactly what is happening. The applicant is now applying to clear an area of 60 hectares. Our concerns are as follows:</p> <p><u>Access:</u></p> <p>A servitude road provides access <u>over our property</u> to the said application site. We also farm on a small to medium scale on our property and are directly affected by the plans of our neighbour. The servitude road was previously only used for residential access and now will be changed to commercial access. This will result in a few challenges for our own operation. We commented on the expected traffic associated with the 19.8 Ha of macadamias. With the large areas now proposed for cultivation, our concern is raised again. The heavy moving vehicles will create dust on the current dirt road which is detrimental to the fruits of our trees as well as health conditions of our orchard. Dust is a major problem in harvesting/winter time. In the winter and harvesting times (From March to August/September) we wet the road one or twice a day depending on the dust. We use our irrigation water for these purposes. We will need a written commitment from the applicant to meet us halfway and come up with a feasible solution.</p> <p><u>Safety and Security:</u></p> <p>Safety is still a main concern and we put systems in place for safety of all the residence on our own property that will now be overruled with more people and vehicles travelling in and out of the applicant farm and our own property without control. The safekeeping of our harvest is also a concern as theft is a major risk to any farmer as the fruit can be</p>	<p><u>Formal Letter 16 January 2023:</u></p> <p>With this letter we acknowledge receipt of your comments received on 17 October 2022 and confirm that your comments have been included within the Draft Scoping Report which will be distributed for public review and comment during the course of January 2023.</p> <p>With regards to the concerns raised, a meeting was undertaken with the applicant in order to provide response to some of the concerns raised. Please see below response to the formal correspondence received:</p> <p><u>Access:</u></p> <p>The applicant confirmed that the servitude road exists over your property in order to access Portion 5 of Duma 201-JU and it was confirmed that a meeting was held between Terblanche Orange (Pty) Ltd and Aeonik Farms Sequoia (Pty) Ltd to discuss and resolve the concerns. Aeonik Farms Sequoia (Pty) Ltd agreed to assist with the maintenance of the access road from the house upwards. The applicant also indicated that the harvesting of nuts would only be taking place three – five years from today which will result to increased traffic on the access road for which there is a servitude. Aeonik Farms then indicated that further agreement for more frequent maintenance will then be undertaken.</p> <p><u>Safety and Security:</u></p> <p>Your concern regarding safety and security is duly noted and Aeonik Farm is in agreement that safety and security is of high importance. Aeonik Farms indicated that brief discussions were held with Terblanche Orange (Pty) Ltd and confirmed that the same Security Company will be</p>

COMMENTS AND RESPONSE REPORT

carried out in bags. Several bags can result in a huge impact on our profit. On the point of safety and security we also require written communication on a way forward as the impact will increase with the increase in activity on the applicant farm.

With the previous EIA process, we requested a legal agreement and we now want to reiterate the importance of such to protect all parties involved.

Water:

Please provide proof of a sustainable water source for the 60 ha area that is proposed to be cultivated. You mentioned in the response to our letter dated 27 January 2022 that the applicant has 48 000m³ of water rights per annum for portion 5 of the farm Duma 201-JU. The final BAR for that project stated: *Although the applicant only has 6ha of water rights, 198,8 ha of Macadamia / Citrus trees require 0.18m³ of water per week for each mature tree. Approximately 250 trees will be planted per hectare on this portion (19.8 ha will be cultivated) which totals a current water use of 46 332m³ per annum. The applicant will therefore have sufficient water available for the proposed cultivation activities.*

This would have resulted in a balance of 1 668m³. Where will the additional water come from. If ground water is being considered we need proof that the aquifers will be able to handle it and that ourselves and other in the catchment will not suffer as a result.

We also request proof of licence application that will need to be submitted to the Department of Water and Sanitation (presented by IUCMA in this region) for water uses under the National Water Act, 36 of 1998. We also again ask proof of registration of the irrigation dam on the farm.

Ecology:

With reference to the Ecologica Investigation by Afrika & Biology dated October 2021 most of the area is not suitable for agriculture (Appendix A2, Final BAR, February 2021 which we suppose should be 2022). The biodiversity assessment concludes that most of the site is largely in a natural state and of significant biological and ecological importance. Refer to the map included in this letter after the points of concern.

appointed for Portion 5 of Duma 201-JU, which is currently appointed for Terblanche Orange. This appointment will be undertaken within the next year and cameras will also be extended. Aeonik Farms also indicated that ID Cards for all staff have been issued to confirm employment by the company. The applicant indicated that the company is currently at the start of their development and is in the process of taking active steps to improve the safety and security for all.

Water:

The applicant currently has 48 000m³ of water rights per annum and indicated that with the current cultivated areas, only 11 232m³ per annum is being used for irrigation. It was noted that most of the orchards were planted on a semi-dry principle where most of the irrigation is being done from March – September. Sufficient rainfall is received from October to February and therefore orchards are not irrigated during this period. At present, the applicant is only irrigating for 4 months during the year which results to 2 808m³ per irrigation month, and 11 232m³ per annum. Based on this irrigation principle, Aeonik Farms still have 36 768m³ per annum available for irrigation. It must also be noted that macadamia trees have a water withholding during in May/June for the trees to hibernate from 4 years onwards. With most of the orchards planted on a semi-dry principle and the correct implementation of water management measures, sufficient water would be available for the expansion of the orchards as proposed.

Ecology:

An Ecological Assessment was undertaken as part of the Scoping and Environmental Impact Assessment currently being undertaken and this report will form part of the Draft Environmental Impact Assessment Report which will be shared for public comment during the month of March 2023. This Ecological Assessment led to the identification of specific areas within the proposed development area, which could be considered for agricultural purposes. Aeonik Farms also confirmed that the remainder of the 140Ha of land will be rehabilitated for wildlife and game and all alien invasive species will be removed and maintained for this purpose.

COMMENTS AND RESPONSE REPORT

Soil:

According to the soil survey that was available to us for the farm Portion 5 Duma in the final BAR for the site, only an area of 13,76ha was surveyed at the top northern corner of the site out of the total 224,6ha farm. The report does not offer any information on the soil qualities of the rest of the farm. Two sites with little information have already been approved outside of the 13,76ha. We request more detail in terms of the suitability of proposed site that will bring the cultivation on the farm to 60Ha.

Once the applicant provides proof that he can sustainably farm 60ha, we would appreciate it if agreements with regards to the other issues can be reached prior to the authorisation of the NEMA activities as applied and that it be recorded in the final submission to the DARDLEA.

Soil:

As part of the Scoping and Environmental Impact Assessment Process, an application was submitted to the Department of Agriculture, Land Reform and Rural Development for the cultivation of virgin soil on the areas proposed for agriculture. The DALRD issued an approval for the cultivation of the areas proposed as the DALRD found the soil slope of the specified areas to be suitable for agricultural purposes. Confirmation of the statement above will be included within the Draft Environmental Impact Assessment Report.