



24G Application: 14/2/4/2/3/D1/14/0002/25

ENVIRONMENTAL AUTHORISATION

The Managing Directors

Forest Farms (Pty) Ltd

PO Box 599

PLETTENBERG BAY

6600

Email: pete@capemushrooms.co.za

Attention: Messrs P.O Leach and M.C Wishart

APPLICATION IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998) ("NEMA"): UNLAWFUL COMMENCEMENT OF A LISTED ACTIVITY: THE UNLAWFUL CLEARANCE OF INDIGENOUS VEGETATION ON PORTION 10 OF FARM 433, JACKAL'S KRAAL, PLETTENBERG BAY.

With reference to your application dated June 2025 in terms of section 24G of the NEMA for the consequences of unlawful commencement of listed activities identified in terms of the NEMA, find below the decision in respect of your application.

A. DECISION

By virtue of the powers conferred by section 24G of the NEMA and the *Environmental Impact Assessment Regulations, 2014* ("EIA Regulations, 2014") (as amended), the competent authority herewith **grants environmental authorisation** to the applicant to continue with the listed activities specified in Section C below in accordance with the Preferred Alternative as described in the application and environmental assessment of June 2025.

The granting of this Environmental Authorisation is for the continuation, conducting or undertaking of the listed activities as described in Section C below and is subject to compliance with the conditions set out in Section G. This Environmental Authorisation shall only take effect from the date on which it has been issued.

The Environmental Authorisation does not exempt the holder thereof from compliance with any other applicable legislation.

B. DETAILS OF THE APPLICANT FOR THIS ENVIRONMENTAL AUTHORISATION

Forest Farms (Pty) Ltd
C/o Peter Owen Leach
PO Box 599
PLETTENBERG BAY
6600

Tel: (044) 533 9161

Cel: 073 276 7805

Email: pete@capemushrooms.co.za

The abovementioned applicant is the holder of this Environmental Authorisation and is hereinafter referred to as "the holder".

C. LIST OF ACTIVITIES AUTHORISED

Listed Activities	Activity/Project Description
<i>Government Notice No. R. 983 of 4 December 2014</i> Activity Number: 27 Activity Description: <i>The clearance of an area 1 ha or more, but less than 20Ha of indigenous vegetation,</i> except where such clearance of indigenous vegetation is required for –	Approximately 1.75 ha of vegetation along the southwestern boundary, was cleared to construct additional mushroom growing tunnels, an additional retention pond, a garden area, and solar panels.

i. The undertaking of a linear activity, or Maintenance purposes undertaken in accordance with a maintenance management plan.	
Government Notice No. 983 of 4 December 2014 - Activity Number: 67 Activity Description: Phased activities for all activities – i. listed in this Notice which commenced on or after the effective date of this Notice or similarly listed in any of the previous NEMA notices, which commenced on or after the effective date of such previous NEMA Notices. Excluding the following activities listed in this Notice –17(i)(a-d); 17(ii)(a-d); 17(iii)(ad);17(iv)(a-d); 17(v)(a-d); 20; 21; 22; 24(i); 29; 30; 31; 32; 34; 54(i)(a-d); 54(ii)(a-d); 54(iii)(ad)	In 2017, approximately 0.88 ha was cleared for the extension of tunnels along the southwestern boundary, remaining below the 1 ha threshold. Subsequent clearing for the garden area and construction of a retention pond increased the cumulative disturbed area beyond 1 ha. In 2023, an additional area was cleared for solar panel installation. Collectively, these phased activities (2017–2023) resulted in vegetation clearance exceeding the 1 ha threshold.

The abovementioned list is hereinafter referred to as “the listed activities/development”.

D. PROPERTY DESCRIPTION AND LOCATION

The listed activities commenced on Portion 10 of the Farm 433, Jackals Kraal, Plettenberg Bay, Western Cape.

The SG digit code is: C03900000000043300010

The co-ordinates for the property boundary are:

Point	Latitude (S)	Longitude (E)
1	34° 4' 11.27" South	23° 17' 43.49" East
2	34° 4' 12.74" South	23° 17' 58.49" East
3	34° 4' 26.30" South	23° 17' 57.71" East
4	34° 4' 24.90" South	23° 17' 40.79" East
5	34° 4' 20.29" South	23° 17' 41.41" East
6	34° 4' 19.84" South	23° 17' 36.54" East
7	34° 4' 13.06" South	23° 17' 37.08" East

The co-ordinates for the site boundary are:

Point	Latitude (S)	Longitude (E)
1	34° 4' 20.23" South	23° 17' 44.33" East
2	34° 4' 24.81" South	23° 17' 44.30" East
3	34° 4' 24.15" South	23° 17' 41.22" East
4	34° 4' 19.80" South	23° 17' 42.05" East
5	34° 4' 18.97" South	23° 17' 44.69" East
6	34° 4' 17.43" South	23° 17' 45.06" East
7	34° 4' 17.71" South	23° 17' 48.05" East
8	34° 4' 18.34" South	23° 17' 47.62" East
9	34° 4' 18.80" South	23° 17' 46.85" East

10	34° 4' 20.19" South	23° 17' 46.69" East
11	34° 4' 20.22" South	23° 17' 44.93" East

Refer to Annexure 1: Locality Plan and Annexure 2: Site Plan.

Herein-after referred to as "the site".

E. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

Digital Soils Africa (Pty) Ltd

C/o Natalie Sharp

45 Church Street

WALMER

Gqeberha

6070

Cel: 082 414 0472

Email: natalie@dsafrica.co.za

F. DETAILS OF THE ACTIVITY/IES UNDERTAKEN

Approximately 1.75 hectares of vegetation along the southwestern boundary of the site were cleared for the expansion of existing agricultural operations. The development includes the construction of:

- Additional mushroom growing tunnels;
- An additional retention pond;
- A garden; and
- Installation of solar panels

G. CONDITIONS OF AUTHORISATION

The following are conditions of authorisation that are set and must be implemented for this Environmental Authorisation.

PART I

Scope of authorisation

1. The holder is authorised to undertake the listed activities specified in Section C above in accordance with and restricted to the Preferred Alternative described in the application and assessment report of June 2025 on the site as described in Section D above.
2. The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.
3. Any changes to, or deviations from the scope of the alternative described in Section F above must be accepted or approved, in writing, by the competent authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the competent authority may request information to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.

PART II

Written notice to the competent authority

4. Seven (7) calendar days' notice, in writing, must be given to the competent authority before continuation of the rehabilitation activities.
 - 4.1 The notice must make clear reference to the site details and 24G Reference number given above.
 - 4.2 The notice must also include proof of compliance with the following conditions 5, 9, and 12.

PART III

Notification and administration of an appeal

5. The holder must in writing, within 14 (fourteen) calendar days of the date of this decision–
 - 5.1 notify all registered Interested and Affected Parties ("I&APs") of –
 - 5.1.1 the outcome of the application;
 - 5.1.2 the reasons for the decision as included in Annexure 3;
 - 5.1.3 the date of the decision; and
 - 5.1.4 the date when the decision was issued.

- 5.2 draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the *National Appeals Regulations, 2025* detailed in Section I below.
- 5.3 draw the attention of all registered I&APs to the manner in which they may access the decision.
- 5.4 provide the registered I&APs with:
 - 5.4.1 the name of the holder (entity) of this Environmental Authorisation;
 - 5.4.2 name of the responsible person for this Environmental Authorisation;
 - 5.4.3 postal address of the holder;
 - 5.4.4 telephonic and fax details of the holder;
 - 5.4.5 e-mail address, if any, of the holder; and
 - 5.4.6 the contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the *National Appeal Regulations, 2025*.

6. The listed activities may not continue within 20 calendar days from the date the holder notifies registered I&APs of this Environmental Authorisation. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided.

PART IV

Management of the activity/development

7. The draft Environmental Management Programme ("EMPr") of June 2025 compiled by Digital Soils Africa and submitted as part of the application for environmental authorisation is hereby approved and must be implemented.

8. The EMPr must be included in all contract documentation for all phases of implementation.

PART V

Monitoring

9. The holder must appoint a suitably experienced Environmental Control Officer ("ECO") or site agent where appropriate, before continuation of rehabilitation activities to ensure compliance with the EMPr and the conditions contained herein.
10. A copy of the Environmental Authorisation, EMPr, audit reports and compliance monitoring reports must be kept at the site of the authorised activities, and must be made available to anyone on request, including a publicly accessible website (if applicable).
11. Access to the site referred to in Section D must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the competent authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.

PART VI

Auditing

12. In terms of regulation 34 of the *EIA Regulations, 2014* the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation, the EMPr and submit Environmental Audit Reports to the competent authority.
 - 12.1 The holder must undertake an environmental audit within three (3) months of completion of the rehabilitation activities and submit an Environmental Audit Report to the Competent Authority within one (1) month after the completion of the environmental audit. The Audit Report must be prepared by an independent person with the relevant auditing expertise and must consider all the information required in Appendix 7 of the *EIA Regulations, 2014*.
13. The holder must, within 7 (seven) days of the date of submission of the report to the competent authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and on a publicly accessible website (if applicable).

PART VII

Activity/ Development Specific Conditions

14. Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during

earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape.

Heritage remains include: meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.

15. A qualified archaeologist and/or palaeontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant heritage resources authority.
16. Alien invasive vegetation clearing and rehabilitation must be undertaken within the invaded areas situated along the southwestern portion of the site.
17. Following the removal of alien vegetation, affected areas must be revegetated with indigenous species to prevent bare ground and reduce the risk of reinvasion.
18. Erosion control measures must be implemented in the degraded area located north of the fenced mushroom tunnel section.

H. GENERAL MATTERS

1. Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the listed activities.
2. [Non-compliance with a condition or term of this Environmental Authorisation or EMPr may render the holder liable to criminal prosecution.](#)
3. The holder must submit an application for amendment of the Environmental Authorisation to the competent authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. If a new holder is proposed, an application for Amendment in terms of Part 1 of the *EIA Regulations, 2014* must be submitted.

Please note that an amendment is not required if there is a change in the contact details of the holder. In this case, the competent authority must only be notified of such changes.

4. The manner and frequency for updating the EMPr is as follows:

Amendments to the EMPr, must be done in accordance with regulations 35 to 37 of the *EIA Regulations, 2014* or any relevant legislation that may be applicable at the time.

I. APPEALS

Appeals must comply the *National Appeal Regulations, 2025* (Government Notice No. R. 5985 in Government Gazette No. 52269 of 13 March 2025). Please note the provisions of Regulation 1(2) & (3) of the *National Appeal Regulations, 2025* when calculating the period of days.

1. The holder (applicant) of this decision must submit an appeal to the Appeal Administrator, any registered Interested and Affected Parties (I&AP's) and the decision maker (Competent Authority who issued the decision) within **20 calendar** days from the date this decision was sent by the decision maker.
2. The I&AP's (not the holder of this decision) must submit an appeal to the Appeal Administrator, the holder (applicant) of the decision and the decision maker within **20 calendar days** from the date this decision was sent to the registered I&AP's by the holder (applicant) of the decision.
3. All appeals submitted must:
 - a. be in writing in the appeal form obtainable from the Departmental website;
 - b. include supporting documents referred to in the appeal; and
 - c. include proof of payment of the prescribed non-refundable appeal fee, if prescribed.
4. The holder (applicant) of the decision must:
 - a. notify registered I&AP's and affected organs of state of any appeal received, and make the appeal available to them, within **5 calendar days** after the 20-day appeal period ends.
 - b. Submit proof of this notification to the Appeal Administrator within 5 calendar days after sending the last notification.

5. The applicant, where applicable, the decision-maker, or any person notified under regulation 4 of the *National Appeal Regulations, 2025* may submit a Responding Statement within **20 calendar days** from the date they received the appeal, in the form obtainable from the Department website to the Appeal Administrator and to the appellant, where the appellant is not the applicant.
 6. Appeals, Responding Statements and supporting documents must be submitted to the Appeal Administrator by means of one of the following methods:
 - a. **By e-mail:**
DEADP.Appeals@westerncape.gov.za or
 - b. **By hand** where that person submitting does not hold an electronic mail account:
Attention: Mr. Marius Venter
Room 809, 8th Floor Utilitas Building,
1 Dorp Street, Cape Town, 8001
- Note:** You are also requested to submit an electronic copy (Microsoft Word format) of the appeal, responding statement and any supporting documents to the Appeal Administrator via email or to the address listed above.
7. A prescribed appeal form, responding statement form as well as assistance regarding the appeal processes is obtainable from the relevant website of the appeal authority: <http://www.westerncape.gov.za/eadp> or the office of the Minister at: Tel. (021) 483 3721 or email DEADP.Appeals@westerncape.gov.za

J. CONSEQUENCES OF NON-COMPLIANCE WITH CONDITIONS

Non-compliance with a condition or term of this Environmental Authorisation or EMPr may result in suspension or withdrawal of this Environmental Authorisation and may render the holder liable for criminal prosecution.

K. DISCLAIMER

The Western Cape Government, appointed in terms of the conditions of this Environmental Authorisation, shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.

Yours faithfully

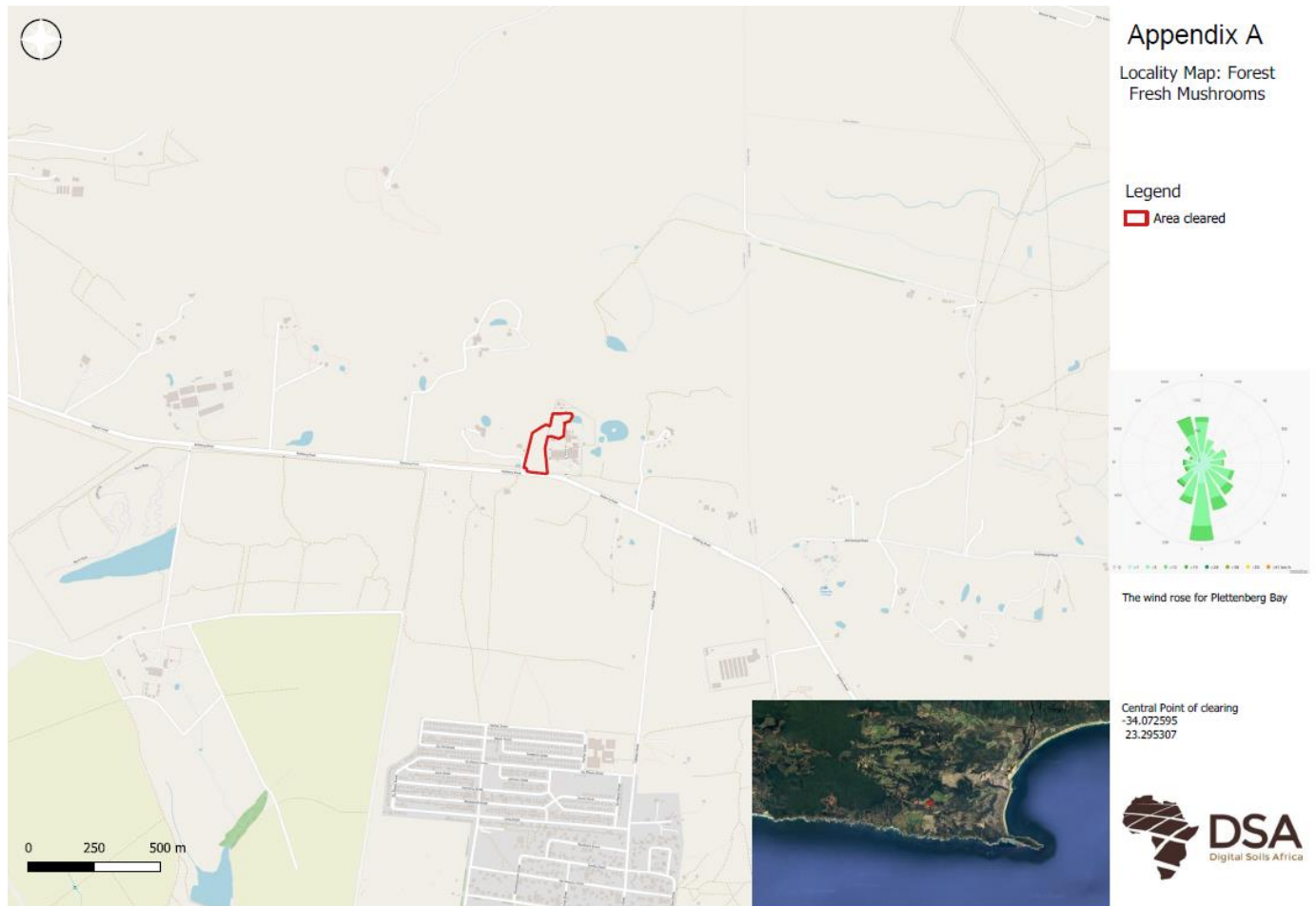
MRS Z TOEFY
HEAD OF RECTIFICATION
DIRECTORATE: ENVIRONMENTAL GOVERNANCE
DATE: 23 June 2026

Cc: (1) Natalie Sharp (EAP)
(2) Raheem Dalwai (DEA&DP: Enforcement - Region 3)

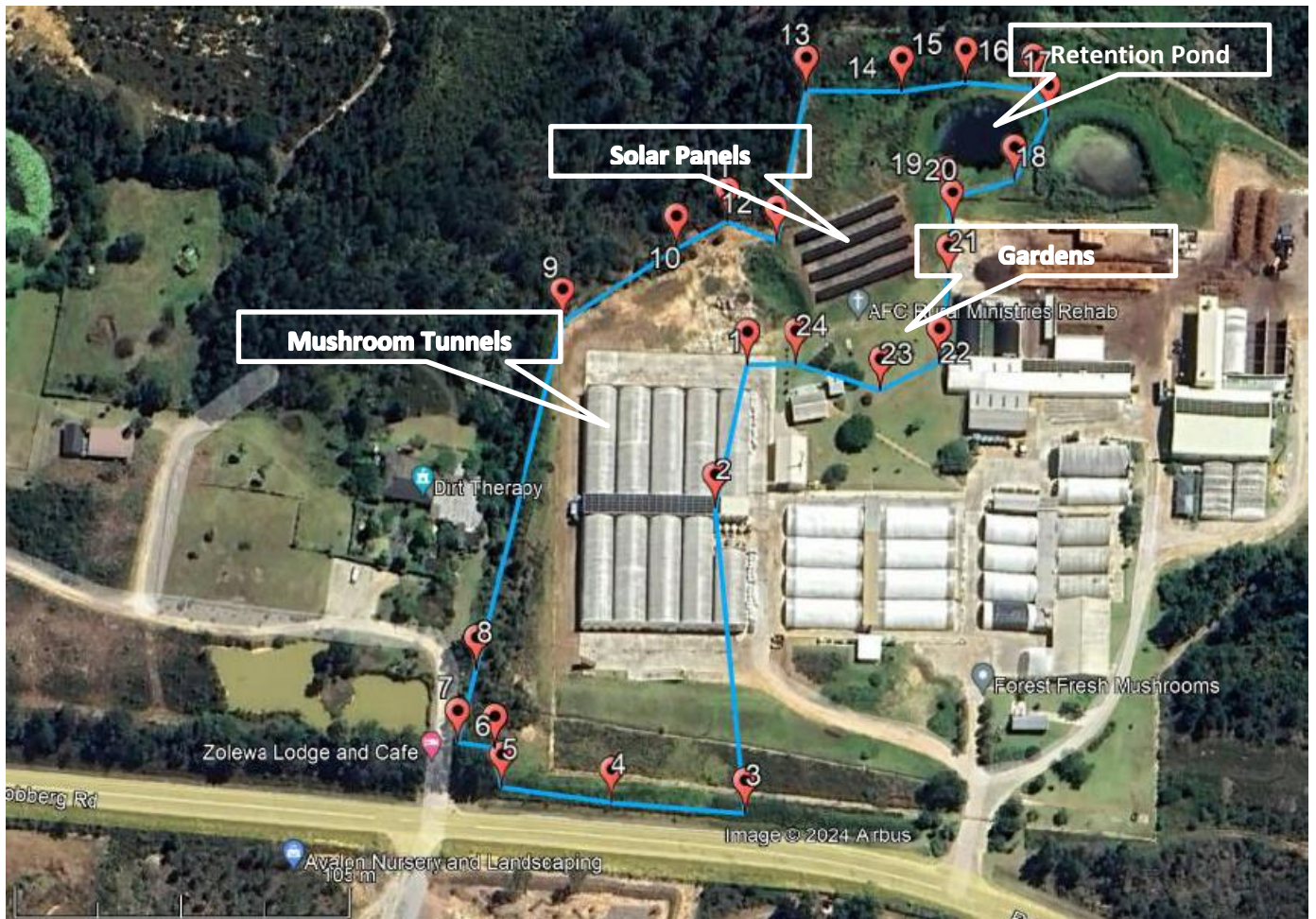
Email: natalie@dsafrica.co.za

Email: Raheem.Dalwai@westerncape.gov.za

ANNEXURE 1: LOCALITY MAP



ANNEXURE 2: SITE PLAN



FOR OFFICIAL USE ONLY:

S24G REFERENCE: 14/2/4/2/3/D1/14/0002/25
ENFORCEMENT REFERENCE : 14/1/1/E3/4/5/3/L1340/23

ANNEXURE 3: REASONS FOR THE DECISION

This Environmental Authorisation is in respect of the consequences of commencement of the afore-mentioned illegal activities. An Environmental Assessment Practitioner ("EAP") was appointed to submit a section 24G Environmental Impact Assessment ("EIA") to the Department to obtain this Environmental Authorisation. The EIA was considered adequate for informed decision-making. In addition, the holder paid an administrative fine of R250 000 (Two Hundred and Fifty thousand rand) to meet the requirements of section 24G of the *National Environmental Management Act, 1998* ("NEMA").

In reaching its decision, the competent authority, *inter alia*, considered the following:

- a) The information contained in the application form dated June 2025 and received by the competent authority on 09 June 2025 and the comments and response report received by the competent authority on same day, and the additional information received by the competent authority on 08 December 2025.
- b) The Environmental Management Programme ("EMPr") dated June 2025 submitted together with the environmental report.
- c) Relevant information contained in the Departmental information base, including, the Guidelines on Public Participation and Alternatives.
- d) The objectives and requirements of relevant legislation, policies and guidelines, including section 2 of the NEMA.
- e) The comments received from Interested and Affected Parties ("I&APs") and the responses provided thereto.
- f) The sense of balance of the negative and positive impacts and proposed mitigation measures.
- g) The site visit conducted on
Date/s: 03 September 2025
Attended by: Officials of the Directorate: Environmental Governance
- h) The appeal decision on the 24G administrative fine dated 30 April 2026.

All information presented to the competent authority was taken into account in the consideration of the application for environmental authorisation. A summary of the issues which, according to the competent authority, were the most significant reasons for the decision is set out below.

1. Public Participation Process

In terms of section 24G(1)(vii)(dd) of the NEMA, "...a description of the public participation process followed during the course of compiling the report, including all comments received from interested and affected parties and an indication of how the issues raised have been addressed ...", is required.

The public participation process conducted by the EAP comprised of the following:

- An advertisement was placed in the Knysna-Plett Herald newspaper on 02 May 2024.
- A site notice was erected on 02 May 2024; and
- Letters were sent to interested and affected parties ("I&APs") and the municipal ward councillor May 2024.
- I&APs were afforded the opportunity to provide comments on the application.
- 30-day public participation conducted from 12 March 2025 to 14 April 2025.
- An additional 21 day commenting period conducted from 09 May 2025 to 30 May 2025.
- An electronic copy of the draft Section 24G Application Report made available on Digital Soils Africa website.

At the end of the public participation process, only one (1) comment was received from Organs of state and nine (9) comments from interested and affected parties (I&APs).

BOCMA's review of the Section 24G submission indicated that potential unauthorised water uses had occurred on Portion 10 of Farm 433, Jackals Kraal. Activities such as land clearing, construction of mushroom tunnels, solar panels, and the retention pond appeared to have triggered Section 21 water uses under the NWA and had been undertaken without authorisation. Clarification had been required on whether these activities had impacted nearby water resources, including the Groot Brak River floodplain. BOCMA also noted that evidence of consultation with DWS, as well as authorisation records for existing and new ponds, had needed to be provided. The discharge of water via furrows and pipelines may have constituted Section 21 (f) water use, and BOCMA highlighted that such discharges should not pollute receiving environments.

The revised report had been required to identify and classify all authorised versus unauthorised water uses, supported by documentation, and water use licence applications had needed to be submitted for unauthorised uses. A detailed water demand assessment for the mushroom tunnel expansion had also been required. BOCMA emphasised that the submission of a licence application did not equate to approval and that undertaking water use without authorisation constituted an offence under Section 151 of the NWA.

The comments and concerns raised by interested and affected parties included the unlawful clearing of vegetation reflecting a disregard for environmental regulations. The common concern raised was the persistent and unbearable odour from the mushroom farm and composting activities, severely impacting residents' quality of life and property values. The odour was said to worsen during certain wind conditions. Additionally, noise from machinery and trucks added to the disturbance. The I&APs expressed that their complaints regarding the odour to the Garden Route District Municipality had gone unanswered. A resident emphasised that they are unable to sell the property due to odour. I&APs stated that their health is being impacted, affecting their ability to live and work comfortably. Some tenants said that it had resulted in tenants vacating rental properties because of unbearable smell. The I&APs wanted independent air quality testing and daily monitoring of hydrogen sulphide (H₂S) and ammonia to be conducted, and implementation of odour-neutralizing technologies. Additionally, to this they were considering taking legal action against the farm regarding odour.

The EAP acknowledged the objections and concerns raised by I&APs and further indicated that Groenewald's Attorneys were responsible and currently handling the Water Use Licence application process.

Consultation with organs of state in terms of section 24O of the NEMA

The following organs of state provided comment on the application:

- Breede-Olifants Catchment Management Agency (BOCMA)

All the concerns raised by I&APs were responded to and adequately addressed during the public participation process. Specific management and mitigation measures have been considered in this Environmental Authorisation and in the EMPr to adequately address the concerns raised.

The competent authority concurs with the EAP's responses to the issues raised during the public participation process and has included appropriate conditions in this Environmental Authorisation and in the EMPr.

2. Alternatives

2.1 Property and Location (Herewith authorised)

The current site and location (Portion 10 of the Farm 433, Jackal's Kraal, Plettenberg Bay, Western Cape) were the only site alternatives considered by the applicant. No other site or location alternatives were considered.

Activity Alternatives

The site is zoned Agriculture 1 and identified for agricultural use in the Plettenberg Bay Spatial Development Framework and Bitou Integrated Development Plan. The mushroom farm extension expands existing activities within an already degraded area, aligning with zoning and municipal policies. No alternative land uses were therefore considered.

The preferred option includes fynbos rehabilitation as recommended by the specialist, to be implemented through the EMP.

Design and Layout Alternatives

The extension of mushroom tunnels, retention pond, and solar panels are already established and operational within a previously degraded area of the property. An alternative layout would require disturbing new areas and increasing the overall development footprint. To minimise further environmental impacts, alternative layouts were therefore not considered.

Technology Alternatives

The mushroom farm relies on specialised, highly controlled processes to optimise growing conditions, maximise yield, and minimise the risk of pathogens and fungal infections. The facility already incorporates water reuse systems to reduce demand and uses solar panels to decrease reliance on the Eskom grid. Given these existing water and energy efficiency measures, no suitable or practical technological alternatives were identified for this development.

2.2 The option of not implementing or continuing with the activity ("No-Go" Alternative)

The option of not proceeding with the development (the no-go alternative) was considered. Prior to clearing, the site was occupied by pine trees and classified as degraded, offering limited economic or social value. It did not support viable agricultural production, generate employment, and had posed a significant fire risk, as evidenced during the 2017 regional fires.

Following clearing and the establishment of the mushroom farm extension and associated infrastructure, the land use now supports agricultural production and has created employment for 54 individuals, all from previously disadvantaged backgrounds. The increased mushroom production also contributes to addressing national supply demands. Given the site's low ecological sensitivity and the rehabilitation measures, the economic and social benefits are considered to outweigh the impacts of clearing degraded vegetation. The development is therefore deemed acceptable, and the no-go alternative is not recommended.

3. Environmental Impact Assessment (EIA) and Mitigation Measures

In reaching its decision, the competent authority, considered the following in respect of the EIA and mitigation measures:

3.1. Activity Need and Desirability

The site is located on Portion 10 of Farm 433, Jackals Kraal, zoned Agricultural 1. It is consistent with the approved land use, as mushroom farming supports agricultural productivity as a key economic, environmental, and cultural resource. The development aligns with the Bitou Municipal SDF and IDP and does not compromise their objectives. It is also consistent with the Garden Route EMF, without affecting environmental management priorities.

Surrounding land uses are predominantly agricultural, and the area is identified for such use in the Bitou SDP. The activity is therefore compatible with the character of the area and has contributed to local job creation. Given that agriculture and tourism are primary drivers of the local economy, the development supports essential economic opportunities and community livelihoods.

3.2. Regional/ Planning Context

Portion 10 of Farm 433, Jackals Kraal is zoned Agricultural 1, and the extension of mushroom tunnels supports this designated land use. The site is located within an area identified for agriculture in the SDF, ensuring consistency with regional planning objectives. The site is not within a Critical Biodiversity Area, and no vegetation of conservation value was identified, aligning the development with the Garden Route EMF. Overall, the development promotes agricultural productivity while maintaining low biodiversity impact, aligning with the IDP and broader sustainability objectives.

3.3. Services/ Bulk Infrastructure

Water supply is sourced from an existing borehole, providing water for irrigation and domestic use. Electricity is primarily supplied by Eskom, supplemented by solar panels and a generator, with solar capacity below 250 kW to improve energy efficiency.

The facility generates approximately 35 kg of solid waste per week, mainly packaging materials (polystyrene, plastics, and pallets), with minor domestic waste. Waste is collected by the applicant and disposed of at a registered disposal site, as the property falls outside municipal collection areas. Sanitation is managed via septic tanks, and stormwater is directed through an underground drainage system to a retention pond.

3.4. Biodiversity Impacts

The Terrestrial Impact Assessment found that the site has low sensitivity for both terrestrial biodiversity and plant species. The cleared area had been heavily invaded by non-native species, with limited intact indigenous vegetation present. The low sensitivity rating was supported by the dominance of alien plants, the absence of critical biodiversity features, and the lack of undisturbed indigenous vegetation within the disturbance footprint. Although the sandstone substrate could support fynbos, ecological integrity is already significantly degraded and remaining flora too sparse for definitive classification.

No Species of Conservation Concern (SCC) were recorded or expected in the highly invaded surroundings, confirming the cleared area's botanical sensitivity as Low.

3.5. Visual / Sense of Place

The property is zoned Agricultural Zone 1, which supports agricultural production and related infrastructure; therefore, the current development is consistent with its lawful land-use rights. Furthermore, the activity aligns with the strategic objectives of the Western Cape Spatial Development Framework (WCSDF), the Bitou Municipal SDF and Integrated Development Plan (IDP), which promote sustainable agricultural development, local economic growth, and optimal use of agricultural land.

3.6. Socio-economic Impacts

The expansion and construction of the additional mushroom tunnels not only boosted production capacity but also generated employment opportunities to 54 employees,

which are all previously disadvantaged individuals for locals, strengthening livelihoods within the surrounding communities. Beyond job creation, the farm has become an active contributor to the Bitou Municipality's agricultural economy, adding to the region's growth and development.

3.7. Impact Assessment and Significance

Terrestrial biodiversity on the site was assessed as Low. Despite screening sensitivity linked to Strategic Water Source Areas and Freshwater Ecosystem Priority Areas, only artificial ponds and dams were present, with no intact natural systems. The area was heavily degraded and dominated by invasive species (Kikuyu grass, pine, wattle), with minimal, senescent indigenous vegetation. No Species of Conservation Concern were recorded, confirming low botanical sensitivity. Overall, disturbance, invasion, and absence of intact vegetation supported a low sensitivity rating.

4. **NEMA Principles**

The National Environmental Management Principles (set out in section 2 of the NEMA), which apply to the actions of all organs of state, serve as guidelines by reference to which any organ of state must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), *inter alia*, provides for:

- the effects of decisions on all aspects of the environment to be taken into account;
- the consideration, assessment and evaluation of the social, economic and environmental impacts of activities (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment;
- the co-ordination and harmonisation of policies, legislation and actions relating to the environment;
- the resolving of actual or potential conflicts of interest between organs of state through conflict resolution procedures; and
- the selection of the best practicable environmental option.

The development will result in both negative and positive impacts.

Negative Impacts:

- Permanent loss of indigenous vegetation.

- Establishment and spread of alien plant species.

Positive impacts:

- Temporary employment opportunities during construction and permanent employment opportunities during operations.
- The expansion of agricultural activities on the site has increased crop production and resulted in a positive economic impact.

In view of the above, the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the EMPr, the competent authority is satisfied that the listed activities will not conflict with the general objectives of integrated environmental management stipulated in Chapter 5 of the NEMA and that any potentially detrimental environmental impacts resulting from the listed activities can be mitigated to acceptable levels.

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