ANIMAL SPECIES COMPLIANCE STATEMENT FOR THE S24G AND PROPOSED DEVELOPMENT ON ERF 4735, GREAT BRAK RIVER, MOSSEL BAY, WESTERN CAPE

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Prepared for:
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28 February 2024
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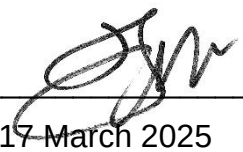
DECLARATION OF SPECIALIST INDEPENDENCE

We, Mr Willem Matthee and Prof. Jan A. Venter, hereby declare that:

- we are acting as independent specialists regarding this application;
- we do not have any interest, hidden or otherwise, in the outcome of this application, apart from financial compensation for the work done to survey the proposed development area and compile this report;
- surveying the site for this faunal compliance statement was done objectively, and that this report and the facts therein contained (regardless of its impact on the application approval process) will not be affected by any outside factors;
- we have the required expertise to perform surveys and produce compliance statements as it pertains to the faunal aspect of this proposed development
- we will comply with the relevant Acts, regulations and legislation;
- we have not, and will not, engage in conflicting interests while performing our duties for this activity, and have no influence over the decision-making authorities regarding their accepting or rejecting of this proposed development;
- we undertake to disclose to the applicant and competent authority all material and information within my possession that may influence the decision-making process regarding the proposed development;
- all particulars furnished by us in this form are true and correct, and that it is an offense to present a false declaration, and that such a false declaration is punishable in terms of Section 24F of the Act; and that
- this document is to be viewed as a whole, and not misquoted out of context.



Date: 17 March 2025

Date: 17 March 2025

DATE	REVISION	STATUS	PREPARED BY	CHECKED AND APPROVED BY
17 March 2025 (Updated)	0	Approved for submission	Willem Matthee	Prof. Jan A. Venter (SACNASP Registration Nr. 400111/14)
				

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1. INTRODUCTION

Cape EAPrac (Pty) Ltd was appointed to facilitate the environmental impact aspects of the S24G application (relating to the removal of vegetation, flattening of a frontal dune, and moving of earth within 100 m of the oceanic high tide mark without the necessary environmental authorisation). The development occurred on Erf 4735 (S34º03’50.6”; E22º12’25.8”), Great Brak River, where an expansion of the existing Seebederfie accommodation, and associated parking for guests, is proposed. Two sections of vegetation were removed between March 2022 and August 2022, as per the aerial imagery (Figures 1 & 2). All proposed infrastructure are proposed for areas that fall within this section of cleared vegetation (previously covered by exotic *Acacia cyclops*); see Appendix 3 for the proposed site development plan.

The property is approximately 9 373 m^2 in size, and dominated by the existing building and associated infrastructure (access road, driveway, etc.). Vegetation around the building consists predominantly of a lawn (to the south of the building) and exotic *Acacia cyclops* (rooikrans). Short coastal thicket (dominated by *Searsia crenata* and other low-growing shrubs) occurs to the south of the property, and sections of Hartenbos Dune Thicket (with *Sideroxylon inerme* and other coastal thicket species) occurs to the east and west of the property.

As per the "Protocols for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes" (hereafter called "the Protocols"), as promulgated in Government Gazette Notice 320 (Government Gazette 43110, 20 March 2020), and amended in Government Gazette Notice 3717 (Government Gazette 49028, 28 July 2023), the Protocols must be adhered to for all new applications for Environmental Authorisation.

Fig. 1: The cadastral boundary and vegetation cover on the property before removal, (imagery obtained from Cape Farm Mapper, v.3.1.0).

Fig. 2: Aerial imagery indicating the cadastral boundary and extent of vegetation removal on the property, as per August 2022 (aerial imagery from Cape Farm Mapper, v3.1.0).

The Department of Forestry, Fisheries and the Environment (DFFE) screening tool (performed on 9 February 2023) identified the site as having **High** sensitivity in terms of the animal species theme (Fig. 3), due to the potential presence of four animal species of conservation concern. These species (and their relative sensitivities) were:

- Knysna warbler, *Bradypterus sylvaticus* (Aves) – High sensitivity
- African marsh-harrier, *Circus ranivorus* (Aves) – High sensitivity
- Denham's bustard, *Neotis denhami* (Aves) – High sensitivity
- Yellow-winged agile grasshopper, *Aneuryphymus montanus* (Insecta) – Medium sensitivity

The site sensitivity verification report investigated the site, and recorded that it instead has a **Low** sensitivity, due to the highly transformed nature of the site (**before the unpermitted clearing occurred**), and low likelihood of three of the four SCC occurring near the site, and low likelihood of one SCC (*B. sylvaticus*) being impacted by the development.

As per the Protocols, this compliance statement is based on the findings of a desktop study and a site visit (used to compile the site sensitivity verification report), to determine the presence (or likely presence) of the SCC, and the potential impacts of the development on these SCC.

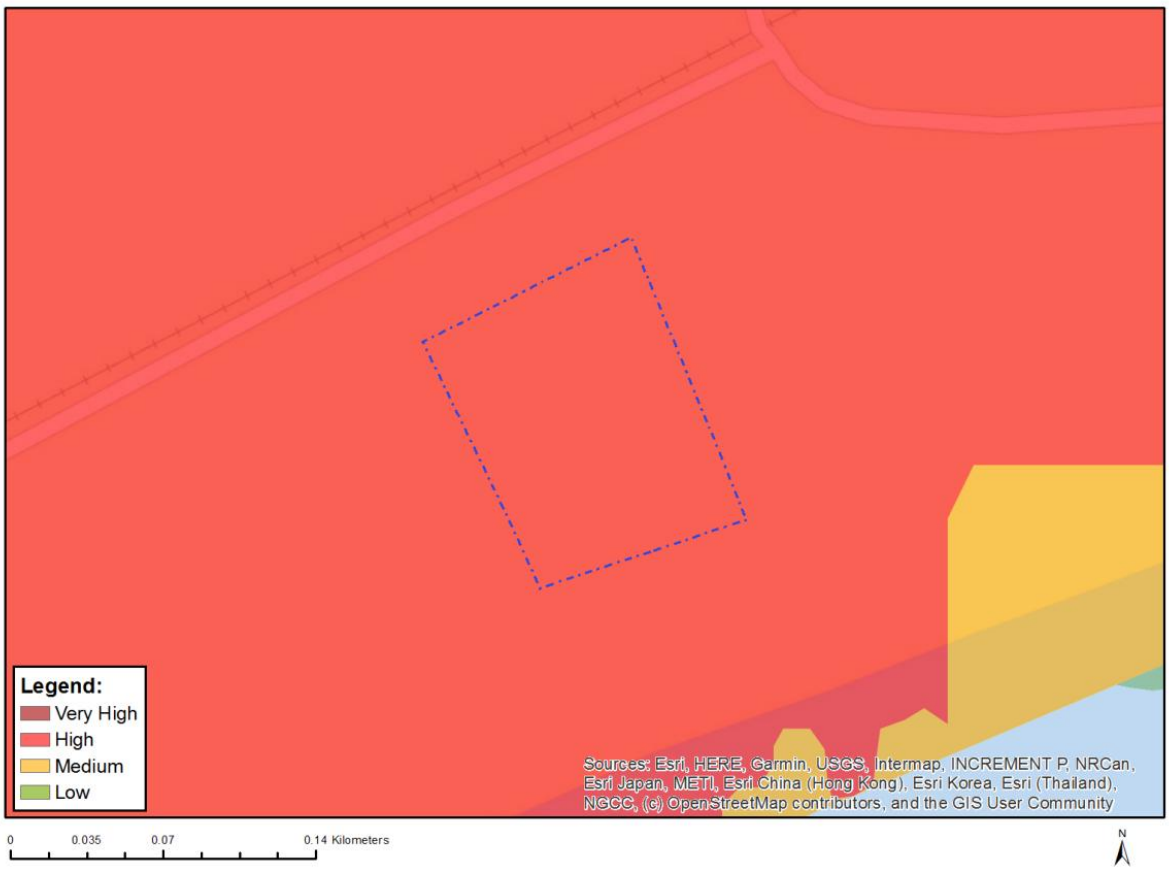

Fig. 3: The site sensitivity in terms of the animal species theme, as recorded in the DFFE screening tool (performed 9 February 2023). The entire property is classified as High sensitivity, due to the possible occurrence of four species of conservation concern.

2. DETAILS OF THE SPECIALISTS

Both specialists that compiled this document have experience in faunal species identification, and the identification of suitable habitats for various species, from invertebrates to large mammalian species. Their details are in the table below.

Table 1. The details and experience of the specialists involved with this report.

Specialist and contact details	**Qualifications**	**SACNASP Registration**	**Experience**
Prof. Jan A Venter **Email:** JanVenter@mandela.ac.za **Mobile:** 0824161096	PhD (Biology) UKZN	400111/14	25 Years' experience in faunal ecology and conservation in both the government and tertiary education sector. Current position: Associate Professor in the Department of Conservation Management at Nelson Mandela University
Willem Matthee **Email:** WillemM@mandela.ac.za **Mobile:** 084 620 4246	M.Sc. (Nature Conservation) NMU	Not registered	Willem has three years' experience in surveying amphibian populations, and an additional five years of bird surveys. He has also been involved in animal diversity surveys on an on-off basis for the past four years. He has completed his MSc in Nature Conservation in 2014. He currently lectures as a lecturer in Conservation Ecology at the Nelson Mandela University George Campus.

3. METHODS

The findings of this report are based on:

1) a desktop study to determine the potential presence of the SCC identified by the screening tool (and any SCC not identified by the screening tool) at the study site;
2) a site visit to the study site, to determine the presence of (and habitat suitability for) the SCC highlighted by the screening tool, or SCC not flagged by the screening tool.

The desktop study included the use of iNaturalist and the Global Biodiversity Information Framework (GBIF) records. Records from these resources were used to determine whether the SCC have been recorded at (or near to) the study site.

A site visit was performed on 1 November 2023, between 10:00 and 12:00. During the site visit, the species observed (mostly animals, but also plants that may be valuable for SCC) were recorded. Observations were visual (i.e., seeing the animal species clearly), acoustic (i.e., identifying species based on their characteristics calls heard during the site visit), or based on the presence of tracks or dung. The survey consisted of walking through the study area, covering the entire study site and all habitats present on the property. The main purposes of the site visit were to determine whether:

1) any of the three SCC flagged by the screening tool occur at the study site;
2) the proposed site for the development acts as a corridor for any of the SCC highlighted by the screening tool;
3) the vegetation (indigenous, exotic, or cultivated) at the site of the proposed development likely supports undetected individuals or populations of the SCC highlighted by the screening tool (that were not picked up during the desktop study); and
4) there are any SCC present at the site that were not picked up by the screening tool.

3.1. Desktop Study

3.1.1. Location and Vegetation

The site for the proposed development is located on Erf 4735, near Great Brak River (S34º03'50.6"; E22º12'25.8"). The property is 9 373 m^2 in size, and is located approximately 90 m from the spring high tide mark.

The vegetation is classified as Hartenbos Dune Thicket (AT40), which is classified as Critically Endangered (DFFE, 2022). The vegetation in the area is, however, heavily invaded by rooikrans (*Acacia cyclops*) and manatoka (*Myoporum insulare*). Both these species are originally from Australia, and are invasive in the coastal regions of the Western Cape. The majority of the property consists of the existing building, and associated lawn and parking area. The vegetation around the property (as well as some fringe vegetation) consists of semi-invaded Hartenbos Dune Thicket, with *Sideroxylon inerme*, *Searsia crenata* and *Osteospermum moniliferum* present. The areas that were cleared consisted mostly of *Acacia cyclops* and Red-purple Ragwort (*Senecio elegans*). In the northern cleared section, there are also some white milkwood (*Sideroxylon inerme*) trees present, which were left standing when the clearing was done.

Fig. 4: The cleared section to the north of the building at the study site, looking south towards the building.

Fig. 5: The cleared area to the north of the building at the study site, looking towards the northeast. In the front right, the weedy indigenous shrub, *Senecio elegans*, can be seen flowering.

Fig. 6: The regrowth on sections of the northern cleared area, looking south towards the building at the study site.

Fig. 7: The lawn (front), cleared section (back) and semi-natural vegetation (left, and far to the back) in the southern section of the property, looking towards the west. In this area, vegetation (most likely *A. cyclops*) was removed, and the frontal dune was flattened.

Fig. 8: The cleared section to the south of the property, looking northwards past the building at the study site (right).

Fig. 9: The cleared section at the southern part of the study site is showing no regrowth. Note the position of the water tank (arrow) for the following photo.

Fig. 10: The vegetation to the north of the southern cleared (and flattened) section. The water tank is also visible in Fig. 9.

Fig. 11: The grass-dominated vegetation to the south of the southern cleared (and flattened) section of the study site. The vegetation grades into a mixture of *Searsia crenata* (indigenous) and *Acacia cyclops* (exotic) to the left of the photograph.

Fig. 12: The vegetation to the south of the study site is a mixture of indigenous *S. crenata* and exotic *A. cyclops*, which is not preferred habitat of any of the SCC flagged by the screening tool.

Fig. 13: The (largely indigenous) Hartenbos Dune Thicket vegetation to the northeast of the property. This vegetation is dominated by *Sideroxylon inerme* (white milkwood), and is the preferred habitat of *Bradypterus sylvaticus* along the south coast.

3.1.2. Animal species sensitivity

The DFFE screening tool identified four species of conservation concern (SCC). These species, along with their associated sensitivities are:

- Knysna warbler, *Bradypterus sylvaticus* (Aves) – High sensitivity
- African marsh-harrier, *Circus ranivorus* (Aves) – High sensitivity
- Denham's bustard, *Neotis denhami* (Aves) – High sensitivity
- Yellow-winged agile grasshopper, *Aneuryphymus montanus* (Insecta) – Medium sensitivity

Based on the desktop study, which included the use of iNaturalist and the Global Biodiversity Information Facility (GBIF), there are the following likelihoods of these SCC occurring at the site of the proposed development:

- A very low likelihood of *A. montanus*, *N. denhami* and *C. ranivorus*; and*;*
- A medium likelihood of *B. sylvaticus* occurring at the site, but a low likelihood of the species occurring within the development footprint.

Bradypterus sylvaticus **(Knysna warbler)** is a vulnerable bird species occurring in dense thickets, including riparian vegetation and coastal thickets dominated by White milkwood, *Sideroxylon inerme* (Smith, 2005; Taylor, 2015a). The main threat to this species is habitat destruction, specifically the clearing of coastal clearings where it occurs. It appears to be largely absent from areas dominated by *Acacia cyclops*, though it may use suitable thickets dominated by other exotic species (specifically lantana and bramble). There are 12 records of this species in the surrounding area on the GBIF database, likely mainly from the *Sideroxylon inerme*-thicket vegetation along the coast. The thicket vegetation adjacent to this development likely supports this species, but there is a low likelihood that it occurred in the area that was cleared. Due to the likely occurrence in the general area (but likely **absence** from the development footprint itself), there is a **low** likelihood that it occurs at the site, and will be impacted by this development.

Circus ranivorus **(African marsh-harrier)** occurs along large water bodies and in neighbouring open vegetation (Simmons, 2005). This species is classified as Endangered in South Africa (Taylor, 2015b), with habitat loss and degradation being the most significant threat to the continued survival of this species. The study site has no large water bodies present, nor is it located adjacent to fresh or brackish water bodies. The thicket vegetation surrounding the property is also too dense to support this species. There is only one record on the GBIF database of this species from the area, with a record from January 2016 of a bird recorded along the N2, where the road crosses the Great Brak River estuary. Due to the lack of records from this area, and the lack of suitable habitat on and around the property, there is a very low likelihood that this species occurs at the study site.

Neotis denhami **(Denham's bustard)** occurs in natural vegetation (fynbos and grasslands), pastures and agricultural fields (Allan, 2005). It is classified as Vulnerable in South Africa (Taylor, 2015c), mainly due to powerline collisions, habitat conversion to intensive monoculture fields, and overgrazing of grassland habitats. There are no records of this species on the GBIF database for the area. Along with the lack of suitably open habitats on the property and surrounding areas, as well as the proximity of the property to the town of Tergniet, there is a very low likelihood that this species occurs at the study site.

Aneuryphymus montanus **(Yellow-winged agile grasshopper)** is a vulnerable grasshopper species known from only six localities (Hochkirck et al., 2018). There are no records of this species close to the study site on the GBIF database, with the closest record being from the Swartberg Mountains (approximately 80 km from this site). *A. montanus* also prefers arid fynbos on rocky substrates, neither of which are present on this property. Due to the lack of records from the area and the lack of suitable habitat on the property, there is a very low likelihood of this species on this property.

3.2. Site visit

3.2.1. Vegetation

The site visit, performed on 1 November 2023, confirmed that the vegetation on the property is dominated by a lawn, with *A. cyclops*-invaded thicket around the property (and on its outskirts). To the south of the property, the thicket vegetation consists of low-growing *Sideroxylon inerme* and *Searsia crenata*, which grades into taller, *A. cyclops*-invaded thickets to the east and west of the property. To the north of the property, a band of taller, *S. inerme*-dominated thicket occurs behind the frontal dune (Fig. 13).

The areas that were cleared most likely held little natural vegetation (apart from the white milkwood trees that were left untouched), and likely consisted of *Acacia cyclops* (an exotic tree species that dominates coastal dunes) and *Senecio elegans* (an indigenous, weedy, flowering shrub that grows abundantly in disturbed sandy areas). Post-clearing, there is little vegetation left, apart from *S. elegans* and a few pioneer plants.

3.2.2. Animal species sensitivity

During the site visit, none of the species of conservation concern (SCC) were recorded at the site. The thicket vegetation around the property is, however, suitable for ***Bradypterus sylvaticus***, and this species occurs in similar thickets less than a kilometre to the west of this property. However, there is no suitable vegetation within the study site, nor in the cleared development footprint, and the clearing of vegetation, flattening of the frontal dune, and earthworks are unlikely to have impacted this species (particularly since the vegetation that was cleared consisted of *A. cyclops* vegetation, which is not a preferred habitat of *B. sylvaticus*).

None of the other three SCC (*C. ranivorus*, *N. denhami* and *A. montanus*) are likely to occur at the study site, as there are no suitable habitats for any of these species at the study site. *C. ranivorus* requires large wetland ecosystems with open vegetation adjacent thereto; neither of these requirements are met at the study site. *N. denhami* requires open vegetation, while the vegetation at the study site is too dense (and it is unlikely to occur in a developed area). *A. montanus* requires arid fynbos vegetation on a rocky substrate: none of these requirements are met, with the area experiencing a relatively high rainfall, being dominated by thicket vegetation, and being on a sandy substrate. There is therefore a **very low likelihood** of these species occurring at the study site.

3.2.3. Other animal species

During the site visit, a total of 15 animal species were recorded (Appendix 2). These observations consisted of eight bird, six insect, and one gastropod species. No SCC were recorded during the survey, but the *Sideroxylon inerme*-thickets to the north of the development site are suitable habitats for *B. sylvaticus*, and it is very likely that it occurs there. There were no noteworthy observations of animal species at the site, as the development footprint largely consists of an area that is already built-up or disturbed: most of the species recorded are generalists, or thrive in urban and peri-urban environments.

4. ANIMAL SPECIES COMPLIANCE STATEMENT

The DFFE screening tool identified the study area as having a **High sensitivity** for the animal species theme, due to the potential presence of four species of conservation concern. The site visit and associated Site Sensitivity Verification Report, however, identified that this site has a **LOW SENSITIVITY** for the animal species theme, due to:

- The very low likelihood of three of the four SCC (*N. denhami*, *C. ranivorus*, and *A. montanus*) occurring at the site;
- The likely presence of one of the SCC (*B. sylvaticus*) in vegetation around the study site (but outside the development footprint);
- The low likelihood of *B. sylvaticus* occurring in the area that was cleared (due to the previous vegetation being dominated by exotic *A. cyclops*); and
- The low importance of the study site (consisting mostly of lawns and developed areas), and development footprint (consisting of cleared exotic *A. cyclops*) acting as potential ecological corridors for the SCC or other species.

The development is unlikely to impact the continued existence of *N. denhami*, *C. ranivorus* or *A. montanus*, and is also unlikely to impact undetected SCC, as they are unlikely to occur at the study site (due to a lack of suitable habitat, or not being recorded near the study site). Though *B. sylvaticus* is known from the area (with sightings less than 1 km from the study site), no specimens were heard or seen during the site visit, and the main area with suitable habitat is located to the northeast of the property. The area that was cleared at the study site consisted of *A. cyclops* thickets, which was unlikely to be suitable habitat for *B. sylvaticus*.

The sensitivity map has been drawn up for this property (Appendix 1), indicating the different sensitivities of the study site (as it relates to the animal species that are of conservation concern). The majority of the property is classified as Low sensitivity, as it consists of the building, parking area and road that were present on the property prior to the vegetation being cleared. The southern and western sections of the property are classified as Medium sensitivity, as these areas still have relatively dense vegetation present that may act as corridors for animals present in the area. Though no *B. sylvaticus* were recorded during the site visit, it is possible that these areas of natural and semi-natural vegetation act as corridors for this species between areas of more suitable habitat.

The addition of two guest rooms and six additional parking spaces (within the existing driveway) is unlikely to have an impact on animal species of conservation concern. The remainder of the property will also be rehabilitated with locally indigenous species, thereby benefiting SCC such as *B. sylvaticus* that may be present in the area surrounding the study site.

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APPENDIX 1: SENSITIVITY MAP OF SEEBEDERFIE, TERGNIET

APPENDIX 2: ANIMAL SPECIES RECORDED ON ERF 4735, GREAT BRAK RIVER, MOSSEL BAY, WESTERN CAPE

Common name	Scientific name
Birds	
Apalis, Bar-throated	*Apalis thoracica*
Dove, Laughing	*Spilopelia senegalensis*
Prinia, Karoo	*Prinia maculosa*
Robin-Chat, Cape	*Cossypha caffra*
Seedeater, Streaky-headed	*Crithagra gularis*
Sparrow, Cape	*Passer melanurus*
Spurfowl, Cape	*Pternistis capensis*
Sunbird, Southern Double-collared	*Cinnyris chalybeus*
Gastropods	
Snail, White Italian	*Theba pisana*
Insects: Coleoptera	
Beetles, Southern yellow tiger	*Lophyra candida*
Insects: Hymenoptera	
Bee, Cape honey	*Apis mellifera capensis*
Insects: Lepidoptera	
Painted lady	*Vanessa cardui*
White, Meadow	*Pontia helica*
Insects: Neuroptera	
Antlions	Myrmeleontidae
Insects: Orthoptera	
Locust, Rain	*Lamarckiana* sp.

APPENDIX 3: THE PROPOSED SITE DEVELOPMENT PLAN FOR THE PROPERTY