

ANNEXURE E2: COPY OF COMMENT FROM CAPE NATURE

Dupré Lombaard (Virdus Works)

From: Ismat Adams <iadams@capenature.co.za>
Sent: 19 June 2026 10:51
To: Dupré Lombaard (Virdus Works)
Cc: Marius Wheeler
Subject: RE: NOTICE OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT (DEA&DP Ref. 16/3/3/1/F4/15/3018/26)

Good day

CapeNature's previous comments still apply, no further comments.

Kind regards,

Ismat Adams
Land-Use Scientist | Landscape West
Conservation Operations
t: 087 087 3188



From: Dupré Lombaard (Virdus Works) <dupre.lombaard@virdus.com>
Sent: Wednesday, 20 May 2026 13:17
To: Ismat Adams <iadams@capenature.co.za>
Subject: NOTICE OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT (DEA&DP Ref. 16/3/3/1/F4/15/3018/26)

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20 May 2026

The Cape Nature Landscape West Conservation Operations
Matzikama Street
Vanrhynsdorp
8170
Per: iadams@capenature.co.za //

Dear Sir / Madam Geagte Heer / Dame

NOTICE OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT: THE PROPOSED DECOMMISSIONING OF AN AQUACULTURE FACILITY ON FARM NO. 1259, MALMESBURY DIVISION (DEA&DP REF. 16/3/3/1/F4/15/3018/26)

Notice is hereby given of a public participation process in terms of the National Environmental Management Act, 1998, Act 107 of 1998) (NEMA) regarding the proposed decommissioning of the existing aquaculture facility on Farm 1259 following acceptance of the application by the competent authority on 11 May 2026. The farm has an area of 3,12 ha that is inside of the delineated urban edge of Paternoster, and is accessed through the waterfront on Erf 2063, Paternoster. Paternoster Groepbelange wishes to redevelop the existing under-utilised buildings on 1,21 ha of the property and to integrate it with the existing waterfront attraction.

The activity that triggers the environmental authorization application in terms of the NEMA Environmental Impact Study Regulations, 2017 is:

- Listing Notice 1 (Basic Assessment process):
 - Activity 31: Decommissioning of a facility for which authorisation is required in terms of the Regulations.

Dupré Lombaard (Mobile: +27 82 895 6362 (WhatsApp only) // Email: dupre.lombaard@virdus.com) of Virdus Works Environmental (Pty) Ltd has been appointed as the independent Environmental Assessment Practitioner (EAP) to undertake the Basic Assessment environmental authorisation process on behalf of the applicant (Paternoster Group Ltd). Any person wishing to register, or participate in the process, or submit comment on the draft basic assessment report (DBAR) may submit written comment by email to the EAP. All correspondence must refer to the subject and DEA&DP reference number, and must contain the name, address, preferred contact details, and sufficient details regarding the subject matter to allow for a rational response.

The DBAR, inclusive of a full description of the proposed development, specialist reports, and proposed draft environmental management programme (EMPr) can be accessed on the Virdus website: <https://www.virdus.com>. If alternative access to the DBAR is required, then special arrangements can be made with the EAP or Nico Williams (Mobile: +27 76 564 8569 // Email: nico.williams@virdus.com). The DBAR will be available for a period of 31 days for public access and comment, from 21 May – 22 June 2026. Virdus Works Environmental respects the right to privacy of all interested and affected parties (I&AP's) and will comply with the requirements of the Protection of Personal Information Act, 2013, Act 4 of 2013. By registering as an I&AP, and participation in the process, I&AP's agree that their names, limited details, and comments may be made available in the public domain.

KENNISGEWING VAN OPENBARE DEELNAME PROSES EN BESKIKBAARHEID VAN KONSEP BASIESE ASSESSERINGS VERSLAG: VOORGESTELDE UITWERKING STELLING VAN 'N AKWAKULTUUR FASILITEIT OP PLAAS NO. 1259, MALMESBURY AFDELING (DEA&DP VERW. 16/3/3/1/F4/15/3018/26)

Hiermee word kennis gegee van 'n openbare deelname proses ingevolge die Wet op Nasionale Omgewingsbestuur, 1998, Wet 107 van 1998, (NEMA) rakende die voorgestelde uitwerking stelling van die bestaande akwakultuur fasiliteit op Plaas 1259 na aanvaarding van die aansoek deur die bevoegde gesag met bovermelde verwysing op 11 Mei 2026. Die plaas het 'n oppervlakte van 3,12 ha wat binne-in die afgebakende stedelike rand van Paternoster is en toegang verkry deur die waterfront op Erf 2063, Paternoster. Paternoster Groepbelange wil die bestaande onder-benutte geboue op 1,21 ha van die eiendom herontwikkel en integreer met die bestaande waterfront.

Die aktiwiteit wat die omgewingsmagtiging aansoek aktiveer ingevolge die NEMA Omgewingsimpak Studie Regulasies, 2017, is:

- Lys Kennisgewing 1 (Basiese Assessering-proses):

- **Aktiwiteit 31: Die uitwerking stelling van 'n fasiliteit wat ingevolge die Regulasies vooraf magtiging nodig.**

Dupré Lombaard (Selfoon: +27 82 895 6362 (slegs WhatsApp) // E-pos: dupre.lombaard@virdus.com) van Virdus Works Environmental (Edms) Bpk is aangestel as die onafhanklike omgewings assesserings praktisyn (EAP) om die basiese assessering omgewingsmagtiging proses namens die aansoeker (Paternoster Groep Bpk) te onderneem. Enige persoon wat wil registreer, of aan die proses wil deelneem, of kommentaar op die konsep basiese assessering verslag (DBAR) wil indien, kan skriftelike kommentaar per e-pos by die EAP indien. Alle korrespondensie moet verwys na die onderwerp en DEA&DP verwysingsnommer en moet die naam, adres, voorkeur kontakbesonderhede en voldoende besonderhede rakende die onderwerp bevat om 'n rasonale reaksie moontlik te maak.

Die volledige DBAR kan op die Virdus-webwerf verkry word: <https://www.virdus.com>. Indien alternatiewe toegang tot die DBAR vereis word, kan spesiale reëlins getref word met die EAP of Nico Williams (Selfoon: +27 76 564 8569 // E-pos: nico.williams@virdus.com). Die DBAR sal beskikbaar wees vir 'n tydperk van 31 dae vir openbare toegang en kommentaar, vanaf 21 Mei – 22 Junie 2026. Virdus Works Environmental respekteer die reg op privaatheid van alle belanghebbendes (I&APs) en sal voldoen aan die vereistes van die Wet op die Beskerming van Persoonlike Inligting, 2013, Wet 4 van 2013. Deur as 'n I&AP te registreer en aan die proses deel te neem, stem I&AP's in dat hul name, beperkte besonderhede en kommentaar in die openbare domein beskikbaar gestel kan word.

Locality / Ligging

Farm 1259, Malmesbury RD decommissioning site



Proposed development / Voorgestelde ontwikkeling

of 3,12ha. The existing crayfish holding tanks are and the aquaculture facilities were in existing buildings with an area of approximately 4 200m² and cover an area of roughly 1,2ha. The crayfish factory was built in the early 1900's and when the Paternoster Visserye company was established in the early 1960's it took over the factory and in the mid 1980's the company established the aquaculture (fish farming) activities. The aquaculture activities remained in full operation until its closure in 2019.

On average 300 migrant labourers and 500 Paternoster locals were employed at the crayfish factory that processed more than 30 000 crayfish per day in the season. To process the crayfish, most of which were sold fresh (live) to European buyers, they had to be kept alive in tanks filled with sea water from delivery to packing. The facility consists of large concrete buildings with asbestos-cement roofs. Inside the crayfish holding tank building that was built on land sloping down to the sea, there are twenty concrete tanks (2m² and 1m deep) holding 40m³ of fresh sea water. Water is extracted from the sea on the Bekbaai (western) side of the facility and pumped into the tanks from where the water runs back into the sea under gravity. When crayfish are held in the tanks, fresh sea water is constantly pumped into the tanks. In this way several thousand crayfish can be kept alive for a week or more. Sea water was also pumped into the other buildings for fish farming activities which ceased in 2019, leaving the buildings under-utilised.

The purpose of the application is to gain approval for the redevelopment of the existing but under-utilised buildings on Farm 1259, Malmesbury RD in Paternoster, and its integration with the abutting waterfront development on Erf 2063, Paternoster. The vacated building space can be better utilised to complement the waterfront development, which has experienced significant growth in visitor numbers since 2021. It is also indicated as a significant opportunity for redevelopment in the Saldanha Bay Municipality Spatial Development Framework, 2025.



Farm 1259 decommissioning site locality



Farm 1259 aquaculture setup

The total allowable crayfish catch has been reduced considerably since 2014 and for the 2022 season alone the quota has been dropped by 21,3%. In an effort to counter the increasing tendency of lower quotas, Paternoster Visserye has entered into an agreement with a service provider to catch, hold, pack, and export crayfish under its quota. As a result, the crayfish tanks are mostly empty and unused and a small number are used if a particularly good catch is landed, but then for no more than five to seven days. During the last decade, the total annual catch for the Group has varied between 21 895 and 70 000 kg, of which approximately 10 – 12% was processed through the facility, i.e., 2,2 – 2,6 tonnes to 7,0 – 8,4 tonnes of crayfish were processed through the facility annually since 2010. The fish farming activities have ceased completely. The Paternoster Group can therefore better utilise the existing buildings, none of which are older than 60 years.

The proposal is to decommission the aquaculture activities (fish farming and crayfish holding tanks), to convert the existing fish farming buildings that are large warehouse type structures, to contain 11 flats (apartments) at ground level, an exhibition area where the old crayfish tanks are retained and also used as an attraction, a laundry to service the waterfront, recreational facilities, and to upgrade the surrounding area with parking and landscaping. The conversion will occur over time and a smaller more compact aquaculture facility with a maximum capacity of 10 000kg wet weight per annum and related product stores will be retained during the conversion process. The majority of the conversions will occur internally, but the facades of the buildings will also change, with new doors and windows inserted to the walls of the existing building to fit the internal alterations.

The existing access, parking and loading areas, municipal and other services infrastructure will be retained and improved. The existing labourers' accommodation, laboratories, store rooms, and offices on the site are proposed for upgrading and accommodation purposes. Access will, for the time being, be through the existing waterfront on the registered access servitude using the existing roads.

Potable water infrastructure will be upgraded to achieve the desired fire flow of 25 l/s at the proposed connection point. This requires upgrading of the external water reticulation network by providing a new 160 mm diameter link from the existing 200 mm diameter supply line along Columbine and St Augustine Streets to the proposed development.

Sewage network upgrading for the proposed development consists of a new internal sewer connection (through Erf 2063) to the existing 160 mm diameter gravity sewer running parallel to Sonkwas Street. The upgrading of the existing Begraafplaas Pump Station, replacement of the existing 75 mm diameter rising main at the Begraafplaas PS with a 110 mm diameter pipe, a new 160 mm diameter gravity sewer along Pieter Street and a 315 mm diameter gravity sewer along St Augustine Street up to the Paternoster Main Pump Station. None of these upgrades exceed the 120 l/s listing threshold.

Stormwater is managed on-site in the existing systems, with minor upgrades to increase the capacity thereof to improve the quality of the runoff.

Solid waste will be collected by the Saldanha Bay Municipality as at present with minimal increase in the volume.

Electricity is supplied by the Saldanha Bay Municipality, through an existing 400kVA distribution transformer. The existing waterfront development on Erf 2063 is served by a similar transformer. The estimated current electricity demand is 600kVA. The After Diversity Maximum Demand for the proposed tourist development is 199,6kVA, while the existing Notified Demand is 200kVA. Thus, no upgrading of supply will be required.

The total potential trip generation for the reconfigured buildings is estimated to be 72 Friday PM peak hour trips (33 in, 39 out) and 61 Saturday peak hour trips (36 in, 25 out). No upgrades to the Kreeftegang (street), Seeduiker Street or R399/Mosselbank Street intersections along St Augustine Road are considered necessary to accommodate the estimated background peak hour volumes by the traffic specialist. However, the Municipality requires widening of Kreeftegang by approximately 3m over a distance of 45m to mitigate peak period congestion at the waterfront.

Listed activities

Activity No(s):	Relevant Activity(ies)	Description of project activity
Listing Notice 1 - 31	The decommissioning of existing facilities, structures, or infrastructure for- i) any development and related operation activity or activities listed in this Notice, Listing Notice 2 of 2014 or Listing Notice 3 of 2014. ii) any expansion and related operation activity or activities listed in this Notice, Listing Notice 2 of 2014 or Listing Notice 3 of 2014; iii) ... iv) any phased activity or activities for development and related operation activity or expansion or related operation activities listed in this Notice or Listing Notice 3 of 2014; or v) any activity regardless the time the activity was commenced with, where such activity: (a) is similarly listed to an activity in (i) or (ii) above; and (b) is still in operation or development is still in progress;	Relates to the decommissioning of the aquaculture facility and redevelopment of the buildings and site for a mixed-use development complementary of the waterfront on abutting Erf 2063.

Activity No(s):	Relevant Activity(ies)	Description of project activity
	excluding where— (aa) activity 22 of this notice applies; or (bb) the decommissioning is covered by part 8 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental Management: Waste Act, 2008 applies.	

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Postal	PO Box 26, Porterville, 6810
Physical	72 Voortrekker Street, Porterville, 6810
Website	www.capenature.co.za
Enquiries	Ismat Adams
Telephone	0870873188
Email	iadams@capenature.co.za
Reference	SSD14/2/6/1/8/4/_Erf 1259_Paternoster_Aquaculture_decom
Date	26 March 2026

Virdus Works Environmental (Pty) Ltd

Via email: dupre.lombaard@virdus.com

Attention: Dupré Lombaard

Dear Dupré

RE: DECOMMISSIONING OF AN AQUACULTURE FACILITY AND REDEVELOPMENT OF A PORTION OF FARM 1259, MALMESBURY RD AT PATERNOSTER

DEA&DP ref: I6/3/3/6/7/1/F4/I5/3229/25

Herewith comments on this application:

- I. Based on the BAR, SDP, and SSVR it is understood that the proposed decommissioning entails repurposing and refurbishing the existing buildings for business use rather than aquaculture. It is noted that aquaculture will still be conducted on the property but at a substantially reduced capacity. Based on the BAR and SDP it is noted that the overall development footprint will not change. This is understood to mean that the remaining vegetated area to the south of the buildings to be refurbished will also not be disturbed. It is noted that essentially the development area has not been selected as any biodiversity priority area based on the WCBSP.
 - I.I Considering the already highly modified nature of the development site and the purpose of the application in re-utilising the existing buildings and not increasing footprint, the conclusions regarding botanical, faunal, terrestrial biodiversity sensitivities are supported.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Kind regards,

Ismat Adams Digitally signed by Ismat Adams
Date: 2026.03.26 16:05:45 +02'00'

Land-Use Scientist: Landscape West
Conservation Operations

Dupré Lombaard (Virdus Works)

From: Dupré Lombaard (Virdus Works) <dupre.lombaard@virdus.com>
Sent: 31 March 2026 04:53
To: 'Ismat Adams'
Cc: 'Marius Wheeler'; kobus@paternostergroep.co.za
Subject: RE: NOTICE OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT (DEA&DP Ref. 16/3/3/6/7/1/F4/15/3229/25)

Dear Ismat

We acknowledge receipt of the comment as submitted and confirm that the situation assessment as contained in the letter is correct; the development footprint is not expanding.

Regards / Groete / Saludos

DUPRÉ LOMBAARD

(SACPLAN B/8076/1998 / EAPASA 2019/304)

Mobile: South Africa +27 82 895 6362 (WhatsApp only)

Móvil: España +34 660 48 24 46

Address / Dirección: Avenida do Malecón 25, Piso 8 E, Santa Uxia de Ribeira, 15960, La Coruña, Spain

Virdus Works (Pty) Ltd (Reg. No. 2018/585747/07)

Development Management Consultants and Environmental Assessment Practitioners

Address: 11 Elektron Street, Techno Park, Stellenbosch, 7600, South Africa

Web: www.virdus.com

From: Ismat Adams <iadams@capenature.co.za>
Sent: 26 March 2026 14:07
To: Dupré Lombaard (Virdus Works) <dupre.lombaard@virdus.com>
Cc: Marius Wheeler <mwheeler@capenature.co.za>
Subject: RE: NOTICE OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT (DEA&DP Ref. 16/3/3/6/7/1/F4/15/3229/25)

Good day

See attached comment

Kind regards,

Ismat Adams
Land-Use Scientist | Landscape West
Conservation Operations
t: 087 087 3188



ANNEXURE E3: FINAL COMMENT FROM THE DWS

ANNEXURE E4: COMMENT FROM THE DFFE: OCEANS AND COAST



forestry, fisheries & the environment

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

Private Bag X 447 · PRETORIA · 0001 · Environment House · 473 Steve Biko Road, Arcadia, PRETORIA

Reference: EDMS 274107

Inquiries: Mr. Xolani Myanga

E-mail: OCEIA@dfpe.gov.za

Telephone: (021) 493 7064

Mr Dupré Lombaard
Virdus Works Environmental (Pty) Ltd
11 Elektron Street,
Techno Park,
Stellenbosch,
7600

Telephone Number: +27 82 895 6362

Email Address: dupre.lombaard@virdus.com

Dear Mr Lombaard

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE DECOMMISSIONING OF AN AQUACULTURE FACILITY AND REDEVELOPMENT OF A PORTION OF FARM 1259, MALMESBURY RD AT PATERNOSTER

The Department of Forestry, Fisheries, and the Environment (DFPE), Branch Oceans & Coasts (O&C) appreciates the opportunity granted to provide comments and recommendations on the Draft Basic Assessment Report (Draft BAR) in the subject of this letter. This Branch will provide comments based on the provisions of Section 24O (2) the National Environmental Management Act 107 of 1998 ("NEMA") and Section 5 of 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 coastal landscapes to realise that 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 Draft BAR, the Branch O&C would like to submit the following comments for your consideration:

1. The Branch acknowledges that the existing buildings are located landward of the Coastal Management Line (CML) and that no new infrastructure is proposed seaward of the CML. However, the applicant is requested to provide a geo-referenced overlay (e.g. GIS or survey-confirmed plan) clearly depicting the spatial relationship between the development footprint, the CML, and the High-Water Mark (HWM).

Notwithstanding the above, the current mapping does not adequately demonstrate verified spatial alignment, particularly in terms of surveyed coordinates and positional accuracy. Furthermore, the applicant must explicitly confirm that no components of the development, including associated infrastructure, services, or temporary construction-related works, will encroach seaward of the CML.

2. The applicant is reminded of Section 13 of the ICM Act which places a strong emphasis on the protection and facilitation of public access to coastal public property and Sections 18 to 20 further require that access must not be unreasonably restricted and, where necessary, must be secured through the designation of coastal access land.

In light of the above, the applicant is requested to clearly indicate how public access to the shoreline will be maintained or improved as part of the proposed development. This should include the identification of existing and proposed coastal access points; confirmation that no infrastructure will obstruct lawful public access to coastal public property; consideration of formalised access routes where applicable; and alignment with any applicable CMLs, municipal by-laws, and coastal access provisions.

3. The Branch acknowledges that the proposed development is largely confined to an already transformed footprint and that no direct encroachment into sensitive coastal areas is anticipated. Notwithstanding this, it is noted that compliance with the objectives of the Coastal Protection Zone (CPZ) in terms of Section 17 of the ICM Act - including the protection of ecological integrity, maintenance of natural coastal processes, and the buffering function of coastal ecosystems - has not been sufficiently demonstrated.

Furthermore, the Branch is not satisfied that the requirements of Section 63 of the ICM Act have been adequately addressed, particularly in relation to the assessment of potential impacts on coastal public property and the CPZ, the consideration of cumulative and indirect impacts, and the evaluation of risks associated with dynamic coastal processes such as erosion, sea-level rise, storm surge, and extreme events. In this regard, the applicant is required to provide a more comprehensive and substantiated assessment demonstrating that the proposed development will not result in adverse impacts on the coastal environment and is consistent with the purpose and management objectives of the coastal zone.

Based on the above, the Branch: Oceans and Coasts supports the granting of Environmental Authorisation for the proposed decommissioning and redevelopment, subject to the applicant addressing the above comments to the satisfaction of the competent authority, and ensuring full compliance with all applicable legislative requirements, including the ICM Act.

Kindly note that the Branch reserves its right to provide further comment once the application for environmental authorisation and specialist studies are made available; and request additional information relating to ICM Act compliance where required. 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 (DFPE), 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: 19/06/2026

Dupré Lombaard (Virdus Works)

From: Xolani Myanga <XMyanga@dfef.gov.za>
Sent: 21 June 2026 09:48
To: Dupré Lombaard (Virdus Works)
Cc: OCEIA
Subject: Re: DFFE OCEANS AND COASTS - COMMENTS ON THE DRAFT BAR FOR THE DECOMMISSIONING OF AN AQUACULTURE FACILITY AND REDEVELOPMENT OF A PORTION OF FARM 1259, MALMESBURY RD AT PATERNOSTER
Attachments: 274107 Comments_signed.pdf

Dear Mr Lombaard,

My apologies. Please find the attached comments.

Thanks & Regards 

Xolani Myanga
Specialised Environmental Officer
Directorate: Coastal Development & Coordination
Chief Directorate: Integrated Coastal Management
Branch: Oceans and Coasts
V&A Waterfront,
Cape Town,
8001

Tel: (+27) 21 493 7064
Cell: (+27) 76 819 2935
Email: xmyanga@dfef.gov.za



**forestry, fisheries
& the environment**

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

From: Dupré Lombaard (Virdus Works) <dupre.lombaard@virdus.com>
Sent: Saturday, June 20, 2026 08:18
To: Xolani Myanga <XMyanga@dfef.gov.za>
Cc: OCEIA <OCEIA@dfef.gov.za>
Subject: RE: DFFE OCEANS AND COASTS - COMMENTS ON THE DRAFT BAR FOR THE DECOMMISSIONING OF AN AQUACULTURE FACILITY AND REDEVELOPMENT OF A PORTION OF FARM 1259, MALMESBURY RD AT PATERNOSTER

Dear Xolani

Thank you for the email. I could not find an attachment with it, if you could resend that for me please.

Regards / Groete / Saludos

DUPRÉ LOMBAARD

(SACPLAN B/8076/1998 / EAPASA 2019/304)

Mobile: South Africa +27 82 895 6362 (WhatsApp only)

Móvil: España +34 660 48 24 46

Address / Dirección: Avenida do Malecón 25, Piso 8 E, Santa Uxia de Ribeira, 15960, La Coruña, Spain

Virdus Works (Pty) Ltd (Reg. No. 2018/585747/07)

Development Management Consultants and Environmental Assessment Practitioners

Address: 11 Elektron Street, Techno Park, Stellenbosch, 7600, South Africa

Web: www.virdus.com

From: Xolani Myanga <XMyanga@dffe.gov.za>

Sent: 19 June 2026 13:48

To: dupre.lombaard@virdus.com

Cc: OCEIA <OCEIA@dffe.gov.za>

Subject: DFFE OCEANS AND COASTS - COMMENTS ON THE DRAFT BAR FOR THE DECOMMISSIONING OF AN AQUACULTURE FACILITY AND REDEVELOPMENT OF A PORTION OF FARM 1259, MALMESBURY RD AT PATERNOSTER

Dear Mr Lombard,

I hope this email finds you well. Kindly find the attached comments for your consideration.

Thanks & Regards 

Xolani Myanga
Specilised Environmental Officer
Directorate: Coastal Development & Coordination
Chief Directorate: Integrated Coastal Management
Branch: Oceans and Coasts
V&A Waterfront,
Cape Town,
8001

Tel: (+27) 21 493 7064

Cell: (+27) 76 819 2935

Email: xmyanga@dffe.gov.za



**forestry, fisheries
& the environment**

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

**Virdus Works Environmental
(Pty) Ltd (Reg. No. 2019/133896/07)**

Environmental Management, Assessment and Administration
PO Box 247, Wolseley, 6830, SOUTH AFRICA
Mobile: +27 76 564 8569
Email: nico.williams@virdus.com



Your ref.: EDMS 274107
DEA&DP ref.: 16/3/3/1/F4/15/3018/26

26 June 2026

Directorate: Coastal Development & Coordination
Chief Directorate: Integrated Coastal Management
Branch: Oceans and Coasts
V&A Waterfront,
Cape Town,
8001

Attention: Mr Xolani Myanga
E-mail: OCEIA@dffe.gov.za

Dear Sir

COMMENT: THE DECOMMISSIONING OF THE AQUACULTURE FACILITY AND REDEVELOPMENT OF A PORTION OF FARM 1259, PATERNOSTER, WEST COAST

The Department's letter dated 19 June 2026 refers.

The letter seeks answers to the questions or matters as inserted with the appropriate responses below.

1. The Branch acknowledges that the existing buildings are located landward of the Coastal Management Line (CML) and that no new infrastructure is proposed seaward of the CML. However, the applicant is requested to provide a geo-referenced overlay (e.g. GIS or survey-confirmed plan) clearly depicting the spatial relationship between the development footprint, the CML, and the High-Water Mark (HWM).

Notwithstanding the above, the current mapping does not adequately demonstrate verified spatial alignment, particularly in terms of surveyed coordinates and positional accuracy. Furthermore, the applicant must explicitly confirm that no components of the development, including associated infrastructure, services, or temporary construction-related works, will encroach seaward of the CML.

Attached hereto under Annexure A is a topographical survey of the site, showing the CML, topographical features, buildings, and the infrastructure on the site and surrounding land. As will appear from the mapping, it is only the existing pump station, and the associated inlet and outlet infrastructure which are located seaward of the CML.

For the avoidance of doubt, no listed activity is undertaken within Coastal Public Property as defined in the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24

of 2008). The seawater inlet and outlet pipes that traverse Coastal Public Property are existing infrastructure that will be retained unchanged, with no upgrading, expansion or related construction. The decommissioning (Listing Notice 1 Activity 31) and all associated works occur on the subject property and within the existing structures. The Department Forestry, Fisheries and the Environment has been notified of the application for commenting purposes and in case that the Coastal Waters Discharge Permit (Section 69 of the NEM:ICMA) currently applicable in terms of a historic use, has to be amended.

The site photograph below shows the seawater pump (inlet) system on the left, the gravity return flow chamber in the centre with the crayfish holding facility on the right. This crayfish holding facility will be retained with a maximum throughput capacity of 10 000kg wet weight per annum that is below the listed activity threshold, hence the decommissioning application. The intake and outlet physical infrastructure on the property date back to the 1970s and will remain unchanged/as-is. Seawater is currently pumped through the crayfish holding tanks at a rate of approximately 40m³ per hour (11l/s) through 120mm pipes. The inlet and outlet systems are installed on the subject property while the inlet and outlet pipes occur on the Coastal Public Property. The system in its current state will be retained as-is for as long as the crayfish quotas or other rational use reasons justify it and the only change is in the volume of seawater that is extracted from and returned to the sea.



There will thus be on-going discharge, as the crayfish holding tanks (40m³) remain operational. The volume of discharge is more or less 20% of what it was in 2019. The number of days / year that the pumps run to maintain fresh seawater in the tanks for the current crayfish operations are below 130. Where with the fish farming operations, the pumps had to run weekly throughout the year, they now run for the crayfish season from early November to mid-March and then only when there are crayfish in the tanks, which is irregular and for a maximum of 8 000kg of crayfish.

2. The applicant is reminded of Section 13 of the ICM Act which places a strong emphasis on the protection and facilitation of public access to coastal public property and Sections 18 to 20 further require that access must not be unreasonably restricted and, where necessary, must be secured through the designation of coastal access land.

In light of the above, the applicant is requested to clearly indicate how public access to the shoreline will be maintained or improved as part of the proposed development. This should include the identification of existing and proposed coastal access points; confirmation that no infrastructure will obstruct lawful public access to coastal public property; consideration of formalised access routes where applicable; and alignment with any applicable CMLs, municipal by-laws, and coastal access

provisions.

The activity is not situated on land that is designated as coastal access land. A public passage (Erf 1611) was previously created along the southern boundary of the property from Bitou Close to Bekbaai (not the decommissioning site but the property), to provide public access between St Augustine Road and the Bekbaai beach or Coastal Public Property. The decommissioning and repurposing of the existing buildings will not have any effect on this coastal access. The biodiversity theme compliance statements recommend strict management of the Coastal Public Property around the site to reduce any potential negative anthropogenic effects and goes as far as to indicate that the land should be designated as a no-go zone to prevent potential habitat degradation and loss. Such designation of the Coastal Public Property is however contrary to the intent of Section 18 of NEM:ICMA and it will be made applicable only for construction personnel, machinery, and contractor activities, while the public will be permitted access with appropriate awareness guidance.

3. The Branch acknowledges that the proposed development is largely confined to an already transformed footprint and that no direct encroachment into sensitive coastal areas is anticipated. Notwithstanding this, it is noted that compliance with the objectives of the Coastal Protection Zone (CPZ) in terms of Section 17 of the ICM Act - including the protection of ecological integrity, maintenance of natural coastal processes, and the buffering function of coastal ecosystems - has not been sufficiently demonstrated.

Furthermore, the Branch is not satisfied that the requirements of Section 63 of the ICM Act have been adequately addressed, particularly in relation to the assessment of potential impacts on coastal public property and the CPZ, the consideration of cumulative and indirect impacts, and the evaluation of risks associated with dynamic coastal processes such as erosion, sea-level rise, storm surge, and extreme events. In this regard, the applicant is required to provide a more comprehensive and substantiated assessment demonstrating that the proposed development will not result in adverse impacts on the coastal environment and is consistent with the purpose and management objectives of the coastal zone.

Compliance with the objectives of the Coastal Protection Zone in terms of Section 17 of the NEM:ICMA, with reference to the protection of ecological integrity, maintenance of natural coastal processes, and the buffering function of coastal ecosystems is difficult to achieve if at the same time public access must be improved. The ecological specialists, as indicated above, made specific recommendations to ensure compliance with the intent of Section 17, amongst others designating the private land around the project site a no-go zone to avoid potential negative biophysical effects. In support of such management action, the existing fence around the site will be retained and it will prevent access to the Coastal Public Property through the site. Direct access via the existing public passage across the property retained and public access to the CPP will not be restricted elsewhere than directly off the site. This will satisfy the ecological mitigation concerns without affecting the public's right of access.

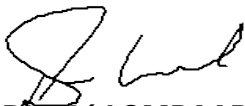
The granitic structure of the peninsula and the surrounding marine environment creates a stable coastal interface, and the existing structures are on average 8m above mean sea level (MSL) and more than 90m from the western edge (HWM) of the peninsula which is the active side enduring most storm energy. Coastal risk mapping produced by the Western Cape Government has been used to determine the potential risk related to coastal processes and it confirms the empirical evidence

relating to the relative safety of the existing buildings and structures.

The applicant has commissioned a marine compliance statement, and the document will be submitted to the Department on its receipt. This compliance statement will provide further information and specialist information that will be included in the BAR.

We trust the above appropriately responds to the issues raised in the Department's letter and look forward to providing further information if required.

Yours faithfully



DUPRÉ LOMBAARD

Technical Planner and Environmental Assessment Practitioner

SACPLAN B/8076/1998 // EAPASA 2019/304

Annexure A: Site topographical survey



Manhole details				
Name	Type	Cover level (m)	Invert level (m)	Pipe Ø (mm)
MH1	Cables	97.00	N/A	N/A
MH2	Unkown	99.01	98.16	N/A
MH3	Storm water	99.80	99.03	500mm
MH4	Storm water	99.99	98.90	500mm
MH5	Sewer	99.63	97.45	150mm
MH6	Storm water	98.73	97.02	500mm
MH7	Sewer	97.71	96.13	150mm
MH8	Sewer	96.49	94.63	150mm
MH9	Storm water	95.96	94.55	500mm
MH10	Storm water	94.57	Locked	N/A
MH11	Valve	97.80	N/A	N/A
MH12	Sewer	95.50	94.76	150mm
MH13	Sewer	94.54	93.52	150mm
MH14	Sewer	93.97	93.64	100mm
MH15	Sewer	93.89	93.25	100mm
MH16	Cables	93.75	N/A	N/A
MH17	Cables	93.55	N/A	N/A
MH18	Cables	93.49	N/A	N/A
MH19	Conservancy tank	91.38	N/A	N/A

Legend:

- SGO Cadastral
- Kerb
- Main contour
- Intermediate contour
- Fence

- Power box/Transformer
- Telephone pole
- Road
- Embankment bottom
- Embankment top

- Tree
- Manhole
- Valve
- Sign
- Lamp

- Paving
- Edge of Tar
- Water meter
- Rodding eye
- Marker

- Pipeline
- Channel
- Rocks
- Gate
- High Water Mark

- Coastal Management Line

Note:

The Coastal Management line is taken from the Department of Environmental Affairs and Development Planning map viewer.

Scale 1:500 @ A0

Date:June 2026

Contours:0.5m

System: WG 19
Height: Local

TOPOGRAPHICAL PLAN
PARTERNOSTER ERVEN

Revisions			
Date	Detail	Date	Detail

friedlaender, burger & volkmann
PROFESSIONAL LAND SURVEYORS, SECTIONAL TITLE CONSULTANTS, MAPPING CONSULTANTS
Dullemeijer 104-4, Prieska 7600 T: 07 21 884041 Cape Town 7800, George 6000 T: 07 21 007881
Pretoria 0001, Bloemfontein 9300 T: 07 21 007881
eng@fbv.co.za www.fbv.co.za

Ref: PAT1613

Dwg: PAT1613 TOPO REV2

ANNEXURE E5: COMMENT FROM THE DALRRD

ANNEXURE INFRASTRUCTURE	E6:	COMMENT	FROM	WCG:
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Dupré Lombaard (Virdus Works)

From: Vanessa Stoffels <Vanessa.Stoffels@westerncape.gov.za>
Sent: 25 March 2026 09:26
To: nico.williams@virdus.com
Cc: Dupré Lombaard (Virdus Works)
Subject: RE: NOTICE OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT (DEA&DP Ref. 16/3/3/6/7/1/F4/15/3229/25)

Dear Nico

Thank you for contacting this Branch. This development does not abut any proclaimed road.

No further action is necessary from this Branch.

Kind Regards

Vanessa Stoffels
Admin Officer
Road Use Management
Chief Directorate Road Planning, Roads Branch
Department of Infrastructure
Western Cape Government
Tel: 021 483 4669

9 Dorp Street, Cape Town: PO Box 2603, Cape Town 8000

Email: vanessa.stoffels@westerncape.gov.za

Website: www.westerncape.gov.za

Road Network Information System: <http://rnis.westerncape.gov.za>

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From: Dupré Lombaard (Virdus Works) <dupre.lombaard@virdus.com>
Sent: Wednesday, February 11, 2026 3:09 PM
To: Vanessa Stoffels <Vanessa.Stoffels@westerncape.gov.za>
Subject: NOTICE OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT (DEA&DP Ref. 16/3/3/6/7/1/F4/15/3229/25)

12 February 2026

ANNEXURE E7: COMMENT FROM WCG: DOA

Dupré Lombaard (Virdus Works)

From: Brandon Layman <Brandon.Layman@westerncape.gov.za>
Sent: 05 June 2026 10:29
To: dupre.lombaard@virdus.com
Subject: FW: NOTICE OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT (DEA&DP Ref. 16/3/3/1/F4/15/3018/26)

Hi Mr. Lombaard

Please note as of 01 May 2026 all applications needs to be submitted to National Department of Agriculture, Please find details below:

DoA Helpdesk details are as follows:

Email: LUAHelpdesk@nda.gov.za

Tel: 012 - 319 7634 / 7571

From: Dupré Lombaard (Virdus Works) <dupre.lombaard@virdus.com>
Sent: Wednesday, 20 May 2026 13:17
To: Brandon Layman <Brandon.Layman@westerncape.gov.za>
Subject: NOTICE OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT (DEA&DP Ref. 16/3/3/1/F4/15/3018/26)

20 May 2026

The Department of Agriculture

P Bag X1

Elsenburg

7606

Per: Brandon.Layman@westerncape.gov.za // Cor.VanderWalt@westerncape.gov.za

Dear Sir / Madam Geagte Heer / Dame

NOTICE OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT: THE PROPOSED DECOMMISSIONING OF AN AQUACULTURE FACILITY ON FARM NO. 1259, MALMESBURY DIVISION (DEA&DP REF. 16/3/3/1/F4/15/3018/26)

Notice is hereby given of a public participation process in terms of the National Environmental Management Act, 1998, Act 107 of 1998) (NEMA) regarding the proposed decommissioning of the existing aquaculture facility on Farm 1259 following acceptance of the application by the competent authority on 11 May 2026. The farm has an area of 3,12 ha that is inside of the delineated urban edge of Paternoster, and is accessed through the waterfront on Erf 2063, Paternoster. Paternoster Groepbelange wishes to redevelop the existing under-utilised buildings on 1,21 ha of the property and to integrate it with the existing waterfront attraction.

The activity that triggers the environmental authorization application in terms of the NEMA Environmental Impact Study Regulations, 2017 is:

- Listing Notice 1 (Basic Assessment process):

ANNEXURE E8: COMMENT FROM WCG: DHS

ANNEXURE E9: COMMENT FROM WCG: DOH

Dupré Lombaard (Virdus Works)

From: Adam Thomas <Adam.Thomas@westerncape.gov.za>
Sent: 11 February 2026 14:29
To: Dupré Lombaard (Virdus Works); Stanley Nomdo
Cc: Sharnay Filander
Subject: RE: NOTICE OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT (DEA&DP Ref. 16/3/3/6/7/1/F4/15/3229/25)

Noted Sir.....received.

Our Provincial Environmental Health Manager is Mr Stanley Nomdo.

I include him into the email here.

Thanks.

A Thomas

From: Dupré Lombaard (Virdus Works) <dupre.lombaard@virdus.com>
Sent: Wednesday, February 11, 2026 3:25 PM
To: jgoosen@westerncape.gov.za; Adam Thomas <Adam.Thomas@westerncape.gov.za>
Subject: FW: NOTICE OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT (DEA&DP Ref. 16/3/3/6/7/1/F4/15/3229/25)

You don't often get email from dupre.lombaard@virdus.com. [Learn why this is important](#)

Dear Sir / Madam

The email address in the notice below is obviously outdated and I am therefore sending the notice to you.

Regards / Groete / Saludos

DUPRÉ LOMBAARD

(SACPLAN B/8076/1998 / EAPASA 2019/304)

Mobile: South Africa +27 82 895 6362 (WhatsApp only)

Móvil: España +34 660 48 24 46

Address / Dirección: Avenida do Malecón 25, Piso 8 E, Santa Uxia de Ribeira, 15960, La Coruña, Spain

Virdus Works (Pty) Ltd (Reg. No. 2018/585747/07)

Development Management Consultants and Environmental Assessment Practitioners

Address: 11 Elektron Street, Techno Park, Stellenbosch, 7600, South Africa

Web: www.virdus.com

From: Dupré Lombaard (Virdus Works) <dupre.lombaard@virdus.com>
Sent: 11 February 2026 14:09
To: jgoosen@pgwc.gov.za
Subject: NOTICE OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT (DEA&DP Ref. 16/3/3/6/7/1/F4/15/3229/25)

12 February 2026

ANNEXURE E10: COMMENT FROM DEA&DP: POLLUTION MANAGEMENT

ANNEXURE E11: COMMENT FROM DEA&DP: WASTE MANAGEMENT



Virdus Works Environmental (Pty) Ltd
3rd Floor Time Square
Elektron Street
Techno Park
STELLENBOSCH
7600

Tel.: 082 895 6362

Email: dupre.lombaard@virdus.com

Attention: Mr Dupré Lombaard

Dear Sir

RE: COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT (DBAR) FOR THE PROPOSED DECOMMISSIONING OF AN AQUACULTURE FACILITY AND REDEVELOPMENT OF A PORTION OF FARM 1259, MALMESBURY RD; PATERNOSTER (DEA&DP REF: 16/3/3/1/F4/15/3018/26) (WML REF: 19/2/5/3/CF5/16/WL0160/24)

We refer to the Draft Basic Assessment Report (BAR) submitted for the above-mentioned project. Kindly note that the comprehensive comments provided by this office in correspondence dated **19 March 2026** remain **unchanged**.

Upon review of the current version of the Draft BAR, it is apparent that the **previously raised concerns and recommendations have not been addressed**. Therefore, we request that our submission dated 19 March 2026 be carried forward and fully integrated into the Comments and Responses Report, and that it be submitted to the Competent Authority as part of the Final Basic Assessment Report (BAR) for their official consideration and decision-making.

In our previous comments dated 19 March 2026, we highlighted under section 3 "Discussion and Recommendations", subsection 3.3 that "The table on page 35, section 7.17, Solid Waste, under the "Action" column, the 3rd row refers to the disposal of solid waste at a site approved by the Department of Water and Sanitation (DWS). Kindly note that in terms of section 49(2) of NEMWA, "a decision to grant an application for a waste management licence in respect of a waste disposal facility is subject to the concurrence of the Minister responsible for water affairs". In the current EMPr, this is now on page 34 instead of 35.

Kindly acknowledge receipt of this letter and confirm that our standing comments will be included in the final submission to the Department and note that the Department reserves the right to revise initial comments and request further information based on any or new information received. Please contact the Directorate: Waste Management should you have any enquiries regarding these comments.

Yours faithfully

Mr. A. Hoon

Control Environmental Officer (Grade B): Head: Waste Management Planning

CC: Abdullah Suliman

Waste Management Licensing

Email: Abdullah.Suliman@westerncape.gov.za

Tel: (021) 483 5838

CC: Natasha Bieding

Environmental Impact Management (Region 1)

Email: Natasha.Bieding@westerncape.gov.za

Tel: (021) 483 5833

Dupré Lombaard (Virdus Works)

From: August Hoon <August.Hoon@westerncape.gov.za>
Sent: 21 June 2026 09:14
To: dupre.lombaard@virdus.com
Cc: Martha Strydom; Abdullah Suliman
Subject: Re: Draft Basic Assessment Report_ Paternoster Aquaculture Decommissioning
Attachments: Paternoster Aquaculture Decommissioning_DBAR_Final_signed.pdf

Good Morning Dupré Lombaard

Please find our comments attached for your perusal.

Kindly acknowledge receipt of this email.

Regards

August Hoon

Control Environmental Officer (Grade B): Head: Waste Management Planning

Department of Environmental Affairs and Development Planning

Western Cape Government

2nd Floor Property Centre, 1 Dorp Street, Cape Town, 8001

Tel: +27 (0)21 483 2712

Cell: +27 (0)83 566 2762

E-mail: August.Hoon@westerncape.gov.za

Website: www.westerncape.gov.za/eadp



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Attention: Mr. Dupré Lombaard

Virdus Works Environmental (Pty) Ltd
3rd Floor Time Square
Elektron Street
Techno Park
STELLENBOSCH
7600

Tel.: 082 895 6362

Email: dupre.lombaard@virdus.com

Dear Mr Lombaard

**COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT (DBAR) FOR THE DECOMMISSIOING OF AN
AQUACULTURE FACILITY AND REDEVELOPMENT OF A PORTION OF FARM 1259, MALMESBURY RD; PATERNOSTER
(DEA&DP REF: 16/3/3/1/F4/15/3042/24) (WML REF: 19/2/5/3/CF5/16/WL0160/24)**

1. PURPOSE

To provide comments on the Draft Basic Assessment Report (DBAR) submitted to the Directorate: Waste Management in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and Environmental Impact Assessment (EIA) Regulations, 2014 (as amended).

2. BACKGROUND

Virdus Works Environmental Consultants were appointed by the applicant, Paternoster Group Ltd, as the independent Environmental Assessment Practitioner (EAP) to undertake the DBAR process for the decommissioning of an aquaculture facility and the redevelopment of the existing buildings to mixed-use business. The aquaculture facility will be reduced to a smaller space of 551m² comprising of 10 000kg wet weight stock of crayfish tanks and tourism accommodation of approximately 2 562m² with 43 parking spaces.

3. DISCUSSION AND RECOMMENDATIONS

The Directorate: Waste Management has the following comments/ recommendations with respect to the proposed activity.

- 3.1 Annexure E16 refers to the confirmation of all services including Solid Waste Management. However, there is no reference to the Saldanha Bay Municipality's Solid Waste Department's capacity to accept and dispose of solid waste generated during the decommissioning or redevelopment and implementation phase of the project. Kindly indicate whether the Municipality has provided a letter regarding the Municipality's capacity to accept and dispose of solid waste generated during all phases of the development, which must be included in the final BAR.
- 3.2 An integrated waste management approach must be implemented throughout all project phases as indicated in the EMPr. Waste avoidance and minimisation principles should be implemented before disposal at a licensed Waste Disposal Facility (WDF).
- 3.3 In the EMPr, page 33, section 7.17, Solid waste management refers to the disposal of solid waste at a site approved by the Department of Water and Sanitation (DWS). Kindly note that the disposal of solid waste must take place at a licensed Waste Disposal Facility, issued in terms of Section 50 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008, as amended), subject to the inclusion of any conditions contained in the Record of Decision (ROD) issued by the Department of Water and Sanitation and Waste Management Licence (WML) issued by the Department of Environmental Affairs and Development Planning (DEA&DP) due to their concurrent function.
- 3.4 Any building rubble generated should be diverted from landfill where possible for re-use in the construction of internal roads and pavement areas or taken to the nearest drop-off facility for crushing. Organic waste must be separated from the general waste stream and beneficiated where possible through composting or mulching as the Department set a target to completely ban organics to landfill by 2027.
- 3.5 The applicant must ensure the proper storage, handling, transportation, and disposal of hazardous substances at a licenced hazardous waste facility. Waste storage must comply with the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) National Norms and Standards for Storage of Waste, 2013, if the storage of general waste exceeds 100m³ or that of hazardous waste exceeds 80m³.
- 3.6 Asbestos waste must be handled as per the Department of Labour Regulations and disposed of at an appropriate hazardous WDF as indicated in the EMPr.
- 3.7 Emergency incidents that fall under section 30(1) (a) of the National Environment Management Act (NEMA) (Act 107 of 1998) must be dealt with as required and reported to the following relevant authorities:
- a) Nazeema Duarte, Environmental Officer from the Saldanha Bay Municipality via Nazeema.Duarte@sbm.gov.za or (022) 701 7116; and
 - b) Amina Sulaiman from the DEA&DP: Pollution & Chemical Management unit via Amina.Sulaiman@westerncape.gov.za or (021) 483 2571.
- 3.8 The National Waste Information Regulations must be adhered to in terms of any hazardous waste generated on site. The applicant must apply for registration as a "Hazardous Waste Generator" with the Integrated Pollutant and Waste Information System (IPWIS), should the need for Hazardous Waste Disposal arise. This application should be completed online on the IPWIS (<http://ipwis.pgwc.gov.za/ipwis3/public/login>), in accordance with the provisions of the National Environmental Management: Waste Act (59/2008): National Waste Information Regulations, 2013. The application can be completed within 30 days of commencement of the waste activity.

3.9 All records of waste generated to be kept on site including waste related complaints and waste disposal certificates.

Please contact the Directorate: Waste Management should you have any enquiries regarding these comments.

Yours faithfully

August Hoon

Control Environmental Officer (Grade B): Head: Waste Management Planning

CC:

Natasha Bieding

Development Management (Region 1)

Email: Natasha.Bieding@westerncape.gov.za

Tel: (021) 483 5833

Abdullah Suliman

Waste Management Licensing

Email: Abdullah.Suliman@westerncape.gov.za

Tel: (021) 483 5838

Dupré Lombaard (Virdus Works)

From: Dupré Lombaard (Virdus Works) <dupre.lombaard@virdus.com>
Sent: 16 July 2026 18:21
To: 'August Hoon'; Xoliswa.Mazana@westerncape.gov.za
Cc: 'Martha Strydom'; 'Abdullah Suliman'
Subject: RE: Draft Basic Assessment Report_ Paternoster Aquaculture Decommissioning WML REF: 19/2/5/3/CF5/16/WL0160/24)
Attachments: EMPr Farm 1259 MRD Paternoster 2026.pdf

Dear August and Xoliswa

For ease of reference and more time to read, I attach the amended Draft EMPr for your comment.

Regards / Groete / Saludos

DUPRÉ LOMBAARD

(SACPLAN B/8076/1998 / EAPASA 2019/304)

Mobile: South Africa +27 82 895 6362 (WhatsApp only)

Móvil: España +34 660 48 24 46

Address / Dirección: Avenida do Malecón 25, Piso 8 E, Santa Uxia de Ribeira, 15960, La Coruña, Spain

Virdus Works (Pty) Ltd (Reg. No. 2018/585747/07)

Development Management Consultants and Environmental Assessment Practitioners

Address: 11 Elektron Street, Techno Park, Stellenbosch, 7600, South Africa

Web: www.virdus.com

From: Dupré Lombaard (Virdus Works) <dupre.lombaard@virdus.com>
Sent: 16 July 2026 17:56
To: 'August Hoon' <August.Hoon@westerncape.gov.za>; Xoliswa.Mazana@westerncape.gov.za
Cc: 'Martha Strydom' <Martha.Strydom@westerncape.gov.za>; 'Abdullah Suliman' <Abdullah.Suliman@westerncape.gov.za>
Subject: RE: Draft Basic Assessment Report_ Paternoster Aquaculture Decommissioning WML REF: 19/2/5/3/CF5/16/WL0160/24)

Dear August and Xoliswa

The WMP letter dated 19 June 2026 is acknowledged. The necessary amendments and improvements have been made to the relevant documents.

Regards / Groete / Saludos

DUPRÉ LOMBAARD

(SACPLAN B/8076/1998 / EAPASA 2019/304)

Mobile: South Africa +27 82 895 6362 (WhatsApp only)

Móvil: España +34 660 48 24 46

Address / Dirección: Avenida do Malecón 25, Piso 8 E, Santa Uxia de Ribeira, 15960, La Coruña, Spain

Virdus Works (Pty) Ltd (Reg. No. 2018/585747/07)

Development Management Consultants and Environmental Assessment Practitioners

Address: 11 Elektron Street, Techno Park, Stellenbosch, 7600, South Africa

Web: www.virdus.com

From: August Hoon <August.Hoon@westerncape.gov.za>

Sent: 21 June 2026 09:14

To: dupre.lombaard@virdus.com

Cc: Martha Strydom <Martha.Strydom@westerncape.gov.za>; Abdullah Suliman <Abdullah.Suliman@westerncape.gov.za>

Subject: Re: Draft Basic Assessment Report_ Paternoster Aquaculture Decommissioning

Good Morning Dupré Lombaard

Please find our comments attached for your perusal.

Kindly acknowledge receipt of this email.

Regards

August Hoon

Control Environmental Officer (Grade B): Head: Waste Management Planning

Department of Environmental Affairs and Development Planning

Western Cape Government

2nd Floor Property Centre, 1 Dorp Street, Cape Town, 8001

Tel: +27 (0)21 483 2712

Cell: +27 (0)83 566 2762

E-mail: August.Hoon@westerncape.gov.za

Website: www.westerncape.gov.za/eadp



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**ANNEXURE E12: COMMENT FROM DEA&DP:
BIODIVERSITY**

ANNEXURE E13: COMMENT FROM DEA&DP: AIR QUALITY

REFERENCE: 19/4/4/1/BS3-Decommissioning of an Aquaculture Facility on Farm No. 1259_Mamelsbury

Enquiries: Mzolisi Benxa

For attention: Mr. Dupre Lombaard

3rd Floor, Time Square
Elektron Street
Techno Park
Stellenbosch
7600

Cell: 082 895 6362

Email: dupre.lombaard@virdus.com

COMMENT ON DRAFT BASIC ASSESSMENT REPORT (BAR) AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT (EMPr) FOR THE PROPOSED DECOMMINISHING OF AN AQUACULTURE FACILITY ON FARM NO. 1259, MAMELSBURY IN THE WESTERN CAPE (DEA&DP REFERENCE: 16/3/3/1/F4/15/3042/24).

The Directorate: Air Quality Management (hereafter 'the D: AQM') has reviewed the above-mentioned documentation (hereafter 'the Report') dated August 2024, as received by the Directorate on 13 August 2024.

The D: AQM has the following comments on the draft BAR and EMPr in terms of the National Environmental Management: Air Quality Act No. 39 of 2004 (NEM: AQA):

1. DUST CONTROL MANAGEMENT

1.1 Dust generated from all the phases of the proposed activities must comply with the NEM: AQA, National Dust Control Regulations (Government Notice No. R. 827) of 1 November 2013.

1.1.1 These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fallout, has a detrimental effect on the environment, including human health.

1.2 Dust may be generated from the demolition of existing tanks and structures, as well as from large vehicles and equipment traversing and operating on site during the construction phase.

1.3 The Directorate recommends that:

1.3.1 Measures to monitor and prevent fugitive dust emissions be mitigated strictly as per the recommendations stipulated in the EMPr.

2. NOISE CONTROL MANAGEMENT

2.1 Noise generated from the construction and operational activities of the facility and from the operational equipment within the facility, which is associated with this type of facility, may give rise to noise levels exceeding the allowable limit. In terms of noise management, the facility must comply with the Western Cape Noise Control Regulations Provincial Notice 200/2013.

2.2 The Directorate recommends that:

2.2.1 measures to monitor and prevent noise nuisance and disturbance be mitigated strictly as per the EMPr.

3. AIR EMISSION IMPACT MANAGEMENT

3.2 Potential air emissions will be in the form of dust pollution from construction vehicles and equipment operating on-site during the construction and operational phases.

3.3 All potential air pollutants on site need to be monitored and if causing significant emissions must be mitigated strictly as per the recommendations stipulated in the EMPr.

4. ODOUR MANAGEMENT

4.1 The applicant is reminded of Section 35 (2) of the National Environmental Management: Air Quality Act No. 39 of 2004 (NEM: AQA), which states that "The occupier of any premises must take all reasonable steps to prevent the emission of any offensive odour caused by any activity on such premises."

4.2 The Directorate recommends that:

4.2.1 All possible odours that may be emitted to the atmosphere from the activities of the facility are recommended to be monitored and mitigated strictly.

5. GENERAL

5.1 Kindly be advised that the Air Quality Officer (AQO) for Swartland Local Municipality (Mr Kobus Marais) must also be engaged regarding the proposed activity as it falls within his jurisdictional area. Mr Kobus Marais can be reached on 022 487 9400 or maraisk@swartland.org.za

5.2 The Department would like to draw your attention to Section 28 of the National Environmental Management Act No. 107 of 1998 (NEMA), i.e., "Duty of Care" which states that:

"Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorized by law or cannot reasonably be avoided or stopped, to minimize and rectify such pollution or degradation of the environment."

5.3 Please note that the above-mentioned recommendations do not pre-empt the outcome of the application.

5.4 No information provided, views expressed and/or comments made by the DEA&DP, D: AQM should in any way be seen as an indication or confirmation:

5.4.1 that additional information or documents will not be requested; or

5.4.2 of the outcome of any application submitted to the authorities.

5.5 Kindly be informed that the D: AQM reserves the right to review the above-mentioned comments, should additional information come to light.



Please contact Mzolisi Benxa (Mzolisi.Benxa@westerncape.gov.za) or Etienne Roux (Etienne.Roux@westerncape.gov.za) should you have any further queries in this regard.

Yours faithfully,

Etienne
Roux

Digitally signed by
Etienne Roux
Date: 2024.10.01
13:16:01 +02'00'

Etienne Roux
HEAD OF COMPONENT: AIR QUALITY REGULATORY SERVICES

Copied to: Mr. M. Benxa (DEA&DP: Air Quality Management)
Ms. Zamokuhle Zulu (DEA&DP: Air Quality Management)
Mr. Kobus Marais (Swarthland Local Municipality)

Email: Mzolisi.Benxa@westerncape.gov.za
Email: Zamokuhle.Zulu@westerncape.gov.za
Email: maraisk@swarthland.org.za



ANNEXURE E14: COMMENT FROM DEA&DP: COASTAL MANAGEMENT

To: Viridus Works Environmental (Pty) Ltd

11 Elektron Street
Techno Park
STELLENBOSCH
7600

Attention: Mr Dupré Lombaard

Tel: 082 895 6362

E-mail: dupre.lombaard@viridus.com

RE: COMMENT: THE DECOMMISSIONING OF AN AQUACULTURE FACILITY AND REDEVELOPMENT OF A PORTION OF FARM 1259, PATERNOSTER, WEST COAST.

Your request for comment received on 20 May 2026, pertaining to the proposal noted above, as well the previous comment by the Sub-Directorate: Coastal Management, dated 08 October 2024, refers.

1. CONTEXT

- 1.1. The Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("NEM: ICMA") is a Specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"). The NEM: ICMA sets out to manage the nation's coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment. In terms of Section 38 of the NEM: ICMA, the Department of Environmental Affairs and Development Planning ('the Department') is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the "Management of public launch sites in the coastal zone (GN No. 497, 27 June 2014) "Public Launch Site Regulations."
- 1.2. The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme ("PCMP"). The Western Cape Provincial Coastal Management Programme ("WC: PCMP 2022-2027) is a five (5) year strategic document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the

Province. This WC: PCMP 2022-2027 was adopted by the Provincial MEC for Local Government, Environmental Affairs and Development Planning on 19 May 2023 and available upon request.

- 1.3. A key priority of the PCMP is the Estuary Management Programme, which is implemented in accordance with the NEM: ICMA and the National Estuarine Management Protocol ("NEMP"). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The Department is in the process of approving a series of Estuarine Management Plans of which over 20 Estuarine Management Plans have already been approved.
- 1.4. The facilitation of public access to the coast is an objective of the NEM: ICMA as well as a Priority in the WC PCMP. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 ("PCASP") and commissioned coastal access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NEM: ICMA. The PCASP as well as the coastal access audits are available upon request.

2 COMMENT

- 2.1 The Sub-directorate: Coastal Management (SD:CM) has reviewed the Draft Basic Assessment Report (DBAR) for the decommissioning of the aquaculture facility and redevelopment of a portion of Farm 1259, Malmesbury Road, Paternoster.
- 2.2 The following comments are provided for your consideration:
 - 2.2.1 While it is acknowledged that coastal risk zone mapping has been included in the DBAR and the subject site is situated along a predominantly rocky shoreline, cognizance must continue to be given to the impacts of climate change, including sea-level rise, increased storm intensity and storm surge events, which are becoming increasingly evident along the Western Cape coastline. Overtopping of waves during coastal surges and storms have been increasingly evident in recent storms.
 - 2.2.2 The DBAR refers to Annexures E4 (DFFE: Oceans and Coasts comment) and E19 (Pre-approval for reclamation of land in terms of NEM:ICMA). However, the DBAR does

not clearly identify any proposed land reclamation activity, nor does it provide an assessment of reclamation-related impacts. The applicant should clarify whether any land reclamation, existing or proposed, forms part of the application. Should no land reclamation be proposed, references to reclamation and Annexure E19 should be removed or suitably clarified. Should reclamation be proposed, the extent, location, legal status and associated authorisation requirements must be clearly described and assessed.

- 2.2.3 The applicant should confirm whether any existing seawater abstraction, discharge, pumping, revetment or associated infrastructure occurs within Coastal Public Property and clearly indicate the future status of such infrastructure following the decommissioning process.
 - 2.2.4 The applicant is reminded that in terms of Section 18(9) of NEM: ICMA, each municipality approving the rezoning, subdivision or development of a land unit within or abutting on coastal public property must ensure that adequate provision is made in the conditions of approval to secure public access to that coastal public property.
 - 2.2.5 The Environmental Management Programme should clearly provide for the decommissioning, removal, rehabilitation or continued management of aquaculture-related infrastructure that will no longer be utilised as part of the proposed redevelopment.
 - 2.2.6 Stormwater generated by the redeveloped site should be appropriately managed to prevent the discharge of polluted runoff into the coastal environment.
- 3 The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: *"...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment..."* together with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.

- 4 The SD: CM reserves the right to revise or withdraw its comments and request further information from you based on any information that may be received.

Yours faithfully



Digitally signed by
leptieshaam Bekko
Date: 2026.06.11
13:44:57 +02'00'

leptieshaam Bekko
CONTROL ENVIRONMENTAL OFFICER
DIRECTORATE: BIODIVERSITY AND COASTAL MANAGEMENT
DATE: 11 June 2026

Virdus Works (Pty) Ltd (Reg. No. 2018/585747/07)

Development Management Consultants and
Environmental Assessment Practitioners

11 Elektron Street, Techno Park, Stellenbosch, 7600, South Africa

Mobile: +27 82 895 6362

Email: dupre.lombaard@virdus.com



Your ref.: 17/1/8(CMU 079/2024)
DEA&DP ref.: 16/3/3/1/F4/15/3018/26

15 June 2026

Department of Environmental Affairs and Development Planning
Directorate: Biodiversity and Coastal Management
4th Floor, Leeusig
1 Dorp Street
Cape Town
8001

Attention: Mr Ryan Apolles
E-mail: Ryan.Apolles@westerncape.gov.za

Dear Sir

COMMENT: THE DECOMMISSIONING OF THE AQUACULTURE FACILITY AND REDEVELOPMENT OF A PORTION OF FARM 1259, PATERNOSTER, WEST COAST

The Department's letter dated 11 June 2026 refers.

The letter seeks answers to the questions or matters raised in paragraph 2 thereof as inserted in summary below.

2.2.1. ... cognizance must continue to be given to the impacts of climate change, including sea-level rise, increased storm intensity and storm surge events, which are becoming increasingly evident along the Western Cape coastline.

The applicant is aware of the risks and is accordingly following a risk averse development planning approach. For the time being, no new building development is envisaged and only the existing buildings will be redeveloped without any physical expansion.

2.2.2. The DBAR refers to Annexures E4 (DFFE: Oceans and Coasts comment) and E19 (Preapproval for reclamation of land in terms of NEM:ICMA). However, the DBAR does not clearly identify any proposed land reclamation activity, nor does it provide an assessment of reclamation-related impacts.

The application shows that the activity is not applicable in the list of Appendices and in the Appendix it is marked "Not applicable – left blank."

2.2.3. The applicant should confirm whether any existing seawater abstraction, discharge, pumping, revetment or associated infrastructure occurs within Coastal Public Property and clearly indicate the

future status of such infrastructure following the decommissioning process.

The site photograph below shows the seawater pump (inlet) system on the left, the gravity return flow chamber in the centre with the crayfish holding facility on the right. This facility will be retained with a maximum throughput capacity of 10 000kg wet weight per annum that is below the listed activity threshold, hence the decommissioning application.



Seawater is pumped through the crayfish holding tanks at a rate of approximately 40m³ per hour (11l/s) through 120mm pipes. The inlet and outlet systems are installed on the subject property while the inlet and outlet pipes occur on the coastal public property. The system in its current state will be retained for as long as the crayfish quotas or other rational use reasons justify it.

2.2.4 The applicant is reminded that in terms of Section 18(9) of NEM: ICMA, each municipality approving the rezoning, subdivision or development of a land unit within or abutting on coastal public property must ensure that adequate provision is made in the conditions of approval to secure public access to that coastal public property.

A public access, Erf 1611, has already been created over the property to allow for public access to the coastal public property at Bekbaai.

2.2.5 The Environmental Management Programme should clearly provide for the decommissioning, removal, rehabilitation or continued management of aquaculture-related infrastructure that will no longer be utilised as part of the proposed redevelopment.

The EMPr makes specific provision for the demolition and removal of the under-utilised concrete tanks. The related infrastructure remains, as it is under ground and its removal is not essential to the proposed (mostly internal) redevelopment of the existing buildings.

2.2.6 Stormwater generated by the redeveloped site should be appropriately managed to prevent the discharge of polluted runoff into the coastal environment.

The roofed and hard surfaced areas from which run-off is generated does not increase as a result of the proposed decommissioning and redevelopment of the existing buildings. Accordingly, the volume of run-off does not increase, and the existing management measures suffice. The engineering services report related to the proposal also confirms the satisfactory nature of the existing management measures.

We trust the above appropriately responds to the issues raised in the Department's letter and look forward to providing further information if required.

Yours faithfully



DUPRÉ LOMBAARD

Technical Planner and Environmental Assessment Practitioner

SACPLAN B/8076/1998 // EAPASA 2019/304