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Sonja Pithey Consulting
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Attention: Sonja Pithey
By email: sonja.pithey@iafrica.com

Dear Sonja

Draft Basic Assessment Report for the Proposed Decommissioning and Rehabilitation of the Stellenbosch Landfill Site, Stellenbosch
(DEA&DP ref. no.: 16/3/1/1/B4/45/1081/14)

CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

The project proposal is for the decommissioning of Cell 1 and Cell 2 of the Stellenbosch Landfill and subsequent rehabilitation in accordance with the proposed end-use. The landfill site is surrounded by agricultural, municipal and industrial land uses. There is minimal natural vegetation in the immediate surroundings and correspondingly there are no Critical Biodiversity Areas either. The natural vegetation that does remain would be associated with the Veldwachters River which passes along the eastern boundary of the landfill.

A freshwater specialist study was undertaken for the project. The study confirmed that the Veldwachters River is in a poor condition by the stage that it reaches the site, due to upstream land-use activities (mainly agriculture), and it worsens after it passes through the site as a result of the wastewater treatment works (WWTW) and the landfill site.

CapeNature has commented on the proposed upgrade of the WWTW where the issue of the water quality of the Veldwachters River was raised, in particular as a tributary of the Eerste River which it flows into nearby. The outcomes are still of relevance for this application.

CapeNature supports the findings and recommendations of the freshwater specialist report. Should all the measures be implemented it is likely to have a net positive impact from the current status. One aspect that CapeNature requires clarity on from the freshwater specialist project team is whether it may be preferable from a water quality perspective if the stormwater run-off was directed into an off-stream dam (there are several artificial dams on site) prior to entering the watercourse, taking into consideration feasibility and context of the surroundings.

The proposed alien clearing programme and riparian rehabilitation would be important mitigation measures for improving the ecological condition of the river and riparian habitat.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Mr Eduard Kok (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Ms Francina du Bruyn, Mr Mico Eaton, Dr Edmund February, Prof Francois Hanekom, Mr Carl Lotter, Dr Bruce McKenzie, Ms Merle McOmbring-Hodges, Adv Mandla Mdludlu, Mr Danie Nel

Various alternatives were proposed for the end-use at the initiation of the project, which has been narrowed down to three alternatives in the Draft Basic Assessment Report (BAR) (it is noted that the end-use alternative analysis was much more thorough than most other cases). CapeNature does not support Alternative 3, which is the no-go option with no rehabilitation.

CapeNature would support either Alternative 1 or 2 or a combination thereof, as it will result in an improvement of the ecological condition of the site and/or efficient use of waste resources that will minimise demand for energy generation elsewhere. The project proposal should however be narrowed down and refined for the Final BAR. Also, the potential lifespan and integration of Cell 3 of the landfill should be included into the end-use proposal.

More detail is required on the proposed actions related to the informal settlement on site and potential growth thereof, as this could result in significant impacts on biodiversity.

One aspect that needs to be mentioned and has not been included in the Draft BAR, is that CapeNature is aware that there are two highly threatened (one Critically Endangered) primitive plant species (*Riccia alatospora* and *Isoetes stephanseniae*) that occur on the municipal property which includes the landfill and the WWTW. The two species are restricted to the granite rock sheets and whalebacks, which reduces the threat from development. However, it is recommended that the long term conservation and persistence of these species needs to be integrated into the management of the site (related to the proposed end-use of the landfill), and more detail is required in this regard for the Final BAR.

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

Yours sincerely



Rhett Smart
For: Manager (Scientific Services)

cc. Arabel McClelland, Department of Environmental Affairs and Development Planning
Tamryn Johnson, Aurecon South Africa