



24G Application Reference: 14/2/4/2/1/F5/16/0002/18

1st 24G Amendment Reference: 14/2/3/F5/16/0002/19

2nd 24G Amendment Reference: 14/2/3/F5/16/0004/23

3rd 24G Amendment Reference: 14/2/3/F5/16/0004/25

The Trustees
Mapula Trust
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Attention: Michael Gregor

APPLICATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION DATED 10 DECEMBER 2018 (EA REF: 14/2/4/2/1/F5/16/0002/18), AS PREVIOUSLY AMENDED 31 JULY 2019 (AMENDMENT REF: 14/2/3/F5/16/0002/19) AND 11 DECEMBER 2023 (AMENDMENT REF: 14/2/3/F5/16/0004/23: THIRD AMENDMENT OF THE EXISTING EA OF FARM BOKKERIVER NO.733, MALMESBURY

With reference to your application for the abovementioned, find below the outcome with respect to this application.

AMENDMENT ENVIRONMENTAL AUTHORISATION

1. DECISION

By virtue of the powers conferred on it by the *National Environmental Management Act, 1998* (Act No. 107 of 1998) ("NEMA") and the *Environmental Impact Assessment ("EIA") Regulations, 2014*, the competent authority herewith **grants** the third amendment of the Environmental Authorisation dated 10 December 2018 (REF: 14/2/4/2/1/F5/16/0002/18), previously amended, 31 July 2019 (REF: 14/2/3/F5/16/0002/19) and 11 December 2023 (REF: 14/2/3/F5/16/0004/23).

The environmental authorisations are amended as set out below:

F. DETAILS OF THE ACTIVITY OR ACTIVITIES UNDERTAKEN

The Mapula Trust proposes to establish an environmental education centre on a portion of Farm Bokkerivier No. 733, Malmesbury and will make use of existing and new infrastructure. The educational centre will house approximately 40 pupils with teachers, the farm manager and farm workers.

Existing infrastructure on the farm includes:

- Homestead
- Stable
- Storeroom cottage
- Temporary ablution facility
- Temporary dwelling
- Partially constructed platform in the tented camp area (to be removed)
- Existing borehole and water tanks

The existing homestead will be converted into a lecture room with display area, kitchen, dining area/living area and teacher accommodation. The existing cottage will be utilised as accommodation for environmental researchers visiting the farm. The existing stables will be converted into accommodation for staff. A portion of the existing storeroom will be demolished and the remainder used for equipment storage, while outside showers will be added.

The wooden platform for the tented camp still needs to be constructed together with the ablution facility. A viewing deck is also proposed to be constructed and integrated into the landscape.

The proposal includes the upgrading of existing and new service supply points. Connections required as part of the development include:

- i) Water supply from two existing boreholes through a pump main into storage tanks and a gravity main further towards the proposed development to provide water under pressure.
- ii) Sewage treatment utilising an existing septic tank and soakaway serving the cottage, as well as a new reed bed sewage treatment system to cater for the homestead and new facilities.
- iii) Solid waste and refuse management through storage, recycling and removal facilities.

- iv) Electricity supply through solar panels with associated cabling and connection points.
- v) Stormwater management.

During the application to the Department for the adoption of an ad hoc development setback line (Reference: 16/3/3/6/2/F5/16/2101/16), it was discovered that the applicant (Mapula Trust) had commenced with the establishment of the environmental education centre. A temporary toilet block with a soakaway system, prefabricated temporary dwelling and a platform in the tented camp area were constructed without formal approval. These construction activities occurred within 100 metres inland of the high-water mark of the sea.

The proposed construction of a pipeline for the supply of water will result in the clearance of 300m² or more of critically endangered vegetation (Atlantis Sand Fynbos).

is amended to read: Amendment by insertion

Establishment of Mini-workshop and Staff werf

The mini-werf will be established adjacent to the existing Prefabricated Dwelling to limit the development of additional buildings on site.

The mini-werf will also include a dedicated refuse facility within the courtyard of the werf that allows ample vehicle clearance.

Permanent use of Temporary Prefabricated Dwelling

The temporary Prefabricated Dwelling is ideally located to oversee the entrance roads while being far enough away to prevent impacting the secluded historical buildings on site. The proposed permanent use of the Prefabricated Dwelling as a security dwelling will accommodate two full-time armed security personnel. The Prefabricated Dwelling will be renovated to include an operational room with CCTV and two bedrooms for the full-time security personnel.

Development of Workshop Facility

The proposed Workshop Facility will be located east of the Temporary Prefabricated Dwelling and aims to provide a versatile space for all operational aspects of the farming activities on site.

The following amenities will be included in the proposed Workshop Facility:

- A laundry room
- Courtyard for general farm maintenance, storing and maintaining farm tractor
- Workshop with workbenches
- An Office
- A secure storeroom
- Ablution facilities
- Dedicated parking space inside building for both the farm tractor and a quad bike

The primary purpose of this building is to provide a facility separate from the Education Centre for all maintenance and farm operation activities.

Development of Staff Accommodation Unit

The proposed new Staff Accommodation Unit will be located directly north of the existing Prefabricated Dwelling. The proposed development will provide a two-bedroom unit with ensuite bathrooms for the farm staff on site.

Services for Mini-Workshop and Staff Werf

Development of Parking Garage

The proposed parking garage will be located directly west of the existing Prefabricated Dwelling and aims to provide open but covered parking spaces for six vehicles.

Expansion of the Tent Facilities

The proposal entails the expansion of the tent facilities associated with the Environmental Education Centre. The proposed expansion for the tented facilities will be as follows:

- Boys' tents: 15 tents (30 individuals with 2 people per tent)
- Girls' tents: 15 tents (30 individuals with 2 people per tent)
- Teacher's tent: 4 tents

A maximum of 70 students and teachers will accommodate on the site.

A minor retaining wall will be constructed in front of the Environmental Education Tented Facility.

2. REASONS FOR THE DECISION

In reaching its decision, the Department took, inter alia, the following into consideration:

1. The information contained in application for amendment of November 2025.
2. The proposed development aims to enhance the functionality of the site by establishing a mini-workshop and staff werf, formalizing the permanent use of the existing Prefabricated Dwelling, and developing new infrastructure to support operational needs. The mini-werf will be positioned adjacent to the Prefabricated Dwelling to minimize additional development. The Prefabricated Dwelling will be converted into a security dwelling with an operational room and accommodation for full-time security personnel. A Workshop Facility will be constructed east of the dwelling to support farming activities, featuring workspaces, storage, ablution facilities, and dedicated parking for farm vehicles. Additionally, a Staff Accommodation Unit will be developed to provide on-site housing for farm staff, while a Parking Garage will offer covered parking for six vehicles. The mini-werf will also include a refuse facility within its courtyard. Furthermore, the Environmental Education Centre will be expanded with additional tented accommodations, allowing up to 70 students and teachers to stay on-site. A minor retaining wall will be constructed to support the expanded tented facility.
3. The Applicant now wishes to amend the 24G EA and amended 24G EAs to expand the student-tented facilities associated with the Environmental Education Centre to accommodate larger school groups. Additionally, there has been an increase in poaching incidents, and the need for enhanced security has become paramount. The current farming operations are scattered across the existing buildings on site. The proposal also includes the establishment of a mini-Workshop and Staff werf to consolidate all agricultural and operational aspects. The existing Prefabricated Dwelling will serve as a security billet and limited new infrastructure will be developed around the security billet to create the mini-werf. Overall, this Part 2 Amendment aims to limit the spread of buildings on the site, address security challenges, centralise the agricultural and operational facilities, and expand the student tented facilities.
4. The original Environmental Authorisation (EA) issued on 10 December 2018 (Reference: 14/2/4/2/1/F5/16/0002/18), and the amended EA issued on 31 July 2019 (Reference: 14/2/3/F5/16/0002/19) is valid for a period of 5 years (10 December 2018 to 10 December 2023). Furthermore, Condition G3 of the 2018 original EA specifies that the development must be concluded within two years.
5. The abovementioned amendment changes the scope of the EA dated 10 December 2018 and is considered a Part 2 amendment.

6. The EA dated 10 December 2018, including the remaining non-amended conditions therein, is still valid and must be complied with throughout the life cycle of the activities authorised.
7. The environment and the rights and interests of other parties are not likely to be adversely affected by the decision to amend the EA.

3. PUBLIC PARTICIPATION PROCESS

The public participation process conducted by the EAP for the Part 2 amendment comprised of the following:

The draft Part 2 section 24G Amendment Report was made available for public review and comment. The 30-day comment period was from 17 April 2025 to 22 May 2025, providing Interested and Affected Parties (I&APs) and relevant authorities the opportunity to register and submit comment on the draft Part 2 section 24G Amendment Report.

A summary of the comments received, and the responses thereto follows below.

CapeNature

CapeNature stated that it is understood that this application is to amend the current EA to expand and reconfigure the student-tented facilities associated with the Environmental Education Centre and establish a new mini-Workshop and Staff Werf on Portion of Farm Bokkerivier No. 733, Malmesbury.

The botanical specialist has assessed the areas on site that will be impacted by new development and has assessed a low negative impact on Langebaan Dune Strandveld of medium botanical sensitivity with no species of conservation concern in the affected areas, considering the small footprint of the proposed new developments. The botanical assessment is supported, and all recommendations and mitigation measures should be implemented.

The proposed developments are within the envelope of existing development on site, keeping the development footprint clustered and limited to one area of the protected area. Based on the Bokbaai management plan, the proposed development falls within a development zone and the infrastructure meets the guidelines as per allowed infrastructure within the zone. Re-aligning the pipeline as per this application will re-align the pipeline entirely into the gravel road of low botanical sensitivity. The proposed re-alignment of the pipeline is supported. In conclusion, CapeNature stated that the conclusions regarding botanical, faunal, terrestrial biodiversity and aquatic sensitivities as per the BAR is accepted.

City of Cape Town - Spatial Planning and Environment Directorate Environmental Management Department

Jurisdiction and Focus: The City of Cape Town ("The City") acknowledged that the property (Malmesbury Farm 733, Bokkerivier) is outside its municipal jurisdiction. Therefore, its comment is not about the land use itself, but about the responsibilities of the relevant local authority (Swartland Municipality) to collaborate with the City's Disaster Risk Management Centre regarding compliance with the 16 km Protective Action Zone (PAZ) around the Koeberg Nuclear Power Station.

Protective Action Zone (PAZ) and Urban Growth: The City noted that part of the farm falls within the Urgent Protective Action Zone (UPZ), which is within 5 to 16 km of Koeberg. The City referenced Policy 16 of its Municipal Spatial Development Framework (MSDF) and Section 158 of the Municipal Planning By-law, which require limiting increases in permanent and transient population and employees in this sensitive zone.

Disaster Risk Management and Emergency Planning: The City emphasized the need for public safety arrangements in the event of a nuclear emergency, including the ability to evacuate people within the 0–16 km area around Koeberg. The City requested that the development be assessed by the Traffic Evacuation Model (TEM) committee and that a completed TEM Form 2 be included in the final report. The City also recommended that the National Nuclear Regulator, Department of Mineral Resources and Energy, and Eskom be notified as interested parties.

Operational Practicalities: The City requested that the final report clearly state the risks associated with the permanent establishment of the training facility within the UPZ, and that the Environmental Management Programme (EMPr) include disaster risk management procedures (e.g., alert systems for workers and visitors in case of a nuclear incident). The City provided contact details for further liaison and requested a copy of the final report for its records.

EAP's Response

The EAP acknowledged the property's location within the 16 km PAZ and confirmed that Swartland Municipality was included as a commenting authority. The EAP agreed to update the final report with references to Policy 16 and Section 158, and to include a draft Emergency Plan. The EAP committed to including a completed TEM Form 2 and to notifying the relevant national authorities. The EAP stated that disaster risk management procedures

would be detailed in the Emergency Plan and that the City's comments would be addressed in the final submission.

The Department's – Directorates: Waste Management Licensing ("WML")

Waste Storage Thresholds: The WML directorate noted that the proposed "mini-werf" will include a dedicated refuse facility. They highlighted that if the storage of waste on site exceeds 80 cubic meters for hazardous waste or 100 cubic meters for general waste, it would trigger the National Norms and Standards for the Storage of Waste (Government Notice No. 926). The EAP responded that waste volumes will be managed to remain below these thresholds.

Integrated Waste Management Approach: WML recommended adopting an integrated waste management approach, prioritizing waste avoidance and minimization before disposal at a licensed facility. The EAP confirmed that the Environmental Management Programme (EMPr) promotes waste reduction, reuse, and recycling before disposal.

Organic Waste Disposal: DEA&DP referenced the provincial ban on organic waste to landfill (50% by 2022, complete by 2027). They required that any indigenous vegetation removed (about 677m²) should be sent to an authorized garden waste chipping facility for composting. The EAP agreed and committed to this in the EMPr.

Legal Compliance: WML reminded the applicant that all waste management must comply with Section 16 of the *National Environmental Management: Waste Act (NEM: WA)*, 2008, which requires managing waste to avoid endangering health, the environment, or causing nuisance (noise, odour, visual impacts). The EAP confirmed that these requirements are included in the EMPr.

Department of Water and Sanitation

Location Relative to Watercourses: DWS noted that the proposed development is not located within the regulated area of a watercourse as defined in the latest government notice. The site transitions from a freshwater to an estuarine system, but the amendment area itself is outside regulated zones.

Effluent Disposal Authorisation: The applicant holds a General Authorisation under Section 21 (g) and (e) of the National Water Act for the disposal and irrigation with treated effluent from the on-site Wastewater Treatment Plant. DWS acknowledged this authorisation.

Borehole Water Use: DWS highlighted that the project includes water supply from two existing boreholes via a pump main into storage tanks. However, DWS has no record of

registration or authorisation for these boreholes. They stated that taking water from a water resource requires authorisation under Section 21 (a) of the National Water Act. The applicant is in the process of applying for this authorisation (DWS reference: WU44444).

Pollution Prevention: DWS emphasized that no surface, ground, or storm water may be polluted as a result of the proposed activities. If pollution occurs, DWS must be informed immediately. The EAP confirmed that the applicant has the necessary General Authorisation for effluent disposal and irrigation.

Legal Compliance: All requirements of the National Water Act regarding water use, resource management, and pollution prevention must be adhered to at all times. DWS reserved the right to amend or add to their comments if new information arises and clarified that their comments do not exempt the applicant from compliance with any other applicable laws or regulations.

4. CONDITIONS

1. The applicant must in writing, within 14 (fourteen) calendar days of the date of this decision–
notify all registered Interested and Affected Parties (I&APs) of –
 - 1.1.1 the outcome of the application;
 - 1.1.2 the reasons for the decision as included in Section 2 above;
 - 1.1.3 the date of the decision; and
 - 1.1.4 the date when the decision was issued.
- 1.2 draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of *National Appeals Regulations, 2014* detailed in Section 4 below;
- 1.3 draw the attention of all registered I&APs to the manner in which they may access the decision;
- 1.4 provide the registered I&APs with:
 - 1.4.1 the name of the holder (entity) of this Environmental Authorisation,
 - 1.4.2 name of the responsible person for this Environmental Authorisation
 - 1.4.3 postal address of the holder,
 - 1.4.4 telephonic and fax details of the holder,

1.4.5 e-mail address, if any, of the holder,

1.4.6 the contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the *National Appeals Regulations, 2014*.

4. APPEALS

Appeals must comply with the provisions contained in the *National Appeal Regulations, 2014*.

1. An appellant (if the holder) must –

1.1 submit an appeal in accordance with regulation 4 National Appeal Regulations, 2014 to the Appeal Administrator and a copy of the appeal to any registered I&APs, any Organ of State with interest in the matter and the decision maker within 20 (twenty) calendar days from the date the holder was notified by the competent authority of this decision.

2. An appellant (if NOT the holder) must –

2.1 submit an appeal in accordance with regulation 4 National Appeal Regulations, 2014 to the Appeal Administrator, and a copy of the appeal to the holder, any registered I&APs, any Organ of State with interest in the matter and the decision maker within 20 (twenty) calendar days from the date the holder notified the registered I&APs of this decision.

3. The holder (if not the appellant), the decision-maker, I&APs and Organ of State must submit their responding statements, if any, to the Appeal Authority and the appellant within 20 (twenty) calendar days from the date of receipt of the appeal submission.

4. This appeal and responding statement must be submitted to the address listed below -

By post: Attention: Mr Marius Venter

Western Cape Ministry of Local Government, Environmental Affairs &
Development Planning

Private Bag X9186, Cape Town, 8000; or

By facsimile: (021) 483 4174; or

By hand: Attention: Mr Marius Venter (Tel: 021-483 2659)

Room 809, 8th floor Utilitas Building

1 Dorp Street, Cape Town, 8000; or

By e-mail: DEADP.Appeals@westerncape.gov.za

Note: You are also requested to submit an electronic copy (Microsoft Word format) of the appeal and any supporting documents to the Appeal Administrator to the address listed above and/ or via e-mail to DEADP.Appeals@westerncape.gov.za.

5. A prescribed appeal form, as well as assistance regarding the appeal processes is obtainable from the office of the appeal authority/ at: Tel. (021) 483 3721, E-mail: DEADP.Appeals@westerncape.gov.za or URL <http://www.westerncape.gov.za/eadp>.

5. DISCLAIMER

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

Your interest in the future of our environment is appreciated.

Yours faithfully

MRS Z TOEFY

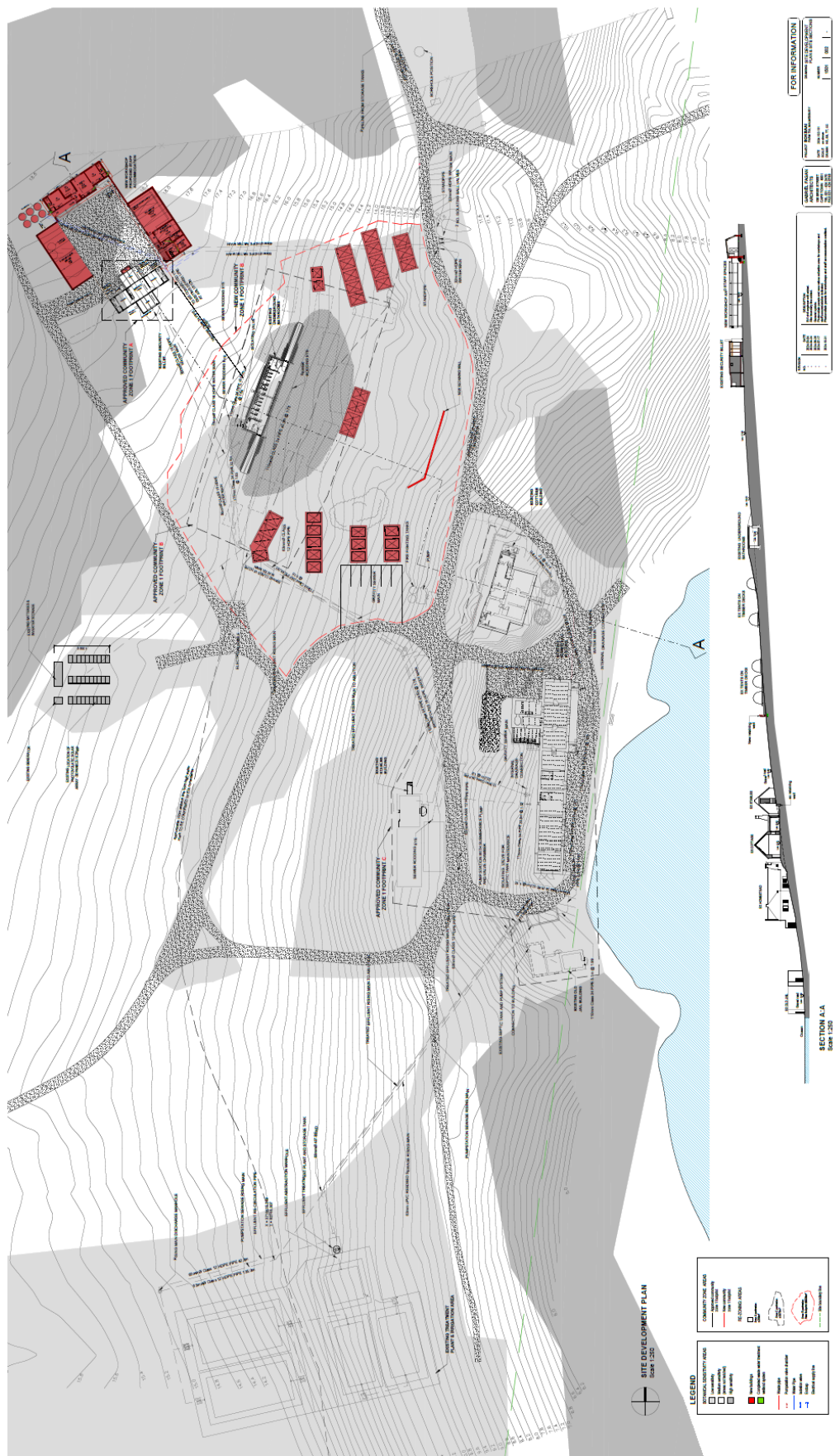
HEAD OF RECTIFICATION

DIRECTORATE: ENVIRONMENTAL GOVERNANCE

Doug Jeffery Environmental Consultants (Pty) Ltd

Email: doug@dougjeff.co.za

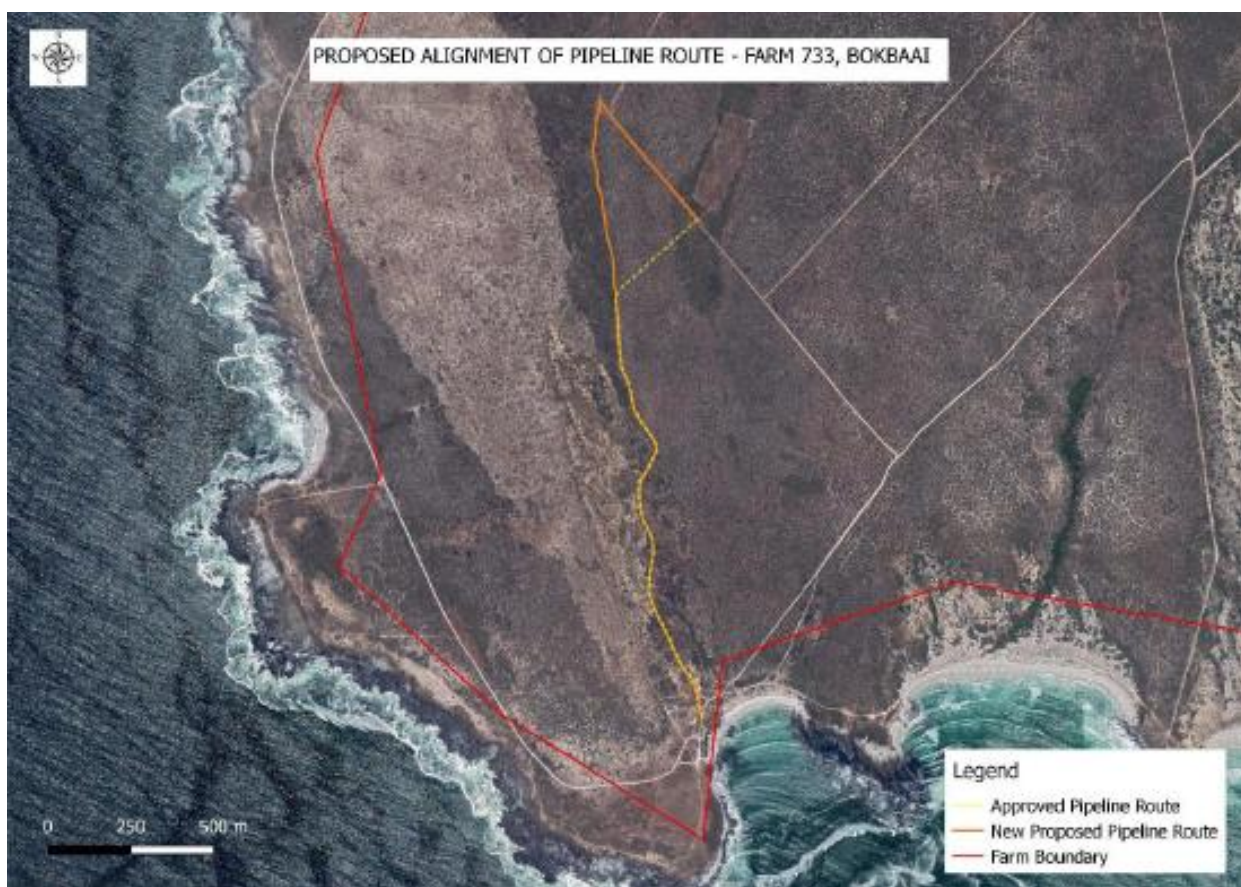
APPENDIX 1- SITE DEVELOPMENT PLANS



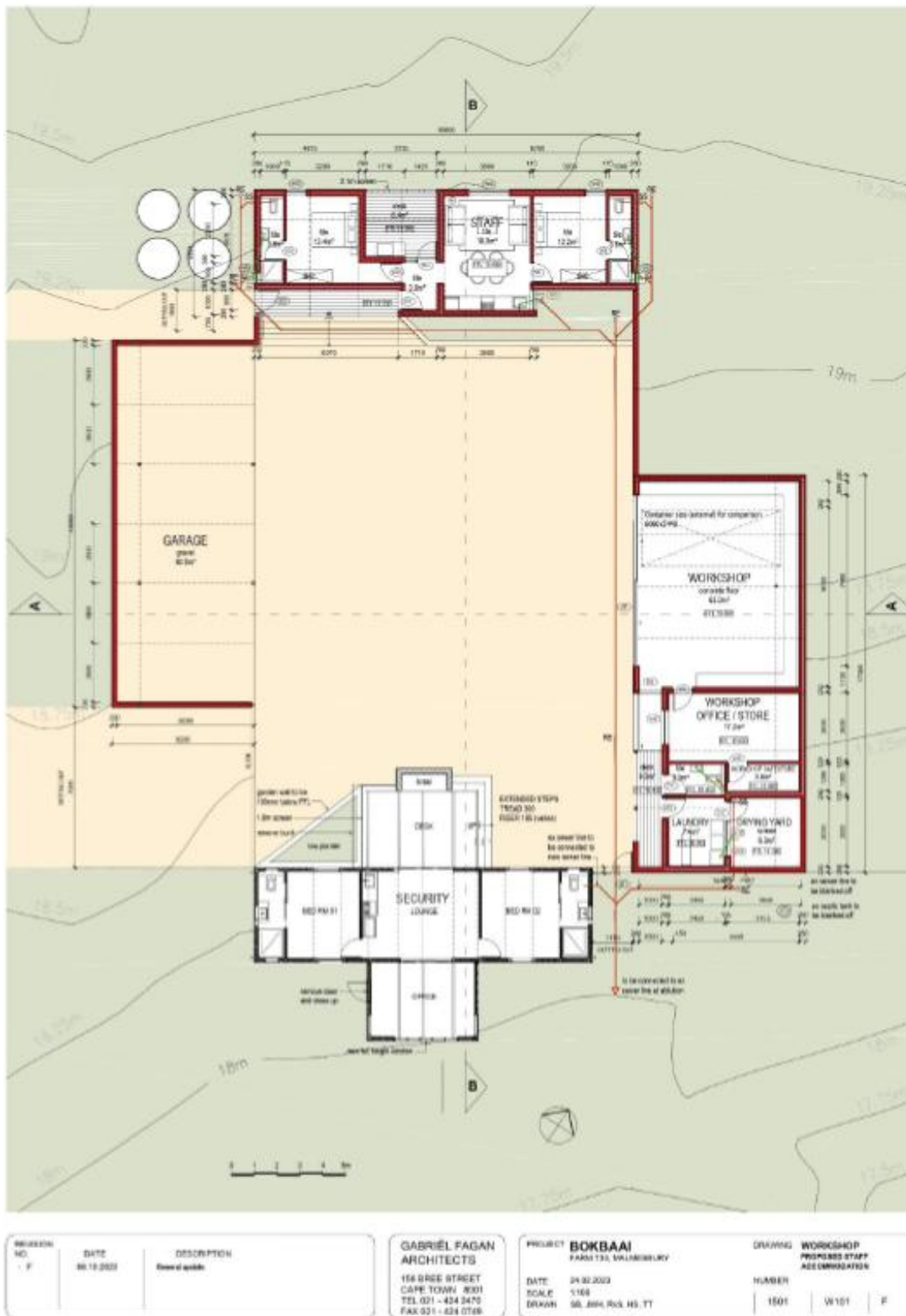
Site Development Plan



Location of proposed development site (red polygon), the existing land uses and the proposed land uses.



Approved realignment of the water pipeline as per the 2019 Amended EA.



Workshop Site Plan for the proposed staff and security werf.