

SITE VERIFICATION REPORT FOR THE PROPOSED INSTALLATION OF THREE 83M³ (249M³) ABOVEGROUND DIESEL STORAGE TANKS ON ERF 601, STASIE ROAD, LUTZVILLE, WESTERN CAPE.

Date: August 2025

SEC REFERENCE: 024053

DEA&DP REF: W-BA-EIA-L07

BACKGROUND

In terms of the *Protocols for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes* (referred to "the Protocols" hereafter) as per Government Notice No. 320 (published in Government Gazette No. 43110 on 20 March 2020)¹, a Site Sensitivity Verification (SSV) Report must be compiled and submitted with each new application submitted after the effective date of the Protocols (9th May 2020).

The aim of the SSV Report is to (i) verify the land use and various theme sensitivities which were identified by the DEA Screening Tool (Appendix D), (ii) agree/dispute theme sensitivity ratings, and provide motivations should the theme sensitivity be challenged, and (iii) provide a motivation as to why the need for identified specialist studies are challenged.

METHODOLOGY:

In terms of the Protocols, the EAP must verify the site's environmental sensitivity in accordance with theme sensitivities and required specialist studies as identified by the DEA Screening Tool (Appendix D). This aids in determining the applicability of the National Environmental Management Act, 1998 (Act No. 107 of 1998), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in relation to the proposed application.

The SSV Report was compiled based on desktop studies and site photographs to determine the applicability of the EIA Regulations, 2014 (as amended) to the proposed application. This SSV Report was compiled by the EAP (Mr. Jonathan Lassen). It must be noted that this SSV Report must be read in combination with the DEA Screening Tool (Appendix D), as well as any other document appended in support of this Post-Application BAR.

Page | 2

PROJECT DESCRIPTION

The applicant, Agrimark (Pty) Ltd, proposes to expand their site by adding three 83m³ (249m³) above-ground diesel storage tanks in the northern section, as outlined in the attached Site Development Plan (SDP) (Appendix I). This expansion will include the construction of a bund floor with new stairs (covering 1.14 m²), a new petrol dispenser area (22.5 m²), a spill slab (120 m²), and an additional bund floor area (237.17 m²). The total area covered by the expansion will be 380.81 m².

The site located on Erf 601, Stasie Road, Lutzville, in the West Coast District, spans a total area of 17,130.38 m². Currently, existing developments occupy only 17.57% of the site, covering 3,009.7 m². The infrastructure on the site includes a fuel service station with a forecourt area, a convenience store, a gas storage facility, a mini substation, an Agrimark retail store, and two Agrimark warehouses. Additionally, the site features 80 designated parking bays for visitors and staff.



Figure 1: Locality Map – with proposed expansion area highlighted in red zone (Cape Farm Mapper)

In summary, the following is proposed:

• The installation of three 83m³ (249m³) aboveground diesel storage tanks.

The proposed expansion triggers the following activities, which is listed in terms of 2014 EIA Regulations, as amended, published under the National Environmental Management Act, Act No. 107 of 1998 (NEMA), and therefore requires an application for Environmental Authorisation: <u>Activity 51 of Listing Notice 1</u> (2014 EIA Regulations, as amended).

Sillito Environmental Consulting (Pty) Ltd (SEC) has been appointed to undertake the Basic Assessment EIA Process with the aim of receiving an Environmental Authorisation in terms of the 2014 EIA Regulations, as amended, published under the National Environmental Management Act (NEMA).

Regulation 16(1)(v) of the Environmental Impact Assessment Regulations 2014, as amended, states that a Screening Report is required to accompany any application for Environmental Authorisation. In this regard the National web-based Screening Tool must be generated and submitted with every application.

The Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes in Terms of Sections 24(5)(a) and (h) and 44 of the NEMA, dated 20th March 2020, prescribes the general requirements for undertaking site sensitivity verification and provides protocols for the assessment and minimum report content for environmental themes.

These Procedures explain that prior to commencing with a specialist assessment the current use of land and the environmental sensitivity of the site identified by the National Screening Tool must be confirmed by undertaking a site sensitivity verification and the outcome of the site sensitivity verification must be recorded in the form of a report. This report, therefore, meets the requirements of the site sensitivity verification report outlined in the Procedures.

The table below indicates the level of sensitivity of each of the themes identified in the National Web-based Screening Tool Report, dated 4th of March 2025:

Theme	Very High Sensitivity	High Sensitivity	Medium Sensitivity	Low Sensitivity	EAPs Opinion
Agriculture Theme				Х	Agree
Animal Species Theme		Х			Disagree
Aquatic Biodiversity Theme	Х				Disagree
Archaeological & Cultural Heritage				Х	Agree
Civil Aviation Theme		Х			Disagree
Defence Theme				Х	Disagree
Paleontology Theme			Х		Disagree
Plant Species Theme			Х		Disagree
Terrestrial Biodiversity Theme	Х				Disagree

Table 1. Site sensitivity themes as identified by the DEA Screening Tool (**Appendix D**).

No	Theme	DEA Sensitivity	Agree / Disagree	Proposed Sensitivity	Motivation
1	Agriculture Theme	Low Sensitivity	Agree	Low Sensitivity	The proposed site for expansion is an existing site, that has been completely transformed and does not support any agricultural crops. This site is located within a built-up area which is not zoned for agricultural use and the surrounding land uses include commercial businesses and residential homes. Due to the factors highlighted above, it is envisaged that the proposed site for fuel storage expansion would not support any agricultural activities and therefore, the site will have a 'Low' agricultural site sensitivity rating.
2	Animal Species Theme	High Sensitivity	Disagree	Low Sensitivity	Anthropogenic activities, associated with the previous clearance and current operation of the site have resulted in the transformation and disturbance of the area. The proposed expansion activities would take place on an already existing site with infrastructure such as a fuel service station, warehouses, mini sub station and convenience store present. There is no indigenous vegetation present on the site, and it is therefore unlikely that the site would be able to support any fauna, listed as being present, in the general site area. Based on the factors outlined above, it is envisaged that the site will have a 'Low' Animal Species theme sensitivity. An Animal Species Biodiversity compliance statement was completed by Enviro-EAP and the findings were in support of the opinions of the EAP, the conclusions of the specialists report are further discussed under Section G of the Post-Application BAR.
3	Aquatic Biodiversity Theme	Very High Sensitivity	Disagree	Low Sensitivity	The Aquatic Biodiversity Theme has been rated as 'Very High' due to an Aquatic Ecological Support Area 1 (ESA1) being in proximity and overlapping onto the proposed site. A non-perennial river also runs along the western boundary of the site and is associated with the ESA1. The proposed installation of the three 83m³ aboveground diesel storage tanks would have no impact on the non-perennial river and due to the tanks being aboveground, possible leaks can be efficiently managed and monitored. In addition, due to anthropogenic activities being present in the surrounding areas and

					the site being already being developed it is envisaged that the proposed expansion will have little to no impact on the ESA1 and non-perennial river. It is therefore the opinion of the EAP that the assigned rating should be 'Low'. An Aquatic compliance statement was completed by Enviro-EAP and the findings were in support of the opinions of the EAP. In addition, the report also outlined that the ESA area present on the online mapping tool (Cape Farm Mapper) was falsely mapped and the conclusions of the specialists report therefore supported the opinions of the EAP. The results of the specialists report are further discussed under Section G of the Post-Application BAR.
4	Archaeological and Cultural Heritage Theme	Low Sensitivity	Agree	Low Sensitivity	The Archaeological and Cultural Heritage Theme has been rated as 'Low', due to the nature of the site and proposed expansion activities; the EAP agrees with the assigned 'Low' sensitivity rating. Due to the nature of the proposed expansion activities, a chance finds clause will still be included and if any archaeological or cultural remains were uncovered, the necessary specialists would be contacted to determine the way forward.
5	Civil Aviation Theme	High Sensitivity	Disagree	Negligible	The Civil Aviation Theme has been rated as 'High' due to the site being within an 8km proximity of a civil aviation aerodrome. The proposed expansion activities will have no impact on any surrounding civil aviation activities or infrastructure, it is therefore envisaged that the assigned sensitivity rating should be 'Negligible'.
6	Defence Theme	Low Sensitivity	Disagree	Negligible	The Defence Theme has been rated as 'Low', due to the nature of the site and proposed expansion activities, the development will have no impact on any Defence related infrastructure or activities. The EAP therefore disagrees with the assigned 'Low' sensitivity rating, and it is envisaged that the rating should be 'Negligible'.
7	Paleontology Theme	Medium Sensitivity	Disagree	Low Sensitivity	According to Paleontological Online Map Tool (https://sahris.sahra.org.za/map/palaeo), the proposed site is situated on the border an area of low paleontological significance. Moreover, the site has been previously transformed. The proposed fuel storage expansion is therefore unlikely to impact any paleontological resource. It is envisaged that the proposed site has a 'Low' sensitivity

					Cultural Herita	age Theme	ological Theme. As mentioned for Sensitivity Theme 4 (Archaeological and e) a chance finds clause will still be included and if any archaeological or ncovered, the necessary specialists would be contacted to determine the
					SAHRIS Palaeo Ma	ар	Blastnis (P)) Bld - Accorded to Company Compan
					1 in 250 000 geological formation in For more information, go to How to. Colour		
					GREY	HIGH MODERATE LOW INSIGNIFICANT/ZERO	desktop study is required and based on the outcome of the desktop study, a field assessment is likely desktop study is required no palaeontological studies are required however a protocol for finds is required no palaeontological studies are required
						ontologica	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map. Cal Sensitivity of the proposed site for fuel storage expansion. Source: SAHRIS,
8	Plant Species Theme	Medium Sensitivity	Disagree	Low Sensitivity	led to signification an already demini substation currently ope	ant transfo eveloped a on, and a erational w	s, including previous clearance and the current operation of the site, have rmation and disturbance of the area. The proposed expansion will occur on site that includes infrastructure such as a fuel service station, warehouses, a convenience store. There is no indigenous vegetation on the site, and it is with ongoing commercial activities. As such, it is unlikely that the site can are listed as present in the surrounding area. Given these considerations, it is
					- - - - -		Page 8

					the opinion of the EAP that the site is expected to have a 'Low' sensitivity for plant species. A Plant
					Species Biodiversity compliance statement was completed by Enviro-EAP and the findings were in
					support of the opinions of the EAP, the conclusions of the specialists report are further discussed under
					Section G of the Post-Application BAR.
					The Terrestrial Biodiversity Theme has been rated as 'Very High' due to an Ecological Support Area 2
			Disagree		(ESA2) being in proximity and overlapping onto the proposed site. A non-perennial river also runs
					along the western boundary of the site and is associated with the ESA2. The proposed installation of
					the three 83m3 aboveground diesel storage tanks would have no impact on the ESA2 because all
	Terrestrial			Low Sensitivity	development works would be contained within the already established site. In addition, due to
9	Biodiversity	Very High Sensitivity			anthropogenic activities being present in the surrounding areas and the site being already being
	Theme	Sensitivity			developed it is envisaged that the proposed expansion will have little to no impact on the ESA2 and
					non-perennial river. It is therefore the opinion of the EAP that the assigned rating should be 'Low'. A
					Terrestrial Biodiversity compliance statement was completed by Enviro-EAP and the findings were in
					support of the opinions of the EAP, the conclusions of the specialists report are further discussed under
					Section G of the Post-Application BAR.

3. Specialist Studies Identified by Screening Tool

The following Specialist Assessments have been identified by the Screening Tool, dated the 4th of March 2025:

- 1. Agricultural Impact Assessment
- 2. Archaeological and Cultural Heritage Impact Assessment
- 3. Palaeontology Impact Assessment
- 4. Terrestrial Biodiversity Impact Assessment
- 5. Aquatic Biodiversity Impact Assessment
- 6. Hydrology Assessment
- 7. Noise Impact Assessment
- 8. Traffic Impact Assessment
- 9. Geotechnical Assessment
- 10. Socio-economic Assessment
- 11. Plant Species Assessment
- 12. Animal Species Assessment
- 4. Motivation by the EAP Agreeing or Disputing the Specialist Assessments Identified in Screening Tool Report
 - a) <u>The following specialist studies, as identified by the Screening Tool Report, will not be carried out:</u>

1. Agricultural Impact Assessment

Erf 601, Lutzville is an existing, transformed site (i.e. previously developed) with surrounding land uses including commercial businesses and residential property. This site is located within a built-up area and is not zoned for agricultural use. The proposed fuel storage expansion will therefore not have any significant agricultural impacts, as these impacts would have occurred during the previous transformation of the land. It is therefore envisaged that an Agricultural Assessment will <u>not</u> be required.

2. Archaeological and Cultural Heritage Impact Assessment

This theme was given a 'Low' sensitivity rating. Due to the nature of the site and proposed expansion activities; the EAP agrees with the assigned 'Low' sensitivity rating. Due to the nature of the proposed expansion activities, a chance finds clause will still be included and if any archaeological or cultural remains were uncovered, the necessary specialists would be contacted to determine the way forward. it is therefore envisaged that an Archaeological and Cultural Heritage Impact Assessment will <u>not</u> be required.

3. Palaeontology Impact Assessment

The Palaeontology Theme was given a 'Medium' sensitivity rating but since the site has already been completely developed, the EAP recommended that the assigned rating be 'Low'. In addition to this, according to Paleontological Online Map Tool (https://sahris.sahra.org.za/map/palaeo), the proposed site is situated within an area of low paleontological significance. It is therefore envisaged that a Palaeontology Impact Assessment will **not** be required. Due to the nature of the proposed expansion activities, a chance

finds clause will still be included and if any paleontological remains were uncovered, the necessary specialists would be contacted to determine the way forward.

4. Terrestrial Biodiversity Impact Assessment

The Terrestrial Biodiversity Theme has been rated as 'Very High' due to the proximity of an Ecological Support Area 2 (ESA2), which overlaps onto the proposed site. Additionally, a non-perennial river runs along the western boundary of the site and is linked to the ESA2. However, the proposed installation of three 83m³ above-ground diesel storage tanks will not impact the ESA2, as all development activities will be confined to the already developed site. Given the presence of ongoing anthropogenic activities in the surrounding area and the site's existing development, it is expected that the proposed expansion will have minimal to no effect on the ESA2 or the non-perennial river. Therefore, the EAP believes the rating should be 'Medium.' However, a Terrestrial Specialist will need to conduct a site survey and prepare a report to confirm whether the current state of the ESA2 justifies the 'Very High' rating. A Terrestrial Biodiversity Impact Assessment will be required to assess the state of the ESA2. A Terrestrial Biodiversity Compliance Statement was compiled by Nicolaas Hanekom of Enviro-EAP.

5. Aquatic Biodiversity Impact Assessment

The Aquatic Biodiversity Theme has been rated as 'Very High' due to the proximity of an Aquatic Ecological Support Area 1 (ESA1), which overlaps onto the proposed site. Additionally, a non-perennial river runs along the western boundary of the site and is associated with the ESA1. The proposed installation of the three 83m³ above-ground diesel storage tanks will not impact the non-perennial river. As the tanks are above ground, any potential leaks can be effectively managed and monitored. Furthermore, given the anthropogenic activities in the surrounding area and the site's existing development, it is expected that the proposed expansion will have minimal to no impact on the ESA1 or the non-perennial river. Consequently, the Environmental Assessment Practitioner (EAP) believes the rating should be 'Medium.' However, a Freshwater Specialist will need to conduct a site survey and prepare a report to verify whether the current condition of the ESA1 justifies the 'Very High' rating. An Aquatic Biodiversity Impact Assessment will be required to assess the state of the ESA1 and the non-perennial river. An Aquatic Species Compliance Statement was compiled by Nicolaas Hanekom of Enviro-EAP.



Figure 3: Water resource map.

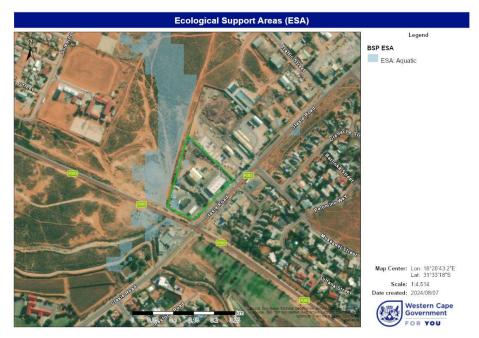


Figure 4. Ecological Support Areas

6. Noise Impact Assessment

The proposed fuel storage expansion will occur within a previously transformed site with existing noise-related operational conditions. It is therefore envisaged that a Noise Impact Assessment (NIA) will **not** be required due to existing noise-related operational conditions.

7. Traffic Impact Assessment

Due to the type of activity (i.e. expansion), it is envisaged that the increase in traffic will be negligible. In addition, the area where the tanks are to be installed are removed from high traffic areas on site and will not

cause obstructions within the roadway. Therefore, it is envisaged that a Traffic Impact Assessment will **not** be required.

8. Socio-Economic Assessment

The construction phase will create temporary employment, and skills-development, opportunities – benefiting the local communities. It is therefore envisaged that a Socio-Economic assessment will **not** be required.

9. Animal Species Assessment

Anthropogenic activities, including previous clearance and the current operation of the site, have caused significant transformation and disturbance to the area. The proposed expansion will occur on an already developed site, which includes infrastructure such as a fuel service station, warehouses, a mini substation, and a convenience store. No indigenous vegetation is present on the site, making it unlikely that the area can support any fauna that are listed as being present. Based on these factors, it is anticipated that an Animal Species Assessment will be required. An Animal Species Compliance Statement was compiled by Nicolaas Hanekom of Enviro-EAP.

10. Hydrology Assessment and Geotechnical Assessment

The is currently a fuel service station as well as other infrastructure listed above on site with existing fuel storage. Should the proposed mitigation measures be implemented (as per the proposed measures to be incorporated in the EMPr and DBAR), it is envisaged that a Hydrological Assessment and Geotechnical Assessment will **not** be required.

11. Plant Species Assessment

Anthropogenic activities, including previous clearance and the ongoing operation of the site, have caused considerable transformation and disturbance to the area. The proposed expansion will take place on an already developed site, which includes infrastructure such as a fuel service station, warehouses, a mini substation, and a convenience store. With no indigenous vegetation present and the site currently in operation with continuous commercial activities, it is unlikely that the area can support any flora listed as present in the surrounding region. Based on these factors, it is anticipated that a Plant Species Assessment will be required. A Plant Species Compliance Statement was compiled by Nicolaas Hanekom of Enviro-EAP.

In conclusion, as the site has been completely transformed and is currently in operation, the proposed expansion of fuel storage capacity is envisaged to have negligible impacts should proposed mitigation measures, to be outlined in the DBAR and EMPr, be implemented. Based on the factors outlined above, the proposed expansion of fuel storage capacity will have a negligible impact on the receiving environment.

Author of Site Verification Report:

Report Reviewer:

Jonathan Lassen

Mid-Level Environmental Consultant

Adv Dip. Marine Sciences

Chantel Müller

Senior Environmental Consultant MPhil Environmental Management