



CONSERVATION INTELLIGENCE: LANDSCAPE CENTRAL

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reference SSD14/2/6/1/9/4/502-10_S24G_Veg Clearing_Spier_Stellenbosch
date 20 November 2025

Mische Molife
GroenbergEnviro
P O Box 1058
Wellington
7654

By email: mische@groenbergenviro.co.za

Dear Ms Molife

RE: Rectification of alleged clearance of vegetation on Portion 10 of Farm 502, Stellenbosch – Section 24G Application/Draft Assessment Report
Consultation Reference Number: 14/2/4/1/B4/39/0017/25
Application Ref No: TBD

CapeNature would like to thank you for the opportunity to comment on the Section 24G Application or Draft Assessment Report. Please note that our comments pertain primarily to impacts on biodiversity and not to the overall desirability of the project.

1. CapeNature provided comment on the Draft Basic Assessment Report for the establishment of a Vineyard on 12 October 2020. These comments still have reference (see comment letter attached in email).
2. According to the the South African Vegetation Map (2018), the area supports Swartland Granite Renosterveld, which is listed as an Endangered Vegetation Type. Given that Swartland Granite Renosterveld has less than 12% of its original extent remaining (which is well below the conservation threshold of 26%), this area has been identified as a priority conservation area based on the mapping in the past. The area appears to be transformed through previous cultivation or disturbance; however, no cultivation took place in the past 20 years, and some natural pioneer vegetation seems to be returning. Any area that has not been cultivated for more than 10 years is legally considered as natural vegetation and needs to be treated as such.
3. The unlawfully cleared areas are situated within a Critical Biodiversity Area (CBA: Terrestrial) – which include areas that are usually, but not always in a natural condition that are required to meet biodiversity targets for species, ecosystems or ecological processes and ecological infrastructure. The CBA was determined due to the presence of the Threatened Vegetation Type, Threatened Plant Species and Water Source Protection (Eerste River). No further loss of natural habitat should occur in CBAs, degraded areas should ideally be rehabilitated, and only low-impact, biodiversity-sensitive land uses should be allowed. Additionally, the area is situated within a Strategic Water Source Area (SWSA) for Surface Water (Boland).
4. According to the Section 24G Report, an Environmental Authorisation (EA) was issued (April 2021) to Spier Wine Estate Pty Ltd for the establishment of a vineyard between the areas that were illegally cleared. Approximately 2 ha of indigenous vegetation were unlawfully cleared outside of the authorized footprint. Apparently, the clearance were done erroneously because the approved development area was not demarcated prior to commencement of the vineyard preparation and the owner is now rectifying the area cleared illegally either side of the approved vineyard area.

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

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

5. The Terrestrial Biodiversity Assessment indicated that the EA authorized the development of a 10 ha vineyard and identified additional areas to be set aside for conservation under a Biodiversity Agreement with CapeNature. These included a 11 ha Buffer zone, a 10 ha conservation area and an existing conservation area of approximately 10 ha (which amounts to 31 ha in total). The Assessment also indicated that Plant Species and Animal Species Theme have a Medium sensitivity rating, while the Terrestrial Biodiversity Theme sensitivity was Very High. The Very High rating is due to the Endangered Ecosystem (Swartland Granite Renosterveld), Terrestrial CBAs and SWSA for Surface Water. The Specialist disputes these sensitivity ratings due to the small size and low ecological impacts of the 2 ha unlawfully cleared areas. However, areas can be considered important, irrespective of their size and CBA mapping and Vegetation Types are mapped for a reason (depending on remaining extent, and type – like Renosterveld which has less than 5% of the vegetation type left - more than 95% of the original lowland renosterveld habitat has been lost).
6. Furthermore, Page 38 of the Terrestrial Biodiversity Assessment states that “Given the disturbed and secondary nature of the vegetation, it is considered unlikely that viable populations of Species of Conservation Concern (SCCs) were present within the areas that were cleared.” CapeNature does not entirely agree with this statement, because individual Plant Species can also be important or valuable and not only entire populations of SCCs. Please see the Plant Species or SCC’s that were encountered during the 2020 CapeNature site visit (Figure 1, 12 October 2020, Comment Letter). We do however agree with the recommendations made by the Specialist: To implement the approved Restoration Plan; To conduct ongoing alien plant control and monitoring – to ensure that alien species do not establish and that secondary vegetation recovers and that the cleared areas should be incorporated into the existing Conservation commitments under the Biodiversity Agreement with CapeNature as per the EA dated April 2021.
7. The Rehabilitation Plan (Appendix H2) or Restoration Plan (Holmes 2021) was written before clearing took place. CapeNature supports this Rehabilitation Plan, and the same principles should apply for the rehabilitation and restoration of the unauthorized/illegally cleared areas, even if it’s not considered “true” Renosterveld. Furthermore, the impacts of the new vineyard (i.e. edge effects) should be considered with regard to rehabilitation and restoration success. Success of the rehabilitation and restoration should also be monitored for a minimum of **3 years**.
8. Please note that conditions linked to other Environmental Authorizations (EA) for the same property is still relevant. Cumulative impacts for the entire property should be considered and remediation measures, such as rehabilitation, as well as protective measures such as biodiversity stewardship should be implemented for existing authorised projects before further disturbance is authorised. Additionally, please provide us with a detailed update regarding the stewardship processes (that have arisen not only out of the vineyard application but out of previous development applications on the property as well).
9. CapeNature recommends that the Biodiversity Agreement (for the Conservation areas) is finalized within one year of the Environmental Authorization (EA) being issued and that Rehabilitation of the area must commence immediately.

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

Yours sincerely



Leandra Knoetze

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