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SITE SENSITIVITY VERIFICATION
AND
AGRICULTURAL COMPLIANCE STATEMENT
FOR THE PROPOSED UPGRADING OF THE BULK SEWERAGE LINE
FROM AMY SEARLE STREET / GREENHAVEN TO THE CRICKET FIELD SEWERAGE PUMPSTATION
NEAR MOSSELBAY WESTERN CAPE

Report by
Johann Lanz

8 August 2025

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EXECUTIVE SUMMARY

The overall conclusion of this assessment is that the proposed development is acceptable because it leads to no loss of future agricultural production potential.

Although the climate, terrain, and soil suitability may allow for viable crop production, other factors constrain the potential of the site to practically deliver agricultural produce and therefore limit its agricultural production potential. These factors include its location in a built-up area and within a road reserve. For these reasons, the site will never be viably utilised for agricultural production, and its potential is therefore assessed here as non-existent.

This assessment disputes the high sensitivity classification of the site by the screening tool and verifies the entire site as being of low agricultural sensitivity because it has no agricultural production potential.

An agricultural impact must by definition cause a change to the future agricultural production potential of land. If there is no change, there is no impact. Because the site has no current agricultural production potential due to its location, the occupation of the site by the development cannot change its agricultural production potential. The development will therefore have zero agricultural impact and is therefore assessed as acceptable.

From an agricultural impact point of view, it is recommended that the proposed development be approved. The conclusion of this assessment on the acceptability of the proposed development and the recommendation for its approval is not subject to any conditions.

1 INTRODUCTION

Environmental authorisation is being sought for the proposed upgrading of the bulk sewerage line from Amy Searle Street / Greenhaven to the cricket field sewerage pumpstation near Mosselbay, Western Cape (see location in Figure 1). In terms of the National Environmental Management Act (Act No 107 of 1998 - NEMA), an application for environmental authorisation requires an agricultural assessment. In this case, based on the low to medium agricultural sensitivity of the assessed area (see Section 7), the level of agricultural assessment required by the protocol is an Agricultural Compliance Statement.

Figure 1. *Locality map of the development, within the Mosselbay Local Municipality.*

The purpose of an agricultural assessment is to answer the question:

> Will the proposed development cause a significant reduction in future agricultural production potential, and most importantly, will it result in a loss of arable land?

Section 9 of this report unpacks this question, particularly with respect to what constitutes a significant reduction. To answer the above question, it is necessary to determine the existing agricultural production potential of the land that will be impacted, and specifically whether it is viable arable land or not. This is done in Section 8 of this report. Sections 8 and 9 of this report directly address the above question and therefore contain the essence and most important part of the agricultural impact assessment.

2 PROJECT DESCRIPTION

The proposed development project entails the installation of a new Ø300mm pipeline from Amy Searle Street / Greenhaven to the cricket field sewerage pumpstation.

3 TERMS OF REFERENCE

The terms of reference for this study are to fulfill the requirements of the *Protocol for the specialist assessment and minimum report content requirements of environmental impacts on agricultural resources*, gazetted on 20 March 2020 in GN 320 (in terms of Sections 24(5)(A) and (H) and 44 of NEMA, 1998).

The terms of reference for an Agricultural Compliance Statement, as copied exactly from the protocol, are listed in the table below, and included, is the place in this report where each is addressed.

Number	Requirement	Where it is addressed
3.	Agricultural Compliance Statement	
3.1.	The compliance statement must be prepared by a soil scientist or agricultural specialist registered with the SACNASP.	Appendix 3
3.2.	The compliance statement must:	
3.2.1.	be applicable to the preferred site and proposed development footprint;	Figure 2
3.2.2.	confirm that the site is of “low” or “medium” sensitivity for agriculture; and	Section 8
3.2.3.	indicate whether or not the proposed development will have an unacceptable impact on the agricultural production capability of the site.	Section 9.1
3.3.	The compliance statement must contain, as a minimum, the following information:	
3.3.1.	contact details and relevant experience as well as the SACNASP registration number of the soil scientist or agricultural specialist preparing the assessment including a curriculum vitae;	Appendix 1
3.3.2.	a signed statement of independence;	Appendix 2
3.3.3.	a map showing the proposed development footprint (including supporting infrastructure) with a 50m buffered development envelope, overlaid on the agricultural sensitivity map generated by the screening tool;	Figure 5

3.3.4.	confirmation from the specialist that all reasonable measures have been taken through micro-siting to avoid or minimise fragmentation and disturbance of agricultural activities;	Section 11.1
3.3.5.	a substantiated statement from the soil scientist or agricultural specialist on the acceptability, or not, of the proposed development and a recommendation on the approval, or not, of the proposed development;	Section 12
3.3.6.	any conditions to which the statement is subjected;	Section 12
3.3.7.	in the case of a linear activity, confirmation from the agricultural specialist or soil scientist, that in their opinion, based on the mitigation and remedial measures proposed, the land can be returned to the current state within two years of completion of the construction phase;	Section 11.2
3.3.8.	where required, proposed impact management outcomes or any monitoring requirements for inclusion in the EMPr; and	None required
3.3.9.	a description of the assumptions made as well as any uncertainties or gaps in knowledge or data.	Section 5
3.4.	A signed copy of the compliance statement must be appended to the Basic Assessment Report or Environmental Impact Assessment Report.	

4 METHODOLOGY OF STUDY

The assessment was based on an on-site investigation of the soils and agricultural conditions conducted on 18 July 2025. It was also informed by existing climate, soil, and agricultural potential data for the site (see references). The aim of the on-site assessment was to assess and determine the cropping potential across the site.

5 ASSUMPTIONS, UNCERTAINTIES OR GAPS IN KNOWLEDGE OR DATA

There are no specific assumptions, uncertainties or gaps in knowledge or data that affect the findings of this study.

6 APPLICABLE LEGISLATION AND PERMIT REQUIREMENTS

This section identifies all applicable agricultural legislation and permit requirements over and above what is required in terms of NEMA.

The project may require agricultural approval (or at least comment from Department of Agriculture)

as part of the required approval in terms of applicable municipal land use legislation.

7 BASELINE DESCRIPTION OF THE AGRO-ECOSYSTEM

The purpose of this section is firstly to present the baseline information that controls the agricultural production potential of the site and then, most importantly, to assess that potential. Agricultural production potential, and particularly cropping potential, is one of four factors that determines the significance of an agricultural impact, together with magnitude of impact, size of footprint, and duration of impact. (see Section 9). Cropping potential also directly determines the true agricultural sensitivity of the land and therefore informs the site sensitivity verification.

A satellite image map of the site is given in Figure 2 and photographs of site conditions are shown in Figures 3 to 4.

The site is not within a Protected Agricultural Area (PAA) (DALRRD, 2020). A PAA is a demarcated area in which the climate, terrain, and soil are generally conducive for agricultural production and which, historically, or in a regional context, has made important contributions to the production of the various crops that are grown across South Africa. Within PAAs, the protection of viable, arable land is considered a priority for the protection of food security in South Africa.

Figure 2. *Satellite image map of the development.*

Figure 3. *Typical site conditions of the assessed area.*

Figure 4. *Typical site conditions of the assessed area.*

7.1 Assessment of the agricultural production potential

Although the climate, terrain, and soil suitability may allow for viable crop production, other factors constrain the potential of the site to practically deliver agricultural produce and therefore limit its agricultural production potential.

These factors include:

- its location within a built-up environment.
- the fact that most of the land is within a road reserve negates its potential for agricultural production.

For these reasons, the site will never be viably utilised for agricultural production, and its potential is therefore assessed here as non-existent.

8 SITE SENSITIVITY VERIFICATION

A specialist agricultural assessment is required to include a verification of the agricultural sensitivity of the development site as per the sensitivity categories used by the web-based environmental screening tool of the Department of Forestry, Fisheries and the Environment (DFFE). The screening tool's classification of sensitivity is merely an initial indication of what the sensitivity of a piece of land might be, as indicated by the only data that is available. What the screening tool attempts to indicate is whether the land is suitable for crop production (high and very high sensitivity) or unsuitable for crop production (low and medium sensitivity). To do this, the screening tool uses three independent criteria, from three independent data sets, which are all indicators of suitability for crop production but are limited and were not designed for this purpose. The three criteria are:

1. Whether the land is classified as cropland or not on the field crop boundary data set (Crop Estimates Consortium, 2019). All classified cropland is, by definition, either high or very high sensitivity.
2. Its land capability rating as per the Department of Agriculture's updated and refined, country-wide land capability mapping (DAFF, 2017). Land capability is defined as the combination of soil, climate, and terrain suitability factors for supporting rain-fed agricultural production. The direct relationship between land capability rating, agricultural sensitivity, and rain-fed cropping suitability is summarised by this author in Table XX.
3. Whether the land is classified as a protected agricultural area (PAA) or not (DALRRD, 2020). All classified PAAs are, by definition, either high or very high sensitivity.

The limitations for determining cropping suitability based on these data are as follows:

1. The field crop boundary data set used by the screening tool is very outdated
2. Land capability mapping is fairly coarse, modelled data which is not accurate at site scale.
3. PAAs are demarcated broadly, not at a fine scale, and there is therefore much variation of cropping suitability within a PAA. All land within these demarcated areas is not necessarily of sufficient agricultural potential to be suitable for crop production, due to finer scale terrain, soil, and other constraints, and therefore not all land within a PAA necessarily deserves to be classified as more than medium agricultural sensitivity.

These three inputs operate independently, and the screening tool's agricultural sensitivity is simply determined by whichever of these gives the highest sensitivity rating. The agricultural sensitivity of the site, as classified by the screening tool, is shown in Figure 7.

Table 2: Relationship between land capability, agricultural sensitivity, and rain-fed cropping suitability.

<table>
<tr><th rowspan="2">Land capability value</th><th rowspan="2">Agricultural sensitivity</th><th colspan="2">Rain-fed cropping suitability</th></tr>
<tr><th>Summer rainfall areas</th><th>Winter rainfall areas</th></tr>
<tr><td>1 - 5</td><td>Low</td><td rowspan="3">Unsuitable</td><td rowspan="2">Unsuitable</td></tr>
<tr><td>6</td><td rowspan="2">Medium</td></tr>
<tr><td>7</td><td rowspan="3">Suitable</td></tr>
<tr><td>8 - 10</td><td>High</td><td rowspan="2">Suitable</td></tr>
<tr><td>11 - 15</td><td>Very High</td></tr>
</table>

The true agricultural sensitivity of any land is equivalent to its actual suitability for crop production on the ground, rather than being determined by a parameter that serves as a proxy for crop suitability in a dataset, which is how the screening tool determines sensitivity. The land's suitability for cropping directly determines how important it is to conserve that land as agricultural production land. To determine suitability for crop production, and hence sensitivity, requires a site-specific assessment, as has been conducted in this assessment, rather than a reliance on data sets that have significant limitations.

Despite the detail in this section above, the determinants of agricultural sensitivity are actually very straightforward and may be summed up as follows. If land is suitable for viable crop production - that is if it has the capability to deliver an above break-even crop yield on a sustainable basis - then it is of high or very high agricultural sensitivity. If it has limitations that prevent it from being able to deliver an above break-even crop yield on a sustainable basis, then it is of medium or low agricultural sensitivity.

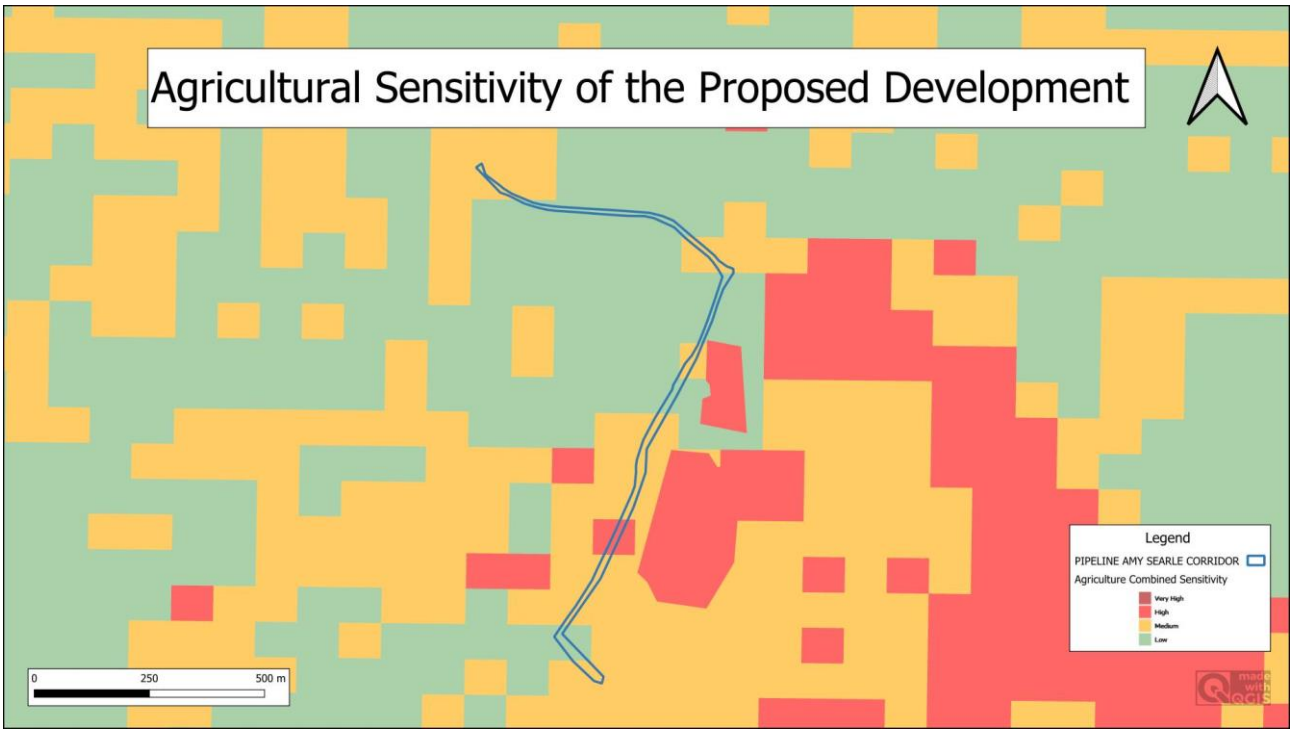

Figure 5. *The assessed footprint (blue outline) overlaid on agricultural sensitivity, as given by the screening tool (green = low; yellow = medium; red = high; dark red = very high). The screening tool's high sensitivity is disputed by this assessment, which rates the entire assessed footprint as being of low agricultural sensitivity.*

The screening tool classifies the assessed site as ranging from low to high agricultural sensitivity and therefore classifies the overall site sensitivity, which is the highest sensitivity encountered across the site, as high. The high sensitivity classification by the screening tool is due to some land being classified as high sensitivity because of its land capability rating, with the highest rating being 8 (moderate). However, as shown in Section 7, the assessed footprint is not at all suitable for viable crop production and its true sensitivity, as assessed on the ground, is therefore low. This assessment therefore disputes the high sensitivity classification of the site by the screening tool and verifies the entire site as being of low agricultural sensitivity because it has no agricultural production potential.

Figure 6. *Verified agricultural sensitivity*

9 ASSESSMENT OF THE AGRICULTURAL IMPACT

9.1 Impact identification and assessment

It should be noted that an Agricultural Compliance Statement is not required to formally rate agricultural impacts by way of impact assessment tables.

An agricultural impact must by definition cause a change to the future agricultural production potential of land. If there is no change, there is no impact. Because the site has no current agricultural production potential due to the limitations of its location, the occupation of the site by the development cannot change its agricultural production potential. The development will therefore have zero agricultural impact and is therefore assessed as acceptable.

9.2 Cumulative impact assessment

Specialist assessments for environmental authorisation are required to include an assessment of cumulative impacts. The cumulative impact of a development is the impact that development will have when its impact is added to the incremental impacts of other past, present, or reasonably foreseeable future activities that will affect the same environment. The potential cumulative agricultural impact of importance is a regional loss of future agricultural production potential.

Due to its zero agricultural impact, the assessed development will not contribute to the cumulative

impact. The cumulative agricultural impact of the proposed development is therefore assessed here as being of low significance and therefore as acceptable. The development will not have an unacceptable negative impact on the agricultural production capability of the area, and it is therefore recommended, from a cumulative agricultural impact perspective, that the development be approved.

9.3 Assessment of alternatives

Specialist assessments for environmental authorisation are required to include a comparative assessment of alternatives, including the no-go alternative. Because of the insignificant agricultural impact of the development, there can be no material difference between the agricultural impacts of any proposed alternatives. All have insignificant agricultural impact and are considered equally acceptable in terms of agricultural impact.

The no-go alternative considers impacts that will occur to the agricultural environment in the absence of the proposed development. There are no agricultural impacts of the no-go alternative, but this is not significantly different from the zero impact of the development, and so from an agricultural impact perspective, there is no preferred alternative between the no-go and the development.

10 MITIGATION

The most important and effective mitigation of agricultural impacts for any development is avoidance of viable croplands. This development has already applied this mitigation by selecting a site on which there are not viable croplands. No mitigation measures are required for the protection of agricultural production potential on the site because the development poses no degradation risk to agricultural resources.

11 ADDITIONAL ASPECTS REQUIRED IN AN AGRICULTURAL ASSESSMENT

11.1 Micro-siting

The agricultural protocol requires confirmation that all reasonable measures have been taken through micro-siting to minimize fragmentation and disturbance of agricultural activities. Because the site is not used for agriculture, micro-siting will make no material difference to agricultural impacts and disturbance.

11.2 Confirmation of linear activity exclusion

If linear infrastructure that is located on land of high agricultural sensitivity has been given exclusion

from requiring an Agricultural Agro-Ecosystem Specialist Assessment because of its linear nature, and therefore only requires an Agricultural Compliance Statement, the protocol requires confirmation that the land impacted by that linear infrastructure can be returned to the current state within two years of completion of the construction phase. No such exclusion applies because this project proposes no linear infrastructure on land that has high agricultural sensitivity.

12 CONCLUSION: AGRICULTURAL COMPLIANCE STATEMENT

The overall conclusion of this assessment is that the proposed development is acceptable because it leads to no loss of future agricultural production potential.

Although the climate, terrain, and soil suitability may allow for viable crop production, other factors constrain the potential of the site to practically deliver agricultural produce and therefore limit its agricultural production potential. These factors include its location in a built-up area and within a road reserve. For these reasons, the site will never be viably utilised for agricultural production, and its potential is therefore assessed here as non-existent.

This assessment disputes the high sensitivity classification of the site by the screening tool and verifies the entire site as being of low agricultural sensitivity because it has no agricultural production potential.

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From an agricultural impact point of view, it is recommended that the proposed development be approved. The conclusion of this assessment on the acceptability of the proposed development and the recommendation for its approval is not subject to any conditions.

13 REFERENCES

Crop Estimates Consortium, 2019. *Field Crop Boundary data layer, 2019*. Pretoria. Department of Agriculture, Forestry and Fisheries.

Department of Agriculture, Forestry and Fisheries (DAFF). 2017. National land capability evaluation raster data layer, 2017. Pretoria.

Department of Agriculture, Forestry and Fisheries (DAFF). 2002. National land type inventories data set. Pretoria.

Department of Agriculture, Land Reform and Rural Development (DALRRD). 2020. Protected agricultural areas – Spatial data layer. 2020. Pretoria.

APPENDIX 1: SPECIALIST CURRICULUM VITAE

Johann Lanz
Curriculum Vitae

Education

M.Sc. (Environmental Geochemistry)	University of Cape Town	1996 - 1997
B.Sc. Agriculture (Soil Science, Chemistry)	University of Stellenbosch	1992 - 1995
BA (English, Environmental & Geographical Science)	University of Cape Town	1989 - 1991
Matric Exemption	Wynberg Boy's High School	1983

Professional work experience

I have been registered as a Professional Natural Scientist (Pri.Sci.Nat.) in the field of soil science since 2012 (registration number 400268/12) and am a member of the Soil Science Society of South Africa.

Soil & Agricultural Consulting **Self employed** **2002 - present**

Within the past 5 years of running my soil and agricultural consulting business, I have completed more than 170 agricultural assessments (EIAs, SEAs, EMPRs) in all 9 provinces for renewable energy, mining, electrical grid infrastructure, urban, and agricultural developments. I was the appointed agricultural specialist for the nation-wide SEAs for wind and solar PV developments, electrical grid infrastructure, and gas pipelines. My regular clients include: Zutari; CSIR; SiVEST; SLR; WSP; Arcus; SRK; Environamics; Royal Haskoning DHV; ABO; Enertrag; WKN-Windcurrent; JG Afrika; Mainstream; Redcap; G7; Mulilo; and Tiptrans. Recent agricultural clients for soil resource evaluations and mapping include Cederberg Wines; Western Cape Department of Agriculture; Vogelfontein Citrus; De Grendel Estate; Zewenwacht Wine Estate; and Goedgedacht Olives.
In 2018 I completed a ground-breaking case study that measured the agricultural impact of existing wind farms in the Eastern Cape.

Soil Science Consultant **Agricultural Consultors International (Tinie du Preez)** **1998 - 2001**

Responsible for providing all aspects of a soil science technical consulting service directly to clients in the wine, fruit and environmental industries all over South Africa, and in Chile, South America.

Contracting Soil Scientist **De Beers Namaqualand Mines** **July 1997 - Jan 1998**

Completed a contract to advise soil rehabilitation and re-vegetation of mined areas.

Publications

- Lanz, J. 2012. Soil health: sustaining Stellenbosch's roots. In: M Swilling, B Sebitosi & R Loots (eds). *Sustainable Stellenbosch: opening dialogues*. Stellenbosch: SunMedia.
- Lanz, J. 2010. Soil health indicators: physical and chemical. *South African Fruit Journal*, April / May 2010 issue.
- Lanz, J. 2009. Soil health constraints. *South African Fruit Journal*, August / September 2009 issue.
- Lanz, J. 2009. Soil carbon research. *AgriProbe*, Department of Agriculture.
- Lanz, J. 2005. Special Report: Soils and wine quality. *Wineland Magazine.*

I am a reviewing scientist for the *South African Journal of Plant and Soil*.

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Forestry, Fisheries and the Environment
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Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

APPENDIX 2: SPECIALIST DECLARATION FORM AUGUST 2023

Specialist Declaration form for assessments undertaken for application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

REPORT TITLE: AGRICULTURAL COMPLIANCE STATEMENT FOR THE PROPOSED UPGRADING OF BULK SEWERAGE LINE FROM AMY SEARLE STREET / GREENHAVEN TO THE CRICKET FIELD SEWERAGE PUMPSTATIONNEAR MOSSELBAY, WESTERN CAPE

Kindly note the following:

1. This form must always be used for assessment that are in support of applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting, where this Department is the Competent Authority.
2. This form is current as of August 2023. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at https://www.dffe.gov.za/documents/forms.
3. An electronic copy of the signed declaration form must be appended to all Draft and Final Reports submitted to the department for consideration.
4. The specialist must be aware of and comply with '*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 act, when applying for environmental authorisation - GN 320/2020)'*, where applicable.

1. SPECIALIST INFORMATION

Title of Specialist Assessment	Agricultural Assessment
Specialist Company Name	SoilZA – sole proprietor
Specialist Name	Johann Lanz
Specialist Identity Number	6607045174089
Specialist Qualifications:	M.Sc. (Environmental Geochemistry)
Professional affiliation/registration:	Registered Professional Natural Scientist (Pr.Sci.Nat.) Reg. no. 400268/12 Member of the Soil Science Society of South Africa
Physical address:	1a Wolfe Street, Wynberg, Cape Town, 7800
Postal address:	1a Wolfe Street, Wynberg, Cape Town, 7800
Telephone	Not applicable
Cell phone	+27 82 927 9018
E-mail	johann@soilza.co.za

2. DECLARATION BY THE SPECIALIST

I, **Johann Lanz** declare that –

- I act as the independent specialist in this application;
- I am aware of the procedures and requirements 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 National Environmental Management Act (NEMA), 1998, as amended, when applying for environmental authorisation which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”) and in Government Notice No. 1150 of 30 October 2020.
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing –
  - any decision to be taken with respect to the application by the competent authority; and;
  - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- All the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of Regulation 48 and is punishable in terms of section 24F of the NEMA Act.

Signature of the Specialist

SoilZA (sole proprietor)

Name of Company:

6 August 2025

Date

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, **Johann Lanz**, swear under oath that all the information submitted or to be submitted for the purposes of this application is true and correct.

Signature of the Specialist

SoilZA – sole proprietor

Name of Company

06/08/25

Date

Signature of the Commissioner of Oaths

Date

SUID-AFRIKAANSE POLISIEDIENS
CAMPS BAY SAPS
06 AUG 2025
CAMPS BAY KAMPSBAAI
SOUTH AFRICAN POLICE SERVICE

APPENDIX 3: SACNASP REGISTRATION CERTIFICATE

SACNASP

South African Council for Natural Scientific Professions

herewith certifies that

Johan Lanz

Registration Number: 400268/12

is a registered scientist

in terms of section 20(3) of the Natural Scientific Professions Act, 2003
(Act 27 of 2003)
in the following field(s) of practice (Schedule 1 of the Act)

Soil Science (Professional Natural Scientist)

Effective **15 August 2012** Expires **31 March 2026**

Chairperson

Chief Executive Officer

To verify this certificate scan this code