

Appendix D3 - BIODIVERSITY COMPLIANCE STATEMENT

COMPLIANCE STATEMENT: Terrestrial Biodiversity, Plant Species, Animal Species and Aquatic Biodiversity Themes

Project: Residential Dwelling and Associated Infrastructure on Erf 1363, Paradise Beach, St Francis Bay, Kouga Local Municipality, Eastern Cape

Applicant: Krzysztof Kryszczuk

Prepared by: Claire De Jongh (EAPASA registration: 2021/3519; SACNASP (certificated): 115390

Date of site visit: 15 January 2026.

Date of Report: July 2026

In accordance with:

Protocol for the Specialist Assessment and Minimum Report Content Requirements for Terrestrial Biodiversity (GN 320 of 2020);

Protocol for the Specialist Assessment and Minimum Report Content Requirements for Aquatic Biodiversity (GN 320 of 2020);

Protocol for the Specialist Assessment and Minimum Report Content Requirements for Terrestrial Plant Species (GN 1150 of 2020); and

Protocol for the Specialist Assessment and Minimum Report Content Requirements for Terrestrial Animal Species (GN 1151 of 2020).

Scope of Assessment

The assessment included:

- review of the Environmental Screening Tool Report;
- review of available biodiversity datasets and environmental information;
- verification of mapped sensitivities during site inspections;
- assessment of the nature, scale and location of the proposed activity;
- consideration of potential impacts on terrestrial biodiversity, terrestrial plant species, terrestrial animal species and aquatic biodiversity; and
- determination of whether separate specialist assessments are required in terms of the applicable protocols.

Declaration

I hereby declare that:

- I am independent and have no financial or personal interest in the proposed development other than remuneration for undertaking this assessment.
- I have the necessary expertise and experience to undertake the site sensitivity verification and prepare this Compliance Statement.
- The information contained herein is, to the best of my knowledge, true and correct.
- This report has been prepared in accordance with the applicable Environmental Impact Assessment Regulations and the specialist assessment protocols published under the National Environmental Management Act, 1998 (Act No. 107 of 1998).
- The opinions expressed are based on the information available at the time of the assessment, together with the findings of the site inspections undertaken on 15 January 2026.



Claire De Jongh

Environmental Assessment Practitioner (EAP)

EAPASA Registration No.: 2021/3519

SACNASP (certificated): 115390

TERRESTRIAL BIODIVERSITY COMPLIANCE STATEMENT

1. Screening Tool Sensitivity

The Environmental Screening Tool (STR) identified the Terrestrial Biodiversity Theme as **Low Sensitivity**.



Figure 1: Terrestrial Biodiversity Theme as Low Sensitivity (STR)

2. Baseline Description

The site comprises an existing residential erf situated within the coastal residential area of Paradise Beach. The vegetation is representative of St Francis Dune Thicket, consisting of indigenous coastal dune vegetation occurring on stabilised dunes. Although the National Vegetation Map (2024) maps the area as Southeastern Strandveld. The site falls within 100 m of the high-water mark of the sea.

In terms of the Eastern Cape Biodiversity Conservation Plan, 2019 (ECBCP) no terrestrial critical biodiversity area (CBA) and no Ecological Support Area (ESA) is mapped on the site. No remnant ecosystems mapped in terms of the National Biodiversity Assessment, 2025, are indicated to occur on the site. The proposed activity consists of a single residential dwelling with a limited development footprint and is therefore not expected to significantly affect terrestrial ecological processes or biodiversity functioning.



Figure 2: No terrestrial CBA or ESA (ECBCP, 2019) mapped on site



Figure 3: No remnant ecosystems mapped on site (NBA, 2022)

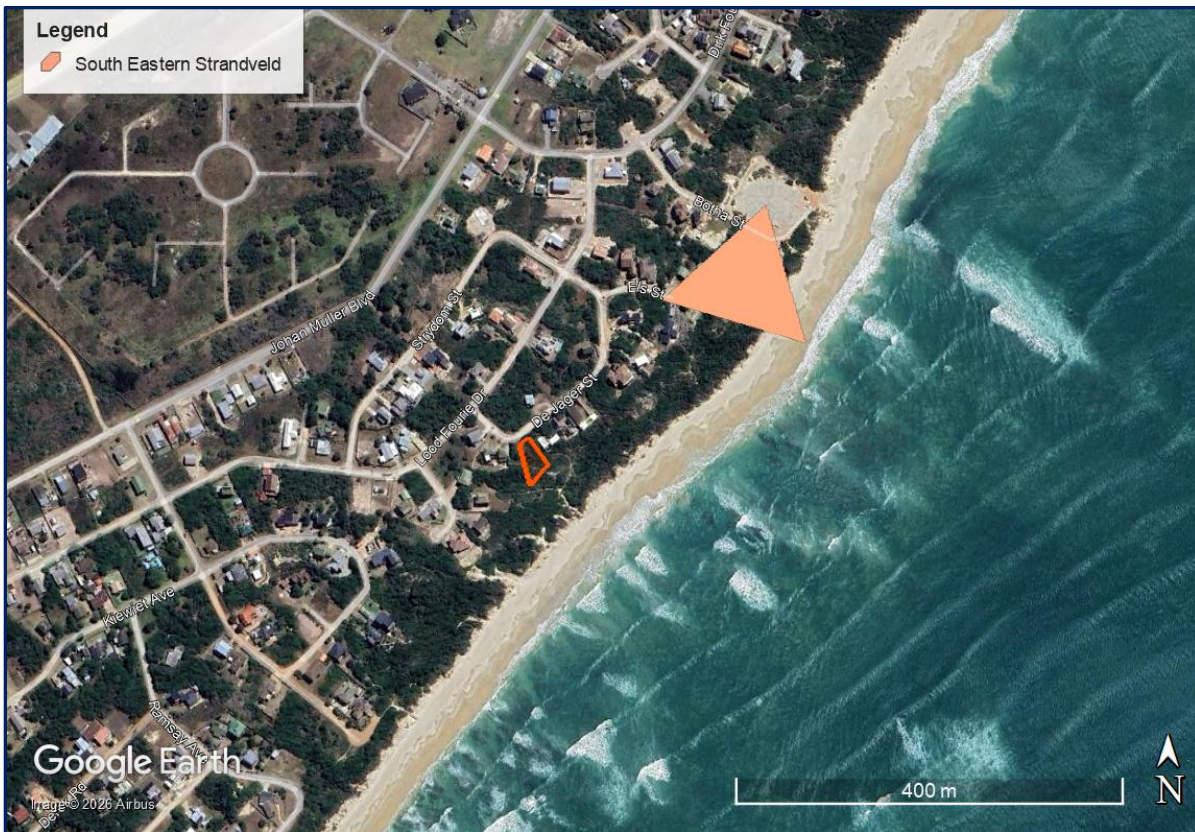


Figure 4: No remnant ecosystems mapped on site (NBA, 2025)

3. Verified Sensitivity

The sensitivity was verified through a desktop assessment, review of biodiversity datasets and a site inspection. The site inspection confirmed that the vegetation is more representative of St Francis Dune Thicket as mapped in the National Vegetation Map, 2019 and typical of coastal dune thicket vegetation associated with the established coastal residential area.

An overall vulnerability assessment of site, incorporating key vegetation and ecological indicators was undertaken and includes the following key criteria:

- relative levels of *intactness* in terms of overall loss of indigenous vegetation cover.
- presence, diversity, and abundance of *species of special concern* (weighted in favour of local endemic species).
- extent of *invasion* (severity and overall ecological impact), as well as the degree to which successful rehabilitation could take place.
- overall degradation incorporating above factors.
- relative importance of the vegetation communities relative to regional conservation status - indicated as vulnerability of the area because of loss.

Intactness

Three basic classes are differentiated as follows:

- **Low:** > 75 % of original vegetation has been removed or lost; and/or no species of special concern present that are critically endangered, endangered, or endemic with highly localised distribution.
- **Moderate:** 25 - 75 % of original vegetation has been removed/lost; and or presence of species of special concern but not having high conservation status or high levels of endemism or highly localised distributions.
- **High:** < 25 % of original vegetation has been removed or lost; and or presence of species with a highly endemism and or high conservation status (endangered or critically endangered).

Intactness for the site is **High**.

INTACTNESS	INVASION		
	LOW	MODERATE	HIGH
High	Pristine	Near Pristine	Moderately Degraded
Moderate	Near Pristine	Moderately Degraded	Severely Degraded
Low	Moderately Degraded	Severely Degraded	Transformed

Alien Invasion

Three classes are differentiated as follows:

- **Low:** no or few scattered individuals.
- **Moderate:** individual clumps of invasives present but cover less than 50% of original area.
- **High:** dense, impenetrable stands of invasives present, or cover > 50 % of area with substantial loss functioning. Rehabilitation will most likely require specialised techniques over an extended period (> 5 years).

Alien invasion for the site is **LOW**.

Degradation

Overall Degradation is determined from the above alien invasion and intactness scores. Degradation for the site is **Low to medium** (slightly transformed)

Overall Sensitivity score

Overall vulnerability (or Sensitivity) of the vegetation within the site is calculated according to the following matrix which combines degradation and overall conservation status of the vegetation units of the site. The overall sensitivity is moderate.

DEGRADATION	CONSERVATION STATUS			
	LEAST THREATENED	VULNERABLE	ENDANGERED	CRITICALLY ENDANGERED
Severely degraded/ Transformed	Very Low	Low	Moderate	Moderate - High
Moderately degraded	Low	Moderate	High	High
Ecologically Pristine or near Pristine	Moderate	Moderate - High	High	Very High (No-Go area)

4. Conclusion

The erf is an estimated 741.6 m² in extent and approximately 45% of the erf will be developed and the remaining area will remain intact which includes the secondary dunes situated on the eastern (coastal) side of the erf. Based on the baseline data, location and site conditions and the nature and scale of the site and development, the verified terrestrial biodiversity sensitivity is Low. No Terrestrial Biodiversity Specialist Assessment is considered necessary.

PLANT SPECIES COMPLIANCE STATEMENT

1. Screening Tool Report

The Environmental Screening Tool identified the Terrestrial Plant Species Theme as **Medium Sensitivity**.

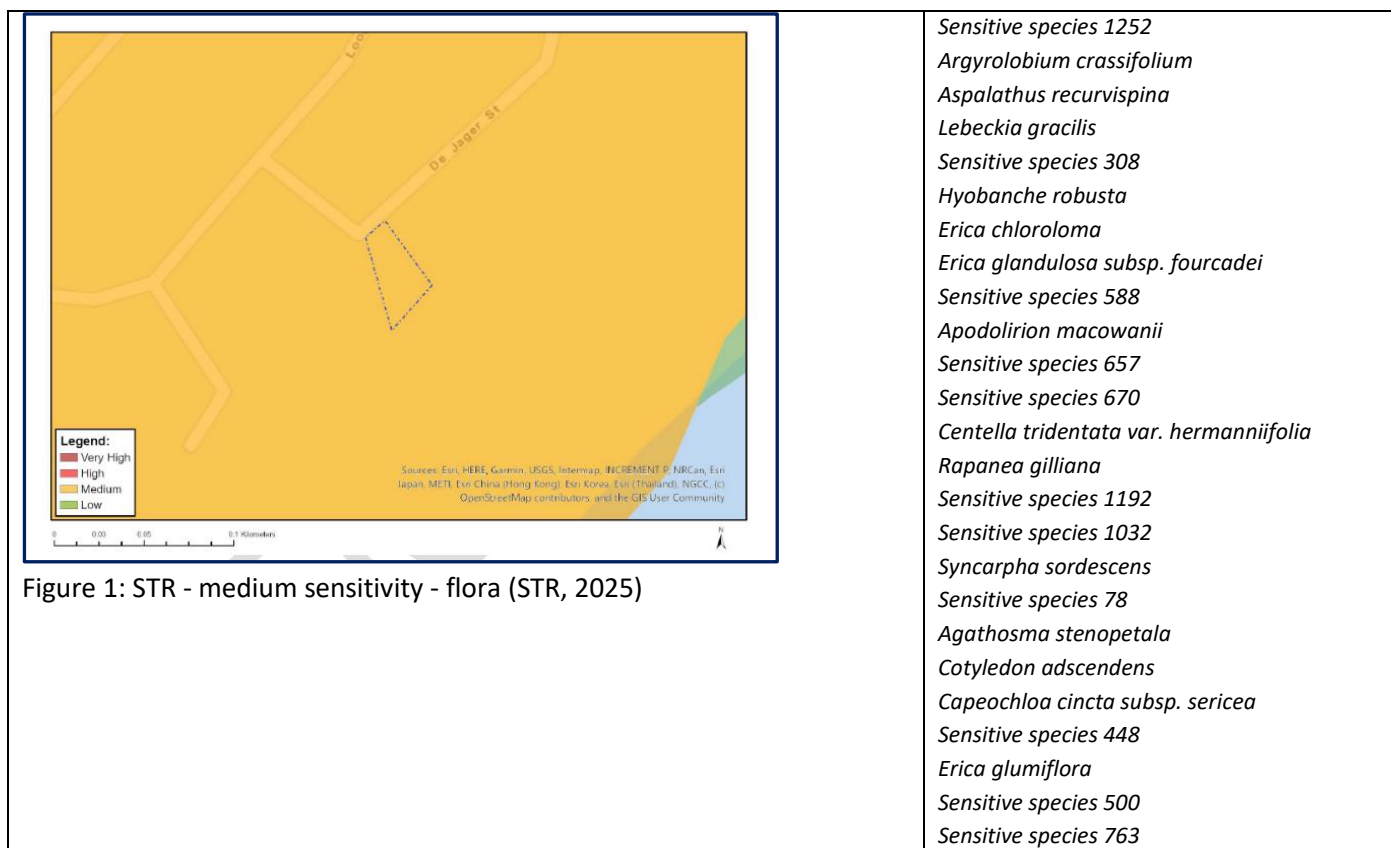


Figure 1: STR - medium sensitivity - flora (STR, 2025)

2. Baseline Description

The Eastern Cape Biodiversity Conservation Plan indicates the site falling outside of any designated terrestrial CBA or ESA areas. No CBAs or ESA's will therefore be affected by proposed development of the dwelling on the residential erf within an urban area. Land cover and remnant vegetation data reflects the site is comprised of natural and degraded St Francis dune thicket vegetation, no fynbos species are present and therefore the site is not representative of southeastern Strandveld of the fynbos biome; the vegetation present is typical St Francis Dune Thicket with indigenous dune shrubs and succulent characteristic of the vegetation type.

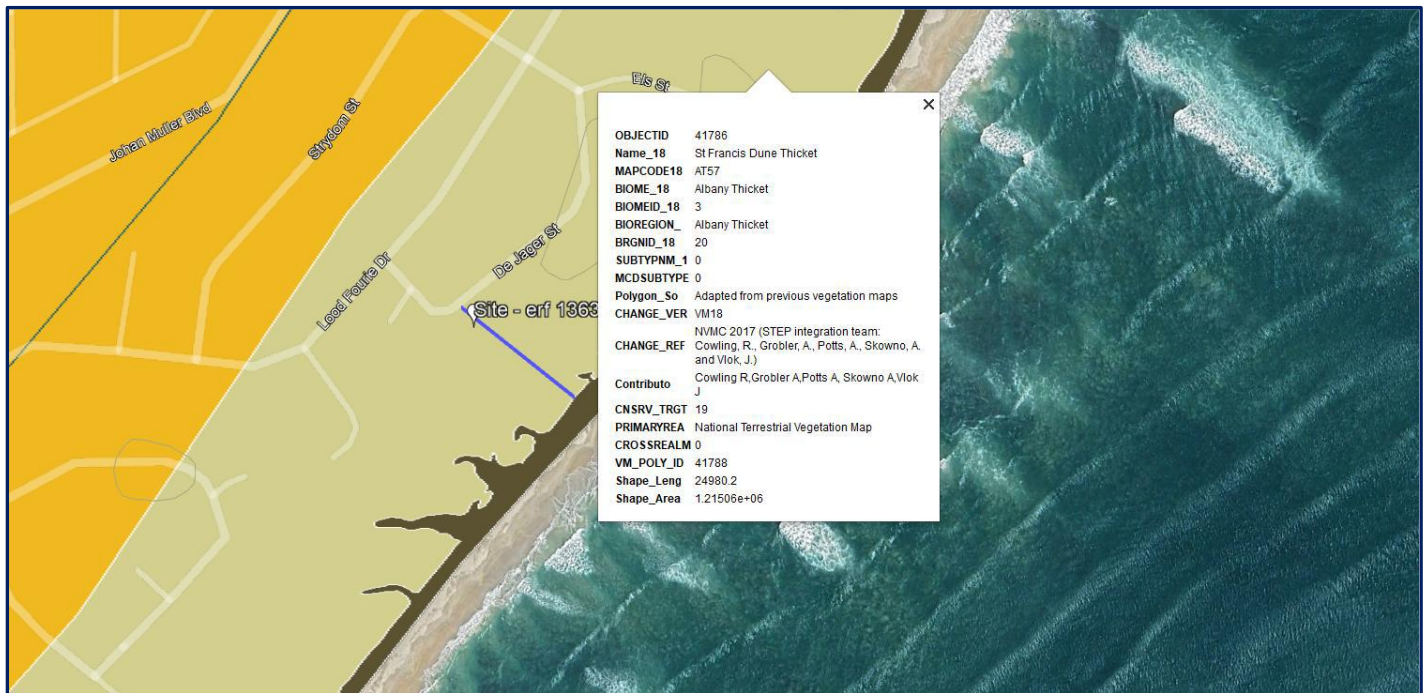


Figure2: Vegetation mapped as St Francis Dune Thicket (least concern) (NatVEG map, 2019)

St Francis Dune Thicket (NBA, 2022)

Type history: STEP map - Algoa Dune Thicket (36 %), Colchester Strandveld (20 %), St. Francis Dune Thicket (38 %); 2012 VEGMAP – AZs 1 Algoa Dune Strandveld (88 %), FFd 11 Southern Cape Dune Fynbos (7 %)

Distribution: This thicket unit occurs in the Eastern Cape Province. In coastal stretches from near the Tsitsikamma River Mouth (west of Oyster Bay) eastward to the Sundays River Mouth.

Vegetation and Landscape Features: Flat to moderately undulating coastal dunes. A mosaic of low (1 - 3m) thicket, occurring in small bush clumps dominated by small trees and woody shrubs, in a mosaic of low (1 - 2 m) asteraceous fynbos. Thicket clumps are best developed in fire-protected dune slacks, and the fynbos shrubland occurs on upper dune slopes and crests. The fynbos component in the vegetation diminishes from west to east, with *Portulacaria afra* occurring occasionally east of Port Elizabeth.

Geology and Soils: The vegetation type is mostly restricted to the Schelm Hoek Formation with the main land types being Ha and Ia.

Climate: The MAP is between 397 mm and 868 mm. The mean monthly maximum is 25.21 °C in February and the mean monthly minimum is 8.31 °C in July. Altitude ranges from 0 - 221 masl.

Conservation Target: 19 %; Conserved in Cape Recife Nature Reserve, Sardinia Bay Nature Reserve, Nelson Mandela Bay Metropolitan University Private Nature Reserve, Rebelsrus Private Nature Reserve

Area transformed: 14.13 %

Threat activities: Mining, alien invasions by *Acacia cyclops*, urban sprawl, erosion low

Protection Level: Poorly protected

Important Taxa: (d=dominant, e=South African endemic, et=possibly endemic to a vegetation type)

Small tree

Olea capensis, *Pterocelastrus tricuspidatus* (d), *Sideroxylon inerme* (d), *Tarchonanthus littoralis* (d)

Succulent shrub

Cotyledon adscendens, *Carpobrotus acinaciformis* (e), *Cotyledon orbiculata* (e), *Crassula nudicaulis*, *Euphorbia mauritanica*, *Gasteria acinacifolia* (e), *Portulacaria afra*, *Zygophyllum morskana*, *Aloe africana* (d)

Low shrub

Coleonema pulchellum (d), *Erica chloroloma*, (e), *Erica glumiflora* (d), *Erica zeyheriana* (e), *Eriocephalus africanus* var. *paniculatus* (e), *Felicia echinata* (e), *Morella cordifolia* (d), *Muraltia spinosa* (d), *Phylica ericoides* (d), *Syncarpha sordescens* (d)

Graminoid

Andropogon eucomus, *Cymbopogon pospischilii*, *Cynodon dactylon* (d), *Ehrharta calycina*, *Eustachys paspaloides*, *Digitaria eriantha*, *Pentameris heptameris*, *Pentameris pallida*, *Restio eleocharis* (d), *Stenotaphrum secundatum*, *Thamnochortus cinereus* (e), *Themeda triandra* (d), *Tristachya leucothrix*, *Imperata cylindrica* (d)

Tall shrub

Azima tetracantha (d), *Carissa bispinosa* (d), *Mystroxydon aethiopicum* subsp. *aethiopicum* (e), *Cassine peragua*, *Cussonia thyrsiflora* (d), *Euclea racemosa* (d), *Grewia occidentalis*, *Gymnosporia buxifolia*, *Gymnosporia capitata* (e), *Lycium cinereum*, *Lycium ferocissimum*, *Maytenus procumbens*, *Metalasia muricata* (d), *Olea exasperata* (d), *Osteospermum moniliferum* (d), *Passerina rigida* (d), *Putterlickia pyracantha* (d), *Robsonodendron maritimum* (e), *Searsia crenata* (d), *Searsia glauca* (e), *Searsia pterota* (e),), *Rapanea gilliana* (d)

Geophytic herb

Brunsvigia litoralis (e)

Herb

Pelargonium suburbanum subsp. *suburbanum* (e), *Agathosma stenopetala* (e). *Aspalathus cliffortiifolia* (et), *Aspalathus recurvispina* (et), *Othonna rufibarbis* (et)

Herbaceous climber

Cynanchum natalitium (e), *Rhoicissus digitata*, *Solanum africanum* (e) Woody succulent climber, *Cynanchum viminalis* (e)

Woody climber

Asparagus aethiopicus

3. Site sensitivity verification

The sensitivity was verified through a desktop assessment and site inspection. The site supports natural and slightly degraded St Francis Dune Thicket vegetation. Typical species observed include *Sideroxylon inerme*, *Olea capensis*, *Cussonia thyrsiflora*, *Euclea racemosa*, *Carpobrotus* spp., *Crassula* spp. *Carpobrotus* spp., *Bulbine* spp. and *Agathosma* spp. Some invasive *Acacia cyclops* (Rooikrans) occurs on the site and within the surrounding area.

Although several plant Species of Conservation Concern are identified within the broader screening area, no Endangered or Critically Endangered plant species were recorded within the proposed development footprint.

Indigenous plant species protected in terms of the Eastern Cape Provincial Nature Conservation Ordinance occur within the site (i.e., *Carpobrotus* spp., *Bulbine* spp. and *Agathosma* spp) however, these species are common within the surrounding coastal dune system, and the limited development footprint minimises vegetation loss.

Two Milkwood trees (*Sideroxylon inerme*), protected in terms of the National Forests Act (Act 84 of 1998), occurs on the property and one is located immediately outside the boundary of the erf, adjacent to the road . The Milkwood tree is protected in terms of the National Forest Act (Act 84 of 1998); In terms of the layout provided, the Milkwood trees occurring on the site fall outside the development footprint and will be retained and will not be disturbed by the proposed development.

A site inspection must take place prior to construction and permits attained for species listed in the PCNO as required. Where practicable, a search-and-rescue programme shall be implemented to salvage suitable indigenous plants from the development footprint for re-establishment within the fill area and other disturbed areas of the site following construction. *Acacia cyclops* is to be removed and replaced with suitable soil-binding dune thicket vegetation. The plants occurring on site (*Carpobrotus* spp., *Bulbine* spp) will be suitable plants for rehabilitation purposes on the site.

ID	Approximate coordinates
Milkwood A	34° 6'20.53"S; 24°53'15.98"E
Milkwood B	34° 6'21.33"S; 24°53'16.58"E
Milkwood C	34° 6'21.05"S; 24°53'15.75"E



Figure 2: Location of milkwood trees identified on the land portion

4. Conclusion

The owner of the property is proposing to develop a dwelling with an estimated development footprint of 296 m² which will include an estimated 43.8 m² decking area. A raised timber platform is also proposed which will be an estimated 33 m² and equipped with a walkway extending between the house and platform. The overall development will be an area of 329.9 m². The erf is an estimated 741.6 m² in extent, which means approximately 45% of the erf will be developed and the remaining area will remain intact.

The proposed development design and footprint avoids protected trees and allows for a significant amount of indigenous vegetation to be retained on the site. Removal and disposal of alien species and the replanting of indigenous vegetation removed during construction during rehabilitation efforts is encouraged. Based on the baseline data, location and site conditions and the nature and scale of the site and development the verified sensitivity of plant species is considered to be low. No Plant Species Specialist Assessment is considered necessary.

ANIMAL SPECIES COMPLIANCE STATEMENT

1. Screening Tool Sensitivity

The Environmental Screening Tool identified the Terrestrial Animal Species Theme as **Medium Sensitivity**.



Figure 1: STR indicates a medium sensitivity for Animal species

2. Baseline Description

The site comprises a small residential erf supporting coastal dune vegetation. The site is underlain by windblown sand and is designated as residential 1 with the surrounding area being the seafront and other houses. Faunal use is expected to be limited to common indigenous birds, reptiles and small mammals associated with the surrounding dune system. These animals are likely to occur as transient visitors due to the existing coastal residential character of the area. Species identified by the Screening Tool are not likely occurring on the site.

Stephanoaetus coronatus (crowned eagle) is not commonly spotted in the coastal area of Jeffreys Bay as the natural habitat includes indigenous forest and mountain areas.

Aneuryphymus montanus (Yellow-winged Agile Grasshopper) is associated with fynbos vegetation and rocky habitats, none of which occurs on the site.

The site is not located within a Key Biodiversity Area or Important Bird Area. No Endangered or Critically Endangered fauna species were recorded during the site assessment, and no suitable breeding or critical habitat occurs within the limited development footprint.

The proposed activity comprises a single residential dwelling with a limited hard footprint and the remainder of the dwelling raised off the ground. The proposed development is not expected to significantly affect habitat availability or faunal movement. Suitable habitat remains within the surrounding coastal landscape.

3. Verified Sensitivity

The sensitivity was verified through desktop assessment and site inspection. Although the STR identifies potential habitat for certain fauna species within the wider landscape, the verified faunal sensitivity associated with the proposed activity and site is considered **Low**.

4. Conclusion

The verified faunal sensitivity associated with the proposed activity is considered Low. The scale of development does not warrant a Terrestrial Animal Species Specialist Assessment.

AQUATIC BIODIVERSITY THEME

1. Screening Tool Sensitivity

The Environmental Screening Tool identified the Aquatic Biodiversity Theme as Low sensitivity.

Baseline Description

The Eastern Cape Biodiversity Conservation Plan confirms that no aquatic Critical Biodiversity Areas or Ecological Support Areas occur on the site. No wetlands, rivers, estuaries or aquatic ecosystems are mapped on the site or within 100 meters of the site. The proposed development is situated on an existing coastal residential erf within a vegetated dune system.



Figure 1: No aquatic CBA or ESA (ECBCP, 2019) mapped on site

Verified Sensitivity

The sensitivity was verified through desktop assessment and site inspection. No aquatic features were observed on the site or within 100 meters of the site.

Conclusion

The verified aquatic biodiversity sensitivity is Low. Given the absence of aquatic ecosystems within the development footprint and the limited scale of the proposed activity, an Aquatic Biodiversity Specialist Assessment is not considered necessary.