



Cape Environmental Assessment Practitioners (Pty) Ltd

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MEETING SUMMARY	Project Name: CapeNature Reserves Road Maintenance Management Plans (Western Cape) DFFE Pre-App Reference Number: 2025-09-0023 Date: Thursday, 25 September 2025 Time: 9:30-10:00 Location: Virtual Teams Meeting																						
ATTENDEES:	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 10%;">CA</td><td style="width: 60%;">Coenrad Agenbach</td><td style="width: 30%;">DFFE</td></tr> <tr><td>MK</td><td>Mamohale Kabasa</td><td>DFFE</td></tr> <tr><td>TP</td><td>Trisha Pillay</td><td>DFFE</td></tr> <tr><td>MM</td><td>Maropeng Mamabolo</td><td>DFFE</td></tr> <tr><td>WW</td><td>Wilfred Williams</td><td>CapeNature – Manager for Tourism Development</td></tr> <tr><td>KW</td><td>Keith Weis</td><td>Department Infrastructure (Roads): Western Cape Government – Project Manager</td></tr> <tr><td>LZ</td><td>Louise-Mari van Zyl</td><td><i>Cape EAPrac</i></td></tr> </table>	CA	Coenrad Agenbach	DFFE	MK	Mamohale Kabasa	DFFE	TP	Trisha Pillay	DFFE	MM	Maropeng Mamabolo	DFFE	WW	Wilfred Williams	CapeNature – Manager for Tourism Development	KW	Keith Weis	Department Infrastructure (Roads): Western Cape Government – Project Manager	LZ	Louise-Mari van Zyl	<i>Cape EAPrac</i>	Representatives from V3 and other EAP not related to this project attended for information purposes only.
CA	Coenrad Agenbach	DFFE																					
MK	Mamohale Kabasa	DFFE																					
TP	Trisha Pillay	DFFE																					
MM	Maropeng Mamabolo	DFFE																					
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LZ	Louise-Mari van Zyl	<i>Cape EAPrac</i>																					
APOLOGIES:	Lukie van Staden (V3 Consulting Engineers)																						
MEETING MEMO																							
<p>Please refer to Appendix A for a copy of the Pre-Application Meeting Agenda for this session. Please refer to Appendix B for a copy of the unmodified, direct Transcript (AI generated from Teams) of the meeting.</p> <p><u>PURPOSE OF THE MEETING:</u> There are several CapeNature Reserves in the Western Cape Province where heavy downpours and flooding have caused mild to severe erosion resulting in infrastructure damage within the reserves. Most notably are the damage to roads. The roads are necessary for access (workers and tourists alike), fire management, fence maintenance, ecological monitoring and tourism (visitors / accommodation).</p> <p>Funding has been secured to conduct maintenance and repairs on existing roads. V3 Consulting Engineers has been appointed as managing agents on behalf of Western Cape Government Department of Infrastructure, to conduct status assessments to identify the location and interventions necessary to restore the roads within several of the Reserves in the Western Cape.</p> <p><i>Cape EAPrac</i> has been appointed as the environmental assessment practitioner (EAP) to advise on the applicability of the Environmental Regulations, more specifically to facilitate and ultimately compile Maintenance Management Plans (MMPs) for the repair and maintenance of the roads within eight (8) Reserves.</p> <p>Have the pre-application meeting with the decision-making Authority DFFE, to discuss the scope of the MMP, verify the like-for-like scenarios, as well as the requirements for stakeholder engagement/public participation.</p> <p><u>SCOPE OF APPOINTMENT:</u></p>																							

Cape EAPrac's appointment is limited to the following Reserves for which DFFE is the competent authority because they fall within World Heritage Sites and within a core Biosphere Reserve (other EAPs are appointed for the remaining reserves and they'll consult with the DFFE directly as part of their scope of works):

- Anysberg (George region)
- Swartberg (George region)
- Gamkaberg (George region)
- Outeniqua (George region)
- Kamanassie (George region)
- GrootVadersbosch (Hessequa region)
- Marloth(Hessequa region)
- Vrolijkheid (Provincial Authority is the decision-making authority – excluded from this submission)

MEETING DISCUSSION:

LZ: The Reserves are prioritized into the repair/maintenance schedule based on the urgency with which some of the accesses need to be restored i.e. tourist/accommodation/ecological monitoring/fire management etc. Anysberg is the priority within the list of Reserves we're appointed for, therefore I'll be using it as the main example for the purpose of this discussion, but note that the grounds for the meeting are similar for all of the reserves.

All of the Reserves are located within mountainous terrain (Google aerial image is shared on the screen) resulting in damages to roads during periods of heavy downpour/rainfall. These damages occur repeatedly and CapeNature has been conducting repairs since the establishment of the Reserves over 40-years in most cases, where they can but it is not sustainable in the manner they do it, hence the need to get engineering input and advise to ensure that the repairs are done in a more sustainable manner.

There are areas where sheet flow damages the roads, resulting in erosion gulleys forming along the tracks, which make it nearly impossible for vehicles to travel along the roads. Most of the time these erosion gulleys are simply filled with rocks/gabions/infill material to create a level, drivable surface, but the material often just washes away with the next rain event making it costly and resulting in significant delays with respect to fixing it, before a specific destination can be reached i.e. cottage / fence / ecological monitoring area and making it impossible to react timeously into fire management. The risk and liability to CapeNature is significant.

In instances where the repair/maintenance qualify as 'like-for-like' i.e. where repair work can be undertaken within the road without removing vegetation and/or infilling/backfilling/working in watercourses, the work can continue without delay and without needing MMPs. Continuing with the 'like-for-like' maintenance will ensure that they can start spending the available funds whilst awaiting the outcome of the MMPs which will focus on the watercourse crossings mostly.

[Photographs of affected roads are put on screen as examples of damages/conditions/terrain] – refer to Appendix A containing the images.

The access routes have been in place from when the properties were still farms, before the NEMA Regulations came into effect. The maintenance and repair work have been continuous all along.

For many of the roads, site inspections have had to be done on foot because the condition of the tracks are such that it cannot access with a vehicle all of the way.

Especially on the water crossings where there is clear evidence of culverts / pipes / gabions / reno mattresses, infill rock and material to create access, V3 has determined that the loose materials keep on washing away. By stabilizing the infill material i.e. by re-creating the low-level crossings using reno-mattresses whereby the material/rock is held together and anchored with wire, the material is much less likely to wash away during flooding, thereby ensuring continuous use of the road/tracks once the water has subsided, with much less

repeated maintenance (they may have to just remove loose rocks that have washed down from the crossing, but the crossing itself will still be drivable).

Must understand that some of the Reserves have tourist accommodation and even public roads traversing them. When the roads become inaccessible as a result of damages, visitors are sometimes stranded, workers residing on the Reserve cannot get out, they cannot get supplies in, other organization relying on the roads i.e. communication tower companies needing to get to their infrastructure, are all cut-off and/or there are delays in getting access until such time a the roads are repaired and drivable once more.

STAKEHOLDER ENGAGEMENT / PUBLIC PARTICIPATION:

With regards to stakeholder engagement the focus is mostly on the Reserves themselves, because the MMPs are for select roads/tracks within the individual Reserves only, therefore the stakeholder opinion can be limited to the following key stakeholders:

- CapeNature (management in general for the specific area, reserve manager) for each Reserve to give input into their Standard Operating Procedures (SOPs) for each of the Reserves, as well as providing input into monitoring during the maintenance/repairs;
- Local Municipalities within each of the Reserve areas (some extent across multiple municipal regions);
- Local catchment management agency representing Department of Water Affairs for each Reserve;
- Department of Infrastructure Western Cape;
- Provincial Department of Environmental Affairs & Development Planning;
- Where the maintenance roads first traverse private land before entering the Reserve where maintenance is required, those private land owners will be notified

In addition to these key stakeholders, to advertise in the applicable local/Provincial newspapers and put up site notices at the respective Reserves to draw the attention of visitors.

TIMEFRAMES:

The Reserves are categorized into priority, therefore the intention is to keep the Reserve MMPs separate and proceed with separate applications so that we can prioritize the reserves according to a schedule.

I have already completed site inspections on four of the eight reserves and will complete the rest in the coming weeks. We started with the most urgent ones, so that we have those details ready for their respective MMPs. If we had to do all eight and wait for the information on all eight to first be available, it would push out the timeframe and delay the ones that are most urgent. The suggestion is therefore to follow a staggered approach into the submissions/processes.

DISCUSSION:

CA: Agree that it is not necessary to discuss the detail of each and every Reserve. Satisfied that the general principle will be similar and the information is sufficient for the purpose of this discussion.

Agree that the like-for-like repairs/maintenance will not be subject to the MMPs on condition that such work does not trigger any 'listed activities'. That work may continue immediately.

Wish to clarify that each Reserve will have its own MMP? Suggest that all roads within the Reserves be incorporated with the MMPs for incase they also have damages in future.

LZ: We submitted the pre-app as a single request simply because it is unnecessary duplication for each Reserve if we had different pre-application meetings for each, however MMPs will be done separately for each Reserve, dealing with specific roads within each Reserve only. The reason for focusing these MMPs on the specific roads within each reserve, instead of all the roads and/or other infrastructure, is linked to the urgency of needing to fix these specific roads. The time it will take to either do a comprehensive MMP covering all, or

other infrastructure within a Reserve, will push out the timeframes in general because the scope of works and funding is available only for these identified roads/tracks within each Reserve.

CA: Remember that Interested & Affected Parties may not always distinguish between like-for-like repairs and something that may require prior Environmental Authorisation. It would therefore be good to indicate to visitors/I&APs that repair/maintenance will be conducted in parallel to the MMP processes to ensure transparency.

Would not want to see one application with staggered approach on the different Reserves, so my Colleagues will have to advise on best approach as well to avoid confusion.

Remember that once an application is submitted, you have to submit the Final MMP within 90days, inclusive of the public participation/stakeholder engagement on that application. And if there is one application only, for all the Reserves, but you have staggered public participation, you will run out of time because after the 90-days is up, we have 30-days to issue a decision if all the correct information is included. Although a single application may save some cost, I do understand the urgency and if you can manage the information that goes out to the public/stakeholders so that it does not cause confusion, the staggered approach for each Reserve/Application will be best even though it will be a lot of unnecessary (procedural) duplication and costs.

A benefit to the staggered approach is that if there is a problem on one Reserve MMP, it will not hold up the others. We could issue one file number with sub-numbers, but ultimately it could be different case officers which could be problematic.

So the options are one application, with different sub-sections and then deal with each Reserve its site-specific aspects as well as general issues. Or have the separate applications each with their own file and treat each process individually to avoid a (procedural) timing issue.

CA: Where will you source the material from with which the repair/maintenance will be conducted?

LZ: CapeNature has always just used the material that's already in the watercourses i.e. rocks and repacked it, or moved the material that washed away back to the crossing to create a drivable area. V3 intends to continue in this matter with this repair/maintenance approach because the location of the Reserves and specifically the management roads are so remote that transporting rocks/material from outside the Reserve will be extremely costly and time consuming, also keeping in mind that the roads/tracks are not all suitable for large vehicles, its mostly accessible by bakkies.

CA: Noted. Make sure that you don't trigger any new listed activities and make sure that the maintenance activities applied for enables you to implement the repair/maintenance in such a manner.

CA: Ito the stakeholder engagement there is a recent court judgement by the Supreme Court of Appeals on amongst others public consultation, specifically about notifications and engagement. Please ensure that you do show that you have given everybody an opportunity to comment/participate in a meaningful manner. A key issue that came out of the verdict is the language in which communication is distributed. So don't only use English, make sure that you use the language that is dominant in the specific area.

Please make use of a local and Provincial newspaper.

Also put notices on the CapeNature website and your own (EAPs website).

Put site notices at the Reserve entrances and/or reception offices so that visitors can clearly see these and have record of them captured in your reports.

Look at private owners along the routes of the Reserves, Water Affairs, DFFE Biodiversity and Protected Areas representatives, all relevant Organs of State. Must show that you have done more than what the minimum requirements are to solicit comments and give everybody chance to comment.

Please ensure that the 30-days document is also circulated to us as DFFE decision-making authority.

WAY-FORWARD:

CA: You must submit the draft meeting minutes back to us to look at. We'll give comment and/or adopt the minutes. Once adopted, you can submit the Application(s) together with the adopted Minutes and together with the draft MMP for the 30-days commenting period. We'll provide you with comments from our side on the draft report.

Once the final Report is submitted back to us with the public participation included, we'll make a decision within 30-days if everything is in order.

Would like to suggest that follow the same approach as the Working for Wetlands theme where you have scenario-based plans and methodologies. So don't go to specific details for each watercourse crossing, or a specific design for each specific crossing. Rather provide a couple of scenarios that can be considered across the spectrum of watercourse crossing, unless there are specifics for specific crossings then deal with that in more detail.

So give us the different scenarios of intervention options, each with their own methodology, assessment and mitigation measures, but overall it must be generic enough to address variabilities so that we don't have to do continuous amendments to the MMP if something insignificant changes.

LZ: We'll provide breakdowns for the different sections of roads/tracks within each Reserve and apply the different interventions as you recommend.

GENERAL:

LS: This is the first pre-application meeting on all of the Reserves, it is nice to have established a baseline from which the other EAPs can take forward their discussions with DFFE. Would it be possible to use the outcome of this pre-application meeting for all the others?

CA: We have already received a request for another pre-application meeting for another cluster of Reserves, but note that it may be awarded to a different Unit within the DFFE, so not necessarily us. And different Unit may have a different approach on how they want the process to be handled. You can still advise on the fact that there has been this pre-application meeting and other EAPs can still suggest that the same approach be followed for other clusters based on these kind of agreed principles. But only once we have adopted the minutes will it be something the other clusters/EAPs can refer to because we do try to be consistent within the DFFE albeit different Units.

KW: Just want to confirm that the like-for-like work can continue?

LZ: Correct on condition that it does not trigger listed activities and you work within the roads and not watercourses. Ensure that NEMA Duty of Care Principles are adhered to.

CA: Yes that work can commence without the MMPs. Make sure however that you have some sort of management conditions and principles in place to show that you are acting in a responsible manner. Get CapeNature to engage with the Contractors once they are appointed for the like-for-like maintenance so that it is done in Duty of Care in a responsible manner.

LZ: Will provide details to you on what falls under like-for-like scenario.

CA: When can we expect the first application to come in?

LZ: When the minutes are adopted by DFFE probably within 10-days depending on the date of advertising.

DECISIONS MADE	<ol style="list-style-type: none">1. Like-for-like repair/maintenance within existing roads/tracks may continue without the MMPs being adopted.2. Processes will be separate applications for each Reserve dealing with specific routes/roads within each Reserve and submission will be staggered to meet with priority schedules where applicable.3. Stakeholder engagement / public participation must consider more than English, also make allowance for the most dominant language in the specific area of the Reserve.4. Keep the MMPs generic enough to allow some adjustments by providing different intervention options for different scenarios within each Reserve.		
ISSUES IDENTIFIED	<ol style="list-style-type: none">1. Take care with public participation/stakeholder engagement and ensure a transparent process with meaningful engagement.2. Ensure that like-for-like repair/maintenance is still done in terms of Duty of Care Principles.3. Be mindful of the 90-day timeframes from submission of the Application to submission of the Final MMPs to ensure compliance with the timeframes.		
FOLLOW-UP ACTION ITEMS			
#	ITEM	RESPONSIBLE PERSON(S)	TARGET DATE
1	Submit draft Meeting Minutes back to DFFE for consideration.	LZ	25-Oct-4



Cape *EAP*rac

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25 September 2025

MEETING AGENDA: PRE-APPLICATION AUTHORITY MEETING

1. PURPOSE OF MEETING

2. INTRODUCTION & PROJECT TEAM

3. SITE ORIENTATION FOR THE DIFFERENT NATURE RESERVES

(Anysberg, Swartberg, Gamkaberg, Outeniqua, Kammanassie under George
Region, Grootvadersbosch, Marloth, Vrolijkheid under Hessequa Region)

4. ROAD CONDITIONS & STATUS QUO ASSESSMENT

5. LIKE-FOR-LIKE REPAIRS VS MAINTENANCE ACTIVITIES ITO NEMA

6. STAKEHOLDER ENGAGEMENT

Private, CapeNature, Water Affairs, DEADP, Municipalities(?)

7. TIMEFRAME

8. CLOSE-OUT COMMENTS



















Outlook

RE: Draft Meeting Minutes submission_2025-09-0023 Maintenance Management Plans for maintenance repair of storm damage in Provincial Nature Reserve

From Maropeng Mamabolo <MAMamabolo@dffe.gov.za>

Date Wed 10/8/2025 9:49 AM

To Louise-Mari van Zyl <louise@cape-eaprac.co.za>

Morning Louise

This is to confirm that the minutes for the "**Maintenance Management Plans for maintenance repair of storm damage in Provincial Nature Reserve**" have been reviewed and approved.

Kind Regards,

Ms. Maropeng Mamabolo

Environmental Officer: Priority Infrastructure Projects

Registered Environmental Assessment Practitioner: 2022/5267

Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

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Pretoria

0001

Phone: 082 943 8889

Email: MAMamabolo@dffe.gov.za



forestry, fisheries
and the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

From: Louise-Mari van Zyl <louise@cape-eaprac.co.za>

Sent: Saturday, 04 October 2025 12:21

To: Maropeng Mamabolo <MAMamabolo@dffe.gov.za>; EIAAdmin <EIAAdmin@dffe.gov.za>;
EIA Applications <EIAApplications@dffe.gov.za>

Cc: Coenrad Agenbach <CAGENBACH@dffe.gov.za>; MMamohale Kabasa
<MKabasa@dffe.gov.za>

Subject: Draft Meeting Minutes submission_2025-09-0023 Maintenance Management Plans
for maintenance repair of storm damage in Provincial Nature Reserve

Dear Maropeng & Colleagues!

**RE: SUBMISSION OF DRAFT PRE-APPLICATION MEETING MINUTES FOR
CAPENATURE ROAD MAINTENANCE & REPAIRS: MAINTENANCE
MANAGEMENT PLANS, WESTERN CAPE PROVINCE [2025-09-0023]**

Thank you once more for your time and considered input during the pre-application meeting for the above-mentioned project.

Attached, please find the draft meeting minutes for your perusal and comment. I have also attached the meeting agenda (Appendix A), as well as the unaltered meeting transcript which Maropeng was kind enough to send with the meeting link as Appendix B to ensure full disclosure and accuracy.

Your feedback on these minutes will be highly appreciated.

Kindly note that I am taking a few days leave with my family during the school holiday. I'll be back in office on 16 October 2025 whereafter I'll have access to my mails again. Should you have any queries in the interim, please note a delayed response from my side (apologies for any inconvenience caused as a result).

In the event that there is anything urgent whilst I am out of office, please contact Carin at 044-8740365 to convey the message to me directly because I will not have reception at all times, but she will still be able to get the message to me via alternative means.

It will be much appreciate if you can acknowledge receipt and confirm that all is in order.

Kind regards / Met Vriendelike Groete,

Louise-Mari van Zyl | 071 603 4132
MANAGING DIRECTOR | PRINCIPAL CONSULTANT
MA Geography & Environmental Studies (Stellenbosch)
EAPSAReg.

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From: Maropeng Mamabolo <MAMamabolo@dffe.gov.za>
Sent: Thursday, 25 September 2025 11:49
To: Louise-Mari van Zyl <louise@cape-eaprac.co.za>; Dale Holder <dale@cape-eaprac.co.za>
Subject: Pre application meeting recording and transcript 2025-09-0023 Maintenance Management Plans for maintenance repair of storm damage in Provincial Nature Reserve

Good Morning

Please receive the attached transcript, link for the recording and contact details below for DFFE Biodiversity and Protected Areas Unit.

[Recap: Pre application meeting 2025-09-0023: Maintenance Management Plans for maintenance repair of storm damage in Provincial Nature Reserves \(Various Sites\) in the Western Cape Province Thursday, 25 September | Meeting | Microsoft Teams](#)

- a) Biodiversity and Conservation Directorate
Name: Biodiversity Admin
Email: BCAdmin@dffe.gov.za
- b) Protected Areas Planning and Management Effectiveness Directorate
Name: Thivhulawi Nethononda
Telephone no.: 012 399 9553
Email: Tnethononda@dffe.gov.za

Regards,
Ms. Maropeng Mamabolo

Environmental Officer: Priority Infrastructure Projects
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forestry, fisheries
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REPUBLIC OF SOUTH AFRICA