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PROJECT NAME:

PROPOSED WAREHOUSES AND ASSOCIATED INFRASTRUCTURE WITHIN THE EAST LONDON INDUSTRIAL DEVELOPMENT ZONE, EASTERN CAPE PROVINCE.

DEDEAT REFERENCE NO: **EC/7/A/LN1, LN3/M/26-36**

REPORT TITLE: **SITE SENSITIVITY VERIFICATION REPORT**

DATE: 29 OCTOBER 2026

ENVIRONMENTAL ASSESSMENT PRACTITIONER:

ABANTU ENVIRONMENTAL SERVICES

APPLICANT:

east london idz
business streamlined

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DECLARATION OF INDEPENDENCE

I, Sive Mlamla, in my capacity as an EAP, hereby declare that I –

- Act as an independent consultant
- Do not have any financial interest in the undertaking of the activity, other than remuneration for the work performed
- Have and will not have vested interest in the activity
- Have no, and will not engage in, conflicting interests in the undertaking of the activity
- Undertake to disclose any material information that has or may have the potential to influence the decision of the competent authority or the objectivity of any report, plan, or document
- Will provide the competent authority with access to all information at my disposal regarding the report, whether such information is favourable to the Client or not
- Based on information provided to me by the Client and in addition to information obtained during the course of this study, have presented the results and conclusion within the associated document to the best of my professional ability
- Reserve the right to modify aspects pertaining to the present investigation should additional information become available through on-going research and/or further work in this field
- Undertake to have my work peer reviewed on a regular basis by a competent specialist.



Sive Mlamla (Pr.Sci.Nat, Reg. EAP(EAPASA))

Environmental Assessment Practitioner

29.10.2026

DETAILS AND EXPERTISE OF THE EAP

Abantu Environmental Services (Pty) Ltd has been appointed by ELIDZ to apply for an exemption from environmental authorisation for land clearing activities in preparation for zone development, infrastructure improvements, construction of new facilities and erection of industrial structures. Refer to **Table 1** below for EAP's details.

Table 1. EAP Details

Environmental Assessment Practitioner:	Mr Sive Mlamla
Expertise:	Sive Mlamla is an environmental scientist with 11 years of experience in scientific research, lecturing and environmental consulting. His key expertise includes environmental impact assessments, environmental compliance auditing, waste planning, proposal & business development, project management, strategic planning, research design & execution, remote sensing & GIS applications for land use/cover change mapping and fluvial geomorphology. **Qualifications** • M.Sc. Geography (Catchment Hydrology) • B.Sc. Honours Environmental Geography • B.Sc. Environmental Sciences (Botany and Geography) **Professional registrations:** • Registered Professional Natural Scientist (Pr.Sci.Nat) - Reg. No. 118495 – SACNASP • Registered Environmental Assessment Practitioner (Reg. EAP (EAPASA)) - Reg. No. 2022/5204 **Training:** • Practical Implementation of Environmental Auditing and Monitoring (2025) • WET-Health Tool & WET-EcoServices for Level 1B and Level 2 assessment (2025) • WET-Health Tool for Level 1A assessment (2025) • Environmental Impact Assessments (2025) • Introduction to Synthetic Aperture Radar and Applications (2024) • Earth Observation Data Analysis with Google Earth Engine (2023) • People Management Skills (2017) • Biodiversity spatial data management, acquisition, and analysis (2018) • Water Use Licence Applications via e-WULAAS (2020) • Remote Sensing (land use/cover classification) and SWAT hydrologic modelling (2017) **Registrations and memberships:** • Member of the South African Wetlands Society Reg. No. S9BPP477 • Member of the Southern African Association of Geomorphologists • Institute of Waste Management of Southern Africa (IWMSA) Reg No. 40120001

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1. INTRODUCTION

Abantu Environmental Services (Pty) Ltd has been appointed by the East London Industrial Development Zone (Applicant) to undertake a Site Sensitivity Verification Report to objectively assess the environmental sensitivities associated infrastructure (**Error! Reference source not found.**, **Figure *2*** and **Figure *3***).



Figure 1. Locality map of the development sites.

The aim of this report is;

- To determine potential triggers of NEMA EIA Regulations Listed Activities and other legislative requirements by the proposed development;
- To verify land use and theme sensitivities for triggering development components as identified by the DFFE Screening Tool;
- To also confirm the need for a particular specialist assessment(s) as indicated by the Screening Tool

1.1 PROJECT DESCRIPTION

The East London Industrial Development Zone (ELIDZ) is proposing the construction of multiple warehouses and associated infrastructure in various properties with footprints as follows;

Table 2. Summarised footprints.

Erf number	Extent (m^2)	Warehouse Footprint (ha)
Site 1		
60932	20622.47	2.06
60933	20622.32	2.06
60934	20622.17	2.06
Site 2		
60859	20415.40	2.04
60861	21983.25	2.20
60863	22839.16	2.28
60865	26362.58	2.64
Site 3		
60847	40861.38	4.09
Total	194328.73	19.42

Development key components;

- Warehouse building
- Office Area
- Refuse Area
- Hardstand Area
- Roadways And Parking
- Ablution facilities

Civil infrastructure/ services will tie into the existing municipal services within the ELIDZ.



Figure 2. Typical warehouse layout.

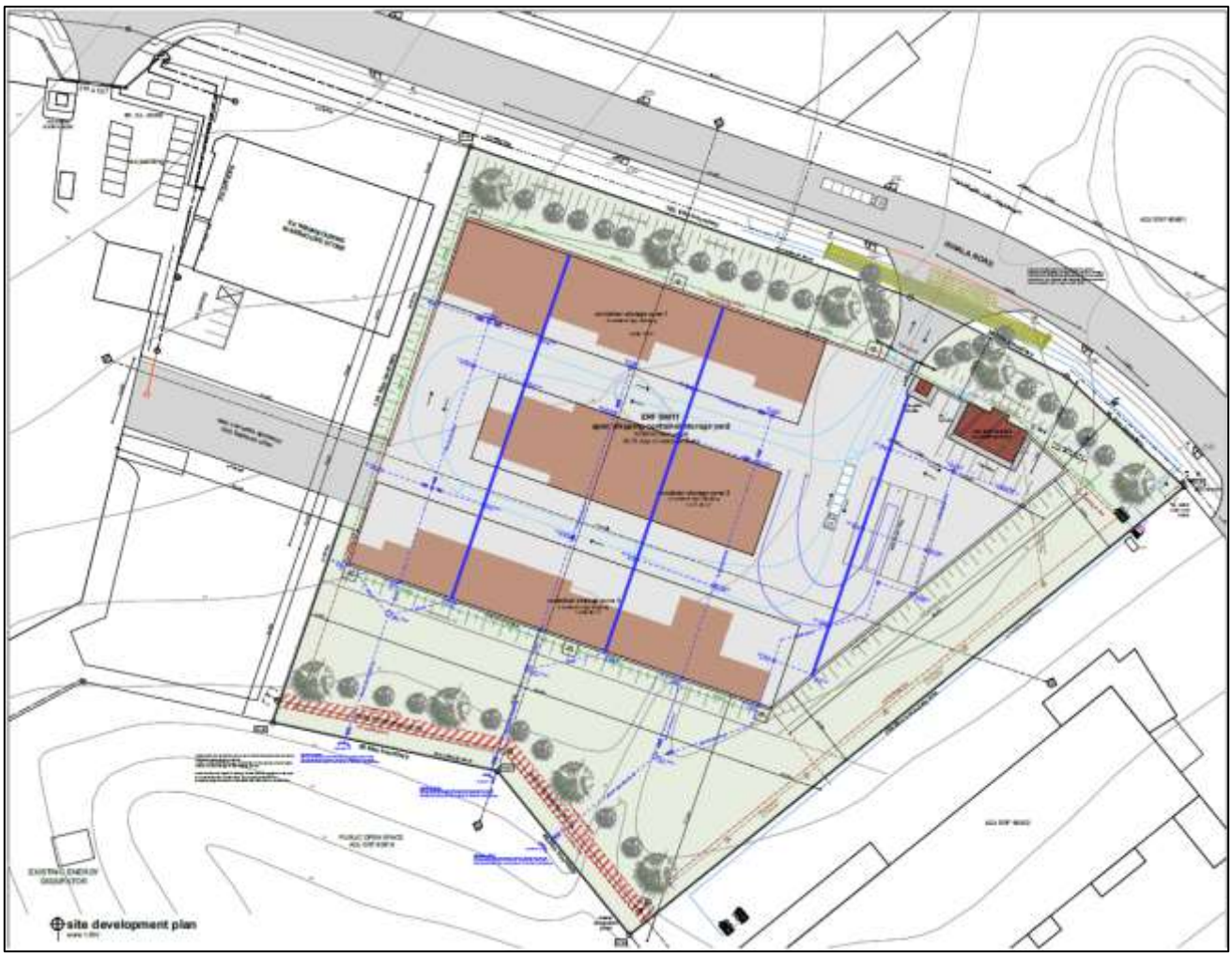


Figure 3. Typical hardstand layout.

1.2 EXISTING INFRASTRUCTURE

The following existing infrastructure is in place at the ELIDZ East London site to support its existing and future tenants:

- Administration support.
- Three phase electrical supply to all sites.
- Security in terms of boundary fencing, electric fencing and a contracted security company that conducts security patrols and access control.
- Sewerage infrastructure that feeds into the municipal sewerage reticulation.
- Potable water supply infrastructure from the municipal water supply system.
- Stormwater infrastructure.
- Sea water abstraction and reticulation infrastructure.



Figure 4. Existing infrastructure within ELIDZ.

The ELIDZ is supported by established infrastructure that services both existing and future tenants, thereby reducing the need for additional land disturbance and enabling more controlled and efficient development. The existing infrastructure framework supports sustainable development within a managed footprint and limits the extent of new environmental disturbance required for future expansion.

The subsequent sections of this report focus on;

- Methodologies for;
    - Environmental screening of the proposed development
    - Screening to sensitivity verifications

2. SITE SENSITIVITY VERIFICATION METHODOLOGY

On 20 March 2020 the Minister of Forestry, Fisheries and the Environmental published the general requirements for undertaking site sensitivity verification for environmental themes for activities requiring environmental authorization (Government Gazette No. 43110). In terms of these requirements, prior to commencing with a specialist assessment, the current land use and environmental sensitivity of the site under consideration by the screening tool must be confirmed by undertaking a site sensitivity verification.

In accordance with the Notice of the requirement to submit a report generated by the national web-based environmental screening tool in terms of section 24(5)(h) of the NEMA, 1998 (Act No 107 of 1998) and regulation 16(1)(b)(v) of the EIA regulations, 2014, as amended, a screening tool was generated and identified specific site sensitivities and themes to be assessed for this specific project. The specialist themes Section 3.3 were identified.

The assessment has been compiled based on:

- A desktop investigation using biodiversity and land-use mapping tools such as inter alia BGIS and;
- Information derived from available specialist assessment reports
- A site investigation undertaken on 26 February 2026 and 07 August 2026
- Information recorded in Screening Report

3. FINDINGS

3.1 CLIMATE

The climate (**Figure 5**) within the ELIDZ area is typically mild, characterized as warm temperate and humid. Temperature variations in East London are relatively limited, largely due to the moderating effect of the warm Agulhas current along the coastline. The region experiences a summer rainfall pattern, with the highest rainfall occurring between September and January. On average, East London receives approximately 530mm of rainfall annually, with mean maximum temperatures around 24°C and average minimum temperatures of about 14°C (CES, 2025).

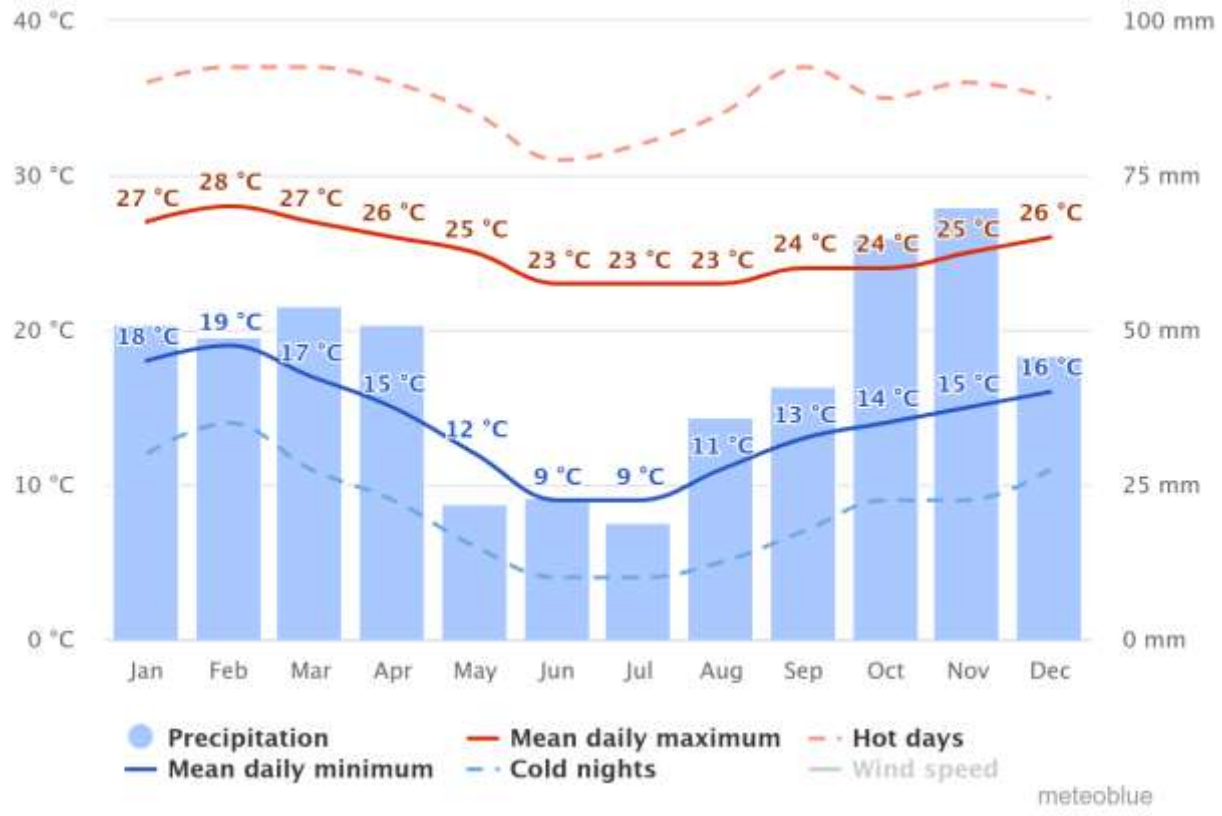


Figure 5. Average annual climatic conditions for greater East London Area (www.meteoblue.com)

3.2 TOPOGRAPHY AND HYDROLOGY

The area features moderately undulating terrain, with steeper slopes around elevated rocky ridges formed by diabase dykes and sills. The site ranges in 0-152m AMSL above sea level elevation. The ELIDZ is located within quaternary catchment R40A, which is within the Mzimvubu-Tsitsikamma Water Management Area. Two short and non-perennial rivers flow through the ELIDZ (Ngqenga river and Mvubukazi river), and the Hickmans River runs beyond the south-western boundary of the ELIDZ along Zone 1. According to the Ecosystem Threat Status, both the Ngqenga river and Hickmans river are considered Least Threatened.

3.3 GEOLOGY AND PALEONTOLOGY

The geology of the development area is dominated by the Middleton formations of the Adelaide Subgroup (Beaufort Group, Karoo Supergroup) and is intruded by dolerite dykes and sills (Bulter, 2024; Mamford, 2025). This geology influences the development of predominantly loamy soils with notable variability, including dolerite clays, grey sandy loams, intra-zonal soils, and soils associated with drainage lines, generally reflecting moderate to high nutrient content (**Figure *6***).

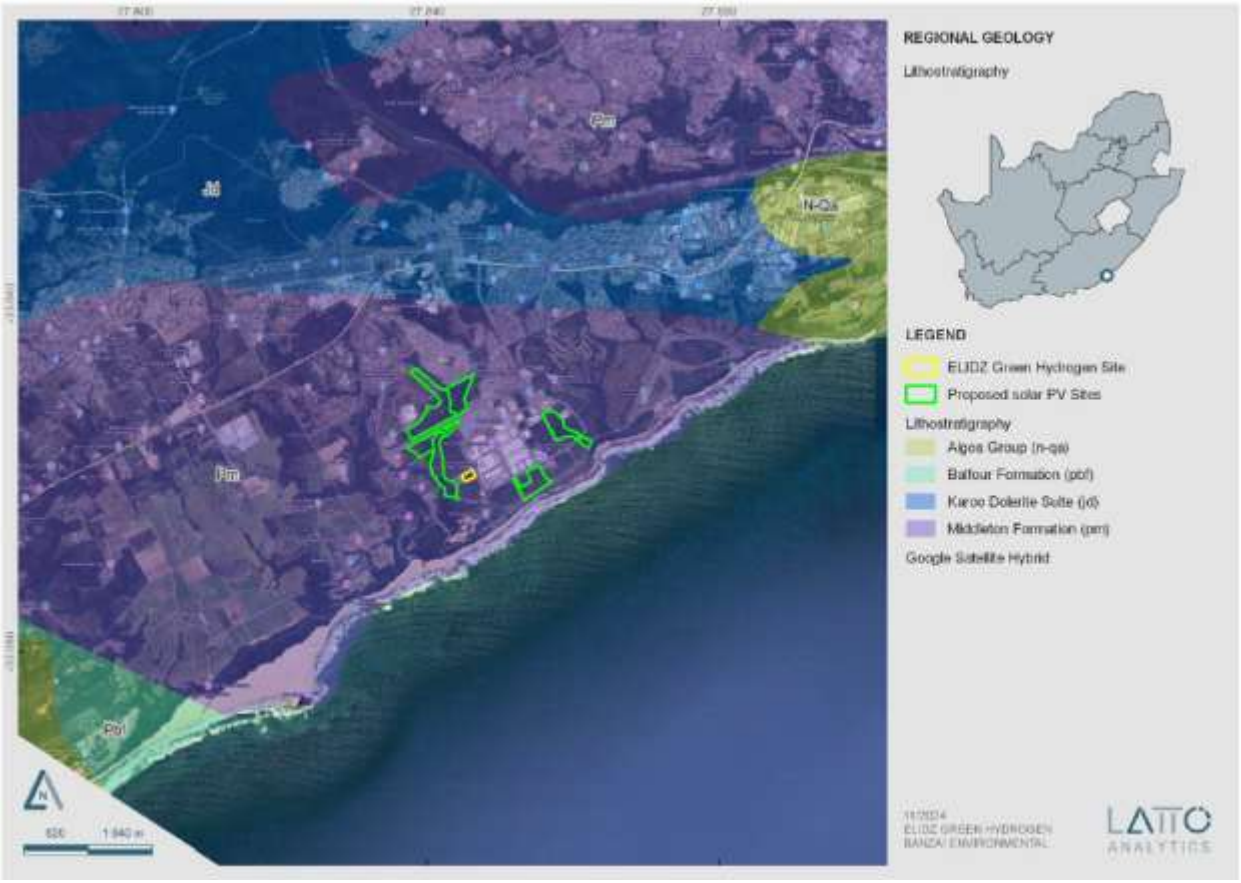


Figure 6. Updated geology (2014, Council for Geosciences, Pretoria) indicates that the study area is underlain by the Middleton Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup) (Butler, 2024).

Entire ELIDZ has a Very High palaeontological sensitivity mostly in the very highly sensitive Middleton Formation which however due to the presence of notable Jurassic dolerite dyke then the sensitivity is rendered to be Very Low due to that dolerite is an intrusive igneous rock that does not have any fossils because it originates from the molten material below the crust. The heat generated by the intrusion tends to destroy any fossils present in their near vicinity (Almond et al, 2013; Bulter, 2024; Mamford, 2025, SAHRIS website). It is very unlikely, therefore, that there would be any fossils in the sediments. In addition, the site is covered by soil and vegetation which do not have fossils (Bulter, 2024, Mamford, 2025).

Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the overlying soils of the Quaternary. There is a very small chance that fossils may occur below the soil cover in the mudstones, siltstones or sandstones of the Middleton Formation so a Fossil Chance Find Protocol should be added to the EMPr. If fossils are found by the environmental officer, or other responsible person once clearing of vegetation and excavation for foundations have commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample. The impact on the palaeontological heritage would be low, as far as the palaeontology is concerned (Bulter, 2024, Mamford, 2025).

3.4 SOILS

The soils within the ELIDZ are generally derived from underlying mudstones, sandstones, and dolerite intrusions, resulting in a mix of soil types across the area. The substrate is primarily loamy soils, but there is significant variability. The geology of the area has a significant effect on the process of soil formation. Generally, the soils found within the ELIDZ area include dolerite clays, grey sandy loam soils, intra-zonal soils and soils associated with water courses (CES, 2025).

3.5 TERRESTRIAL AND AQUATIC BIODIVERSITY

3.5.1 TERRESTRIAL

The ELIDZ supports a complex ecological mosaic comprising nine distinct plant community types and six faunal habitat types falling under the three major vegetation types.

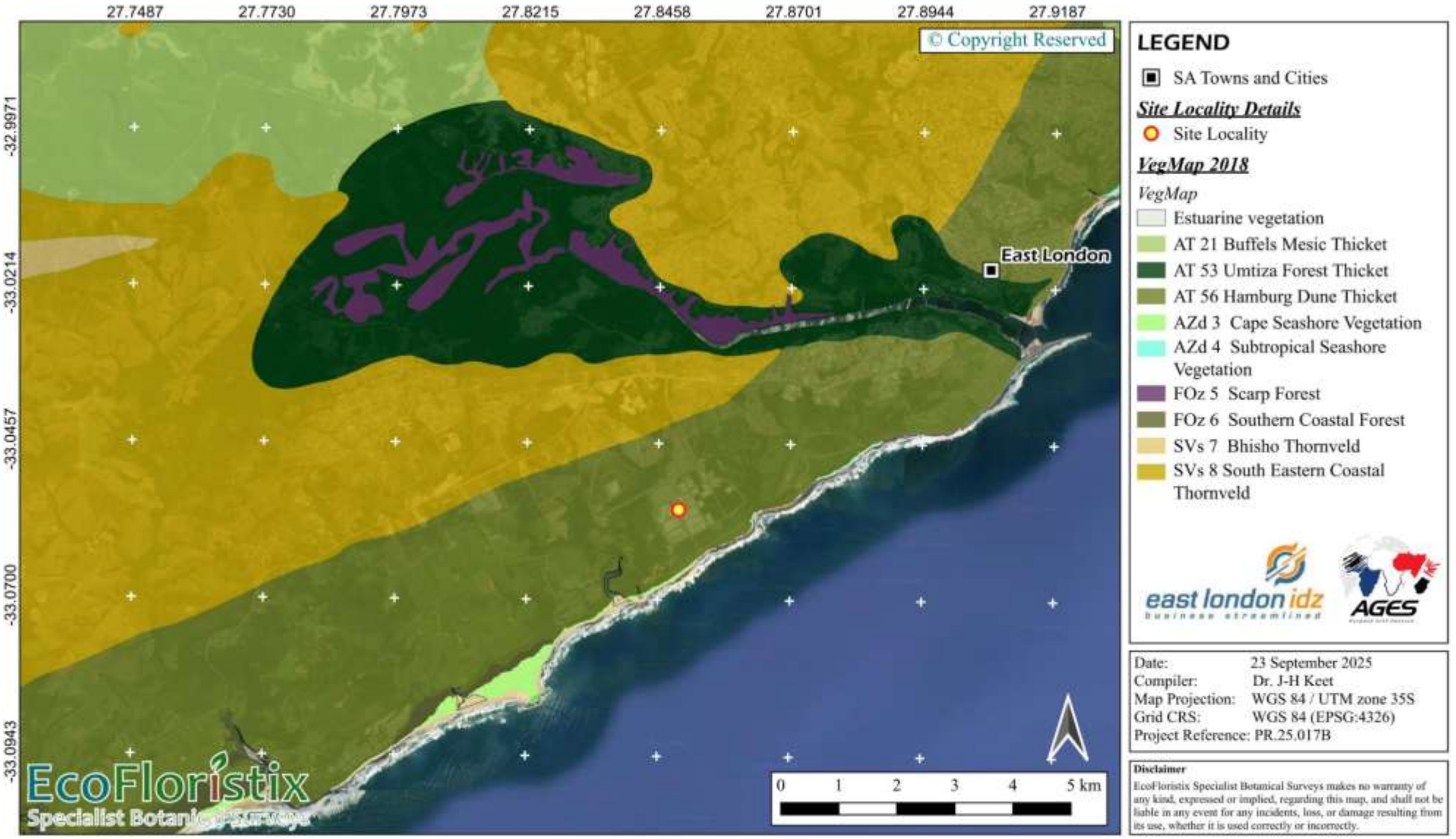


Figure 7. VegMap 2018 vegetation for the ELIDZ and surroundings (EcoFloristix, 2025).

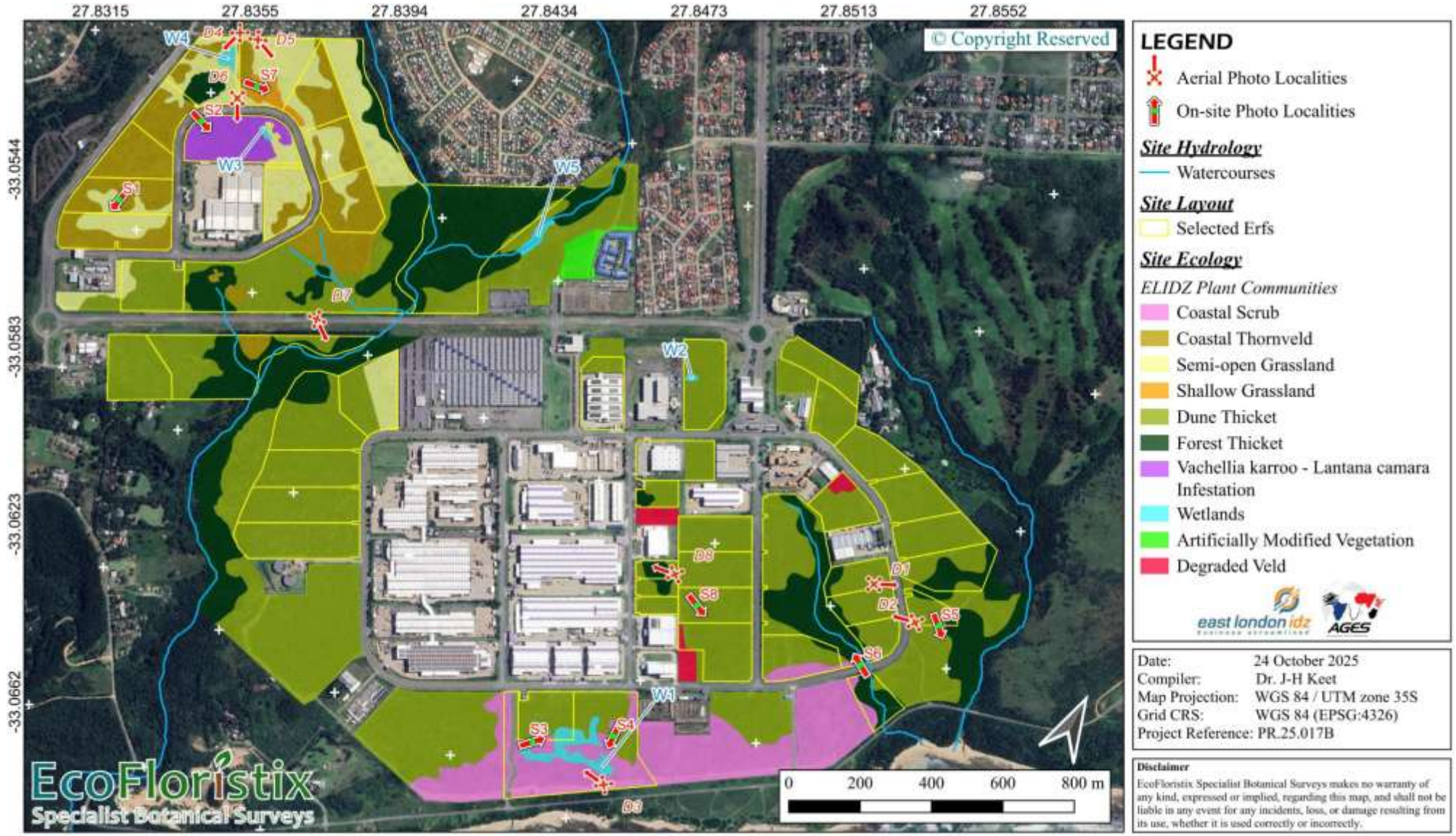


Figure 8. Plant communities of the ELIDZ (EcoFloristix, 2025).

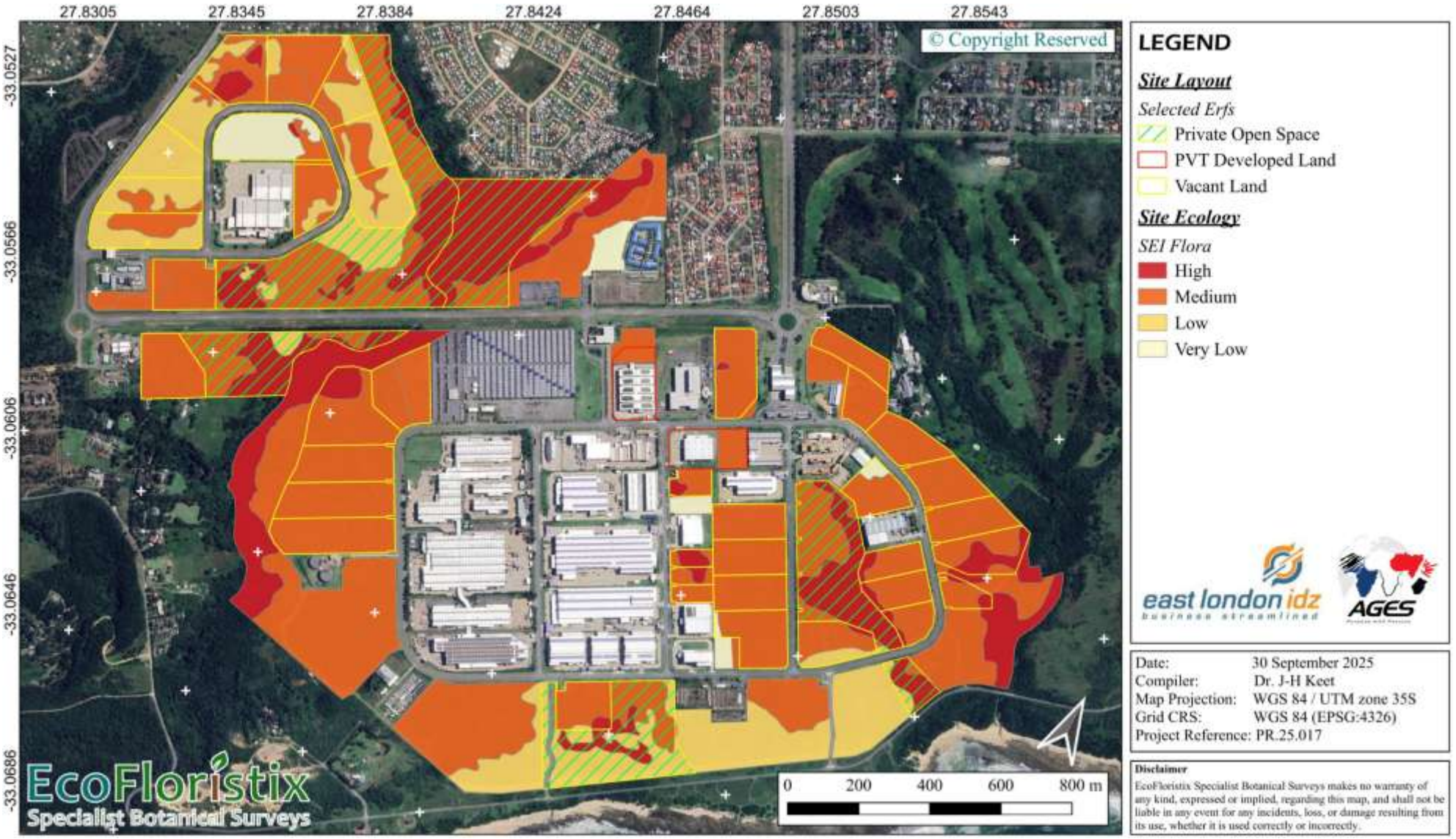


Figure 9. Botanical Site Ecological Importance (SEI) for the study area (EcoFloristix, 2025).



Figure 10. Faunal Site Ecological Importance (SEI) for the study area (EcoFloristix, 2025).

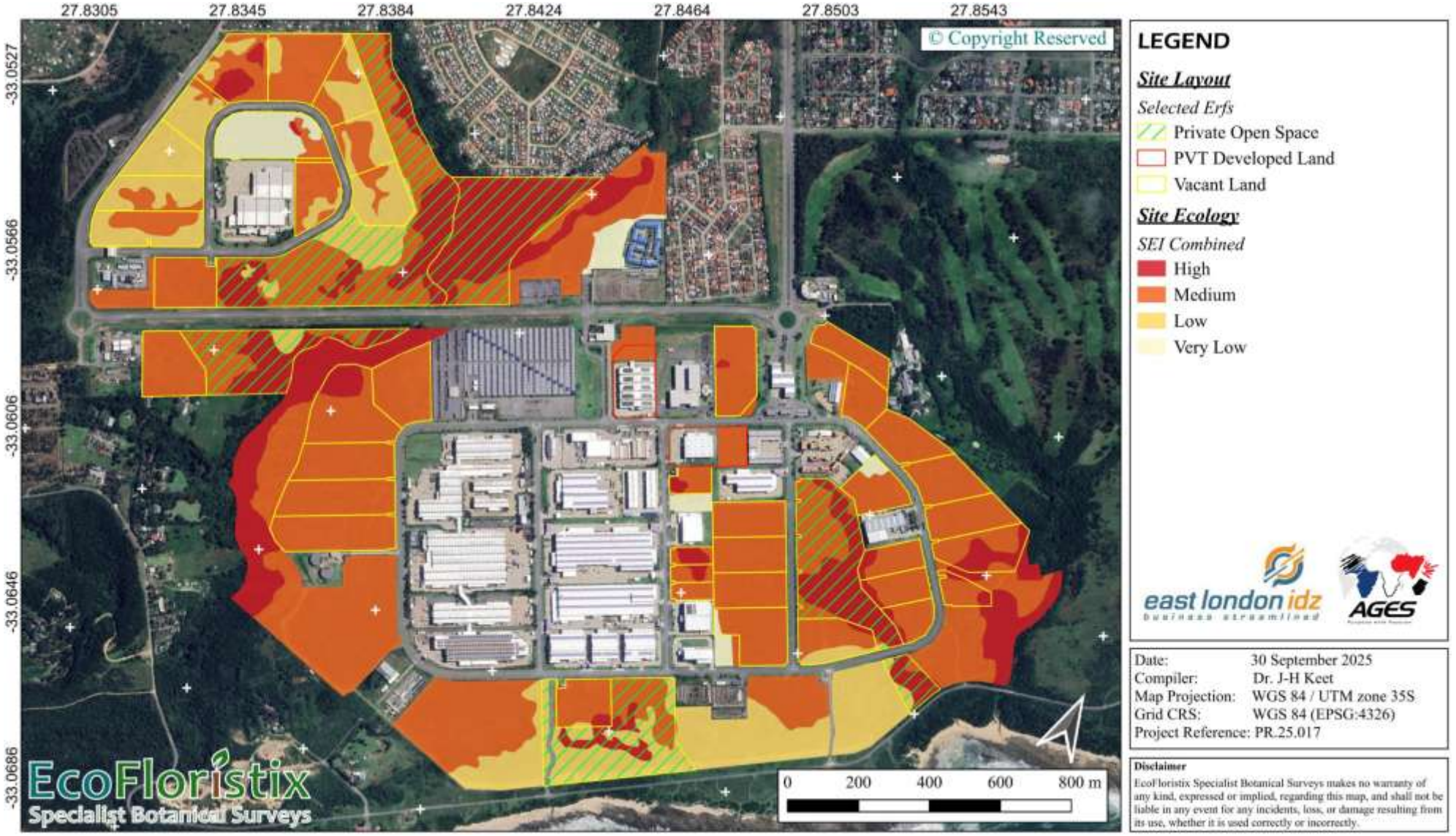


Figure 11. Combined Site Ecological Importance (SEI) for the study area (EcoFloristix, 2025).

3.5.2 AQUATIC

According to the DFFE screening tool the project area is classified as a Very High aquatic sensitivity, indicating the presence of ecologically important watercourses and associated habitats that may be vulnerable to disturbance from land clearing activities. According to the Eastern Cape Biodiversity Conservation Plan (ECBCP, 2019), the Mvubukazi River which runs through some of the zones falls under ESA 1, highlighting its role in maintaining ecosystem functioning. The National Biodiversity Assessment – Inland Aquatic / Freshwater Realm (2018), the Mvubukazi River is classified as Least Threatened (Eco-Pulse, 2024), suggesting that at a broader scale the system remains relatively intact.

These sensitivity ratings indicate that land clearing activities have the potential to impact aquatic systems if not appropriately managed, particularly through sedimentation, alteration of drainage patterns, and vegetation removal. Nevertheless, such sensitivities are largely localized to specific features (e.g., drainage lines and riparian zones) rather than uniformly across the entire site. The application area also includes previously transformed and low-sensitivity zones, which supports the broader characterisation of the site as having relatively low overall environmental sensitivity in the context of ELIDZ as an established industrial area.

The ELIDZ EMF provides spatial guidance by delineating sensitive areas and prescribing appropriate buffers, avoidance measures, and management interventions. Through adherence to these EMF requirements, including the protection of riparian zones and implementation of standard mitigation measures, potential impacts in aquatic systems are expected to be effectively avoided or minimized to acceptable levels.

3.6 SOCIO-ECONOMIC ASPECTS

Buffalo City Metropolitan Municipality (BCMM) is one of two metropolitan municipalities in the province, covering approximately 2,753 km², with East London as its administrative centre. In 2022, it had a population of about 975,255, growing at an annual rate of 2.15% (up from 1.52% in 2016), while the dependency ratio declined from 55.4 to 48.3 per 100 working-age individuals. The local economy is mainly driven by community services (25%), finance (24%), and manufacturing (24%), with trade and transport each contributing 12%.

(a) Population

According to the 2022 Census by Statistics South Africa, the population is estimated at 975 255, reflecting growth from 781 853 in 2011. The population comprises approximately 47.3% males and 52.7% females, with the majority (67.4%) falling within the working age-group (15-64 years), followed by children aged 0-14 years (24.8%), while the elderly population (65 years and older) accounts for 7.8%.

(b) Household living conditions

Most population reside in formal dwellings, some population still live in traditional dwellings and the minority of the population live in informal dwellings. Most households have piped water inside their houses (65.7%). The number of households with no access to piped water is minimal (2.8%) Majority of the population uses flush toilet (80.7%) and are followed by the population who use pit toilets (16.0%). Most households in the municipality have their refuse removed by the local authority at least once a week (71.3%), with 19.3% having their own refuse dump and 2.5% have no rubbish disposal areas. The majority of residents in the municipality use electricity for lighting (94.6%), same applies for cooking majority use electricity for cooking (65.9%).

(c) Economy

The metro records an average annual GDP growth of 1.90%, comparable to the Eastern Cape Province (2.08%) but slightly below the national rate of 1.91% of 2022. However, its longer-term growth (0.44%) lags behind South Africa (0.92%), despite peaking at 4.26% in 2021. The East London sub-metro was the largest economic contributor, accounting for 35.93% (R36 billion) of the municipal economy in 2022. Community services dominated the economy (37.3% of GVA), followed by finance (19.3%) and trade (17.0%).

3.7 CULTURAL HERITAGE SITE

As seen on **Figure *12*** below the sensitivity on palaeontological resources within the proposed site is rated as 'Very High', as such a field assessment and protocol for finds is required.



Colour	Sensitivity	Required Action
RED	VERY HIGH	field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	desktop study is required
BLUE	LOW	no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

Figure 12. SAHRIS Palaeo map showing that the project area is rated as Very High for palaeontological sensitivity.

Despite the Very High sensitivity for heritage resources, two recent studies document the status quo from this environmental aspect;

CES (2024)

- Cultural heritage resources are known to occur in the Project area and the location and presence of these features could not be confirmed during the site assessment. The nature of previously identified resources potential / possible graves as well shell middens imply a medium-high cultural heritage sensitivity for the project landscape.
- Furthermore, the fact that the presence and location of these known resources could not be confirmed during the currently survey further increases the risk of damage or destruction of these resources.

- An estimated four possible graves (Sensitive Areas 1 & 2 and SIY 01 & 02) in the form of stone cairns were previously identified within the Project area. However, these features are currently overgrown with vegetation and marshes and could not be accessed nor identified conclusively during the site assessment (see **Figure *12***).

- Four archaeological sites (IDZ 01, 04, 05, & 06) were also previously identified within the development footprint. Similarly, these features could also not be identified due to vegetation growth and wetland areas (see **Figure *13***).



Figure 13. Image showing survey tracklog of the heritage impact assessment for the ELIDZ Green Hydrogen Pilot Facility Project (CES, 2024).

CES (2025)

The larger landscape around the project area indicates a rich heritage horizon mainly linked to the Historical Period primarily related to warfare, maritime heritage, farming, rural expansion, industrial heritage of the past century and a half.

No cultural heritage resources were identified in the proposed development site.

However, since shell middens are known to occur within the ELIDZ, monitoring of ground and vegetation clearance of the area of the Project area by a knowledgeable ECO or Heritage Specialist during the Preconstruction Phase.

If shell middens or any accidental finds are made all activities in the vicinity of the find must cease immediately and a 20m no-go buffer zone must be implemented.

All heritage studies done within the IDZ point to the potential presence of heritage resources which are unable to be identified with certainty due to subsurface nature / masked by vegetation overburden, amongst others. The studies ultimately make the same and similar mitigations for impacts arising from developments within the development areas.

Although the findings of the above-mentioned heritage studies are not certain, they are noted. To identify with certainty such heritage resources on site, destructive sampling methods would have to be employed.

Therefore, the ultimate blanket mitigation for the possibility of finding cultural heritage resources within the ELIDZ is a chance-finds procedure that should be implemented immediately.

3.8 SITE SENSITIVITIES IDENTIFIED (SCREENING TOOL)

This section entails the sensitivities, and the required specialists identified by the screening tool (**Table 3**).

Table 3. Site Sensitivities identified (Screening Tool).

Theme	Erf 60847	Erf 60859	Erf 60861	Erf 60863	Erf 60865	Erf 60932	Erf 60933	Erf 60934
Agriculture theme	High	High	High	High	High	High	High	High
Animal theme	High	High	High	High	High	High	High	High
Aquatic biodiversity theme	Very High	Very High	Very High	Low	Very High	Very High	Very High	Very High
Archaeological and cultural heritage theme	Low	Low	Low	Low	Low	Low	Low	Low
Civil aviation theme	Very High	Very High	Very High	Very High	Very High	Very High	Very High	Very High
Defence theme	Low	Low	Low	Low	Low	Low	Low	Low
Paleontology theme	Very High	Very High	Very High	Very High	Very High	Very High	Very High	Very High
Plant species theme	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium
Terrestrial biodiversity theme	Very High	Very High	Very High	Very High	Very High	Very High	Very High	Very High

3.9 SPECIALIST ASSESSMENTS IDENTIFIED

Based on the above environmental sensitivities, the proposed development footprint, the following list of specialist assessments have been identified for inclusion in the assessment report by the screening tool.

Table 4. Specialist assessments identified.

Specialist assessment	60847	60859	60861	60863	60865	60932	60933	60934
Landscape/Visual assessment	√	√	√	√	√	√	√	√
Archaeological and Cultural Heritage assessment	√	√	√	√	√	√	√	√
Palaeontology assessment	√	√	√	√	√	√	√	√
Terrestrial Biodiversity assessment	√	√	√	√	√	√	√	√
Aquatic Biodiversity assessment	√	√	√	√	√	√	√	√
Socio-Economic assessment	√	√	√	√	√	√	√	√
Plant species assessment	√	√	√	√	√	√	√	√
Animal Species assessment	√	√	√	√	√	√	√	√

3.10 RECOMMENDED SPECIALIST STUDIES

The specialist studies listed in **Table 4** of **Section 3.9** are indicated to be required for the project area. Notwithstanding, based on site inspection and desktop analysis, motivation has been included in cases where the recommended specialist study will be or not be undertaken (see **Table *5***).

Table 5. EAP response to specialist assessments identified in the screening tool report.

Specialist Studies Required one	Indication of Whether Studies Will Be Conducted or Not (Yes/No)	Motivation for any Studies That Will be or Not Be Undertaken
• Landscape/Visual Impact Assessment	No	**All erven** The proposed development is located within an existing designated industrial area, with the nature and scale of the development consistent with surrounding land uses**.** Therefore, a Landscape/Visual study will not be undertaken.
• Archaeological and Cultural Heritage Impact Assessment	No	**All erven** The DFFE Screening tool listed the archaeological and cultural heritage theme for the site as High. However, two recent studies done by CES (2025) have covered the archaeological and cultural heritage theme spatially adequate. Therefore, an Archaeological and cultural heritage Impact Assessment is not deemed necessary for the application process. Mitigations of from the existing studies including the EMF are recommended.
• Agricultural Impact Assessment	No	**All erven** The DFFE Screening tool listed the agriculture theme for the site as High. However, the entire area is formally designated for industrial development and is currently not utilised for agricultural production. Therefore, an Agricultural Impact Assessment is not a requirement.
• Palaeontology Impact Assessment	No	The DFFE Screening tool listed the paleontology theme for the site as Very High. According to the SAHRIS Paleo Sensitivity Map, the paleontological sensitivity is very high. However, two recent studies by Coastal and Environmental Services (2025) and Banzai Environmental (2024) have been conducted and have covered the Paleontology theme. Therefore, a Paleontological Study is waived substantiated by the similar reasons as that of the heritage theme. .
• Terrestrial Biodiversity Impact Assessment • Plant Species Assessment • Animal Species Assessment	No	**All erven** The DFFE Screening tool listed the terrestrial biodiversity theme for the site as Very High. However, a Terrestrial Biodiversity study has already been conducted (EcoFloristix, 2025). Therefore, the existing study is robustly adequate to address Terrestrial Biodiversity related impacts though the comprehensive mitigations and recommendations which equally address impacts on plants and animals within the undeveloped parts of the IDZ applicable to the exemption application.

Specialist Studies Required one	Indication of Whether Studies Will Be Conducted or Not (Yes/No)	Motivation for any Studies That Will be or Not Be Undertaken
• Aquatic Biodiversity Impact Assessment	Yes	**All erven** The DFFE Screening tool listed the aquatic biodiversity theme for the site as Very High. The presence of wetlands, drainage lines, and possible National Freshwater Ecosystem Priority Areas (NFEPA) features within or near this zone necessitates a detailed aquatic assessment. Notwithstanding, the proposed developments are located outside aquatic features nor their regulated water areas, thus, a full study is not required. A Compliance Statement has been compiled.
Socio-Economic Impact Assessment	No	The proposed development is consistent with the planning framework of the ELIDZ and is expected to contribute positively to the local economy. As such, a socio-economic assessment is not considered necessary.

The motivations presented in the above table are informed by a suite of existing, site-specific studies and strategic planning tools applicable to the ELIDZ. These include:

- Final BAR for the proposed logistics sequencing facility located in the ELIDZ
- Final EIA for the proposed green hydrogen pilot facility and associated solar PV facility located in the ELIDZ
- Specialist studies (Terrestrial Biodiversity, Palaeontology, Heritage, Aquatic)
- Environmental Management Framework (EMF)

4. CONCLUSION

An environmental scoping site visit was undertaken in February and August 2026. The purpose of the site visit was to gather enough information to develop a complete, comprehensive understanding of the receiving environment of the site and inform the project's environmental impact assessment process. This preliminary assessment forms the basis against which the EIA will be conducted. From the site verification conducted, it is apparent that the proposed developed triggers vegetation clearing sensitivities. Based on the verification of the identified sensitivities by the National Screening Tool report. Selected specialist studies should be commissioned to inform the environmental impact assessment due to high and every high sensitivity as verified on site. Identified specialists are:

- Terrestrial Biodiversity Impact Assessment – Inclusive of Plants and Animal species
- Aquatic Biodiversity Impact Compliance Statement.

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