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**SITE SENSITIVITY VERIFICATION
AND
AGRICULTURAL COMPLIANCE STATEMENT
FOR THE PROPOSED SEKURUWE WATER TREATMENT WORKS AND ACCESS ROAD
LIMPOPO PROVINCE**

**Report by
Johann Lanz**

27 September 2023

Table of Contents

Executive summary	1
1 Introduction.....	2
2 Project description	2
3 Terms of reference.....	3
4 Methodology of study	4
5 Assumptions, uncertainties or gaps in knowledge or data	4
6 Applicable legislation and permit requirements.....	4
7 Site sensitivity verification.....	4
8 Baseline description of the agro-ecosystem	6
8.1 Assessment of the agricultural production potential	8
9 Assessment of the agricultural impact.....	9
10 Conclusion: Agricultural Compliance Statement.....	10
11 References	11
Appendix 1: Specialist Curriculum Vitae	13
Appendix 2: Specialist declaration form August 2023	14
Appendix 3: SACNASP Registration Certificate	17
Appendix 4: Soil data	18

EXECUTIVE SUMMARY

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

The site is classified as low to medium agricultural sensitivity by the screening tool. This has been confirmed by this assessment, because of the agricultural production potential and current agricultural land use.

The site is located in an area where there is no crop production. Cropping potential is limited by a combination of climate and soil constraints. The climate is classified as arid and therefore is limiting to rain-fed cropping. Soils are constrained by limited depth above the underlying rock. The climate and soil combination provides an insufficient moisture reservoir for viable rain-fed crop production and limits the land's agricultural potential to grazing only. Furthermore, factors other than climate and soil capability also constrain the potential of the property to practically deliver agricultural produce and therefore influence its agricultural production potential. The site is highly unlikely to ever be viably utilised for agricultural production and its potential is therefore assessed as low.

An agricultural impact is a change to the future agricultural production potential of land. This is primarily caused by the exclusion of agriculture from the footprint of a development. In this case, the total footprint of land from which potential future agriculture will be excluded, is only approximately 3.9 hectares and it is not viable cropland. The loss of this amount of grazing land, of which there is no particular scarcity in the country, will result in negligible loss of agricultural production potential in terms of national food security. The agricultural impact of the proposed development is therefore assessed as being of very low significance and acceptable.

From an agricultural impact point of view, it is recommended that the proposed development be approved.

1 INTRODUCTION

Environmental authorisation is being sought for the Sekuruwe water treatment works. 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 verified low to medium agricultural sensitivity of the site (see Section 7), the level of agricultural assessment required by the protocol is an Agricultural Compliance Statement.

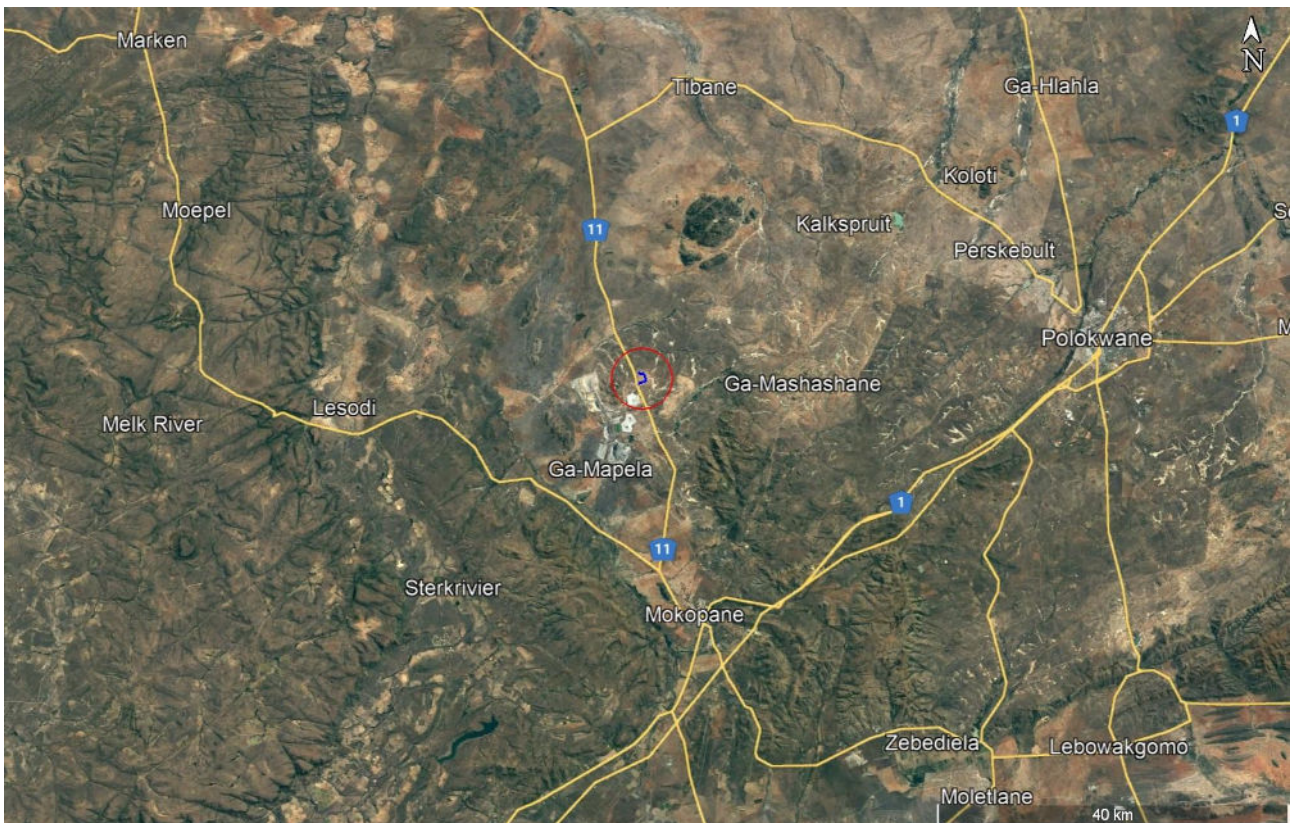


Figure 1. Locality map of the development (within red circle) in Sekuruwe.

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

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

As is shown in Section 9, this assessed development will not result in a loss of viable arable land and therefore poses almost zero threat to agricultural production potential.

2 PROJECT DESCRIPTION

The project will cause the permanent exclusion of any potential future agricultural production from the entire footprint of the development (as shown in Figures 2 and 3). Once agriculture is

excluded, there can be no further on-site agricultural impact. There is also no off-site agricultural impact. The details of the context of this facility within the greater project and the details of the design and layout of the facility is therefore of no relevance to agricultural impacts and it is unnecessary to consider it any further in this assessment. All that is of relevance is the loss of the footprint (3.9 ha) to potential future agricultural production.

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 stipulated in the agricultural protocol, are listed below, and the section number of this report which fulfils each stipulation is given after it in brackets.

1. The Agricultural Compliance Statement must be prepared by a soil scientist or agricultural specialist registered with the South African Council for Natural Scientific Professions (SACNASP) (**Appendix 3**).
2. The compliance statement must:
 1. be applicable to the preferred site and proposed development footprint (**Figures 2 to 3**);
 2. confirm that the site is of “low” or “medium” sensitivity for agriculture (**Section 7**); and
 3. indicate whether or not the proposed development will have an unacceptable impact on the agricultural production capability of the site (**Section 10**).
3. The Agricultural Compliance Statement must contain, as a minimum, the following information:
 1. details and relevant experience as well as the SACNASP registration number of the soil scientist or agricultural specialist preparing the statement including a curriculum vitae (**Appendix 1**);
 2. a signed statement of independence by the specialist (**Appendix 2**);
 3. a map showing the proposed development footprint (including supporting infrastructure) with a 50 m buffered development envelope, overlaid on the agricultural sensitivity map generated by the screening tool (**Figure 2**);
 4. confirmation from the specialist that all reasonable measures have been taken through micro-siting to avoid or minimize fragmentation and disturbance of agricultural activities (**not applicable because the land is not used for agriculture**);
 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 10**);
6. any conditions to which this statement is subjected (**Section 10**);
 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 (**not applicable**);
 8. where required, proposed impact management outcomes or any monitoring requirements for inclusion in the EMPr (**not required**); and
 9. a description of the assumptions made and any uncertainties or gaps in knowledge or data (**Section 5**).

4 METHODOLOGY OF STUDY

The assessment was based on a verification of the lack of current agricultural land use on the site and the location of the site within a non-agricultural area. The assessment was also informed by existing soil and agricultural potential data. This level of agricultural assessment is considered entirely adequate for an understanding of on-site agricultural production potential for the purposes of this assessment.

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

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, as well as in terms of the Subdivision of Agricultural Land Act (Act 70 of 1970 - SALA), if the property is currently zoned for agriculture.

7 SITE SENSITIVITY VERIFICATION

A specialist agricultural assessment is required to verify 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). Agricultural sensitivity is a direct function of the capability of the land for agricultural production, based only on its climate, terrain and soil capabilities. The different categories of agricultural sensitivity indicate the priority by which land should be conserved as agricultural production land.

The screening tool classifies agricultural sensitivity according to two independent criteria, from two independent data sets, both of which may be indicators of the land’s agricultural production potential but are limited in that the first is outdated and the second relies on fairly course data. The two criteria are:

1. whether the land is classified as cropland or not on the field crop boundary data set, and
2. its land capability rating on the land capability data set

All classified cropland is by definition either high or very high sensitivity. Land capability is defined as the combination of soil, climate and terrain suitability factors for supporting rain-fed agricultural production. It is rated by the Department of Agriculture's updated and refined, country-wide land capability mapping (DAFF, 2017). The higher land capability values (≥ 8 to 15) are likely to indicate suitability as arable land for crop production, while lower values (< 8) are only likely to be suitable as non-arable grazing land. The direct relationship between land capability rating and the screening tool's agricultural sensitivity is shown in Table 1.

Table 1. Relationship between land capability and agricultural sensitivity as given by the screening tool.

Land capability value	Agricultural sensitivity
1 - 5	low
6 - 8	medium
9 - 10	high
11 - 15	very high

The agricultural sensitivity of the site, as classified by the screening tool, is shown in Figure 2.

The screening tool classifies the assessed area as ranging from low to medium agricultural sensitivity. None of the land is classified as cropland and the rating of agricultural sensitivity is therefore purely a function of classified land capability as per Table 1 above.

The classified land capability of the site ranges from 5 to 6. This assessment verifies that the site is not within crop boundaries and verifies the classified land capability, based on the assessment of the cropping potential of the site in this report (see following section). This assessment therefore confirms the low to medium sensitivity rating by the screening tool.



Figure 2. The development footprint overlaid on agricultural sensitivity, as given by the screening tool (green = low; yellow = medium; red = high; dark red = very high). The screening tool's low to medium sensitivity is confirmed by this assessment.

8 BASELINE DESCRIPTION OF THE AGRO-ECOSYSTEM

The purpose of this section of an agricultural assessment report is to present the baseline information that controls the agricultural production potential of the site so that an assessment of that potential can be made. Agricultural production potential, and particularly cropping potential is one of three factors that determines the significance of the agricultural impact, together with size of footprint and duration of impact (see Section 9).

Important parameters that control the agricultural production potential of the site are given in Table 2. The land type soil data is given in Appendix 4. A satellite image map of the development site is given in Figure 3.

Table 1: Parameters that control and/or describe the agricultural production potential of the site.

	Parameter	Value
Climate	Köppen-Geiger climate description (Beck <i>et al</i> , 2018)	Arid, steppe, hot
	Mean Annual Rainfall (mm) (Schulze, 2009)	502
	Reference Crop Evaporation Annual Total (mm) (Schulze, 2009)	1426 - 1443
	Climate capability classification (out of 9) (DAFF, 2017)	5 (moderate)
Terrain	Terrain type	Highveld with some relief
	Terrain morphological unit	Crest to mid-slope
	Slope gradients (%)	6
	Altitude (m)	1235
	Terrain capability classification (out of 9) (DAFF, 2017)	5 (moderate) to 6 (moderate-high)
Soil	Geology (DAFF, 2002)	Medium-grained, yellowish, laminated sandstone of the Makgabeng Formation of the Waterberg Group. Also sand of the Quaternary System.
	Land type (DAFF, 2002)	Ae335
	Description of the soils	Shallow to deep, light textured, red, well-drained soils on underlying rock
	Dominant soil forms	Hutton, Clovelly
	Soil capability classification (out of 9) (DAFF, 2017)	3 (low)
Land use	Agricultural land use in the surrounding area	Informal grazing only
	Agricultural land use on the site	Informal grazing only
General	Long-term grazing capacity (ha/LSU) (DAFF, 2018)	7
	Land capability classification (out of 15) (DAFF, 2017)	5 (low) to 6 (low-moderate)
	Within Protected Agricultural Area (DALRRD, 2020)	No

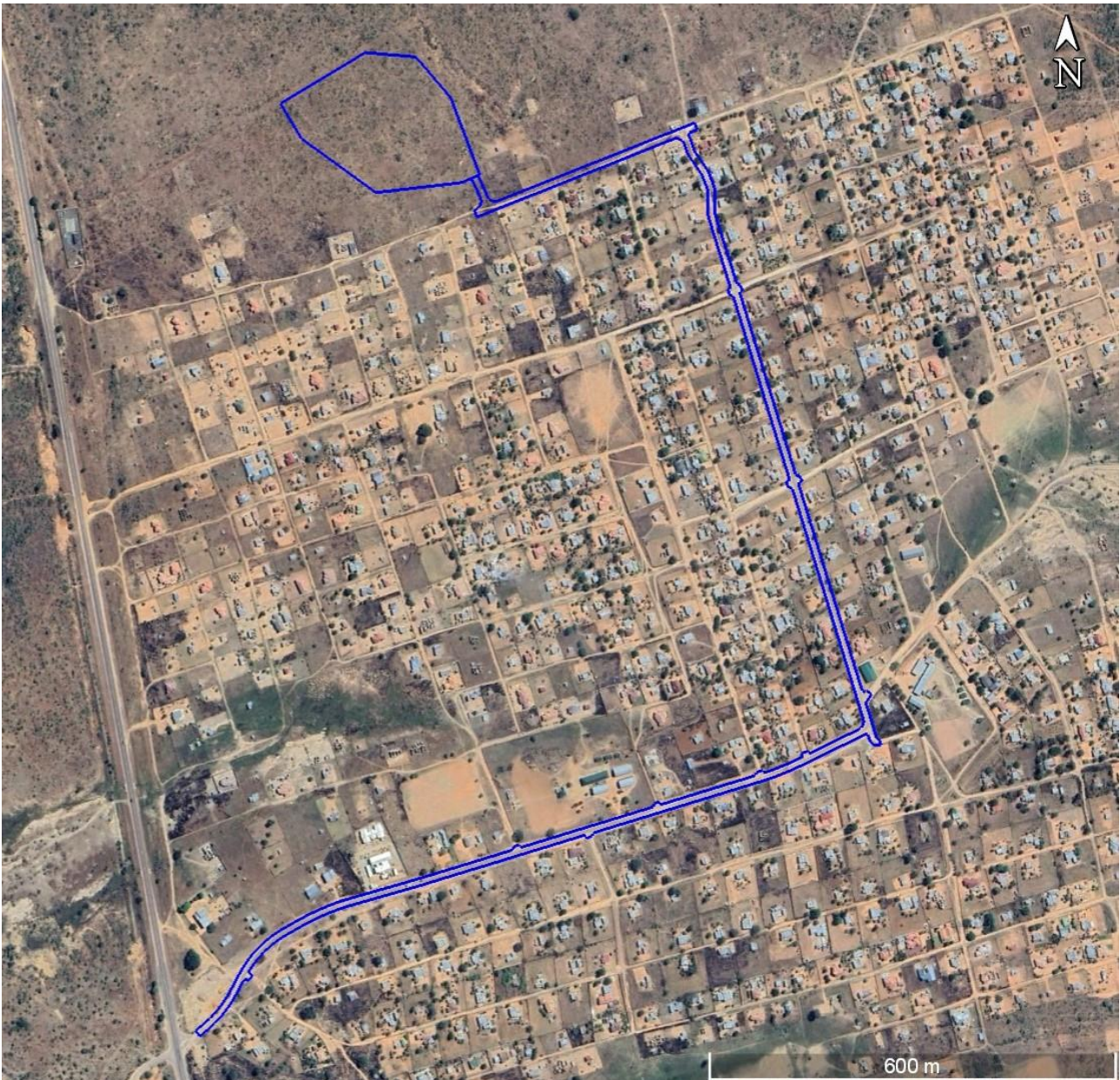


Figure 3. *Satellite image map of the development footprint.*

The site falls outside of an area that is classified as a Protected Agricultural Area. A Protected Agricultural Area is a demarcated area in which the climate, terrain, and soil are generally conducive for agricultural production and which, historically, has made important contributions to the production of the various crops that are grown across South Africa. Within Protected Agricultural Areas, the protection, particularly of arable land, is considered a priority for the protection of food security in South Africa, but the protection of land outside of these areas is generally not considered a food security priority.

8.1 Assessment of the agricultural production potential

This assessment of the agricultural production potential of the site is based on an integration of

the different parameters in Table 2 above.

The site is located in an area where there is no crop production. Cropping potential is limited by a combination of climate and soil constraints. The climate is classified as arid and therefore is limiting to rain-fed cropping. Soils are constrained by limited depth above the underlying rock. The climate and soil combination provides an insufficient moisture reservoir for viable rain-fed crop production and limits the land's agricultural potential to grazing only. Furthermore, factors other than climate and soil capability also constrain the potential of the property to practically deliver agricultural produce and therefore influence its agricultural production potential. These factors include its location surrounded largely by non-agricultural land uses, the lack of any existing cropping infrastructure or inputs, and the existence of non-agricultural infrastructure on the property. For these reasons, the site is highly unlikely to ever be viably utilised for agricultural production and its potential is therefore assessed as low.

9 ASSESSMENT OF THE AGRICULTURAL IMPACT

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 is a change to the future agricultural production potential of land. In most developments, including the one being assessed here, this is primarily caused by the exclusion of agriculture from the footprint of the development. The significance of an agricultural impact is a direct function of the following three factors:

1. the size of the footprint of land from which agriculture will be excluded (or the footprint that will have its potential decreased)
2. the baseline production potential (particularly cropping potential) of that land
3. the length of time for which agriculture will be excluded (or for which potential will be decreased).

The most significant agricultural impact possible, ignoring the length of time component, is therefore a loss of a large area of high yielding cropland and the least significant impact is a loss of a small area of low carrying capacity grazing land.

Cropping potential is highlighted in factor 2, above, because the threshold, above which it is a priority to conserve land for agricultural production, is determined by the scarcity of arable crop production land in South Africa and the relative abundance of land that is only good enough to be used for grazing. If land can support viable and sustainable crop production, then it is considered to be above the threshold and is a priority for being conserved as agricultural production land. If land is unable to support viable and sustainable crop production, then it is considered to be below

the threshold and of much lower priority for being conserved.

In this case the land is not viable cropland. The total footprint of land from which potential future agriculture will be excluded, is only approximately 3.9 hectares. The loss of this amount of grazing land, of which there is no particular scarcity in the country, will result in negligible loss of agricultural production potential in terms of national food security. The agricultural impact of the proposed development is therefore assessed as being of very low significance and acceptable.

Specialist assessments for environmental authorisation are required to assess 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.

Agricultural land throughout South Africa is under inevitable pressure from various non-agricultural land uses. The cumulative impact of agricultural land loss is significant. However the agricultural priority should be to conserve future agricultural production, not simply agriculturally zoned land. As has been shown above, the site has limited current agricultural production and limited capacity for future agricultural production. Therefore it is a site which can be used for non-agricultural purposes without a high loss of agricultural production potential. The cumulative agricultural impact of the proposed development is therefore assessed 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.

Specialist assessments for environmental authorisation are required to assess the impacts of alternatives including the no-go alternative. 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 very low impact of the development, and so from an agricultural impact perspective, there is no preferred alternative between the no-go and the development.

No mitigation measures are required for the protection of agricultural production potential because the entire site will be excluded from agricultural land use.

10 CONCLUSION: AGRICULTURAL COMPLIANCE STATEMENT

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

The site is classified as low to medium agricultural sensitivity by the screening tool. This has been confirmed by this assessment, because of the agricultural production potential and current agricultural land use.

The site is located in an area where there is no crop production. Cropping potential is limited by a combination of climate and soil constraints. The climate is classified as arid and therefore is limiting to rain-fed cropping. Soils are constrained by limited depth above the underlying rock. The climate and soil combination provides an insufficient moisture reservoir for viable rain-fed crop production and limits the land's agricultural potential to grazing only. Furthermore, factors other than climate and soil capability also constrain the potential of the property to practically deliver agricultural produce and therefore influence its agricultural production potential. The site is highly unlikely to ever be viably utilised for agricultural production and its potential is therefore assessed as low.

An agricultural impact is a change to the future agricultural production potential of land. This is primarily caused by the exclusion of agriculture from the footprint of a development. In this case, the total footprint of land from which potential future agriculture will be excluded, is only approximately 3.9 hectares and it is not viable cropland. The loss of this amount of grazing land, of which there is no particular scarcity in the country, will result in negligible loss of agricultural production potential in terms of national food security. The agricultural impact of the proposed development is therefore assessed as being of very low significance and 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.

11 REFERENCES

Beck, H.E., N.E. Zimmermann, T.R. McVicar, N. Vergopolan, A. Berg, E.F. Wood. 2018. Present and future Köppen-Geiger climate classification maps at 1-km resolution, Nature Scientific Data. Available at: <https://gis.elsenburg.com/apps/cfm/>.

Department of Agriculture Forestry and Fisheries (DAFF). 2018. Long-term grazing capacity map for South Africa developed in line with the provisions of Regulation 10 of the Conservation of Agricultural Resources Act, Act no 43 of 1983 (CARA), available on Cape Farm Mapper. Available at: <https://gis.elsenburg.com/apps/cfm/>

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.

Schulze, R.E. 2009. South African Atlas of Agrohydrology and Climatology, available on Cape Farm Mapper. Available at: <https://gis.elsenburg.com/apps/cfm/>

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*.



forestry, fisheries & the environment

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

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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

The Sekuruwe water treatment works and access road.

Kindly note the following:

- 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.
- 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>.
- An electronic copy of the signed declaration form must be appended to all Draft and Final Reports submitted to the department for consideration.
- 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	Not applicable – 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@johannlanz.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

Johann Lanz – Soil Scientist (sole proprietor)

Name of Company:

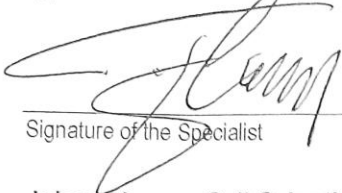
19 September 2023

Date

SPECIALIST DECLARATION FORM – AUGUST 2023

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

Johann Lanz – Soil Scientist – sole proprietor

Name of Company

2023/09/19

Date

Commissioner of Oaths Johann Kotze

Signature of the Commissioner of Oaths

2023-09-19

Date



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 2024**



Chairperson

Chief Executive Officer



APPENDIX 4: SOIL DATA

Table of land type soil data

Land type	Soil series (forms)	Depth (mm)	Clay % A horizon	Clay % B horizon	Depth limiting layer	% of land type
Ae335	Hu	> 1200	8 - 10	8 - 15	R;so	38.0
Ae335	Hu Cv	400 - 600	8 - 10	10 - 20	R	29.5
Ae335	R					14.3
Ae335	Gs	200 - 400	8 - 10	10 - 20	R,so	10.0
Ae335	Va	> 900	15 - 20	15 - 30	ud,so	4.5
Ae335	Cv Oa	> 1000	15 - 25	15 - 35	ud;so	2.3
Ae335	S					1.5