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## **ALIEN INVASIVE VEGETATION SPECIES CONTROL PLAN FOR**

**PROPOSED DEVELOPMENT OF LOW-IMPACT, SELF-CATERING CAMPING  
NODES WITH SHARED AMENITIES FACILITIES FOR THE LOVEMORE FAMILY -  
PORTION 104 OF FARM 216, UITZICHT, KNYSNA, WESTERN CAPE**

In terms of the National Environmental Management: Biodiversity Act (NEM:BA Act No 10 of 2004, as amended), Invasive Species Regulations (October 2020) and NEMA EIA Regulations (2014, as amended)



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# 1. INTRODUCTION AND BACKGROUND

Portion 104 of Farm 216, Knysna (hereafter referred to as “the property”) the Knysna Estuary on the northern boundary, and Featherbed Private Nature reserve on the western boundary. The property extends **9.96 Ha**(as per the title deed).

<b>SG Region:</b>	KNYSNA
<b>Farm Nr:</b>	104/216
<b>Area (Ha):</b>	9.96
<b>SG Code:</b>	C03900000000021600104

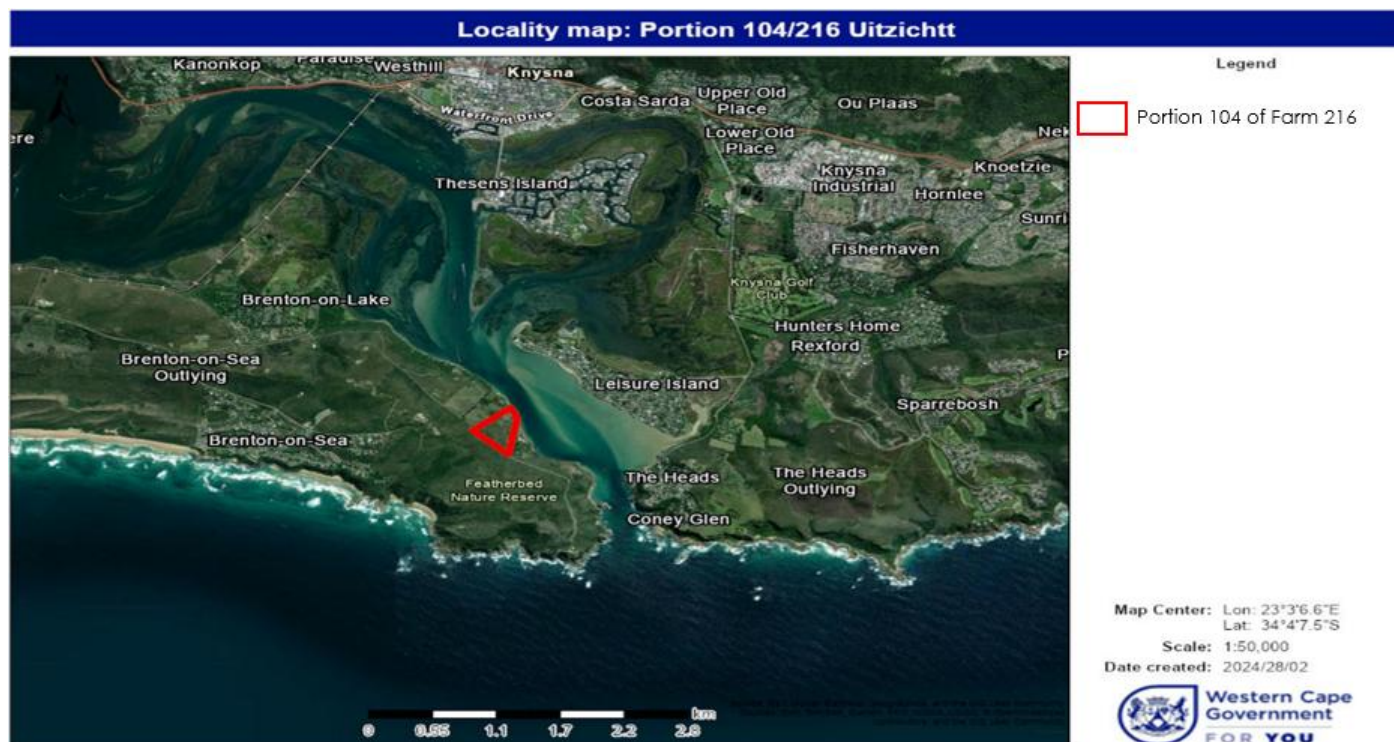


Figure 1: Locality Map of Portion 104 of Farm 216

Access to the site will be via Dolley Raats Street (a tarred road) that transitions into a gravel road, Dominee J.F. du Toit Avenue, which eventually becomes C.J. Langenhoven, leading towards the property. The following coordinates indicate the boundaries of the property (Google Earth, 2024).

FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Northern Boundary	34°	04'	11.13"	23°	02'	54.85"
Eastern Boundary	34°	04'	16.84"	23°	02'	58.28"
Southern Boundary	34°	04'	26.60"	23°	02'	55.97"
Western Boundary	34°	04'	17.99"	23°	02'	44.04"

## 2. LISTED ALIEN INVASIVE PLANT SPECIES PRESENT

In terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) (NEM:BA), invasive alien species are regulated through Chapter 5, which provides for the control and eradication of listed

invasive species to prevent or minimise their harm to ecosystems, biodiversity and people. According to section 70 of NEM:BA, the Minister Published a national Government Gazetted list (2020) of Alien Invasive Plant Species separated into the following categories –

Table 1: Description of National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) (NEM:BA) categories 1 (a and b),2, and 3

NEM:BA Category	Description
Category 1 (a and b)	<p>Invasive species falling under this category are prohibited plants, i.e. are illegal to grow or keep and must be controlled / eradicated. These plant species possess characteristics that can prove harmful to humans and/or have a detrimental impact on the environment, people or the economy. These plant species are only allowed in biological control reserves that are designed for the breeding of bio-control agents.</p> <p>Road reserves are not considered biological control reserves and as such these species need to be removed from such area unless specifically permitted to be there.</p>
Category 2	<p>Invasive species falling under this category are planted with a commercial or utility value. These species have certain useful qualities, which include the commercial use of for timber, animal fodder, food, soil stabilisation etc. The species falling under this category are only permitted in demarcated areas, under controlled conditions and in bio-control reserved. However, they are not permitted within 30 m of 1:50 year floodline or a watercourse or wetlands unless it is authorised by the National Department of Water Affairs.</p> <p>Road reserves are not considered demarcated areas or control conditions and as such these species need to be removed from such area unless specifically permitted to be there.</p>
Category 3	<p>These species are primarily 'exotic' or ornamental horticultural plants that escaped from residential gardens. These species may not be planted and propagative material may not be traded (except where the appropriate permits are in place). Eradication of these species is not required- except within 30 m of 1:50 year floodline or a watercourse or wetlands. The spread of these species must be prevented.</p>

According to the specialist assessment undertaken by Capensis (2024), Portion 104 of Farm 216 has historically been subject to invasion by alien invasive plant species (IAPs). The site previously supported extensive stands of alien vegetation, particularly Eucalyptus and Pinus species, which were largely reduced during the 2017 Knysna wildfires. Although the fires significantly reduced the alien canopy, several invasive species remain present on the property and continued monitoring and removal will be required to prevent reinvasion.

The long history of invasion is likely to have altered the soil chemistry in certain areas, which may limit the recovery of indigenous vegetation without ongoing management. The specialist further notes that surrounding properties still contain notable infestations of alien species, increasing the likelihood of re-establishment on the site if active management is not implemented.

Table 2 below lists the alien invasive plant species recorded or considered likely to occur on the property, based on the findings of the Capensis (2024) Terrestrial Biodiversity Assessment, together with their applicable NEM:BA Alien and Invasive Species Regulations (October 2014, as amended 2020) categories.

Table 2: NEM:BA listed (October 2014, as amended 2020) alien invasive species present (and likely to occur) on the property

Species	Common Name	NEMBA Category
<i>Acacia cyclops</i>	Rooikrans	Category 1b
<i>Acacia podalyriifolia</i>	Pearl Wattle	Category 1b
<i>Acacia saligna</i>	Port Jackson Willow	Category 1b
<i>Lantana camara</i>	Lantana	Category 1b
<i>Melaleuca linearis</i>	Narrow-leaved Bottlebrush	Category 1b
<i>Pinus radiata</i>	Monterey Pine	Category 1b
<i>Acacia mearnsii</i>	Black Wattle	Category 2
<i>Acacia melanoxylon</i>	Blackwood	Category 2
<i>Acacia baileyana</i>	Bailey's Wattle	Category 3
<i>Coleus neochilus</i>	Mosquito Spurflower	N/A
<i>Crassula sarmentosa</i>	Trailing Stonecrop	N/A
<i>Eucalyptus cladocalyx</i>	Sugar Gum	N/A

### 3. ALIEN INVASIVE VEGETATION SPECIES: CONTROL PLAN

The purpose of this Alien Invasive Vegetation Species Control Plan is to ensure compliance with applicable environmental legislation, specifically the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) and the associated Alien and Invasive Species Regulations (October 2014, as amended). The plan provides guidance to the property owner regarding the removal and ongoing management of alien invasive plant species identified on the property. The scope of this plan is limited to invasive plant species recorded or likely to occur on the site, as identified through the specialist assessment. No invasive animal species were observed during the site assessment and are therefore not addressed in this plan.

#### 3.1. Strategic Objectives

##### Objective 1 – Prevention:

To implement measures that prevent the introduction of NEM:BA-listed alien invasive vegetation species onto the property, and to prevent the spread of such species to neighbouring properties.

##### Preventative actions:

- No listed alien invasive plant species will be planted.
- Areas bordering the neighbouring land will be prioritised for control to prevent existing invasive plants from spreading beyond the boundaries of the property.

- These prevention measures will be communicated to all users of the property (where applicable).

### Objective 2 – Early Detection and Rapid Response:

To put measures in place whereby new and secondary invasive species are detected early and removed before establishing sustainable populations and start spreading (Early Detection and Rapid Response).

Early Detection and Rapid Response actions:

- Regularly survey the property to detect any new or emerging invader plant species.
- Report category 1a species immediately to the Department of Forestry, Fisheries and the Environmental (DFFE) and ask for assistance with the control of the species.
- Do not allow emerging or new species to produce seeds or off-spring, or start growing vegetatively, act immediately by removing them.
- Update species list by including these species and indicate where on the property they were located.
- Increase surveillance in the areas where the species occur to ensure the plants re-sprout or re-occur.

### Objective 3 – Restricted Activities and Duty of Care:

To adhere to Restricted Activities and Duty of Care as determined by NEMBA & Regulations concerning invasive and alien species.

Actions NEM:BA Regulation 6(a-g) Restricted Activities:

- Prevent spreading or allowing the spread of any specimen of a listed invasive species.

Actions Section 69 & 71 Duty of Care relating to alien species:

- Take all required steps to prevent or minimise harm to biodiversity.
- Notify the competent authority, in writing, of the listed invasive species occurring on the property.
- Take steps to control and eradicate the listed invasive species and to prevent it from spreading.

### Objective 4 - Appropriate means and method of control:

To ensure the means and methods of control are appropriate to the species and environment and are implemented in such a way that it minimizes the risk to biodiversity and the environment.

Actions to ensure appropriate means and control methods:

- Implement measures to prevent the starting of wildfires, including spreading to neighbouring land and to be ready and able to combat fires on the farm should they occur.
- Mechanical and hand tools must be best suited to the work and the size of plants being cleared and in a good working condition.
- Control methods must be appropriate for the species and the environment.
- Control methods are to be implemented in such a way that it prevents harm to biodiversity and the environment.

### Objective 5: Fire prevention and preparedness:

Implement measures to prevent the starting of wildfires on the property, wildfires spreading to neighbouring land, and ensuring fire-preparedness and ability to combat fires on the property should they occur.

Fire prevention and preparedness actions:

- Manage fuel loads by controlling invasive plants.
- Join the Fire Southern Cape Fire Protection Association (SCFPA).
- Prepare and maintain a fire break around the property (if recommended by the SCFPA).

### **3.2. Management Units**

To facilitate the effective removal and management of alien invasive vegetation on Portion 104 of Farm 216, the property has been divided into clearly defined management units. The delineation of these units was informed by the findings and recommendations of the Terrestrial Plant Species Specialist (Capensis, 2024), together with consideration of the proposed development footprint and identified no-go areas.

For practical management purposes, the internal access road that traverses the property has been used as the primary boundary between management areas. As a result, all areas located east of the internal access road are classified as Management Unit 1, while all areas located west of the road are classified as Management Unit 2.

This simplified division allows for efficient implementation of alien clearing operations, as the road provides clear access routes and logical working boundaries for clearing teams.

It should further be noted that areas earmarked for development are excluded from the management units, as these areas will be transformed as part of the authorised activities. The management units therefore apply only to the remaining natural or semi-natural portions of the property located outside the development footprint.

- Recommended priority order

<b>Priority</b>	<b>Management Unit</b>	<b>Reasoning</b>
1 <sup>st</sup>	Management Unit 1 (Eastern Portion – ±28 537 m <sup>2</sup> )	This area is easily accessible from the internal road and contains portions of degraded vegetation where alien invasive plant species are present. Early intervention in this unit will assist in preventing further spread towards the estuary and surrounding natural vegetation.
2 <sup>nd</sup>	Management Unit 2 (Western Portion – ±56 315 m <sup>2</sup> )	This unit represents the larger portion of the property and will require a phased approach to alien clearing due to its extent. Clearing operations can be implemented progressively from the internal road outward to

maintain manageable working areas and effective follow-up control.

To meet the objectives of this control plan, a systematic and ongoing alien clearing programme, consisting of initial clearing followed by regular follow-up control, must be implemented across both management units. This programme should follow the recommended methods and timelines provided by the terrestrial biodiversity specialist to ensure sustained suppression and eventual eradication of invasive alien plant species on the property.



Figure 2: Management Unit Map of Portion 104 of Farm 216

### 3.3. Eradication methods

Various eradication and control measures may be applied to each of the listed invasive alien vegetation species. It is important to note that this report provides recommendations only. The responsibility lies with the property owner to ensure that monitoring is carried out effectively, with no deviation from the suggested methods. It will be recommended that an Environmental Control Officer (ECO) be appointed to monitor the progress of the alien invasive vegetation clearance to ensure compliance with the proposed methodology and environmental legislation.

- Felling:

- This applies to species of invasive plants that cannot regenerate by coppicing e.g. most pine species. Cut horizontally and close to the ground as possible.
- Cut material (biomass) needs to be removed / stacked depending further use or burnt / chipped.

- Felling and Herbicide Treatment:
  - This method applies to alien invasive vegetation species that can regenerate by coppicing (regrow from the cut stump). When felling. Always cut the alien invasive vegetation species as horizontal and close to the ground as possible so as not to leave sharp points that could be a danger to others.
  - A registered herbicide with the Department of Agriculture is then applied to the cut stump.
  - A sticker agent may also be needed depending on the type of herbicide used plus the use of vegetable dye should be added to your herbicide mix to allow for tracking of what has and what has not been sprayed.
  - Herbicide when used in this method is applied via solid cone nozzle the herbicide must be applied to the cut stump as soon as possible to allow the herbicide to be absorbed by the plant via the *xylum phloem* canals (a plants version of veins and arteries).
  - These veins are found cambium layer which is the area between the bark and the wood, and this is where the herbicide must be applied. i.e. the outer rim of the cut stump.
  - Cut material (biomass) needs to be removed / stacked depending further use or burnt / chipped.
- Ringbarking:
  - Used on alien invasive vegetation species in areas where it is impossible to remove the biomass or where felling would damage the surrounding indigenous habitat.
  - This involves simply cutting a ring half a meter up the tree's trunk exposing cambium layer then painting the exposed cambium layer with approved herbicide from the Department of Agriculture.
- Folio Spraying with Herbicide:
  - This method is mainly restricted to follow up phases over areas where the seed bank has germinated on mass.
  - When doing this wait till the newly germinated alien invasive vegetation species have reached a height of 1 meter as at this point of growth this will result in killing the early and late germinating seedlings.
  - This process will have to be repeated depending on the depth of the seedbank which correlates to the frequency of germination
- Hoeing / Pulling by Hand:
  - This method should be a way of life i.e. if alien invasive vegetation species is observed, hand pulling is recommended where possible. It is best to pull by hand after rainfall.

### **3.4. Targets and Timeline**

The primary objective of this Alien Invasive Vegetation Management Plan is to achieve the systematic removal and long-term control of alien invasive vegetation across Portion 104 of Farm 216 within the first five years of the operational phase of the development. Clearing activities are therefore not expected to commence during the construction phase, as the property owner will prioritise construction activities during this period. Instead, alien clearing will begin once the development enters the operational phase, allowing sufficient time and resources to be allocated to the implementation of the clearing programme.

The clearing programme will follow a phased approach aligned with the defined management units. Areas with higher levels of disturbance and easier access will be prioritised first, followed by the larger management unit covering the western portion of the property. Initial clearing will be followed by routine follow-up clearing to remove regrowth and emerging seedlings, ensuring that alien invasive species are progressively reduced and ultimately eradicated from the property within the five-year implementation period.

Management Unit	Initial Clearing	Follow-Up Clearing	Notes
Management Unit 1 (Eastern Portion – ±28 537 m <sup>2</sup> )	Year 1 – Year 2 of operational phase	Year 2 – Year 5	Priority area due to accessibility and proximity to the estuary. Early clearing will reduce the risk of further spread into surrounding natural vegetation.
Management Unit 2 (Western Portion – ±56 315 m <sup>2</sup> )	Year 2 – Year 3 of operational phase	Year 3 – Year 5	Larger management unit requiring a phased clearing approach. Follow-up clearing will focus on removing regrowth and seedlings following the initial clearing phase

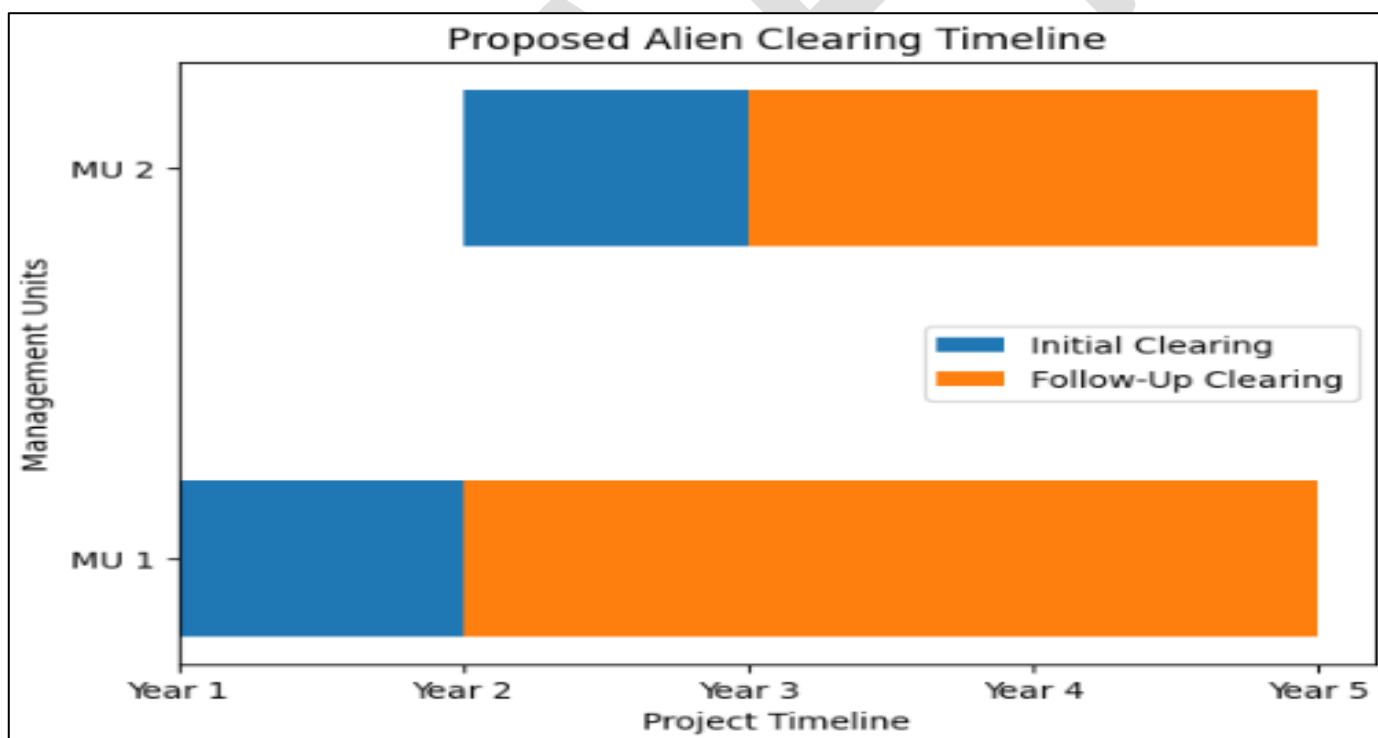


Figure 3: Timeframes associated with each management unit

### 3.5. Responsibilities and Requirements

Successful implementation of this Alien Invasive Species Control Plan depends on the clear allocation of roles and responsibilities among all parties involved. This section defines the duties of the Property Owner, the appointed contractor / alien invasive vegetation removal teams, the recommended Environmental Control Officer (ECO), and the relevant authorities, including the Department of Forestry, Fisheries and the Environment (DFFE) as the competent authority and the Knysna Local Municipality.

- Property Owner:
  - Must ensure that the clearing team follows the approved methodology.
  - Must provide access to all parts of the site, facilitate safe working conditions, and make available any necessary resources to support proper clearing, biomass disposal, and site rehabilitation.
  - Must ensure that only approved herbicides are used and that all herbicide use is recorded and stored safely in compliance with applicable legislation.
  - Responsible for ensuring that erosion control measures and any required restoration actions are implemented immediately after clearing to prevent soil loss and to encourage recovery of indigenous vegetation.
  - Must remedy any damage to the environment caused by their activities or by the actions of the appointed contractor.
  
- Contractor / Alien invasive vegetation removal teams:
  - Responsible for carrying out alien vegetation clearing on site in line with the approved methodology.
  - Must ensure all staff are trained and competent in safe alien clearing practices, herbicide application, and environmental protection measures.
  - Must follow occupational health and safety requirements on site, including the use of PPE (personal protective equipment) and safe storage and handling of herbicides.
  - Must keep detailed records of the areas cleared, the density of infestations removed, quantities and types of herbicides used, and any follow-up treatments done.
  - Must report progress and any problems to the Property Owner and appointed ECO.
  
- Environmental Control Officer (ECO) (Recommended):
  - Should be formally appointed to oversee the clearing operation to ensure it is done in accordance with this plan, the National Environmental Management: Biodiversity Act (Act 10 of 2004), and relevant Knsyna Municipal and DFFE requirements.
  - Must conduct site inspections during clearing operations at the start and end of each management unit to verify compliance with approved methods and identify any non-compliance or risks of environmental damage.
  - Must monitor that erosion control and rehabilitation measures are effectively implemented after clearing.
  - Must provide guidance on adaptive management if unforeseen site conditions arise.
  - Must maintain a record of site visits, findings, and recommendations and submit progress reports to the Property Owner and Competent Authority.
  
- Department of Forestry, Fisheries, and the Environment (DFFE) (Competent Authority):
  - Holds the authority to enforce compliance with the National Environmental Management: Biodiversity Act and the Alien and Invasive Species Regulations.
  - May inspect the property at any stage to verify that the clearing is being done in line with the approved plan.
  - Reviews any required reports or follow-up plans as part of the duty of care.

- Knysna Local Municipality:

- Responsible for local oversight within its jurisdiction, ensuring that landowners meet their environmental management obligations.
- May provide additional guidance on waste disposal (e.g., transporting cleared biomass to approved Green Waste sites) and erosion control best practices.

### 3.6. Monitoring and Evaluation

Monitoring involves repeated observations or recording of data to be able to track progress and determine the efficacy of control methods. A very basic monitoring programme applies to private land. A monitoring report must be produced following this basic monitoring programme, either by the property owner, or the recommended ECO.

WHAT	FREQUENCY	HOW	RESPONSE
How effective are the control methods	4-6 months after every operation	Survey cleared areas and look for regrowth	Continue with methods or adapt to be more effective
Do the infestation levels decrease	Annually	Visual, photos	Continue clearing – you are doing well
How much herbicides were used	After every operation	Herbicide records / register	Keep track of cost and ensure no wastage
Does the forest recover in the cleared areas?	Annually	Photos, survey	If it does – you are doing well, if not, look at clearing methods, clearing intervals or consult an expert
How many jobs were created	After every operation	Timesheets	Send to DFFE

### 4. CONCLUSION AND RECOMMENDATIONS

This Alien Invasive Vegetation Management Plan has been prepared as part of the Basic Assessment process for the proposed development on Portion 104 of Farm 216, Uitzicht, Knysna. The plan forms a precautionary management framework to guide the control and progressive eradication of invasive alien plant species on the property and will be submitted as part of the Basic Assessment Report (BAR) and Environmental Management Programme (EMPr). Implementation of this plan will be subject to the conditions of the Environmental Authorisation should such authorisation be granted by the competent authority.

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**ANNEXURES**

## Annexure A: Fire Prevention and Contingency Planning

To minimise the risk of wildfires starting on Portion 23 of Farm 186, and to reduce the chance of fires spreading to neighbouring properties, it is strongly recommended that the property owner joins the Southern Cape Fire Protection Association (SCFPA). Membership will provide guidance on local fire risk management and best practices.

In line with the National Veld and Forest Fire Act, 1998 (Act 101 of 1998), all landowners have a legal duty to take reasonable steps to prevent, control, and extinguish wildfires. This includes preparing and maintaining fire breaks to the standards set out by the SCFPA. Failure to comply may result in liability for damage caused by uncontrolled fires spreading from the property.

Fire breaks must be planned and maintained to:

- Be wide and long enough to reasonably prevent a veldfire from spreading to or from neighbouring land.
- Be designed to avoid causing soil erosion.
- Be kept clear of flammable material that could carry a fire across it.

It is further recommended that the landowner:

- Maintains membership in the SCFPA and follows any specific fire management recommendations they provide.
- Keeps firefighting equipment in good working condition and has trained personnel available to respond to fires.
- Notifies the SCFPA and neighbouring landowners in advance of any planned burns, and takes reasonable steps to stop the spread of fires should they occur.
- Ensures that, in an emergency, appropriate access is available for officials and emergency responders to enter the property and suppress fires.

Bringing alien invasive plant infestations under control is also a critical step in fire management, as alien-infested areas can burn hotter and spread fires more rapidly than intact indigenous fynbos.

## **Annexure B: Fire Prevention and Contingency Planning**

It is the landowner's responsibility to ensure a safe working environment and that the teams working on the property adhere to the minimum safety requirements. This can be achieved by sourcing appropriately trained and experienced teams. The principle of "leave no trace" applies.

The landowner should liaise with the contractor to ensure the following minimum SHE requirements are adhered to:

### **Toilet facilities**

- The contractor is responsible for providing a mobile toilet on site for the duration of the work (it is not in all cases possible to provide a mobile toilet, where the field conditions are not suitable for a mobile toilet, human waste should be buried by digging a hole of at least 20 cm deep)
- Clean water must be made available in suitable containers for drinking and mixing herbicides

### **Team's skills requirements**

- Chainsaw operators in possession of valid certificates
- Herbicide applicators certified

### **Work methods and equipment**

- Equipment must be suitable for the work and in good working condition
- Adhere to work methods stipulated in the site specification

### **Vehicle and driver**

- The driver must be in possession of a valid PrDP
- The vehicle must be roadworthy
- Tools must be transported in the trailer, separately from the workers

### **Safety precautions**

- Certified SHE Rep on site
- Certified Safety Office on site
- The SHE Rep must conduct daily safety talks
- The first aid kit must be on site

### **COID**

- The contractor must be in possession and present proof of a valid certificate of good standing with the Compensation Commissioner
- Any incidents must be reported to the landowner
- An indemnity form must be signed stating that the contractors accepts full liability for any COID related matters and that the landowner will not be held liable should the contractor not comply with minimum standards
- The contractor deals with COID cases and not the landowner
- Near misses, incidents and accident register must be kept

### **Insurance**

- The contractor must be appropriately insured for the vehicle and equipment
- The contractor must provide proof of third party and liability insurance
- Sign an agreement whereby the contractor accepts liability for damages in case of negligence

## Storage of fuel and herbicides

- Fuel and herbicides must be left in a shady area, away from the resting/eating area
- The area must be clearly marked with bunting
- The bunting must be removed on completion of the job
- Herbicide mixing and refuelling must be conducted on a spill blanket
- A spade must be on site to cover any accidental spillage
- A serviced and functional fire extinguisher must be kept at the fuel refilling area

## Preventing fires

- No smoking while working, assign a designated smoking area
- Remove cigarette butts
- No smoking during windy conditions
- Keep 1 fire beater for every team member within reach of the workers
- No chainsaw work during Code Red days - Fire Danger Indices (FDIs) obtainable from FPA

Correct PPE that should be worn

Item	Supervisor	Machine operator	General workers SHE Rep; 1 <sup>st</sup> Aid Rep; Driver	Specialized herbicide applicator
Sunhat (follow up operations)	✓	✓	✓	✓
Hard hat (when chainsaws are being used)	✓	✓	✓	✓
Hard hat with visor and certified earmuffs (SABS or EU),	x	✓	x	x
T-shirt	✓	✓	✓	✓
Conti suit	✓	✓	✓	✓
FESA approved chainsaw pants (eleven layers) with broad belt or braces	x	✓	x	x
Whistle	✓	✓	x	x
Safety boots	✓	✓	✓	✓
Gumboots (only when working in riverine/wetland areas)	✓	✓	✓	✓
Chainsaw safety boots	x	✓	x	x
Gloves	✓	✓	✓	✓
Chainsaw operators gloves	x	✓	x	x
Safety goggles	✓	✓	✓	✓
Cape (when using a knapsack)	x	x	x	✓
Mask (when applying herbicides)	x	x	x	✓
Rubber gloves (for mixing herbicides)	x	x	x	✓
Rubber apron (for mixing herbicides)	x	x	x	✓
Rain suit (during rainy conditions)	✓	✓	✓	✓

It is recommended that the requirements are stipulated in the work specifications and the contractor accept accountability in writing.