# **CHAPTER 3**

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**Supplementary Material: Specialist Report** 

(B) Vegetation and flora report

1	
2	BOEGOEBAAI STRATEGIC
3	ENVIRONMENTAL ASSESSMENT
4	
5	FLORA OBSERVATIONS OF THE BOEGOEBAAI PORT DEVELOPMENT
6 7	SITE AND SURROUNDING AREAS, RICHTERSVELD MUNICIPALITY, NORTHERN CAPE, SOUTH AFRICA
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10	(B) VEGETATION AND
11	FLORA REPORT
12	
13	Report compiled by:
14	Pieter C.V. Van Wyk
15	
16	
17	May 2025
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19	
20	Report prepared for:
21	Council for Industrial and Scientific Research
22	

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### INTRODUCTION

The Richtersveld region already contained 336 known endemic plant taxa by 1999 (Cowling et al. 1999), however continuous new discoveries proofs that this figure is exceeded by far (Van Wyk et al. 2024). It is acknowledged as one of the richest desert floras of the planet (Cowling et al. 1998) and forms part of a 'biodiversity hotspot' defined to set conservation priorities (Meyers et al. 2000).

The introduction of the Biome concept, based largely on a classification of growth forms and major climatic determinants has led to the description of South Africa's 7 biomes. Of these biomes Fynbos, Succulent Karoo and Nama Karoo Biomes occupy southern Africa's southwest winter and summer rain fall region (Rutherford & Westfall 1986) and a later introduced biome, the Desert Biome (Rutherford & Westfall 1994). A map introducing the seven biomes of South Africa, namely: Savanna, Thicket, Grassland, Forest, Fynbos, Nama Karoo, Succulent Karoo, and Desert were introduced later (Rutherford & Westfall 1994; Low & Rebelo 1996; Mucina and Rutherford 2006). The Richtersveld is unique in that it is situated within four of these biomes, namely the Succulent Karoo Biome, Desert Biome, Fynbos Biome and Nama Karoo biome (Jüergens 1991), and this is possibly the main reason for the unusual high biodiversity found within the area, even though the aridity and harsh climate. Of these biomes the Fynbos and Succulent Karoo biomes have recognition as two of Earth's biologically richest and most endangered terrestrial Eco regions (Mittermeier et al. 1999). The Boegoebaai Port project falls within the Succulent Karoo Biome.

Looking past the biome level and more towards a human introduced border, such as a municipal area, the Richtersveld Municipal area has a figure of endemic flora, total number of flora and endangered flora as well as vegetation units, exceeding by far, any municipal area in the Northern Cape Province (Van Wyk et. al. in prep.). Even though the Richtersveld Municipal area has the lowest annual average rainfall of any municipal area in the province, the biodiversity is unlikely elsewhere and this is greatly contributed towards the complexity of the region's geology, topography, climate, and long climate as well as geological stability. Keeping this in mind, should there have been a scale for rating districts and municipal areas according to their importance to biodiversity, the Namakwa district and the Richtersveld Municipal Area (see Image 1) would have rated as the most important in the Northern Cape Province.

 Of all the species and ecosystems found within the Richtersveld Municipal Area, the Alexander Bay Lichen Fields is by far thee-most extraordinary ecosystem, not only in the region but on earth. The Alexander Bay Lichen fields falls under the Namib Lichen Fields and is a South African Heritage Site It is also one of the most threatened habitats in the world! The lichen fields are the largest and richest of its kind in the world, and they are considered an ecological wonder by scientist across the world, due to their density and species richness. Due to its uniqueness the Alexander Bay Lichen Fields, they have received a conservation aim of being conserved 100% (Mucina and Rutherford 2006). Not well documented but of equal importance and uniqueness are the lichen fields found on the Boegoeberg South and Boegoeberg North hills.

Over the past years rare and new endemics species are still being discovered in the Richtersveld whilst at the same time species are disappearing (Van Wyk et al. 2024). More than 90 years of mining, bad agriculture practices and land use transformation has let to what scientist referred to as the perfect storm (Jurgens et al. 2025). Mass\_desertification are causing extinction, this desertification are anthropogenic. One can clearly see how species are becoming more endangered by looking at the species listed for the Richtersveld Municipal area on the SANBI Red List (see table 4). It is this also a fact that the Richtersveld Municipal area is the most threatened municipal area in regard to biodiversity of any municipal area in the Northern Cape Province. The level of threats can also be seen in the recent publication of species richness of the Richtersveld National Park, which proved that the Richtersveld National Park has the highest number of red listed species, of any of South Africa's National Parks.

As a result of the threats, in 2015 the South African National Biodiversity Institute (SAMBI) joined forces together with South African National Parks (SANParks) to reassess the endemic flora of the Richtersveld. A first up-listing of plant taxa from this region, where completed in 2015, which was published on the South African Red List of Endangered species (Raimondo et al. 2015) (see image 3). A second phase of updating the red list statuses of flora from the region commenced in 2022 and several species were up listed on the red list in 2023 (Raimondo et al. 2023), mostly due to new threats mining posed along the Orange River. The need for a third up-listing of species, due to threats becoming more, was commence in 2024, as a result of the Boegoebaai Port related developments, and the impacts this development will have on species (Raimondo et al. in prep. 2025).

#### CHAPTER 3: SUPPLEMENTARY MATERIAL: VEGETATION AND FLORA REPORT (B)

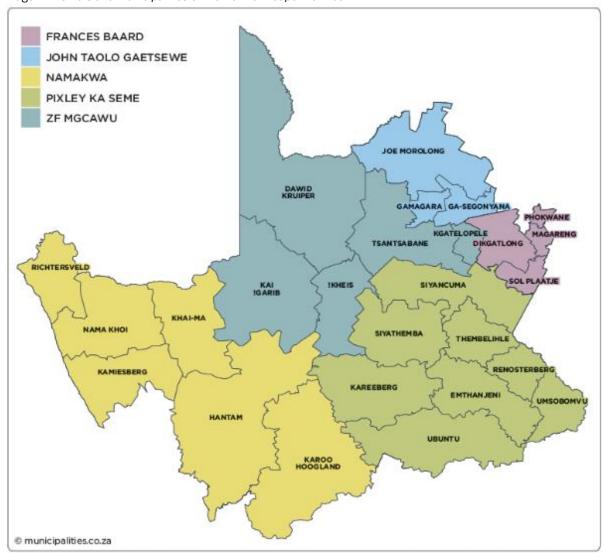
This report is a local-scale, spatially focused SEA report identifying sensitivities within and surrounding the proposed port and affiliated developments, including the SEZ development area covering  $\sim$ 33 500 ha ("Boegoebaai Port and SEZ SEA") as well as the surrounding area, the Richtersveld Municipal Area and sections of the Nama Koi Municipal area (Image 1 & 2).

Furthermore, this report was conducted using expert on-site, ground-truthing to produce high resolution spatial data, which are overlapped with existing database of plant species occurrence within the study area. From this data sensitive and non-sensitive areas could be pointed out. From the data collected for this report, unique habitat was also documented and mapped, of the most unique habitats, includes, lichen fields and plant communities associated with brant's whistling rats and heuweltjies. This report also explored the species richness of the Richtersveld Municipal area and includes a graph showing the number of threatened plant species as listed on the SANBI red list (Table 4, towards the end of the document) annually, and how the number of species becoming threatened are growing.

# STUDY AREA

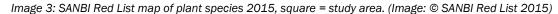
 The Study area includes the Richtersveld Municipal area and a small section of Nama Koi Municipal areas (Image 1 & 2). Both Municipal areas falls within a region known as the Richtersveld and Northern Namaqualand. The border of the study area in the east is the tar road between Steinkopf and Vioolsdrif, in the north the Orange River from Vioolsdrif towards Alexander Bay, in the west the shoreline between Port Nolloth and Alexander Bay and the southern border of the study area for this report is the tar road between Port Nolloth and Steinkopf. The core area of this report is the proposed port and SEZ development area covering 33 500ha known as the "Boegoebaai Port and SEZ SEA" (Image 2). The area is situated within the Richtersveld Municipality area, in the north-western corner of South Africa (Image 1), close to the small mining town of Alexander Bay and partly falls within South Africa's Succulent Karoo and Desert Biomes.

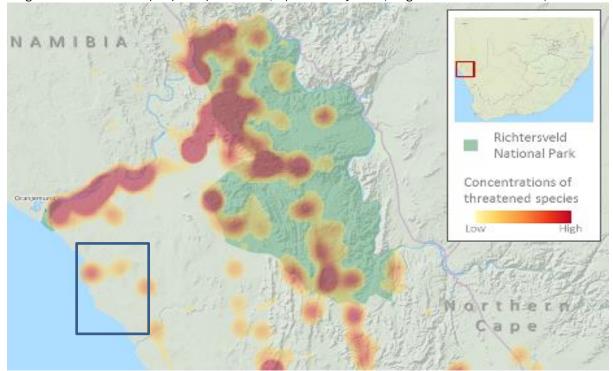
1 Image 1: Districts and Municipalities of the Northern Cape Province.



3 Image 2: Close up map of the 33 500ha study area (Image: © Google Earth 2023).







# METHODS AND MATERIAL

Before doing site visits, high resolution satellite images and the vegetation map of South Africa were studied. From this desktop activity, strategic points were chosen as samples sites within all land types of the core study area and some sampling surrounding this area. Hereafter, site visits were conducted. Whilst visiting strategic sites, any area which visually seemed unusual regarding plant communities, whilst on the site, were also visited.

When data was collected two methods of sampling were done, one was point sampling of individual species, uploaded onto iNaturalist or for which herbarium vouchers were collected and two, collective data collection within a  $10m \times 10m (100m^2)$  plot.

Sampling method one: data was gathered by taking photos of species, together with GPS and uploading the photos onto iNaturalist as well as adding the photos to a private photo herbarium for the Richtersveld bio region belonging to the author of this report). Encase species could not be identified, using photos, herbarium voucher collections were made, but only outside the restricted mining area, as no permission was obtained to collect herbarium vouchers within the mining area. When voucher specimens were collected, the following information was also collected using a standard Herbarium Collection Form: GPS coordinates, Altitude, Vegetation Type, Substrate, Moisture regime, Soil type, Lithology, Exposure, Aspect, Slope, Biotic effect, and Plant Features which included: growth form, height, flowering, or fruiting. Herbarium voucher of plants were pressed, frozen at -15°c after which it was dried at 65°c. Also included encase of species of special concern, counts of the species were done within a radius of 50m of the individual GPS point.

<u>Sampling method two:</u> data was gathered in a 100m² square plot of 10m x 10m, this was done several times within all land types, as well within various altitudes of the study site. Within each plot the following information was gathered: GPS, altitude, soil type, lithology, all floral taxa including higher plant taxa as well as lower, estimation crown coverage in percentage per species, overall percentage of vegetation cover, and counts of species of special concern. This methodology was used to compare the various plant communities within the land types.

#### CHAPTER 3: SUPPLEMENTARY MATERIAL: VEGETATION AND FLORA REPORT (B)

Plant species identifications was done by comparing herbarium material at Compton, Bolus, Stellenbosch, and SANBI, Pretoria Herbariums, or contacting taxonomic specialist where applicable. A Nikon SMZ800 microscope was used to examine finer detail.

Herbarium vouchers of Lichens and Mosses was also made from outside the mining area. When voucher specimens were collected, the following information was also collected using a standard Herbarium Collection Form: GPS coordinates, Altitude, Vegetation Type, Substrate, Moisture regime, Soil type, Lithology, Exposure, Aspect, Slope, Biotic effect, and Plant Features which included: growth form, height, fruiting and photographs for colour references of species. When sampling the lichen, mosses, and liverworts they were collected within  $100m^2$  quadrants. Within these quadrants all lichens & bryophytes seen were sampled, those on rock were chiselled from the rock with a piece of substrate still attached, those on plant material were sampled with the plant material be it branch or leaf and those on soil were gently removed from the soil and wrapped in acid free toilet paper (to prevent crumbling of the thallus and the soil which keeps the lichen in one piece). These were then placed in plastic containers to prevent damage to the voucher specimens. Processing of the voucher specimens were done at a later stage, for this they were carefully removed and sorted. Soil lichen was treated by brushing 20% cold glue mixed with 80% water on the lower part to prevent them from crumbling. The fruticose specimens were dipped in water and gently pressed to enable better mounting and storing of specimens.

Lichen species identification was done by observing them under a dissecting microscope (10x magnification eyepiece and 0.65 to 4.5x magnification, thus 6.5 to 45 x magnifications). The lichens are then separated into the same species within a sampling area and each species is then further identified by means of spot tests using iodine, a 10% solution of potassium hydroxide, and bleach. During a spot test a certain part of the lichen is tested, for example, the medulla or apothecia and its reaction to a certain chemical. Colour change or lack of colour change is noted and compared to keys for lichen identification. Lichens of the Namib Desert (Wirth, 2010) was used for identification of the voucher specimens. Some lichen specimens were given to lichenologist to examine and identify.

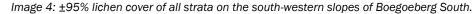
The conservation status was obtained by searching the SANBI Red List for each species (<a href="http://redlist.sanbi.org/">http://redlist.sanbi.org/</a>). Photos were also taken of different habitats, and notes made on any unique forms of fauna, soil, micro habitats ext., which contributes to any unique plant species or communities' existence.

# RESULTS

# **Species**

In total 69 10m x 10m plots were completed for this study (Image 26) and over 8 000 individual points of species were collected.

In total 331 higher plant taxa were recorded for the 33 500ha "Boegoebaai Port and SEZ SEA" planned development site (Table 1 & see Image: 2 for study area) and in total over 3 000 higher plant taxa and over 300 lower plant taxa for the Richtersveld Municipal area (Van Wyk personal observation). Lower plant taxa recorded were an astonish amount of 91 taxa, even though this was not the primary focus of this study. Most of the lower taxa were lichens, highlighting the richness and importance of the locality as a 'centre of diversity' for lichens, likely of global importance (Table 2). In combination the total floral taxa, including Spermatophyta, Bryophyta, Fungi and Lichens totalled at an astonishing 422 taxa for the 33 500ha "Boegoebaai Port and SEZ SEA" development area. In total 36 red listed taxa were recorded and in additional 15 species which will become of conservation concern should this development footprint not be shifted to west of the tar road between Alexander Bay and Port Nolloth, were recorded, this in total 51 plant species of conservation concern were recorded (Table 3). Of the red listed plant species within the study site, 4 species are already listed as endangered, and 5 species are listed as critically endangered.





3 Vegetation

This report does not include land types, but rather a brief description of some plant communities. From the various sampling sites of species in plots, it became clear that altitude as well as broader land types plays a much less important role in the distribution of species within the study site, it is rather soil chemistry and exposure to wind and fog that plays the more important roles. It became clear that looking at satellite images does not help much in defining the vegetation units of the study area. This said, looking at the vegetation types as described in South Africa for the study site, in the field made no sense. According to the vegetation types of South Africa, only 4 vegetation units are found within the core study area, however there are at least 8 main plant communities within the study site, which can be considered as "vegetation types". These communities are however interwoven in a complex matter making mapping a mess. Furthermore, during the research for this study, the difference in vegetation according to altitude was also explored, in the sense of highlands areas vs lowland areas, and again, this made no sense as over and over plant communities were found in the lowland and highland areas of the study site, depending on the soil conditions rather.

Here are a brief description and names of the various plant communities recorded within the study site:

#### Alexkor Moon Landscape

This vegetation exists out of two perennial species, a species of *Caroxylon* (ganna) and *Osteospermum polycephalum* (janneper se kaneel), which are extremely sparsely distributed within vast sections of the mining area south Alexander Bay. Where these species are found in combination, the previous plant communities have been 100% destroyed by the mines, this waist land has zero chance of recovery and in

#### CHAPTER 3: SUPPLEMENTARY MATERIAL: VEGETATION AND FLORA REPORT (B)

comprises most of the yellow areas marked in Image 22 of the report. Plots including this plant community: AL11; AL29-AL32.

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### Boegoeberg Strandveld

- This vegetation is poor in species generally, with one to two species of special concern. It comprises of a combination of vegetation found on bright white dunes, which are dominated by *Cladoraphis cyperoides* (steekbiessiegras) and *Tetraena clavata*. The poor species cover within this vegetation is likely due to exstreme sand blasting caused by unrehabilitated mine quarries and comprises of 50% of the area west of the tar road between Port Nolloth and Alexander Bay. Plots including this community: AL8-9; AL14-16;
- 9 the tar road between Port Nolloth and Alexander Bay. Plots including t 10 AL18; AL27-28; AL66.

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### Boegoeberg Dwarf Succulent Shrubland

- All quarzitic rocky outcrops within the study area shares the same plant community structure. These
- communities are uniquely different to the plains east of Alexander Bay and any rocky areas elsewhere in
- the Richtersveld. This is also the smallest plant communities even though the most species rich. Several
- narrow endemics and two localized endemics are found on these. The most dominant features are the
- 17 presence of Antimima perforata, Conophytum saxetanum and various dwarf species of Crassula such as C.
- plegmatoides. Plots including this plant community: AL1-7 and AL67-68.

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#### Silty Plains Scorpiontail Succulent Shrubland

- 21 This is the most widespread plant community within the study area. Even though much poorer than the
- yellow and red dunes as well as rocky areas, this unit still host several unique species. The most dominant
- 23 species in this unit is Mesembryanthemum pseudoschlichtianum (skerpioenangel), Lampranthus
- 24 otzenianus, Amphibolia succulenta and Mesembryanthemum dinteri. Plots including this plant community:
- 25 AL13; AL21-23; AL37-38; AL44-48; AL53-58; AL60-63.

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#### Rooi T'kooi Succulent Shrubland

- 28 This plant community is found on yellow dune sand throughout the study site and predominantly
- dominated by Stoeberia utiles (rooi t'kooi). It host the highest species numbers and tallest vegetation
- 30 within the coastal plains of the region. Plots including this plant community: AL19-20; AL24; AL35-36;
- 31 AL39-43; AL49-52; AL59; AL64-65.

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#### Vaal T'kooi Dwarf Succulent Shrubland

- 34 This plant community consist out of dwarf succulents, of which Stoeberia beetzii (vaal t'kooi) is most
- 35 dominant and *Drosanthemum luederitzii*. This combination of plant species are found on pale loamy soils,
- 36 sometimes with calcrete and quartz pebbles and are extremely spotty, sometimes appearing as if
- 37 heuweltjies, however these are likely remnants of old brant's whistling rats nests. Plots including this plant
- 38 community: AL10; AL25-26.

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#### Salt Marsh

- 41 Plant community which grows in high salinity and damp soil, with three springs which include sedges such
- 42 as Juncus acutus subsp. leopoldii, and salt pans with Limonium dyeri and Frankenia pomonea. Plots
- 43 including this plant community: AL12.

# Namib Lichen Fields

This included areas where there are high presence of *Caloplaca* and *Xanthoparmelia* species on the soil and small stones which are typically associated with the same type of habitats and species within the Namib Desert. Plots including this plant communities: AL17; AL23.

Image 5: Unique combination of succulents on Boegoeberg North.



Image 6: Unique lower plant taxa, lichens and moss species on Boegoeberg North.



1 Image 7: Boegoeberg endemic, undescribed species of Antimima.



Image 8: possible new species of soil orchid from Boegoeberg belonging to the genus Holothrix.



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Most significant are the Boegoeberg North and Boegoeberg South plant communities, which in combination of succulents and lichen cover should be considered of global uniqueness (see Images 4-8). Furthermore, the several localities of Namib desert lichen fields, which has a very limited distribution in South Africa, are also unique of the core study area (see Images 9-11). Other unique vegetation containing high density of lichen cover on shrubs, was also observed, some of these sites might potentially hold the highest % of lichen cover biomass for any vegetation units on the coast of South Africa (see Images 12-13).

A unique discovery was also made during this study. Thousands of active Brant's Whistling Rats (*Parotomys brantsii*) nests which are active where discovered. The positive reaction of plants to the activities of these rodents made it clear that they are important ecosystem engineers, which has been transforming the plant community structure, possibly for hundreds if not thousands of years. Each den may have several rats, and there are thousands of dens within a large section of the planned Boegoeberg development area (see *Images 14-16*).

Another unique vegetation feature within the footprint area which has a fauna component attached to it, is large sections of heuweltjies, where Harvester Termites (*Hederotermis*) are ecosystem engineers, creating special nutrient rich loamy soils, which create habitats for certain plant species. A paper was published in 2024 about the importance of heuweltjies and evidence provided by the Stellenbosch University that some of these termite colonies has been occupied for tenth of thousands of years and are carbon zincs of global importance (see *Images 17-19*).

The study area includes a newly discovered, species of *Pelargonium*, which made headlines in media, 2023 (see *Image 20-21*). There might still be several unknown species, especially geophytes within this study site.

Image 9: Caloplaca elegantissima



Image 10: Xanthoparmelia walteri

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Image 11: Stony flats at Duikerkop, containing several Namib Desert Lichen species.



Image 12: Strandveld vegetation covered with over 60% Xanthodactylon species on woody shrubs.



Image 13: Xanthodactylon turbinatum densely covering wood, and a green Ramalina fimbriata.



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Image 14: Google Earth Image of Brant's whistling rats nest/dens north of Duikerkop, showing unique patterns of vegetation associated with these rats.



Image 15: Ground view of Brant's whistling rats nest/dens.



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Image 17: picture showing less vegetated area of Heuweltjie, always associated with Mesembryanthemum and Eberlanzia plant species.



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Image 18 © Google Earth: map showing distribution of heuweltjies, which forms par of the Richtersveld Scorpiontail vegetation units. This area is of high sensitivity, and found on the Swartbank to Holgat River area.

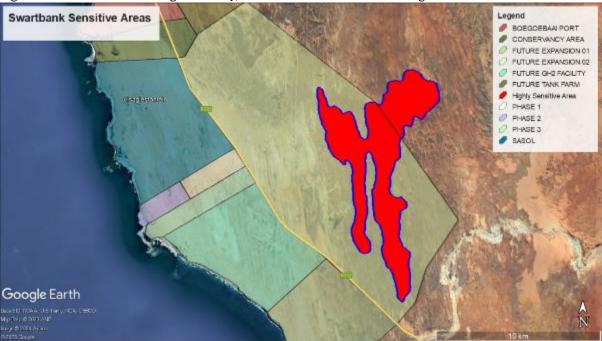


Image 19: dark material are termite fras always found in the centre of active heuweltjies.



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Image 20: map of highly sensitive vegetation on Visagiesfontein hill.

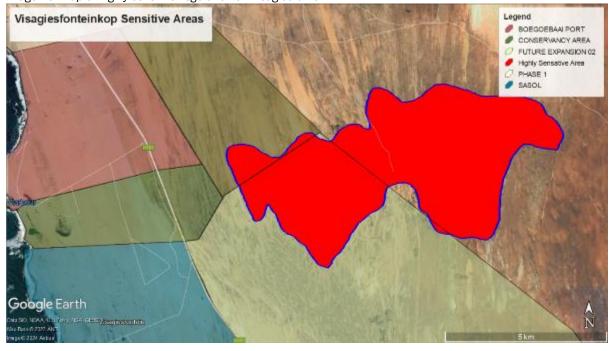


Image 21: Newly discovered Pelargonium from Visagiesfontein hill by the author of this report.



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## DISCUSSION: SENSITIVITY OF THE DEVELOPMENT SITE

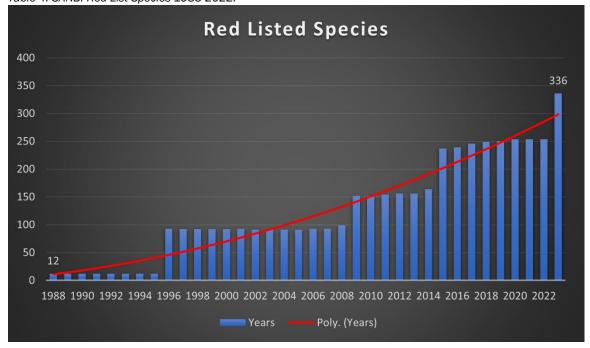
During the botanical survey several new and rare discoveries were made on both fauna and flora. From the data collected I was able to map sensitive habitats as well as habitats which are not sensitive. Habitats with low sensitivity is because of past and present mining impacts. There are large sections of vegetation, where not more than 10 species of plants occur, of which non has threatened status, and in some cases, there are large areas in the mine which has no plants, insects nor birds, due to past mining damage. These areas trigger no environmental conservation red tape and should be chosen for development in the future (see *images* 22-24).

Combining my data from the recent survey with that of 22 years of collecting data in the Richtersveld area, I could create a map showing the medium to high sensitivity areas of the whole Richtersveld region, which should not be considered for any further development or human induces stresses, in red, and the areas in yellow, are biodiversity-dead areas due to past disturbances, with little to no chance of ever recovering (see *image* 25).

The high plant taxa within this study site, as well as the high number of species of conservation concern, highlights the importance of this site for conservation. The areas not destroyed by mining directly or indirectly are still of high sensitivity and should not be developed. Overall keeping in consideration the high species numbers, any form of development in a region such as this can be devastating to the environment.

Important to note is the overall sensitivity of the landscape chosen for this large-scale development. The Richtersveld Municipal area already suffered a lot under land use changes and climate change. In Table 4 are an example of how the number of species being threatened has grown for the Richtersveld between 1988-2022. Due to the development of the Boegoebaai Port and green energies, including all secondary developments because of the future establishment of the port, more than 100 species additionally will be listed, making the Richtersveld the locality with the highest number of threatened species on the African continent (Van Wyk personal observation).

Table 4: SANBI Red List Species 1988-2022.



Regarding sensitivity of the lichen fields, even if not within the direct foot print of the port, are the following case study: In the 1800s independent observations in England, Munich, and Paris documented that lichens were already disappearing from urban areas. By the early 1900s this "city" effect was a widely recognized phenomenon in Europe and was first attributed to coal dust, which was emitted by most homes as well as many industries. Only later did the colourless gas, sulphur dioxide, become recognized as a

principal phytotoxic agent. Today the list of air pollutants is much longer and includes oxidants, hydrogen fluoride, some metals (Section 12.7), acid rain, and organics. Certainly, the list of potentially toxic substances is not yet fully circumscribed. The high sensitivity of lichens is related to their biology. Most species live for decades or hundreds of years and a few longer; thus, as perennials, they are subject to the cumulative effect of pollutants. Lichens have no vascular system for conducting water or nutrients; as a consequence, they have developed efficient mechanisms for taking up water and nutrients from atmospheric sources. Fog and dew are major water sources for lichens, often have much higher pollutant concentrations than precipitation, and the lichens' nutrient concentration mechanisms also will concentrate pollutants. Unlike many vascular plants, lichens have no deciduous parts, and hence cannot avoid pollutant exposure by shedding such parts (Hawksworth 1971; Nimiset al. 2002, Nash, T.H., III 2008). There is evidence that the nearby tar road between Port Nolloth and Alexander bay has had a negative effect on the Alexander bay Lichen Fields due to air pollution by vehicles (Jurgens, Mucina and Rutherford 2006). An unknown lichen fields of almost equal importance also occurs on the south-western slopes of Boegoeberg hills which are currently being negatively impacted by mining. The proposed refineries of Oil and other mineral, as well increase air pollution by sea vessels, trains and more vehicle traffic could have a devastating effect on the lichen fields of the region.

The importance of biodiversity within the Richtersveld Municipality and some sections of the northern Nama Koi Municipality of the Northern Cape Province, cannot be stretched far enough. Scientific explorations especially over the past few decades provided evidence that vast areas of this region are of global importance due to high levels of endemism unlike elsewhere on earth. Regardless of the importance, recent research showed that this biodiversity hotspot is under immense pressure of degradation due to bad anthropogenic land use practices (Jurgens et al. 2025), which should raise great concerns for the region. Should mega developments such as the Boegoebaai port, railway, green energies and other developments roll out, not only in the Richtersveld Municipal area but also in the Sperrgebiet of Namibia.

Given the low rainfall, aridity and past damaged caused by the mines within the core development area, the higher plant taxa are still significantly high, indicating the uniqueness of the chosen locality for this development. Most species were recorded on rocky outcrops and in the area east of the Port Nolloth – Alexander Bay tar road, where mining impacts has been way less.

#### CONCLUSIONS

The Boegoebaai development area falls within a highly sensitive habitat, already severely impacted by 99 years of diamond mining. The locality for the 'harbour' or 'port', close to the Boegoeberg twin hills, should be shifted either to the north or south of these two mountains. The reason being that there is still natural vegetation between these two hills which contains unique endemic vegetation. The area between the two mountains, likely form a unique microclimate, due to the two hills forming a wind shelter, this could be observed by the high presence of lichens and snake species such as dwarf beaked snakes on the northern side of Boegoeberg South. Furthermore, the rocky areas overlooking the ocean, at the planned harbour wall site, contains the highest concentration of *Crassula plegmatoides* within the species distribution, removal of this population will have a detrimental impact on the species, as well as decrease in Namib Desert Lichen Fields within South Africa.

 The rich lichen fields on the Boegoeberg twins and some other localities, as well as the Alexander Bay Lichen Fields, are of the most sensitive and bizarre habitats on earth, they are especially sensitive to air pollution. A study needs to be done on the dominant movement of air from the planned port site, to ensure that it does not move onto the Alexander Bay Lichen Fields, and what scale of air pollution will be created by this development, as this might also negatively impact all the western side of the Namib desert.

All areas with rocky outcrops within the development site, including the Boegoeberg twins, contains high concentrations of endemic plants as well as unique lichen communities and should not be touched. Some of these areas is of such importance, that the erecting of towers on them should not be considered at all.

A large section in the southern part of the scope area for this development host the largest colonies of brant's whistling rats south of the Orange River, which has unique vegetation associated with them. Disturbances to these areas can lead to total collapse of ecosystems and should be avoid at all costs.

20 21 The Visagiesfontein hill is the highest point in alleviation on the coastal plains of the Richtersveld. The hills have an ancient underlying dune, densely covered with vegetation, including lichens, which together forms a fog oasis, allowing such dense vegetation to exist in the arid northern coastline of South Africa. This vegetation hosts several endangered species, including some rare species only recently discovered. The dense vegetation on this hill also allows for high concentrations of fauna to survive, including one of the largest colonies of desert rain frogs (Breviceps macrops).

It is important to pay attention to the publication "A Perfect Storm" (Jurgens et al. 2025) which explains how easily small disturbances in a windy area such as Boegoeberg planed port area, can become catastrophic. At all costs, development should be limited only to the yellow areas as indicated in Image 22, to prevent an environmental catastrophe. Developing the yellow areas, could actually be of conservation importance and prevent the movement of sand from these areas into non disturbed areas east of the mines. It is however of great importance that air pollution needs to be limited, to prevent major die backs of lichens not only on Boegoeberge but all of the Namib Desert which air potentially could be impacted by Boegoebaai.

Image 22: map of low biodiversity areas which solely should be considered for future development.



5

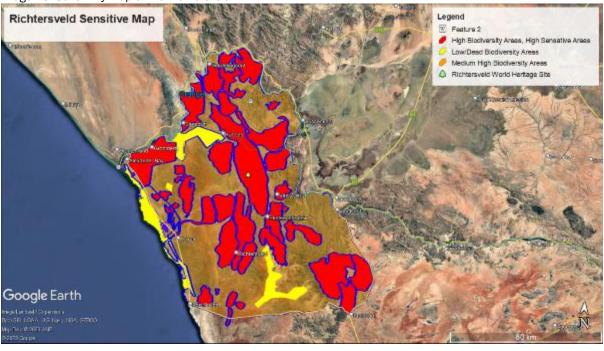
6

7

Image 24: map showing section of development area, in green which is medium sensitive, however needs to be compared with image 23 in this document. This green zone should not be considered for development, as it will have detrimental negative impacts on the high sensitivity areas.



Image 25: Sensitivity map of the Richtersveld.

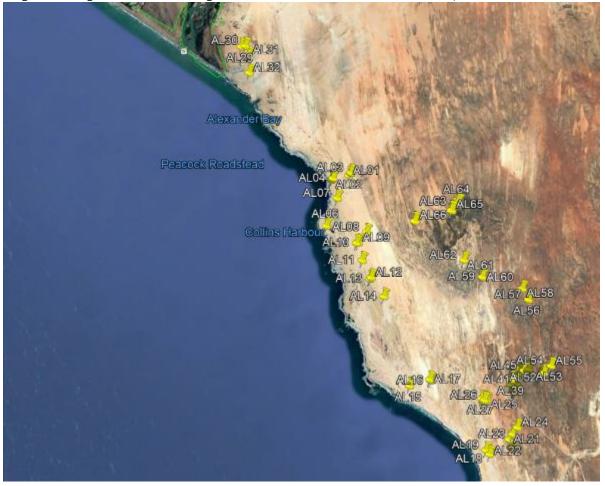


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Image 26 © Google Earth 2025: Showing areas where data was collected in 10m x 10m plots.



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# Appendix 1 Checklist of Plant Taxa Observed

Table 1: A List of the higher plant taxa observed. Total taxa observed = 331.

Taxon Name	Taxon Name	Taxon Name	
Adenogramma glomerata	Drosanthemum hispidum	Monsonia ciliata	
Adromischus marianiae var. hallii	Drosanthemum inornatum	Monsonia luederitziana	
Adromischus montium-klinghardtii	Drosanthemum luederitzii	Monsonia patersonii	
Aizoon crystallinum	Eberlanzia cyathiformis	Monsonia patersonii	
Aizoon fruticosum	Eberlanzia sedoides	Monsonia salmoniflora	
Aizoon pruinosum	Enneapogon scaber	Moraea namibensis	
Aizoon sarcophylla	Eriocephalus brevifolius	Myxopappus acutilobus	
Albuca cooperi	Eriospermum namaguanum	Nemesia arenifera	
Albuca flaccida	Euphorbia angrae	Nemesia bicornis	
Albuca grandis	Euphorbia burmanii	Nemesia saccata	
Albuca maxima	Euphorbia caput-medusae	Odyssea paucinervis	
Albuca sp. nov	Euphorbia dregeana	Oncosiphon grandiflorum	
Albuca suaveolens	Euphorbia ephedroides var. ephedroides	Oncosiphon suffruticosum	
Aloe arenicola	Euphorbia ephedroides var. imminuta	Ophioglossum polyphyllum	
Aloe framesii	Euphorbia ephedroides var. imminuta	Ornithogalum falcatum	
Amellus nanus	Euphorbia hamata	Ornithoglossum dinteri	
Amellus tenuifolius	Euphorbia mauritanica	Ornithoglossum parviflorum var.	
	,	parviflorus	
Amphibolia rupis-arcuatae	Euphorbia rhombifolia	Ornithoglossum vulgare	
Amphibolia succulenta	Euphorbia stapelioides	Osteospermum microcarpum	
Anacampseros namaquensis	Felicia microsperma	Osteospermum oppositifolium	
Anacampseros retusa	Felicia namaquana	Osteospermum polycephalum	
Anthospermum dregei	Fenestraria rhopalophylla subsp.	Othonna furcata	
	aurantiaca		
Anthospermum spathulatum subsp. spathulatum	Ferraria schaeferi	Othonna quercifolia	
Antimima paripetala	Ferraria variabilis	Othonna undulosa (filicaule)	
Antimima perforata	Foveolina dichotoma	Oxalis bullulata	
Antimima sp. nov Boegoeberg	Frankenia pomonensis	Oxalis copiosa	
Antizoma miersiana	Frankenia pulverulenta	Oxalis psammophila	
Apiaceae sp.	Gazania schenckii	Oxalis sonderiana	
Aptosimum viscosum	Gazania tenuifolia	Pelargonium adriaanii	
Arctotis canaliculata	Gethyllis grandiflora	Pelargonium echinatum	
Arctotis sp. nov	Gethyllis linearis	Pelargonium fulgidum	
Asparagus capensis var. capensis	Gladiolus saccatus	Pelargonium grandicalcaratum	
Asparagus capensis var. litoralis	Gladiolus viridiflorus	Pelargonium minimum	
Asparagus declinatus	Grielum grandiflorum	Pelargonium moniliforme	
Asparagus exuvialis	Grielum humifusum	Pelargonium parviflorum	
Asparagus graniticus	Harveya squamosa	Pelargonium sibthorpiifolium	
Asparagus juniperoides	Hebenstretia integrifolia	Pelargonium sp. nov	
Asparagus undulatus	Hebenstretia parviflora	Peliostomum virgatum	
Atriplex vestita var. appendiculata	Hebenstretia repens	Pharnaceum croceum	
Babiana hirsuta	Hebenstretia robusta	Pharnaceum exiguum	
Babiana namaquensis	Helichrysum dunense	Pharnaceum microphyllum	
Bulbine abyssinica	Helichrysum hebelepis	Phragmites australis	
Bulbine ophiophylla	Helichrysum herniarioides	Phyllopodium hispidulum	
Bulbine rhopalophylla	Helichrysum leontonyx	Phyllopodium namaense	
Calobota angustifolia	Helichrysum marmarolepis	Polygala leptophylla	
Calobota cinerea	Helichrysum obtusum	Polygala mossii	
Calobota halenbergensis	Heliophila cornuta var. squamata	Pteronia glabrata	
Capnophyllum leiocarpon	Heliophila lactea	Pteronia onobromoides	
Caroxylon aphyllum	Hermannia macra	Pteronia paniculata	
Caroxylon cf. pillansii	Hermannia paucifolia	Quaqua armata subsp. maritima	
Caroxylon nollothensis	Hermannia pfeilii	Quaqua inversa	
Caroxylon sp.	Hermannia sp. nov	Radyera urens	
Caroxylon sp. Caroxylon zeyheri	Holothrix filicornis	Rhynchopsidium pumilum	
Centropodia glauca	Holothrix cf. schlechteriana (possible	Roepera cordifolia	
Corni opodia giadoa	TOTO THE ST. SOLITO OF ICOTALIA (POSSIBLE	, toopora ooranona	

Taxon Name	Taxon Name	Taxon Name
Cephalophyllum compressum	Hydnora africana	Roepera fusiforme
Cephalophyllum ebracteatum	Hyobanche sanguinea	Roepera morgsana
Cephalophyllum rigidum	Isolepis marginata	Roepera sp. nov
Chaetobromus involucratus subsp. dregeanus	Jamesbrittenia fruticosa	Ruschia cf. variabilis
Cheiridopsis robusta	Jamesbrittenia merxmuelleri	Ruschia fugitans
Chenopodium murale	Jordaaniella clavifolia	Ruschia pallens
Chlorophytum viscosum	Jordaaniella cuprea	Ruschia pollardii
Chrysanthemoides incana	Jordaaniella spongiosa	Ruschia sp. (possible new)
Chrysocoma ciliata	Jordaaniella uniflora	Salvia africana-lutea
Cladoraphis cyperoides	Juncus acutus subsp. leopoldii	Sarcocornia natalensis var. affinis
Cladorapis spinosa	Kedrostis psammophila	Schismum schismoides
Coelanthum semiquinquefidum	Kewa angrae-pequenae	Searsia longispina
Colchicum irroratum	Kewa salsoloides	Selago angustibractea
Conicosia elongata	Kohautia ramosissima	Selago namaquensis
Conicosia pugoiniformis subsp. alborosea	Lachenalia anguinea	Senecio abruptus
Conophytum saxetanum	Lachenalia klinghardtiana	Senecio aloides
Cotula anthemoides	Lachenalia xerophila	Senecio sarcoides
Cotyledon orbiculatum subsp. orbiculatum	Lampranthus otzenianus	Septulina glauca
Crassothonna cylindrica	Lampranthus stipulaceus	Solanum burchellii
Crassothonna sedifolia	Lapeirousia arenicola	Spergularia bocconi
Crassothonna sparsiflora	Lapeirousia barklyi	Spergularia media
Crassula ammophila	Lapeirousia macrospatha	Stapelia pulvinata
Crassula atropurpurea var. cultriformis	Lasiosiphon microphyllus	Stipagrostis ciliata var. capensis
Crassula brevifolia subsp. psammophila	Lavatera arborea	Stipagrostis obtusa
Crassula columnaris subsp. prolifera	Ledebouria undulata	Stipagrostis schaeferi
Crassula deceptor	Leipoldtia uniflora	Stoeberia beetzii
Crassula elegans subsp. elegans	Lessertia candida	Stoeberia frutescens
Crassula expansa subsp. pyrifolia	Lessertia frutescens subsp. frutescens	Stoeberia utilis
Crassula muscosa var. muscosa	Limeum fenestratum	Suaeda plumosa
Crassula muscosa var. obtusifolia	Limonium dyeri	Teloschistes capensis
Crassula natans	Lotononis falcata	Teloschistes puber
Crassula plegmatoides	Lycium bosciifolium	Tetraene clavata
Crassula pseudohemisphaerica	Lycium decumbens	Tetraene patenticaula
Crassula rudolfii	Lycium ferocissimum	Tetragonia cf. fruticosa
Crassula subaphylla subsp. subaphylla	Lycium tetrandrum	Tetragonia decumbens
Crassula tetragona	Lyperia triste	Tetragonia echinata
Crassula tomentosa var. tomentosa	Manochlamys albicans	Tetragonia fruticosa
Crotalaria meyeriana	Manulea altissima	Trachyandra alliata
Curio crassicaulis	Manulea androsacea  Manulea minuscula	Trachyandra falaseta
Curio radicans Curio sulcicalyx	Melolobium adenodes	Trachyandra falacata Tridentea pachyrrhiza
Cynodon dactylon	Mesembryanthemum arenosum	Tylecodon paniculatus
Cynorhiza typica	Mesembryanthemum barklyi	Tylecodon reticulatus subsp.
Cynomiza typica		reticulatus
Cyperus marginatus	Mesembryanthemum brevicarpum	Tylecodon schaeferianus
Dasispermum hispidum	Mesembryanthemum cf. subnodosum	Tylecodon similis
Deverra denudata subsp. aphylla	Mesembryanthemum crystalinum	Tylecodon wallichii subsp. eclonianus
Dianthus namaensis	Mesembryanthemum deciduum	Veltheimia capensis
Didelta carnosa var. tomentosa	Mesembryanthemum dinteri	Veltheimia capensis
Dimorphotheca polyptera	Mesembryanthemum hypertrophicum	Wahlenbergia androsacea
Dimorphotheca sinuata	Mesembryanthemum marlothii	Wahlenbergia annularis
Dipcadi crispum	Mesembryanthemum noticflorum	Wahlenbergia asparagoides
Dischisma spicatum	Mesembryanthemum occulatum	Wahlenbergia prostrata
Dregeochloa pumila	Mesembryanthemum pseudoschlichtianum	Zaluzianskya affinis
Drimia barbata	Mesembryanthemum quartziticus	Zaluzianskya benthamiana
Drimia elata	Mesembryanthemum serotinum	Ziziphus mucronata
		,
Drimia occultans Drosanthemum curtophyllum	Mesembryanthemum tetragonum Microloma sagittatum	

Table 2: Checklist of lower plant taxa observed. Total taxa observed = 91.

Acarospora gypsi-deserti	Heterodermia namaquana	Santessonia namibensis
Acarospora luederitzensis	Lecanographa subcaesioides	Staurothele dendritica
Acarospora ochrophaea	Lecanora panis-erucae	Teloschistes capensis
Arthothelium desertorum	Lecanora sp.	Teloschistes chrysocarpoides
Buellia cf. follmannii	Lecanora sphaerospora	Teloschistes chrysophthalmus
Buellia cf. stellulata	Lecanora substylosa	Teloschistes puber
Buellia follmannii	Lecanorsa cf. substylosa	Tephromela austrolitoralis
Buellia halonia	Lecidea sarcogynoides	Tephromela nashii
Buellia incrustans	Lecidella crystallina	Toninia australis
Buellia inturgescens	Lecidella placodina	Tornabea scutellifera
Buellia procellarum	Ledidea sarcogynoides	Tortula atrovirens
Buellia sipmanii	Niebla cephalota	Trentepohlia sp.
Buellia sp.	Opegrapha culmigena	Usnea sp.
Buellia stellulata	Parmotrema perlatum	Xanthodactylon alexanderbaaii
Caloplaca bonae-spei	Parmotrema reticulatum	Xanthodactylon flammeum
Caloplaca cinnabarina	Parmotrema sp.	Xanthodactylon inflatum
Caloplaca elegantissima	Pertusaria pseudomelanospora	Xanthodactylon turbinatum
Caloplaca gyalectoides	Pertusaria velata	Xanthoparmelia arrecta
Caloplaca namibensis	Peterjamesia circumscripta	Xanthoparmelia cf. dregeana
Caloplaca renatae	Placidium squamulosum	Xanthoparmelia cf. incomposita
Caloplaca rubelliana	Podaxis sp.	Xanthoparmelia dregeana
Caloplaca sp.	Polytrichum sp.	Xanthoparmelia equalis
Chrysothrix granulosa	Ramalina angulosa	Xanthoparmelia hottentotta
Combea mollusca	Ramalina canariensis	Xanthoparmelia hueana
Dimelaena radiata	Ramalina fimbriata	Xanthoparmelia incomposita
Diploschistes actinostomus	Ramalina lacera	Xanthoparmelia namibiensis
Dploicia canescens	Ramalina melanothrix	Xanthoparmelia tentaculina
Flavoparmelia soredians	Ramalina sp.	Xanthoparmelia walteri
Flavoparmelia sp.	Roccella montagnei	Xanthoria sipmanii
Gloeocapsa sp.	Santessonia hereroensis	
Grimmia laevigata	Santessonia lagunebergii	

Table 3: List of Species of Conservation Concern. Status = SANBI Red Data status. Total Species of Conservation Concern = 51. Total Red List species observed = 36.

Taxon Name	Status	Taxon Name	Status
Adromischus marianiae var. hallii		Jordaaniella clavifolia	VU
Adromischus montium-klinghartii	VU	Jordaaniella uniflora	NT
Albuca sp. nov		Lachenalia klinghardtiana	VU
Aloe arenicola	NT	Lapeirousia barklyi	VU
Aloe framesii	NT	Lapeirousia macrospatha	VU
Amphibolia succulent	NT	Lasiosiphon microphyllus	
Antimima perforata	CR	Leipoldtia uniflora	
Antimima sp. nov		Mesembryanthemum marlothii	
Arctotis canaliculata		Monsonia ciliata	
Babiana namaquensis	VU	Monsonia pattersonii	VU
Bulbine ophiophylla	EN	Moraea namibensis	EN
Bulbine rhopalophylla	VU	Nemesia arenifera	
Crassula ammophila	NT	Nemesia saccata	VU
Crassula brevifolia subsp. psammophila	VU	Pelargonium adriaanii	VU
Crassula plegmatoides	VU	Pelargonium sp. nov	
Crotalaria meyeriana	NT	Phyllopodium hispidulum	EN
Dregeochloa pumila	CR	Phyllopodium namaense	VU
Drimia barbata	CR	Polygala mossii	NT
Drimia occultans		Quaqua armata subsp. maritima	
Eberlanzia sedoides		Quaqua inversa	
Euphorbia angrae		Stapelia pulvinata	
Frankenia pomonensis	VU	Tridentea pachyrrhiza	CR
Gazania schenckii	CR	Tylecodon schaeferianus	VU
Helichrysum dunense	VU	Wahlenbergia asparagoides	NT
Helichrysum tricostatum	NT	Wahlenbergia erophiloides	
Jamesbrittenia merxmuelleri	EN		