

CHAPTER1: INTRODUCTION

1.1 INTRODUCTION

This report follows on from the Draft Public Participation Report (March 2002) that was released in June 2002 together with the Draft Strategic Environmental Assessment (SEA) for public comment.

The Final Public Participation Report builds on the Draft Public Participation Report, which was included as a specialist report in the Draft SEA and should be read in consultation with that report. As such, it does not elaborate in detail on issues that are already addressed in the previous report but attempts to highlight issues that have emerged during the comments period for the Draft SEA.

Sandy & Mazizi Consulting cc. are the appointed consultants responsible for facilitating the public participation process for the SEA for the proposed expansion of the greater Addo Elephant National Park (gAENP). The approach to the SEA and public participation process was adopted in July 2001 after a meeting between SANParks, Coastal & Environmental Services, Sandy & Mazizi Consulting, the Provincial Department of Economic Affairs Environment and Tourism and the National Department of Environmental Affairs and Tourism. (See Diagram 1 overleaf)

1.2 BACKGROUND TO THE PUBLIC PARTICIPATION PROCESS

Between July 2001 and December 2001 extensive consultation took place in and around the planning domain when a cross spectrum of organisations, individuals and groups were consulted. These included Farmers associations, labour unions, farm labourers, community based structures, local authorities, agricultural associations, environmental groups, land owners, government departments and business.

The reader is referred to the Draft Public Participation Report for the details of Stage One and Two of the Public Participation Report. One of the outcomes of that process was the identification of a list of issues and concerns raised by I&APs. The issues raised were summarised into an Issue Trail and responses to the issues identified were provided, based on the information gathered during the SEA process. (See Appendix A for copy of the Issues and Response Trail from the Draft Public Participation Report)

For example, the impact on farm labourers has been highlighted as a key issue throughout the process and this is discussed in detail in the Draft Public Participation Report and in the Draft SEA. The response provided notes that SANParks has appointed consultants to develop a Resettlement Framework Plan (RFP). Consequently this report notes this issue, recognises that it has again been raised as an area of concern and indicates how it is being addressed by SANParks. It does not elaborate on the specific aspects of this issue, as this is done in the Draft Public Participation Report, the Draft SEA and the relevant specialist study.

The same approach has been adopted to issues that were noted in the Draft Public Participation Report and have again been raised with the release of the SEA.

1.3 OVERVIEW OF THIS REPORT

The purpose of this report is to provide the reader with information on the following:

- ?? Introduction and background to the Public Participation Process
- ?? Background to Stage one and two of the Public Participation Process
- ?? Details of the process implemented for Stage Three
 - ?? Information dissemination
 - ?? Capacity Building for I&APs
 - ?? Opportunities created to participate and comment on the Draft SEA
- ?? Overview of the key issues that emerged during the comments period

These aspects are covered in greater detail in Section 2.1.

The comments received through the public participation process have been summarised into an Issues Trail and a response is provided by the relevant source/s.

CHAPTER TWO: PUBLIC PARTICIPATION PROCESS

2.1 OVERVIEW OF THE PUBLIC PARTICIPATION PROCESS

In July 2001 a three-phased approach to public participation was adopted for implementation for the Strategic Environmental Assessment for the expansion of the greater Addo Elephant National Park (gAENP), as follows:

Stage 1: Identification and Networking with Interested and Affected Parties
Communication Strategy (ongoing)

Stage 2: Draft SEA, Draft Public Participation Report and Public Comments Period

Stage 3: Final SEA and Final Public Participation Report

The overarching goal of the Public Participation process has been:

"To create opportunities for I&APs within and around the planning domain to receive information, participate in the process, as well as raise issues and concerns with regards to the establishment of the Proposed greater Addo Elephant National Park for consideration in the decision making process."

Within the context of the overarching goal this report focuses on information sharing and the opportunities created for I&APs to comment on the Draft SEA (Stage One and Two of the public participation process). It provides the reader with an overview of the comments received on the Draft SEA at public meetings, networking meetings, and through written correspondence. It further highlights the key issues identified in the Draft Public Participation Report, identifies those that still remain issues of concern, and highlights any additional issues that may need to be considered in future planning for the expansion of the park.

Thus, the purpose of this report is to build on the previous public participation report and highlight key issues that have been identified through the public consultation process. The reader is referred to Appendix A of this report which contains a copy of Chapter Three of the Draft Public Participation Report which highlights the key issues that have emerged throughout the process and contain the interim Issues and Response Trail. This appendix forms an important component of the public participation process as it captures the spectrum of issues and concerns raised by I&APs across the planning domain.

The following provides a brief summary of Stage One and Two of the Public Participation Process. The reader is referred to the Draft Public Participation Report for a detailed overview of these stages.

2.2 STAGE ONE: IDENTIFICATION OF I&APS, ISSUES & CONCERNS

The purpose of the first stage in the process has been to:

- ?? Identify interested and affected parties (I&APs) to participate in the process
- ?? Identification of I&AP issues and concerns for consideration by relevant specialists
- ?? Provide a spectrum of I&APS with information on the project and SEA process

At the conclusion of Stage One and Two of the public participation process, a total of **621 I&APs** were registered on the database. Key aspects of the process were that a large number of I&APs responded to the newspaper advertisements placed requesting them to register their interest in the project. A large number of written comments were received from I&APs on the project, **forty-six (46) recorded written comments**. In addition to this **234 I&APs** provided their comments through networking meetings held between September 2001 to December 2001. (Appendix D Final I&AP Database)

Networking meetings are meetings between the participation consultant and an organisation, business, group or individual. At these meetings the participant was provided with an overview of the project and SEA process and is provided the opportunity to raise issues and concerns.

The following table provides a summary of the interaction for Stage 1 of the process.

Event	Participation
Written comments received	46
Participation in networking meetings	234
Database Total	621

Table 1: Summary of interaction for Stage 1 of the Public Participation Process

2.3 COMMUNICATION STRATEGY

The communication process for Stage One and Two of the project formed the foundation of the public involvement process, and was an ongoing activity throughout the process.

To facilitate communication, a briefing paper was produced in English, Afrikaans and Xhosa and distributed to all I&APs registered on the database. The briefing paper is one of the tools used to share information with I&APs on the project and SEA process to develop their capacity to participate and raise issues of concern.

Public information sessions, advertisements in the print media and networking meetings all formed part of the ongoing communication strategy with I&APs. Project information was also made available on the Coastal & Environmental Services website (www.cesnet.co.za).

In addition to the above, advertisements in the print media and networking with the various farmers associations within the planning domain played a key role in identifying I&APs, providing them with information on the project and noting issues and concerns.

The issues and concerns identified through Stage One and Two of the process were captured and formed part of Chapter Three of the Draft Public Participation Report (See Appendix A).

2.4 STAGE TWO: PUBLIC PARTICIPATION PROCESS

The following section of the report provides a detailed outline of the public participation process implemented for the release of the Draft SEA.

The objective of this stage of the process was to ensure the Draft SEA was distributed to I&APs across the planning domain and that it was accessible in order to obtain the responses of I&APs to the Draft SEA.

2.4.1 Draft SEA and Public Participation Report

This section of the report focuses on the mechanisms used to distribute the Draft SEA to I&APs across the planning domain, and to provide them with information on the Draft SEA as well as notify them of the opportunity to comment, and obtain feedback on the Draft Report.

The following key activities were associated with Stage Three of the process:

- ?? Media advertisements
- ?? Distribution of Draft SEA
- ?? Notification to all I&APs
- ?? Public Information Meetings

2.4.1.1 Media Advertisements

Advertisements were placed in the following newspapers notifying I&APs of the availability of the Draft SEA for comment, the venues for public information meetings and how they could access copies of the Draft SEA:

- ?? Die Burger, 24 May 2002 and 5 June 2002
- ?? East Cape Weekender, 25 May 2002
- ?? The Herald, 24 May 2002 & 5 June 2002

Copies of the advertisement can be viewed in Appendix B of this report.

2.4.1.2 Distribution of the Draft SEA

One of the challenges of the public participation process has been to distribute sufficient and accessible information across the proposed 400 000 hectares proposed for the expansion of the park.

In addition to the Draft SEA and Specialist reports being made available on the project website, the Draft SEA was distributed as follows:

Farmers Associations: Kirkwood, Glenconnor, Secretary Zuurberg, Alexandria, Secretary Nanagga, Waterford, Paterson, Kleinpoort, Somerset East

Libraries: Govan Mbeki, Port Elizabeth, Walmer, Port Elizabeth

Other Venues: Addo Elephant National Park, Pearson Park Caravan Resort, Sundays River/Colchester Residents Association, Agriculture Eastern Cape, Sandy & Mazizi Consulting cc.

2.4.1.3 Notification to I&APs

All I&APs on the project **database (511)** were notified in writing of the availability of the Draft SEA and Specialist Studies and were invited to attend public information meetings (See copy of correspondence attached in Appendix B).

In addition to this all I&APs were provided with a copy of Chapter Three of the Public Participation Report, the Issues and Response Trail, (See Appendix A) the Executive Summary of the Draft SEA as well as a map of the eight proposed expansion areas.

2.4.1.4 Public Information Meetings

The distribution of information on the Draft SEA culminated in a series of public information meetings. The purpose of these meetings was to provide I&APs with an overview of the key findings of the Draft SEA, obtain their comments and any additional issues for inclusion in the Final Public Participation Report and SEA.

Eight public information meetings were held as follows:

Addo, Valentine Hall, 10 June 2002, 10 am

Kleinpoort, Kleinpoort Agricultural Association, 10 June 2002, 2:30pm

Port Elizabeth, City Hall, 10 June 2002, 6 pm

Paterson, East Cape Co-op Paterson, 11 June 2002, 11 am

Kommadagga, Zuurberg, Bracefield Hall, 11 June 2002, 2:30pm

Sundays River/Colchester, Sand Dunes Hall, 11 June 2002, 6pm

Nanagga, Kinkelbos Hall, 12 June 2002, 10 am

Alexandria, Alexandria Sports Complex, 12 June 2002, 2:30pm

The meetings were facilitated by Sandy & Mazizi Consulting with representatives from SANParks (all meetings) and Coastal and Environmental Services (at two meetings) present to engage with I&APs around issues raised (Appendix C contains the notes from the public information meetings).

2.4.2 Stage Three: Final Public Participation Report

The last stage in the public participation process is the compilation of this Final Public Participation Report.

This next section of the report summarises the comments made at the various public and networking meetings and from written comments received. The detailed comments can be found in Appendix C. The issues raised were forwarded to the relevant source/s for a response for inclusion in this Issues and Response Trail.

The final public participation report will be submitted to Coastal and Environmental Services for them to submit to the National Department of Environmental Affairs and Tourism (DEAT) together with the Final SEA for decision making¹.

¹ It should be noted that as an SEA is not a legal requirement, no formal Record of Decision will be issued by DEAT. A letter formally approving the SEA is anticipated.

CHAPTER THREE: ISSUES AND RESPONSE TRAIL

3.1 KEY ISSUES AND CONCERNS

The following section of the report highlights key issues and comments raised in response to the Draft SEA. It does not repeat in detail the key issues already noted in the Draft Public Participation Report, see Appendix A but highlights those issues not yet noted and those that are still emerging as issues that require attention in further planning for the expansion of the Park.

This section of the report needs to be read in consultation with Chapter Three of the Draft Public Participation Report. Where applicable reference has been made to the relevant section of Chapter Three of the Draft Public Participation Report.

3.1.1 Displacement and Relocation of Farm Workers

The displacement and relocation of farm workers through the land purchase process has again been noted and raised as an area of concern. SANParks has appointed an independent consultant to develop a comprehensive Resettlement Framework Plan, including specific Resettlement Action Plans (RAPs) which will consider affected farm workers, including those already impacted on through the land purchase process after 1997. (Refer to issue 3.2.1 Draft Public Participation Report, March 2002) and Sections 5.5.3, 5.5.4, 8.2 and 11.1.2 in the Draft SEA.

3.1.2 Communication Strategy, Ongoing Uncertainty & Land Purchase Process

The ongoing uncertainty surrounding the expansion of the park as well as the need for a comprehensive communication strategy to share information on the project and develop an understanding of the project implementation schedule has again been highlighted with the release of the Draft SEA. The development of a comprehensive communication strategy was a recommendation of the Draft SEA. SANParks has committed itself to developing a comprehensive communication strategy to improve communication on the project and share information with affected parties within the planning domain. (Refer to issue 3.2.2, 3.2.4 & 3.2.8 Draft Public Participation Report and Sections 5.5.3, 5.5.4, 8.2.4 and 11.2.1 in the Draft SEA.)

3.1.3 Socio-Economic Baseline Information in the SEA

A significant criticism received on the Draft SEA is the utilisation of 1996 census data in the socio-economic assessment. While this has been acknowledged in the Draft SEA as one of the shortcomings of the process this outdated data is viewed by I&APs as insufficient for making decisions on a project of this nature, considering the potentially diverse negative socio-economic impacts. This issue is related to the following key issues highlighted in the Draft Public Participation Report:

?? **Impact on Unemployment and Economic Opportunities** - comments received note that the socio-economic data does not provide a true reflection of the present status quo in the planning domain. For example figures quoted for farm wages are outdated and this creates a bad impression of farmers and cannot be used to compare employment associated with conservation. (Issue 3.2.5 Draft Public Participation Report,) Although this point was noted, the independent consultant survey of selected farms estimated these values.

- ?? **Impact on Farming Related Industries and Activities** - The socio-economic assessment does not fully assess the existing farming related industries and activities in the area. This is however acknowledged in the Draft SEA and a recommendation of the SEA is that a detailed, site-specific socio-economic assessment of the planning domain is conducted (Issues 3.2.3 Draft Public Participation Report, March 2002).
- ?? **Impact on Dairy, Beef and Chicory Production** - This issue has again been raised as an area of concern but not to the same degree as previously. This can be attributed to the fact that SANParks refocused its land purchases owing to the conservation planning consultants recommendations and will not be actively pursuing the incorporation of land in the highly productive dairy, beef and chicory producing areas of Nanagga and Alexandria. It has however been noted that should SANParks want to expand into this area the socio-economic information provided in the Draft SEA is inadequate for decision making. A detailed up to date socio-economic assessment of the area should be required prior to any expansion into this area. (Issue 3.2.6 Draft Public Participation Report and Section 11.2.3 of the Draft SEA, where one of the recommendations of the Draft SEA is that a detailed socio-economic assessment of the planning domain is conducted)
- ?? **Impact on Mohair, wool and mutton Production** - This issue relates, but not exclusively so, to the proposed expansion into Kommadagga, and has again been highlighted in response to the Draft SEA. This is cause for concern as the socio-economic information on this area is viewed as inadequate for decision making, yet the Zuurberg area that falls within Kommadagga has been highlighted as a priority expansion area. Comments received request that a detailed socio-economic assessment of this area be done prior to any decision made with regards to expansion into Kommadagga. (Issue 3.2.7 Draft Public Participation Report and Section 11.2.3 of the Draft SEA, where one of the recommendations of the Draft SEA is that a detailed socio-economic assessment of the planning domain is conducted).

3.1.4 Management of the Sundays River

The Sundays River Estuary and the upper reaches of the Sundays River have been identified as having a high biological significance. SANParks has committed itself to developing a management/zonation plan for the river in consultation with affected parties and residents (Issue 3.2.9 Draft Public Participation Report, March 2002).

3.1.5 Coega Industrial Development Zone

The proposed positive benefits that could potentially be derived from the Coega Industrial Development Zone are not adequately identified or noted as opportunities in the SEA. In as much as the Coega development needs to take into account the gAENP, SANParks needs to take the Coega development into account in the planning of the Park.

3.1.6 Need for Socio-Economic Indicators and Targets

The Draft SEA provides indicators for achieving biophysical and conservation targets but does not provide indicators for achieving socio-economic targets for the expansion of the Park. These guidelines are important to ensure that the development is within sustainable limits, socially, ecologically and financially.

3.1.7 Lack of a Legal Framework for the SEA

The SEA makes recommendations for the future planning and expansion of the Park but comments received indicate that there was concern regarding the impetus to implement these recommendations in light of the lack of a legal framework. This adds to the concern as to how the process will be taken forward.

3.2 ISSUES AND RESPONSE TRAIL

The following section of the report tables the comments received on the Draft SEA and responses to these issues.

3.2.1 Socio Economic Issues

	ISSUE	RESPONSE
	Relocation of Affected Farm Workers	
	A very clear compensation and relocation package is needed for farm workers that will last them for 30-40 years and ensure the sustainability of their livelihoods.	This issue has been raised across the planning domain and has been captured extensively in the Draft Public Participation Report. SANParks has commissioned the development of a Resettlement Policy Framework Plan (RFP), including specific Resettlement Action Plans (RAPs) to address this issue. These RAPs, along with a SANParks resettlement policy will undergo a legal review to inform future decisions and plans.
	Will SANParks consider those people who have already lost employment as a result of the expansion of the Park?	The Resettlement Policy Framework Plan will attempt to identify those people that have already been affected by the expansion of the park.
	The development of a resettlement and compensation plan must be developed by consultants appointed by a committee of farm workers supported by trade unions.	The consultants preparing the RFP have been appointed directly by SANParks, using World Bank/GEF funds. As such, the RFP will be reviewed and approved by the World Bank and will be prepared in accordance with World Bank Operational Policy 4.12 - Resettlement. In addition it will undergo an independent legal review reference SANParks compliance, before any future plans are implemented. Its recommended that the establishment of a committee would form part of the implementation phase of the RFP.
	Expansion into Kommdagga	
	The following needs to be assessed before any decisions are made on the expansion into Kommdagga, impact on mohair, wool and the mutton industry. This area has highly productive farms, which have not been adequately assessed, in the SEA. The assessment needs to take into account the fact that farmers in this area have two farms which together make up and economically productive unit utilising the Zuurberg mountains in times of drought.	Given the size and diversity of the planning domain the SEA dealt with agriculture on the broad scale. In this regard it was concluded by the consultants that ecotourism as a land use is competitive and sustainable by comparison with current small stock (inclusive of mohair) and cattle farming, but not with dairy. The final SEA recommends that an economic assessment of the mohair, wool and mutton producing farms be done.

Empowerment, Employment and Inclusion of disadvantaged communities	
People in the disadvantaged areas and relocated farm workers need to be trained in tourism so that they can maximise tourism opportunities. They should be doing more than just cutting bushes and erecting fences for SANParks, which only has short-term benefits.	As part of the implementation phase there will be opportunities for incentivised community-based partnerships that include, but are not restricted to, tourism opportunities. These partnerships will facilitate capacity building.
There is a need to quantify exactly what and how many jobs will be created by the project?	It is estimated that between 40 & 42 jobs will be created per 15 000ha developed (about 1 person per 350ha) (see specialist study 11). This is slightly lower than the average of 1 employee per 304ha obtained during further research undertaken during the Resettlement Policy Framework study (Report not yet released). Of these 25% are unskilled, 50 semi-skilled and 25% skilled. This however does NOT include the increase in job creation in associated and down stream industries associated with Addo.
The claimed generation of approximately 360 new jobs – presumably in addition to the current employees – may be incorrect. One needs to deduct the jobs lost by the farm labour to actually show the net effect.	The initial development of 123 000ha given over the AENP as it now stands, would create 360 tourism based employment opportunities. These would be additional jobs, as no-one is currently employed on this land. In addition, SANParks is currently employing 350 previously unemployed people in the Poverty Relief and Work for Water programmes focused on the PDI sector.
The Mountain Zebra Park is used as an example to illustrate the point that the expansion of the park will result in job losses and not job creation. E.g. the Mountain Zebra park has triple in size with many losing their employment on farms and the park has only created temporary jobs and SANParks has laid off workers at the park.	See above point
Land Claims	
There are land claims in the Paterson area.	Land claims are taken into account in the expansion of the Park.
A land claim is in progress in Colchester for Olifantsplaat.	SANParks is aware of this land claim but note it to be restricted mostly to Vetmaakvlakte and not Olifants Plaat.
What is given preference, a land claim or expansion of the Park?	Land Claims are given preference by law. SANParks does not contest land claims.
Financial Sustainability	
The park needs to be financially self sustainable	Addo Elephant National Park is financially self sufficient. With the concession process, this is expected to improve.

3.2.2 SEA Related Issues

ISSUE	RESPONSE
How far is the social impact study for Alexandria?	This was part of the general SEA study that looked at the whole planning domain. It used 1996 census data and data collected from a limited farm survey conducted for this project. The findings have been incorporated into the Draft SEA. The SEA has acknowledged that this data is outdated. A comparison of the census data with farm survey data

		collected as part of the SEA, showed that the data was comparable, except for the expected number of people in the planning domain, which over estimated the number considerably.
	Did the SEA take into account the economic and social impacts of economic activities indirectly related to farming, e.g. teachers who are employed to teach labourers at farms schools.	The SEA was a desktop study using existing information for the study area. A detailed socio-economic assessment for the study area has not been done.
	The SEA refers to World Bank Recommendations but does not say what these are.	The draft SEA refers to World Bank Safeguard Policies, which are explained in Section 2.5 of the Draft SEA report.
	Independent consultants, not appointed by SANParks, must investigate, the statement that more jobs will be created, a socio-economic study of the area, study of the mohair situation, the suitability of the Zuurberg for game versus livestock.	The Resettlement study provides more information on the issue of employment (see earlier response). The suitability of the area for game was assessed as part of the C-Plan exercise (see specialist report 1). A broad economic assessment of the planning domain was undertaken (Specialist report 9). No specific study on the economic comparisons between mohair and game farming per se was undertaken, but rather comparison the broader scale small - large stock comparison.
	Who drew up the C.Plan and was it an independent process?	The CSIR and TERU drew up the C.Plan as part of the independent team appointed by SANParks to assess the expansion of the Park.
	The report is not an SEA in terms of the DEAT guidelines. This approach of not considering alternatives is realistic, but others also raised complaints against the CDC SEA for not considering fundamental land use alternatives. Perhaps the potential lost opportunities should be considered more fully as a separate item, in lieu of alternative land uses.	We agree that the report does not follow all the DEAT guidelines for SEA. We also agree that in this case, as in many other instances, the SEA was not able to address one of the major limitations of the project-level EIA, the need to assess fundamentally different alternatives. This was primarily because no other alternatives, other than the status quo, were available for assessment. It is for this reason that we attempted to assess the opportunities and constraints of both options. However, as this was done from the gAENP perspective, the report does not fully explore the potential lost opportunities that the gAENP represents to the status quo. Cognisance of this must be taken in the decision making process.
	The SEA details problems encountered and how they are going to be addressed, it does not make an assessment.	The problems and their possible mitigatory measures or recommendations form only a single component of the entire assessment.
	The guidelines to ensure that the development is within sustainable limits (social, ecological and financial) are not clearly stated, as required by an SEA. It is recommended that a separate chapter should be devoted to this (the current conclusions are too general in nature). This Chapter can then be used for guiding the way forward.	CES feels that it is almost an impossible task to present guidelines for ensuring that the development is within sustainable limits, simply because sustainable limits cannot be clearly defined. The requirement to do so is a major limitation of the SEA process, as our knowledge base is incomplete at this stage. At best, the project will attempt to ensure that no person, community or natural resource is worse off or more negatively affected by the proposed development than it presently is. At this stage the gAENP project can achieve this from an ecological perspective, but less so from a financial and social one, although the predictions offer a better alternative to the status quo. These sustainability issues are also critical components of the park's Integrated Environmental Management System (IEMS) and

		Strategic Management Plan (SMP).
	The difficulty of generating sustainability criteria is acknowledged (pg 29). But there is little evidence of any clear effort towards trying to do so. These criteria must be developed for the GAENP. It is recommended that criteria be developed for the GAENP and included with the Guidelines section. Each guideline should be linked to one of the criteria. All of these should be linked into an EMS to ensure that they are correctly managed and reported. [It is noted that Targets are given for ecological systems, but not for the social or financial ones].	The development of sustainability criteria was not part of the Scope of Work for the SEA. Sustainability criteria will form part of the gAENP IEMS where all components of social, economic and ecological requirements are addressed
	Page 32 claims that it is possible to assess the opportunities and constraints. The report is very weak on assessment – it mostly lists the opportunities and constraints. It is recommended that each opportunity and constraint should be more effectively assessed, so that this exercise can lead to guidelines and criteria.	It proved to be difficult to attach ratings (such as one does when assessing impacts in an EIA) to the opportunities and constraints. The amount of information available (bearing in mind the desktop nature of the study) only made it possible to identify opportunities and constraints. The claim on pg 32, that these have been assessed is therefore not correct.
	The report implies that the GAENP will be one contiguous park. This is not the case as a number of National roads and specifically the N2 exist and the Park expansion will need to accommodate these roads. This constraint has not been adequately recognized.	The fact that the park is not contiguous is explained in the report, and is dealt with in more detail in specialist reports. Fragmentation (pg 53) is listed as an important constraint.
	The impacts or constraints associated with existing roads and additional traffic have not been mentioned – noise, NOx and PM10s.	The impacts of existing roads and additional traffic were not a major constraint and were therefore not included in the SEA.
	Both the level of employment and financial benefits claimed, due to increased Tourism, is misplaced. Both of these refer to each overseas tourist while in a country. NOT for each tourist visiting any one venue. Thus the implication that the current travel costs (pg 75) was about R 5 000 per visitor to the Park [for 1 night!] ignores the fact that tourists also came to see other places.	A detailed Cost-Benefit analysis for the park will facilitate the improved interpretation of these figures.
	The report does not clearly state, as is common best practice, that the people directly affected by the project [the creation of the GAENP] will be included as the project 's beneficiaries. This approach is being applied at the Coega IDZ, the Maguga dam in Swaziland and all new World Bank funded schemes. Thus compensation is not enough – to make people no worse off than they were, is enough – experience has shown that the “developers” always over estimate their ability to develop sustainable livelihoods. Thus one needs, in addition to the usual efforts, to incorporate all the directly affected parties as part of the beneficiaries of the project.	The SANParks Resettlement Framework Policy will address these issues in greater detail. Currently directly affected people are given first option for employment opportunities within the park as well as other initiatives such as the Working for Water and Poverty Relief programmes.
	Regular mention is made of developing 4 x 4 trails. No mention is made of the negative	Only major opportunities and constraints were identified and discussed in the SEA. The constraints

	impacts (constraints) that such trails have – erosion, noise, disturbance to animals, costs of maintenance and visual impacts from within and outside the park. Constraints have also not been included for many of the other proposed income generating schemes. These should be noted.	related to for example 4X4 trails were not significant, as all forms of development would be bound by conservation principles and policies that dictate the development of National Parks. Any activities which are listed in the national regulations will follow standard EIA procedures to assess any possible impacts that these may have.
	Socio-Economic Assessment	
	A number of concerns have been raised around the socio-economic assessment that was done for the SEA. One of the main areas of concern is that 1996 census data has been used for this study which does not give a true reflection of the area and therefore its validity in making decisions on the expansion of the park. The impression created by this is that the incorrect information is purposefully provided to create the impression that the expansion of the park is a viable option.	The initial specialist studies for the gAENP were desktop studies to determine what information was available and what additional studies were required. It was recommended in the SEA that the socio-economic assessment be updated and that additional studies be undertaken. This has in fact been done in selected areas as part of the resettlement policy framework study. This study indicates that the 1996 census data were in fact inaccurate, in that they grossly overestimated the amount of people living within the planning domain. A more detailed survey should therefore be undertaken.
	It seems that the studies have not all been done and are not complete. How can such important decisions be made on incomplete studies, especially where economic information is lacking? One needs to look at how much agricultural land will be affected by the 370 000 hectares of the Park and quantify the impact of this in financial terms.	A fairly broad but rather conclusive cost benefit analysis was undertaken, which demonstrated that in most areas of the planning domain the conservation alternative represents a more financially viable option than current land use, especially with the exclusion of the Alexandria dairy farming area. IAPs have called for more detailed studies on the Merino farming area, but no agreement has been reached on this matter.
	The figures for the socio-economic study need to be checked and corrected. If these figures are incorrect how many other figures in other reports might not be incorrect.	The initial specialist studies for the gAENP were desktop studies to determine what information was available and what additional studies were required. It has been recommended in the SEA that the socio-economic assessment be updated and that additional studies be undertaken.
	The figures quoted for salaries for farm workers is not correct (R300 – 500), where do these figures come from?	Data from the 1996 census were used in the socio-economic assessment. This data was supported by a limited farm survey conducted for one of the specialist reports. A more thorough socio-economic assessment has been done as part of the Resettlement Framework Plan (RFP) and data will also be updated when the 2002 census data becomes available. The information from the RFP report indicates that the average wage in a selected area of the planning domain is R698.00 per month, and the median value R588.00.
	Alexandria cannot be used as an indication of poverty in the region to motivate the project, as it is not a poor area.	Alexandria was not singled out as an example of the poverty in the area. Rather the level of poverty was presented generally for the entire planning domain.
	What will be the impact on Paterson, specifically Bulkop and the Co-op which presently employ people.	A detailed area specific socio-economic assessment has not been done rather focused at the broad trends and issues.
	SANParks moves forward on the assumption that it is only SANParks that conserves the	The 10% target does consider the contribution made by private reserves within the planning domain and

	environment. The 10% target should take into account private conservancies.	these were captured in the conservation planning exercise.
	Public Participation	
	Sandy & Mazizi said we were going to be given six weeks to comment but we only have four weeks, can this be extended?	An extension of the comment period was granted to I&APs that requested. The comments period provided was beyond that of the legal limits.

3.2.3 Project Management Related Issues and Information

	ISSUE	RESPONSE
	Management Arrangements	
	How will SANParks accommodate existing conservancies and what say do they have over the running of these conservancies, e.g. Riverbend	The management of existing conservancies, which focus on wildlife conservation within the planning domain, will be negotiated with each individual landowner. The inclusion of such areas into the national park is dependant upon the adoption of SANPark's conservation philosophies and principles.
	Local people should be targeted for contract parks not people from outside of the area.	Local people will be given preference as they are seen to be directly affected by the expansion project and this is addressed in the park's procurement policy.
	What is meant by contractual Parks and will SANParks be giving out concessions?	Contractual Parks allows for the ownership of private land within the park. The details of each contract are negotiated in consultation with specific landowners as the dynamics and requirements for each area differ.
	How large does a farm need to be to be included under a contract, will SANParks consider individual farms?	The area requirements will vary from region to region within the planning domain and inclusion of properties will be guided by the contribution to the conservation of the area's biodiversity.
	Will contractual parks allow you to continue with agriculture?	No, once an agreement has been reached with SANParks the private contractual partner agrees to follow the conservation principles of SANParks. In the case of Addo, SANParks advocates restoring all the historic biological processes, of which free-ranging large carnivores remains an integral component of the project.
	WESSA EP supports management option 1 whereby the majority of the Park is under schedule 1 ownership and management. It is our belief that such an approach would be in the best long-term interests of both the South African community and it's natural heritage (biodiversity and cultural);	This approach is the preferred management option by SANParks.
	The need for the commercialisation of certain 'zones' within National Parks in South Africa to ensure the financial viability of the Parks is accepted. However, the impact of the development of areas for exclusive use on the general public of South Africa, via the loss of viewing and other opportunities in National Parks, has not been adequately assessed. The collective social impact of non-availability of concession areas within the GAENP on the general public of the Eastern Cape and South Africa be fully assessed, and that these findings be used to stringently determine the total number and size of future concession areas within the Park.	The zonation of the park has not yet been completed, as there remain areas to be consolidated. Once completed the zonation plan and allocation of additional concessions as well as general use zones will be completed. SANParks is currently investigating options to maximise benefits from national parks at all levels. The need for non-concession tourists remains an integral part of the SANParks tourism philosophy.

	Non-indigenous Game	
	Game farms in the area use foreign game as they are more suitable to the environment. Money is made from game that comes from game farms in the Northern Transvaal. SANParks should rethink their strategy of not allowing foreign game into the Park.	The introduction of "foreign" (non-indigenous inclusive of southern African species) game into SANParks is against their conservation philosophy. It is also ecologically unwise to follow such practices.
	Access to the Park	
	Where will the second entrance to the park be situated? The Sundays River Valley is concerned about an entrance on the N2 and the impact on the town of Addo. Will farming alone be able to sustain Addo.	The second entrance to the Park is proposed at Colchester with the current exit/entrance option remaining. It is not anticipated that this will have a negative impact on the town of Addo, but would be subject to a separate environmental study.
	Parks belongs to all the people of SA, SANParks needs to ensure that everyone has access to the entire area.	Once the park has been fully consolidated there will be a zonation process that will identify areas into various types of use zones thus restricting access in certain areas.
	A better road to Addo is needed.	This issue has been raised within the local Integrated Development Plans of the NMMM, the responsible authority.
	How will people access the mountainous areas purchased?	Determined as part of the zonation system. Access will be allowed through a number of products: horse, walking and 4x4 trails, self drive etc.
	Will one be allowed on Darlington Dam with a boat?	Activities compatible with nature based tourism would be supported such as canoeing and sailing. The use of motor boats don't necessarily fit into this but would be considered as part of the general park zonation plan.
	What provision is being made for the people of Colchester to ensure their access to the river?	The future management and utilisation of the river will be negotiated in consultation with local residents and affected parties, to find compatible ecological and recreational zonation system.
	4x4 vehicles have been banned from the beaches, how will access to these areas be obtained to view the big 7?	A number of opportunities will be possible. It is likely that boat based trips would be undertaken to access the marine protected area to view the marine species of the big 7. Access to the beach requires a permit from DEAT or SANParks, and is presently being discussed.
	Fencing of the Park Fencing presently going up in the Park is blocking off access for Eskom to their powerlines.	SANParks will ensure access for Eskom to their powerlines.
	Provincial Roads within the Park	
	Does SANParks go through Provincial Roads to deproclaim a road?	SANParks would follow the stipulated procedures for such deproclamation and where necessary would meet with the SA National Roads Agency or the Provincial authorities to discuss the utilisation of roads within the park.
	Sundays River Access and Management	
	The estuary and river mouth of the Sundays River have been listed as a high priority area will access to these areas be restricted? What is meant by 2km's of the Sundays River estuary being incorporated into the Park? What restrictions will be placed on boating on the Sundays River? There is a concern that the Sundays River will be closed altogether for recreation.	The future utilisation of the Sundays River will be developed in consultation with the residents of this area and other affected parties and would form an integral part of the zonation plan. The 2km stretch refers to that between the Sundays River mouth and the first bend near the Pearson Park resort on the N2 which would be incorporated when the Schelmuhoek dunes are included

	Boating and fishing is an expensive sport with many fees and licenses being paid for, this needs to be taken into account when managing access to Sundays River.	This will be considered when developing a management and zonation plan for the river.
	Detailed Project information	
	What kind of camps will be developed in the Park?	Camps in the park will vary in order to cater for a range of local and international tourist needs. There will be a combination of SANParks as well as concession site camps, which will range from bush camps to luxury accommodation.
	Farmers farm for profit, not conservation, lions at Darlington Dam are inconsistent with small stock farming.	SANParks acknowledges that in certain areas conservation and farming practices are incompatible however, SANParks has committed itself to working together with its neighbours to minimise negative impacts and work towards building relationships of mutual benefit.
	Once the area is fenced off what animals will be stocked?	The entire greater Addo Elephant National Park can accommodate a wide variety of species given the diversity of habitats, as per consultant reports. The species that are stocked will be those that are suited to any particular region, i.e. no wildebeest in thicket habitats, while also having been recorded from the area historically. Inappropriate species would include, giraffe, blue wildebeest, white rhino, impala, nyala, waterbuck, sable antelope, red lechwe, as well as any other exotic species such as fallow deer.
	What is meant by ownership of the dunes has been transferred to SANParks and are we trespassing when we walk on these dunes.	SANParks is now responsible for management of the dunes and access to these dunes will be regulated through designated access points. Activities on the dunes and Sundays River beach will be addressed in the zonation plan.
	Have the latest recommendations on responsible tourism and eco-tourism adopted at the recent Indaba conference been taken into account in the proposal?	The SEA and conservation planning study were completed prior to the recent Indaba Conference and these recommendations were therefore not specifically addressed. However, SANParks currently adopts this approach in its management of national parks and adheres to best practise.
	The Addo Planning forum needs representatives from farm workers.	The restructuring of the Addo Planning Forum has been proposed and the representation of farm workers will be addressed as a priority. However, with them not represented by a union or other organization makes it difficult.
	Will the expansion of the park go south of the R72 in Alexandria?	This will be the case for selected areas as SANParks now manage the Woody Cape reserve and Alexandria forests sections which are south of the R72
	What is the total cost of the land to be purchased and does SANParks have the money for this?	Estimated purchase for the whole area is about R400 million but SANParks has no intention of purchasing the entire footprint rather focusing on key areas for which SANParks largely has the funding from DEAT and donors. Other private land could be incorporated on a contractual basis.
	The community of Paterson together with the local authority is presently looking at land for agriculture. How will the expansion of the park impact on this project?	A number of priority areas for SANParks were identified in the conservation planning process. The immediate Paterson surroundings were not identified as being of critical importance. Furthermore, SANParks will not prescribe to the general public about making land use decisions on private property.

	If this is an independent study is SANParks obliged to implement the recommendations?	Please refer to the recommendations and conclusions of the final SEA.
	Where is the golden mile and will it be excluded from the Park?	This is the Alexandria dairy area south of the R72, and will be excluded.
	What will happen to the additional land up to Bushmans that used to be part of Woody Cape?	All land that was previously part of the Woody Cape Nature Reserve now forms part of the Addo Elephant National Park and is managed by SANParks. SANParks has no intention of including the land between Canon Rocks and Woody Cape in the park.
	What is the Addo Planning Forum?	The Addo Planning forum is a representative forum consisting of key stakeholders within the planning domain. These include municipalities, NGO's, business, tourism, agriculture, conservation, and land affairs. The forum meets four times a year to discuss relevant issues around the expansion of the park
	The water in the Sundays River Inter Basin Transfer Scheme is the livelihood of farmers in the Sundays River Valley and vital to their existence, how will the Park impact on this?	The expanded park will have no impact on the water resources downstream of the Darlington Dam as the Sundays River Irrigation Board will still be responsible for providing this water and managing its release.

3.2.4 Marine Environment

	ISSUE	RESPONSE
	Commercial Fishing	
	From a scientific point of view certain facts in the SEA need to be corrected e.g. pg 39 & 49 relating to squid spawning grounds and the collapse of the line fishing industry. Fishing for squid has a very limited impact on other species, this must be considered. Excluding squid fishing would place a very negative impact on other areas. You already have a number of protected areas along this coast line, Sardinia Bay, Tsitsikamma etc. The argument that one needs to close this area to provide a breeding ground for squid is unfounded. The average investment in the fishing industry is about R3 million which is consistent throughout.	The management of the Marine Protected area will be developed in consultation with affected parties, including the commercial fishing industry.
	The establishment of a Marine Protected area which prohibited fishing would have a tremendously negative impact on the commercial squid fishing industry which produces 6 000 tons per annum of fish, employs 2500 fisherman and 300 factory workers totaling R180 000 million to the economy.	This comment is noted and will be taken into account when developing a management plan of the Marine Protected area.
	How will the Marine Protected area be managed in coordination with the Algoa Bay Management Plan?	It is likely to form part of the ABMP. SANParks will be involved on the ABMP steering committee in future discussions.
	Islands	
	What islands will be included in the park and will it include Jaheel? The islands are highly biodiverse and are presently under serious threat from perlemoen poaching.	The Bird and St Croix Island group would be included in the Marine Protected area. The threat of perlemoen poachers is presently a national problem and an area for concern. Management of the Island groups will include mechanisms to prevent poaching.
	Bird Island should be used for low volume high yield tourists.	This recommendation is noted.

	A successful rehabilitation programme will require active monitoring of the islands to identify oiled birds and remove them for rehabilitation to the rehabilitation centre. Samrec & WESSA propose that the SEA should impose on SANParks as part of the management of the islands an obligation to monitor the animals on the islands on a frequent basis, identify animals in need of rehabilitation and remove such animals for treatment at the rehabilitation centre.	This recommendation is noted. It is likely that this will form part of SANParks management of the marine area. There are currently long-term seabird monitoring programmes in place on the islands and these will continue.
	General	
	It is recommended that a conservation area of a 500m radius around St Croix and Brenton and an appropriate area around Jaheel be established and not the whole expanse of sea up to the high water mark.	This would not be in line with the conservation policies of SANParks, whereby functional ecosystems and processes are conserved.
	Commercial oyster collecting has been conducted along the coastline opposite St Croix & Brenton since 1962 with the approval of Marine and Coastal Management. The beaches in this area are also used for rock and surf angling since 1955. The marine protected area should not interfere with these activities.	The management of the marine protected area will be developed in consultation with all affected parties, including MCM, as well as commercial and recreational fishing communities.
	Commercial fishermen are exploiting the marine environment. What will happen to management of the marine environment while a management plan is being developed?	Until a management plan has been developed and implemented, the current levels of exploitation will continue.
	Exactly where does the boundary end at Boknes and Cannon Rocks and where is the Marine Protected area?	The description of the MPA boundary is provided on page 64 of the marine specialist report (#3) which forms part of Volume 1 of the SEA. The area is delineated by the meridians of 25°42'E and 26°30'E, which run perpendicular to the coast some 0.5 nm west of Jahleel Island and circa 1 nm east of Cape Padrone, respectively. The seaward limit is defined by latitude 33°52'S

3.2.5 Communication Strategy

	ISSUE	RESPONSE
	SANParks needs to talk to affected people, to consult with them and ensure that they are part of the process and can plan ahead. There should be an ongoing mechanism to deal with issues that come up through the project.	SANParks is in the process of developing a communication strategy, which will amongst others ensure that affected people are kept informed of the project progress. Affected parties are also encouraged to contact SANParks directly with any specific queries that may fall outside of this communication strategy.
	The way forward on the process has not been as clear as it has been up until now, SANParks needs to continue with this kind of communication.	It is the intention of SANParks to develop a communication strategy, which will continue to keep affected parties informed.
	The poor record of SANParks level of communication with affected parties is correctly acknowledged. The need to improve communications is stated in the report. It would be helpful if an effective communication programme is developed, costed, funded and received SANParks' commitment to its	SANParks is committed to developing a comprehensive communication strategy.

	implementation. This is a very necessary and very expensive exercise.	
	The way forward [section 8.3] is not clear. It only states what happens to the SEA. It should rather give a possible 5-year plan of what should be happening – particularly in terms of specific developments and communications with I&APs.	This recommendation will be taken into account when developing the communication strategy.
	Farmers in Nanagga are not happy with the way things have been dealt with in the past and this has impacted very negatively on farmer's lives. It is unacceptable that SANParks is still not communicating details to farmers and that they still do not know where they stand. What has been presented has created even more uncertainty for people. The project has been implemented over a number of years at a detriment to farmer, where are the farmers rights in this process? The plan needs to be more refined with a clear way forward.	Farmers in Nanagga will be included as part of the communication strategy and be kept informed of the project progress. It is acknowledged that the assessment and involvement of a project the size of Addo over a number of years can create uncertainty in certain areas. The farmers are represented on the Addo Forum and as such the feedback from that should be made to the farmers via their representative

3.2.6 Land purchase strategy

	ISSUE	RESPONSE
	Approach and Timeframes for Land Purchase	
	Is the outer circle on the priorities map SANParks final long term aspiration and the inner red circle the short term goal? What are the short and long term timeframes for acquiring land? There are 8 priority areas, what will happen to the areas falling outside of the priority areas.	The inner circle represents the gAENP footprint. The outer circle includes an additional 5km buffer zone and together these form the gAENP planning domain. The priority areas are those areas that have been determined by the C-Plan exercise as being important for SANParks in terms of conservation value to protect processes and achieve targets. Areas outside of these SANParks priority areas may have been identified in the C-Plan exercise but their contribution to achieving conservation goals for the area would depend on alternative mechanisms, such as conservancies. A six-year time frame is being planned upon.
	While the latest map is more comprehensive there is still uncertainty on what farms it affects.	Affected farm owners will be contacted by SANParks. Farm owners who are uncertain about the status of the farms should contact SANParks directly. Those directly affected by the expansion have been by and large contacted by SANParks.
	Are these the final boundaries for the expansion of the Park, experience elsewhere with SANParks indicate that the area will continue to grow.	There are no final boundaries for the park as SANParks will buy land as and if it becomes available and if it contributes to meeting conservation goals. But SANParks won't be planning to buy outside the domain.
	Purchase of Land in Alexandria and Nanagga	
	The report states that SANParks will not actively pursue the purchase of land in Alexandria and Nanagga yet there are two priority areas indicated for this area. These areas are high intensive dairy areas and	The priority area at Alexandria north of the R72 has been identified as a low priority area and will therefore not be the focus of land purchase by SANParks. It does not mean that SANParks cant be approached to purchase the land or visa-versa – it

	important to agriculture	just means that SANParks wont be actively expanding the land via purchases. The Nanaga area was identified as a high priority area but the entire area covered by the ellipse may not be required. Properties within this area will be identified and SANParks will approach these landowners as necessary on a willing buyer-seller basis.
	The Alexandria and Nanagga farming area are recognised as important for agriculture will SANParks still target this area for incorporation in the Park?	Please see the above response.
	Should SANParks actively pursue the incorporation of this area into the Park and detailed socio-economic assessment of the area must be done.	SANParks will investigate the need for a detailed cost-benefit analysis as required
	Expropriation Possibilities	
	If SANParks can prove that a specific farm is vital from a conservation perspective and takes the matter to court who is liable for the farmers legal fees if this is against his will?	SANParks does not favour the expropriation of land. The expropriation process is governed by regulations pertaining to expropriation and the High Court Act prescribes liability for costs that may be incurred in such an event. Should land however be required government makes the farmer an offer on the land. If the farmer refuses to sell the land the government would need to take the farmer to court. If the price offered is accepted by the farmer then no legal fees are incurred. If government can prove that the offer made was fair and reasonable then the farmer is liable for the party and party costs prescribed by the High Court Act.
	If a farmer falls within an area marked as high from a conservation perspective will they be forced to sell?	SANParks is committed to a willing seller willing buyer strategy for acquiring land. The reason a specific farm may be marked as of high conservation value may vary and this would need to be taken into account in the purchase process, e.g. a farm may have one patch of high biological significance.

3.2.7 Coega Industrial Development Zone Related Issues

	ISSUE	RESPONSE
	What is the buffer zone between the gAENP that the Coega IDZ?	The buffer zone would vary. In the marine environment there is unlikely to be any buffer whatsoever due to the proximity of the islands while at Darlington Dam there is quite an expansive buffer. Along the coastline there is likely to be a buffer of only 4-5 km of privately owned land.
	The CDC will work with SANParks to assist them in whatever way to realize the Vision of the GAENP. This may be achieved by incorporating visual guidelines for CDC developments, sharing experience in making people beneficiaries of a development as well as technical know how of managing infra-structural contracts in a cost effective and empowering manner.	SANParks appreciates the interest shown by the CDC in the gAENP project and is committed to working together to ensure that the two developments are compatible.
	The impression created by the SEA is that the Coega Project and the proposed Greater Addo Elephant Park are mutually exclusive	The report states that from an environmental perspective, the CDC provides a constraint to the gAENP for the following reasons:

	<p>developments and cannot work together in any given circumstances. SANParks have stated that they believe the developments can be compatible. The report makes it sound like given a choice its either the GAENP or the Coega project, The Coega project or the GAENP will not on their own entirely resolve the problems faced by the regional economy.</p>	<p>?? Development of the planned Coega harbour and industrial area adjacent the park is expected to have considerable negative impacts in the form of general pollution (atmospheric, marine, light, invasive aliens and noise), in addition to knock on affects such as increased road, rail traffic and other developments – all of which are largely not compatible with conservation.</p> <p>?? The proposed development of a deepwater port at the mouth of the Coega River presents a highly significant future limitation to the proposed GAENP-MPA, as the eastern breakwater of this port will literally define the western border of the MPA. The port will service a proposed large back-of-port Industrial Development Zone, which could have major repercussions for the proposed MPA as well as the islands.</p> <p>It was also stated in the report that careful physical planning and constructive engagement with Coega Development Corporation can mitigate the constraint that the proposed development of the Industrial Development Zone at Coega poses on planning for tourism and optimum land use of GAENP.</p>
	<p>The report does not take into account the benefits or opportunities that will be created by the Coega Project to ecotourism e.g. the opportunities that will be created by the eventual relocation of the tank farm (regeneration of the heart of the city) from the middle of town to an area outside town in order to develop tourism attracting opportunities that could spin off the required through put to Addo.</p>	<p>The report does not take these benefits into account.</p>
	<p>The SEA also does not take into account the improvement of the infrastructure within the Metro due to the Coega Project, as well as the infrastructure with the IDZ that will feed back to the Metro e.g. doubling of the N2, Neptune road will definitely have a positive effect on the success of the Addo Initiative, and again this issue has not been considered as an opportunity.</p>	<p>The report does not take these benefits into account.</p>
	<p>The IDZ's primary objective is job creation - more especially to those that were historically disadvantaged, this is meant to be achieved by inducing foreign investment. One foresees an increase in the disposable income of people within the region particularly the local people. This again creates the opportunity for the GAENP to be also enjoyed by the local people and not only the tourist from outside P.E. and abroad. This misperception needs to be corrected.</p>	<p>This is an opportunity provided by the CDC which was not included in the SEA.</p>
	<p>The GAENP should take the Coega IDZ into account in its planning and recognising any actual constraints or opportunities [rather than perceived ones], just as the CDC is taking the</p>	<p>SANParks is involved in discussions with the CDC, particularly with respect to the assessment of visual impacts to date, in attempts to guide future developments to reduce potential impacts from the</p>

	GAENP into account in its planning.	Coega IDZ.
	The Coega Project is identified as a constraint without any mitigation, the planning of the Coega project does take into account its visual impact on the GAENP. Visual guidelines show that impacts beyond 10 km distance are not significant.	This comment has been noted.

3.2.8 Project Support and Potential Benefits

	ISSUE	RESPONSE
	<p>Addo</p> <p>?? The proposal is impressive and should continue.</p> <p>?? The development is good and the completion is eagerly anticipated.</p> <p>?? The development will be positive for the entire Eastern Cape.</p>	This comment has been noted.
	Madiba Bay will not detract from Addo but would compliment the Park by showcasing attractions in the Eastern Cape and should be encouraged.	This comment has been noted.
	The CDC would like to record its support for this very important initiative. The GAENP could have significant benefits if its can adequately compensate for the potentially affected communities [this is best achieved by aiming to make them beneficiaries of the project] and if it is made financially sustainable [in the long term].	This comment has been noted.
	A limitation to international tourists is that you cannot fly directly into PE. The expansion of Addo would be an important component in the marketing of future charter business to the region.	This comment has been noted.

3.2.9 General Comments

	ISSUE	RESPONSE
	The biggest threat to the expansion of the Park is the present landowners.	This comment has been noted.
	The genuine concerns of the agriculture sector must be taken into account, they are a vital sector of the economy.	This has been taken into account and an economic assessment of the agricultural areas has been recommended in the SEA.
	Why is a resort the size of Pearson Park not mentioned anywhere in the SEA?	The SEA dealt with an overall assessment of the planning domain and identified various economic sectors within this. It did not look at individual operations within the planning domain.
	Recommendations made in the SEA must be incorporated into a management strategy for the gAENP.	Some of the recommendations made in the SEA have already been adopted by SANParks in their Strategic Management Plan and will form an integral part of the Environmental Management System for the gAENP. (MIKE) The recommendations of the SEA as well of the specialist reports and additional studies, will be incorporated into a management strategy, or Environmental Management System, for the gAENP.

	The statement that game migrates into the Zuurberg is incorrect, farmers living in the area will tell that very little game migrates into this area. This is prime sheep farming area.	Historically, under natural conditions, game utilised the Zuurberg as a drought refuge and in an upland-lowland movement driven by habitat/food needs.
	How will SANParks protect Milkwood, Wild Plum and Yellow Wood trees from being destroyed by elephants.	SANParks will adhere to a specific recommended number of elephants to ensure that habitat destruction does not occur. Vegetation monitoring research will form an important part of park management to assess elephant impacts.
	Further studies should be done by consultants appointed by I&APs and not SANParks but should be paid by SANParks.	The process for appointing and paying consultants is prescribed in the EIA regulations and follows national government regulations.
	Is SANParks aware that surveys are being done in the Alexandria area for oil prospecting?	SANParks is aware of activities which are currently in progress offshore.
	What does it mean in the report when it states "This comment has been noted"?	SANParks is aware of the comment and will take it into account in their planning.
	If the Coega IDZ negatively impacts on the Park has SANParks fought this development?	SANParks has submitted comments on the Coega development throughout the process as a registered I&AP and will continue to do so. SANParks is also working in consultation with the Coega Development Corporation to minimise any potential negative impacts.
	Who gives SANParks the right to establish the park?	SANParks is mandated by National Government to conserve the environment on behalf of the people of SA.

CHAPTER FOUR: CONCLUSION

4.1 CONCLUSION

Associated with large projects that evolve over a number of years is always some level of uncertainty and confusion, especially as the project grows and changes.

The feedback received during the last two stages of the public participation process is that there is for the first time, more clarity on the expansion of the greater Addo Elephant National Park. While this may be the case it is just as important to note that for affected farmers in the area there is still no certainty. It is important that SANParks harness the momentum that has been created through this process and continue to communicate with affected people in the area.

The release of the SEA and the public participation process has to a large degree begun the process of building relationships between SANParks and I&APs within the planning domain. While a number of issues have yet to be resolved and still remain areas of concern the development of a good communication system which will keep people informed of the project objectives and progress will go a long way towards developing good will and mutual respect between 'neighbours'.

The general impression that has developed through the public participation process is that while the process for the establishment of the gAENP has not been without its problems there is definite in principle support for the establishment of the expanded Park.