

20 July 2011

Arcus Gibb (Pty) Ltd
P O Box 1635
WESTVILLE
3630
rstow@gibb.co.za

Dear Mr Stow

Proposed Construction of a Link Road
Dube Trade Port – Watson Highway

Draft Environmental Impact Report (EIR):

WESSA recognises that the proposed road provides a strategic transport link and the EIR identifies and describes the impacts of past and existing land uses, the proposed and future developments in the catchment in the short to long term, including the expansion of KSIA. The report notes the importance of considering the future scenario which will increase impacts on the systems, in terms of ecological function.

Approach to Wetland Loss and Mitigation

The construction of the proposed Link Road will result in the permanent loss of an area of wetland and the EIR and specialist report, Terrestrial Ecological and Wetland Impact Assessment, considers the “hectare equivalent” approach to mitigating the loss while an “offset ratio” is discussed in the Environmental Management Programme.

1. “Hectare Equivalent”

The Terrestrial Ecological and Wetland Assessment Report concludes that the loss of 1.79 ha of degraded wetland (33% integrity) can be compensated by rehabilitating 0.55 ha of wetland to 100% integrity. While WESSA finds that the studies undertaken to identify the impacts of the proposed link road, and provide mitigation, are comprehensive we do not agree with the “hectare equivalent” approach adopted to mitigate the permanent loss of the ecosystem.

The approach is flawed as it does not adequately compensate for the loss of wetlands, and effectively makes wetlands more vulnerable to decline (for example, in disregarding the fact that these areas provide habitat (space) and are not solely providers of ecosystem goods and services, and



COASTWATCH
KWAZULU



KZN REGION

100 Brand Road
Durban
4001

Postal address:

Postnet Suite #66
Pvt. Bag X04
Dalbridge
4014

Tel: 031 201 3126

Fax: 031 201 9525

www.wessa.org.za

EIA Co-ordinator:

P O Box 343
4184 Pennington

Tel: 039 9752147

Fax: (request) 039 9752147

Cell: 083 9814814

afromatz@telkomsa.net

FOUNDER MEMBER OF



International Union for
Conservation of Nature

Reg No. 1933/004658/08

(Incorporated Association not for gain)

Registration Number in Terms of the Non

Profit Organisation Act 1997: 000-716NPO

Tax Exemption Number: 18/11/13/1903

DIRECTORS

Messrs: Dr RG Lewis (Chairman),
Prof M Kidd, J Pinnell (National Treasurer),
Dr RJ Taylor, P Burger, G Barnes,
M Fischer, Prof C Fabricius, A Gubb

Mesdames: DL Perrett (Vice Chairman),
SML Gumede (Chief Executive Officer),
S Erasmus, Dr E Rosenberg

MR Ward (Company Secretary)
MJ Powell (Exco Chairman)



such an offset would result in there being less wetland habitat (space) being available in the landscape and land-use matrix. The proposed offset ratios should not be adjusted down for factors like habitat condition particularly where rehabilitation potential may be overlooked.

This is consistent with the NEMA principles which require specific attention to stressed or impacted ecosystems in planning and management as opposed to downgrading their *de facto* importance (section 2(4)(r)).

The functionality based (or “hectare equivalent”) approach does not consider the special habitat status of wetlands and suggests that habitats of low value can be traded because of reduced conservation value, rather than the appropriate response being to attempt intensive management where impacts are reversible, such as in the case of the project area.

2. “Offset Ratio”

The draft Environmental Management Programme (appendix F), section 4.2.6 (a) in addressing the permanent loss of wetland discusses an “offset ratio” using a ratio of 1:3 based on best practice guidelines (Brownlie, 2009 and Kotze, 2007) where approx. 1.55 ha of wetland lost would be offset by the rehabilitation of 4.65 ha. WESSA supports this approach to mitigating the loss of wetlands and it appropriately considers that the current land use state which has compromised the wetlands is reversible.

Cumulative Impacts

The EIR further considers the impacts of the proposed link road and mitigation of wetland loss cumulatively with respect to future scenarios where it was determined that the contribution of the Link Road to cumulative impacts is small compared with other developments proposed for the catchment in the short to long term. However, it was noted that the benefits of mitigating the impact of this project cannot be considered in isolation of the cumulative impacts i.e. the benefits from the mitigation will be reduced/lost as the surrounding area is transformed and systems are further fragmented. It was therefore recommended that the benefits from the proposed mitigation be optimised by rehabilitating and maintaining other wetlands and wooded vegetation on the Trade Port. This will secure ecological functioning in the interim i.e. before the expansion of the airport projected for 20-40 years’ time. This is important given the currently impacted state of the catchment and associated impacts to downstream users. The following was recommended -

1. Cumulative impacts have been considered in this EIA. Mitigation measures have been recommended to address cumulative ecological impacts, however, this would required all parties involved with developments in the Hlawe catchment to identify the need for a catchment ‘Greenbelt’ / “Open Space Plan” and to conserve the relevant portions of wetlands and associated wooded vegetation (and buffer zones where relevant) within their footprints.



2. It was also recognised that it may not be possible to mitigate the impacts of the long term KSIA expansion 'on-site' should the expansion take place. It is therefore recommended that investigations commence into mechanisms to deal with such an eventuality in the planning phase of the expansions.

Without mechanisms in place to address the identified cumulative impacts which are required in order to give value to the proposed mitigation for the Link Road it must be concluded that the establishment of the Link Road will contribute cumulatively to negative impacts on the catchment which is unacceptable. The proposed offset (although it is unclear how the 1:3 ratio was determined to be appropriate) must take cumulative impacts into consideration.

Wetland Rehabilitation Plans

The rapid and ongoing loss of habitat in the catchment is not in line with the slow and often delayed associated rehabilitation and mitigation activities and rehabilitation plans must include timelines and quantifiable requirements.

In addition -

Construction – KSIA Waste Water Treatment Works

It is stated that “The required widening of the embankment along the route will result in the removal of the temporary KSIA waste water treatment works”. How will waste water from the KSIA be managed during the period when the facility is out of commission? The management of this aspect needs to be explained.

Thank you for the information and opportunity to comment.

Yours sincerely



C Schwegman (Mrs)
EIA Co-ordinator, WESSA KZN Region

