

Table 3: Comments and Response Report for the Proposed Hotel at the Confluence of the Timfene and Crocodile Rivers within the Kruger National Park

Issues And Comments Raised	Commentator/s	Source	Response
Comments Received On Initial Public Participation			
<ul style="list-style-type: none"> It is important to note that Riverside Farm is a sugarcane production farm. Sugarcane is burned before cutting (harvesting), and this practise happens on daily basis. We will not be able to stop this practise under no circumstances. We will not be responsible for any smoke or ash that might pollute the air towards the planned hotel. 	Mr Cornel van der Merwe Neighbour to proposed Hotel	Fax 10 August 2010	<p>Site No. 2 was selected by the Applicant after due consideration of the negative impacts of the presence of sugar cane on the southern side of the Crocodile River. Mr. v d Merwe will be contacted to ascertain the seasonality of the burning, harvesting and other activities and to investigate ways in which the impacts can be limited.</p> <p>It is acknowledged by the Applicant that Mr, v d Merwe will not be held responsible for smoke or ash. Rehabilitation of the southern river bank will be investigated which could contribute to minimising the impacts.</p> <p>Dr Kotze has been registered and will be afforded an opportunity to comment on the Draft Scoping Report</p>
<ul style="list-style-type: none"> Registered as an I&AP 	Dr. Pieter Kotze Clean Stream Biological Services	e-mail 03/08/2010	
<ul style="list-style-type: none"> Registered as an I&AP; Wishes to arrange a meeting 	Mr Hennie Snyman Malelane Chamber of Business	e-mail 6 September 2010	<p>The Malelane Chamber of Business will be notified of the availability of the Draft Scoping Report. Once a date has been determined for a Focus Group Meeting Mr Snyman will be contacted and informed accordingly.</p>

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<ul style="list-style-type: none"> ■ Kruger Park already congested with volume of guests and cars. ■ Crocodile River frontage has already been exploited to the fullest with Marloth Park development and all the other developments on outer boundary of the River from Malelane Gate to Crocodile Bridge gate. ■ Major impact study must be published to all concerned. "Re Environmental Impact". ■ "Kruger Camps" in keeping with the theme and character of the Kruger not hotels. ■ If this is passed what is to stop further development in Kruger 	Mrs Rosalind McEwan Komati River Chalets	Fax 22 July 2010	<p>■ The Site was identified by the SANParks for the possible development of a Hotel as it is situated within the 'High Intensity Leisure' Zone as per the Draft Conservation Development Framework Since making the Draft coping Report available for comment it has been confirmed to ILA that the zoning as indicated in the PPP agreement is not yet formal. However the SANParks is in the process of refining the Conservation Development Framework (CDF). Refer to Figure 5 which indicates the Park's intent in this regard.</p> <p>■ Furthermore the proposed site is situated along the periphery of the Park which is in line with the peripheral development policy which allows for development on the periphery of the park rather than within the park which could result in a greater ecological impact.</p> <p>■ A Park & Ride Facility is proposed at the Malelane Entrance Gate. The facility will provide for parking of vehicles for guests of the hotel. The facility will also provide for parking of vehicles for day visitors to the park in order to utilise park game drive vehicles. The development will therefore not contribute to an increase in traffic in the park. As the establishment of the Park & Ride facility will also cater for day visitors and not just hotel guests it will serve to reduce the number of vehicles travelling within the park.</p> <p>■ The proposed development is in line with the proposals of the KNP Management Plan and the Parks Commercialisation Strategy.</p> <p>■ A full Environmental Impact Assessment is in process of which this Scoping Report forms part. The Draft Environmental Impact Assessment Report will include : ➤ All specialist reports as well as analysis of; ➤ Potential Alternatives identified; ➤ Provision of services; ➤ Details on the re-routing of Rhenosterkoppies Road;</p>

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<ul style="list-style-type: none"> It has been reported that the Malelane gate will operate 24 hours when the new hotel concession opens in the park. Is this valid? What will be the impact of the 240 bedroom hotel on the Quota of the Malelane Gate? The Malelane gate was scheduled for an upgrade, can an update be given on this. What is the KNP going to do with the traffic congestion that is being caused on the R570, by people waiting as this is a national road, causing access problems to landowners as well as people driving on the wrong side to bypass. What would be the feasibility of electronic feeder boards be placed up at start of R570 advising guests to other gates to eliminate congestion. (Same as traffic boards seen on N4 outside Nelspruit) How will the new system at Crocodile Bridge Gate work. Extra light in the park. Day animals sleep at night and night animals certainly don't want the light. 	<p>Variety of Komatiipoort and Malelane product owners:</p> <p>5 August 2010</p>	<p>e-mail</p>	<p>Environmental issues; Assessment of significance of environmental issues; Assessment of significant impacts.</p> <p>The report will be made available to registered I&AP's for comment.</p> <ul style="list-style-type: none"> Mitigation of environmental issues; Only guests to the Hotel will have 24/7 access. Details on the operation of the access and Park & Ride facility will be included in the EIA Report. Access times for other visitors will remain unchanged. Details regarding the Park & Ride Facility are not yet available. This will be included in the EIA Report which will identify impact on the quota of the Malelane Gate. The Park & Ride will provide for day visitors to the park as well which will decrease the number of vehicles entering the Park. It is also proposed that a fast track lane could become operational where not all vehicles entering the Park will be required to first park and enter reception, which will serve to decrease congestion at the gate. Fast track lanes are also proposed at the Crocodile Bridge including Park & Ride Facilities. <p>Visual impacts anticipated will be assessed further and mitigation measures proposed during the Environmental Impact Assessment Phase. Mitigation measures will take cognisance of amongst others:</p> <ul style="list-style-type: none"> Building materials; Site topography; The site's natural screening capability; Colour selection; Structures; and Obtrusive lighting conditions. <p>Mitigation measures provided must aim to limit visual impacts through ensuring that the development proposal blends in with the natural environment and has minimal impact on faunal activity (lights, migration routes, lay-out of buildings etc)</p>

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<ul style="list-style-type: none"> International tourist expect to have an African experience and don't want to stay in commercialized hotels, rather upgrade existing camps How will this affect our B&B's, lodges in the surrounding areas? I realize it is job creation, but rather spend money on teaching customer service as well as language skills. This is so lacking in the hospitality industry. For the meeting, I would like to discuss the queuing system at Malelane Gate and the fact that guests have to queue even if they have a reservation. 		e-mail 5 August 2010	<p>■ Many of the self catering facilities throughout the park are popular but do not meet the expectations of visitors who want a full service safari experience that includes modern conference support facilities. The proposed hotel will be a full service facility that is proposed on the periphery of the park.</p> <p>■ The PPP will be required to abide by and comply with the KNP Sustainable Design Principles & Guidelines, KNP Environmental Guidelines as well as mitigation measures as proposed as part of this EIA. The development proposal will therefore be designed in such a manner as to blend into the natural character of the Park as per the aforementioned requirements.</p>
<ul style="list-style-type: none"> Comments will be made once the reports have been made available. We are incorporated into KNP and already have approval for a hotel site of 100 rooms on the Crocodile river. We also have approval for a low water bridge linking to the 525. 	Mr Martin Heyneke Lugedlane Developers	Fax 5 August 2010	<p>■ Noted. Mr Heyneke will be informed of the availability of the Draft Scoping Report and afforded the opportunity to comment.</p> <p>■ The Applicant is aware of the Mjejane Game Reserve and the development plans for the Reserve, including the prospect of a competitor hotel. The Applicant regards the Mjejane Reserve as a complementary attraction in raising the tourism profile of the area and wishes to operate in harmony for mutual benefits.</p>
<ul style="list-style-type: none"> This serves to advise that we intend to participate in the EIA process of the new development and our registration will be lodged by 13 August. 	Heather Cranko General Manager Pestana Hotels and Resorts	e-mail 22 July 2010	<p>■ Noted</p>

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<ul style="list-style-type: none"> ■ Why a Hotel in Conservation area? ■ Question arises, who is benefiting from this? Not nature, but either government or a member of state. ■ Does not fit the initial purpose of the Kruger National Park. 	Mr Riaan Ollwagen	e-mail 19 August 2010	<p>■ In September 1998 the Department of Environmental Affairs and Tourism articulated the need for SANParks to prepare for lesser dependence on state funding, which would increasingly be aimed at funding the essential conservation requirements. This formed the basis of the Commercialisation Strategy adopted by SANParks in 2000 with its foundation in the economic theory which defines the State's responsibility as one of performing a regulatory function and intervening in the market place only where there is market failure. The objective was to reduce the dependence on state funding and improve existing operational efficiencies.[SANParks Strategic Plan for Commercialisation 2006-2011]</p> <p>■ In 2000 SANParks embarked on a commercialisation process that allowed it to grant concessionaires rights for the use of defined areas of land and infrastructure within national parks, coupled with the opportunity to build and operate tourism facilities over specific time periods. The aim of the process has been to increase the net revenue that commercial activities contribute to SANParks's core function of nature conservation [Kruger National Park Management Plan December 2008]</p> <p>■ Will be notified of the availability of the Scoping Report and afforded an opportunity to comment.</p>
<ul style="list-style-type: none"> ■ Requested more information 	Merek	e-mail 20 July 2010	<p>■ All persons have been added onto the database and will be afforded the opportunity to comment on the Draft Scoping Report.</p>
<p>Please also register the following persons to receive correspondence – also for Lukimbi Safari Lodge.</p> <ul style="list-style-type: none"> ■ Mrs Marilyn Marais (Director) ■ Mr Deon Bezuidenhout ■ Manager – Lukimbi Safari Lodge ■ I also recommend contacting other concession holders in southern KNP – Jock Safari Lodge 	<p>Craig Gebhardt On behalf of Lukimbi Safari Lodge (Pty) Ltd</p>	e-mail 6 October 2010	<p>■ Concessions within the Southern Region have been added onto the data base and will be afforded an opportunity to comment on the Draft Scoping Report</p>

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Initial key concerns on this project relate to the following:		Craig Gebhardt On behalf of Lukimbi Safari Lodge (Pty) Ltd	e-mail 6 October 2010	<p>■ The status quo of the tourism market and the feasibility of the new proposed Hotel was investigated and was proved to be financially sustainable.</p> <p>■ As per the Information Memorandum for the Malelane Hotel Development prepared by SANParks the KNP Tourism statistics are as follows: 'For the financial year ending March 2008, guests to the KNP increased by 6.3% from 1,313,185 to 1,396,054 and average unit occupancies increased by 76.1% from 68.9% to 72.5%. Bed occupancies increased by 2.7% from 54.1% to 57.6% and Tourism Income was up by 11% compared to the previous financial year. For the collective period of the ten month term of April 2008 to January 2009, with the exception of Guests to Park, overall KNP indicators are up. Activities increased by 9.0% from 128,935 to 140,514, Camping person nights are up by 7.7% from 324,830 to 349,817 person-nights and Unit Nights sold are up by 7.7% from 308,211 to 332,004. Unit Occupancies increased by 3.9% and Unit Occupancies and Bed Nights sold by 3.9% and 6.6% respectively. For the period under review, total Guests to Parks for Kruger decreased by 2.9% from 1,201,922 to 1,167,371 persons. (A copy of this document is available on the SANParks website)</p>
<p>1. Feasibility and Financial Impact on existing tourism operations Lukimbi Safari Lodge is a 32 bed 5 star that was developed on the 15 000ha Lwakahle concession (Between the Mlampane, Biyamithi and Crocodile River). The 20 year concession with SANP was tendered for in a competitive bidding process in 2001. At the time of tender there was no intention indicated from SANParks to develop additional upmarket (4 Star) beds within the south of the KNP. The development of an additional 240 upmarket beds has the potential to significantly impact on the operation of Lukimbi Safari Lodge. This is of particular concern in that the concession agreement entered into by SANParks and the concessionaire binds the concessionaire to making minimum payments to SANParks based on projected income at the time of the tender submission. Since the concessions were awarded there have been a number of unforeseen events (9/11, 2008 Recession etc. that have made it very difficult for the concessionaires to meet these income projections.</p>				

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<p>The development of additional beds has the potential to reduce and limit the occupancies at concessions such as Lukimbi Safari Lodge. The effect of this could be quite substantial on the concessionaire. The knock on of reduced or limited occupancy may have (but not limited to) the following impacts:</p> <ul style="list-style-type: none"> ■ Concessionaire doesn't meet income projects - the project starts experience negative returns on investment. ■ Jobs are compromised ■ Community and empowerment initiatives being undertaken by the concessionaire are compromised due to reduced revenue. <p>Have any feasibility studies been undertaken to:</p> <ul style="list-style-type: none"> ■ thoroughly assess the tourism market? ■ Is the market able to sustain 240 additional 4 star beds? <p>What will the impact be on similar surrounding tourism establishments? I don't believe that the surrounding tourism facilities are operating at full capacity, such that the impact of this development would not be felt. There are a large number of middle to upper market tourist beds immediately adjacent to Malelane gate (Malelane Sun, Pestana resort and others). Are these beds being filled?</p>	<p>Craig Gebhardt On behalf of Lukimbi Safari Lodge (Pty) Ltd</p>	<p>e-mail 6 October 2010</p>	<p>The proposed Hotel development falls within the approved KNP Management Plan for which a consultation process was undertaken. The management plan of the KNP provides for the broad zoning system on which potential tourism and other infrastructure developments may take place. The Conservation Development Framework is the plan that guides development in National Parks. This is supplemented by the various park management plans. The Hotel proposal offers a different product as that of the 5star lodges within exclusive traversing areas and will therefore cater for different spectrums of visitors. The proposed Hotel will be a 4 star product focused on conferences with much lower rates than those of the lodges. In addition the Hotel has no exclusive traversing area and will make use of SANParks infrastructure and vehicles for purposes of game drives only on the KNP public roads.</p>

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<ul style="list-style-type: none"> Assess the impact of additional traffic in the South of the Park. This area is one of the busiest sections of the park and visitor quotas are regularly reached. The development is likely to generate a substantial amount of additional organised game drive traffic. Much of this will occur after hours (Night drives). This will have an impact on users such as the concessions. <p>Other concerns</p> <p>These items are of a general nature and it is believed, from perusing the Background Document, that they will be addressed.</p> <ul style="list-style-type: none"> Water Abstraction – the Crocodile River is a stressed system – particularly in winter; Effluent treatment and disposal – no mention is made of an EIA application in terms of NEMWA. Will treated effluent be released to the Crocodile River? Increased traffic volumes in the south of the park. Roads and sightings are already heavily congested; Night driving in the park to access the hotel – how will this be managed and controlled? <p>I believe that Lukimbi Safari Lodge will have further comments once more detail on the proposal is available, however we request that you consider the recommendation of specialist reports on feasibility and financial impacts on existing operators in your scoping report.</p> <p>Please keep us informed of any public meetings.</p>	<p>Craig Gebhardt On behalf of Lukimbi Safari Lodge (Pty) Ltd</p>	<p>e-mail 6 October 2010</p>	<p>A Park & Ride Facility is proposed at the Malelane Entrance Gate. The facility will provide for parking of vehicles for guests of the hotel. The facility will also provide for parking of vehicles for day visitors to the park in order to utilise park game drive vehicles. The development will therefore not contribute to an increase in traffic in the park. As the establishment of the Park & Ride facility will also cater for day visitors and not just hotel guests it will serve to reduce the number of vehicles travelling within the park.</p> <p>It is proposed Day & Night Game Drives and Guided Walks be operated by SANParks vehicles and guides to provide this service to guests. The Hotel will operate according to SANParks policies and procedures relating to game driving, including night driving.</p> <p>There is no potable water on site. The closest perennial river is the Crocodile River, although it may dry up during periods of extreme low rainfall. Water for the development will either be supplied from the Crocodile River or boreholes. The quantity and quality of underground water is not known and will have to be determined through a Hydrogeological Evaluation. A license from the Department of Water Affairs will be required to extract water from either the River or from boreholes. The EIA Report will confirm: Point of supply; Water design criteria; Services lay-out; Affected Floodlines.</p> <p>A Waste Use License in terms of the National Environmental Management: Waste Act, 2008 will be required for the treatment of effluent, wastewater or sewage with an annual throughput capacity of 15 000 cubic metres or more. Adherence of the proposed system to the requirements of the SANParks Environmental Guidelines will be assessed as part of the EIA Phase. Once specifications of the waste water management system become available the associated impacts relating to approximate volume, discharge and method of treatment will be investigated as part of the EIA.</p>



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Registered as an I&AP	Tracy-Lee Petersen	e-mail	Representatives of SANParks as per the database and distribution list will be afforded an opportunity to review and comment on the Draft Scoping Report
Public involvement is one of the foundation stones of effectual environmental assessments as it is our comments that will add volume to the environmental progression. The Nkomazi Local Municipality as the neighbouring Municipality of Kruger National Park would like to have the full EIA report so that we have a clear understanding of the proposed projection for us to be able to comment informatively and to enable us to submit any concern in a well-versed manner.	Mr Mxolisi Lukhele	31 August 2010 Fax	The Municipality have been afforded the opportunity to comment on the Draft Scoping Report
Please register Bokamoso Environmental Consultants and Landscape Architects as Interested and Affected Party that will participate in the above mentioned process. We have recently been appointed by a lodge in the area to assist them in this matter. We would appreciate it if you could supply us with more detail regarding the following: <ul style="list-style-type: none"> Status of the application (Scoping Report, EIA Report etc); Detail of public participation process followed up to date; Dates of public meetings; When will the report be ready for perusal? Copy of the Plan of study for EIA; Copy of the approval of the Plan of study for EIA; and Copy of the Scoping Report. Please confirm that you registered Bokamoso as interested and affected party.	Lizelle Gregory (Bokamoso Landscape Architects and Environmental Consultants)	e-mail 17/08/2010	Has been registered as an I&AP. Will be afforded an opportunity to comment on the Draft Scoping Report which includes information requested.

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<p>The intention of SANParks to build a hotel at Malelane, and the possibility of another at Skukuza, has (is) causing some rather serious concern. This is a dramatic deviation from the established norms and ethos for the Kruger National Park and is bound to illicit opposition.</p> <p>I have already expressed my opposition to the idea of a hotel. Unfortunately and unnecessarily this has resulted in some personal spat but I would like to believe that they are now done and buried. The fact that I differ from SANParks on this issue, and possibly in future on some other issues, does not influence my personal relationships with friends and (ex) colleagues, it does not change my attitude towards SANParks and, least of all, it does not in any way impact on the pride and joy I nurture for our national parks, in particular the KNP. The views I express are sincere and honest.</p> <p>The fact that there are opposing views can only be to the benefit of the decision-making process. In a matter as serious as the development of hotels the more involvement there is in the mix of viewpoints the greater the chances of a rational approach being adopted. It is in this spirit that I would like to submit a short overview of the philosophical development of tourism facilities in the KNP that could possibly play a role in guiding decisions to be taken.</p>	<p>Salomon Joubert</p>	<p>E-mail 12 October 2010</p>	<p>■ A strategic decision by SANParks on the Malelane Hotel Development is in place, the Environmental Impact Assessment is therefore being conducted on an approved land use proposal in terms of Park Management Plans. ILA can not provide comment on the Strategic Decision made as it is a separate process from this EIA Process. (Also Refer Section1.1 of this Scoping Report). A separate platform should therefore be created for discussion of the Strategic Decision and Affected Parties and SANParks must correspond directly in this regard.</p> <p>The following response has been extracted from the Kruger National Park Management Plan December 2008.</p> <p>■ 'Park Management Plans were not formulated in isolation of national legislation and policies. Management plans comply with related national legislation such as the National Environmental Management: Biodiversity Act, national SANParks policy and international conventions that have been signed and ratified by the South African Government.</p> <p>Coordinated Policy Framework Governing Park Management Plans</p> <p>■ The SANParks Coordinated Policy Framework provides the overall framework to which all Park Management Plans align. This policy sets out the ecological, economic, technological, social and political environments of national parks at the highest level.</p>

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<p>Tourism to the KNP started in 1923 with the institution of the "Round-in nine" railway tours to the Lowveld by the South African Railways. This tour included an overnight stop at Skukuza which proved immensely popular and resulted in a close working relationship with the SAR.</p> <p>When the KNP was proclaimed in 1926 there were no facilities for tourists. At one of its earliest meetings, in 1927, the newly appointed National Parks Board rejected a proposal by the SAR to erect an hotel at Skukuza. After some experimentation accommodation in the early rest camps was provided in the form of rondavels and squaredavels. At the end of his illustrious career as Warden of the KNP, in 1946, Col Stevenson-Hamilton accepted that most of the rest camps were incorrectly placed and argued that "... any hotels and in future new camps should be sited outside the Park's western boundary the enlargement and/or increase of rest camps in the midst of the Park should in future be avoided." On his retirement he summarised his basic philosophy, typed in capitals, as flows: KEEP IT SIMPLE; KEEP IT WILD</p> <p>During the Second World War tourism largely ground to a halt. Soon after, however, rest camps were renovated and opened to the public. It was also a time that considerable attention was given to the harmonizing of the roles of conservation and tourism. In this respect Stevenson-Hamilton's successor, Col Sandenburgh, expressed the view that "the primary object of the KNP is that it shall provide a sanctuary wherein nature will be left undisturbed" but lamented that "there seems a deplorable</p>	Salomon Joubert	E-mail 12 October 2010	<p>■ In accordance with the NEM: Protected Areas Act, the Coordinated Policy Framework is open to regular review by the public to ensure that it continues to reflect the organisation's mandate, current societal values and new scientific knowledge with respect to protected area management. This document is available on the SANParks website.</p> <p>■ The key functions of this management plan are to:</p> <ul style="list-style-type: none"> ➤ ensure that the KNP is managed according to the reason it was declared; ➤ be a tool to guide management of a protected area at all levels, from the basic operational level to the Minister of Environmental Affairs and Tourism; ➤ be a tool which enables the evaluation of progress against set objectives; ➤ be a document which can be used to set up key performance indicators for Park staff; and ➤ set the intent of the Park, and provide explicit evidence for the financial support required for the Park <p>■ This management plan for KNP comprises four broad sections:</p> <ul style="list-style-type: none"> ➤ the background to and outline of the desired state of the KNP and how this was determined; ➤ a summary of the management strategies, programmes, projects and initiatives that are required to move towards achieving the desired state (obviously these strategies, programmes and projects can extend over many years but the management focus until 2013 is presented); ➤ an outline of the Strategic Adaptive Management methodology and strategies that will ensure that the KNP undertakes an adaptive approach to management. It focuses park management on those critical strategic issues, their prioritisation, operation and integration, and reflection on achievements to ensure that the longer-term desired state is reached; and ➤ presentation of a high level costing.

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<p>lack of the real conception of what the word 'sanctuary' really means and that there is a need for public instruction. Our object should be to create an atmosphere wherein the people will feel that the KNP is not only a Sanctuary for wildlife but also a Sanctuary for them from the hustle and bustle, the cares and tribulations, and the squalors of civilised life."</p> <p>To gain some clarity on this issue the Board appointed Prof F Hoek as a one-man commission in 1953 to advise it on the best way forward in developing the KNP's tourism facilities. The 'Hoek Commission' recommended, inter alia, that the Provincial Administration be requested to build a major road along the length of the western boundary, outside the KNP; that several rest camps be demolished and new one's be built on the western boundary; that the KNP be divided into five sections (on the basis of ecological divides) and that tourists not be allowed to travel from one section to the next within the Park. Travel from one section to the next would only be possible along the public road along the western boundary.</p> <p>The Hoek Commission strongly recommended that control over tourist numbers be exercised and was of the opinion that the Southern District had already reached its maximum. It was emphatic that "a standpoint must now be taken: must the KNP become simply a holiday resort or must it be a sanctuary in the true sense?"</p> <p>In 1955 the Fifth International Congress on Tourism resolved that "all authorities charged with the administration of national parks and nature reserves be requested to undertake detailed scientific research into the effects of tourism on wildlife and, based on the findings of such research, to determine the development of tourism in the parks." In this regard the KNP's biologist, Dr Nel, quoted from The paradox of National Parks (Boyle) that "the spirit and force behind the National Park idea has, in all countries, been the demand for the preservation of nature; so that something shall remain as it used to be, unspoilt by the advance of civilisation. There has, of course, also been a demand for places of recreation, but that quite different demand can be satisfied in quite a different way, by the development of holiday resorts of many different kinds. There is in humanity</p>	<p>Salomon Joubert</p>	<p>E-mail</p> <p>12 October 2010</p>	<p>Implementation of SANParks' Sustainable Tourism Framework</p> <p>■ Sustainable Tourism is defined as "tourism which is developed and maintained in an area (community environment) in such a manner and at such a scale that it remains viable over an indefinite period and does not degrade or alter the environmental (human and physical) in which it exists to such a degree that it prohibits the successful development and wellbeing of other activities and processes" (Butler 1993). The KNP tourism programme is aimed at simultaneously addressing and supporting the 6 key goals and associated strategic objectives of the DEA strategic plan and the SANParks strategic tourism principles and objectives. In order to achieve the desired nature-based tourism destination state in KNP, tourism activities and experiences must optimise the parks' unique attributes and special features as the preferred focus to ensure sustainability and a unique product compatible with the overall desired state whilst applying the principles of responsible tourism. Amongst others the following aspects will require focused attention:</p> <p>■ Visitor management. Taking heed of a recent demand analysis, it is anticipated that should the demand continue to grow at its current rate, the KNP will not be able to manage its visitors, particularly in the southern region. Creative alternatives to 'self drive' tourism model will need to be investigated possibly incorporating a type of 'park and drive' concept in the next 20 year horizon. Attention will need to be given to the current quota system, particularly since 70% of visitors currently comprise day visitors and The KNP will need to consider converting these to overnight visitors, limiting day visitors. The development proposal includes the construction of a Park & Ride Facility at the Malelane Entrance Gate, which will cater for all of the Hotel guests and some day visitors. This will serve to reduce the number of vehicles entering the park.</p>

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<p>a very deep-seated love of wild nature, which National Parks must satisfy, or else degenerate to become merely 'playgrounds' for the people".</p> <p>Dr Nel cautioned that the pursuit of commercial gains was rapidly eroding away the primary objective of nature conservation and warned that the unchecked growth in tourist numbers resulted in the Board "... being forced to provide more and better amenities ... which in turn draw more 'popularity' and 'money' ... The result in the long run is the debasement of the higher and lasting values of wildlife conservation, that is the cultural values which call for sacrifices and not reward, and which endanger the purpose of a national park."</p> <p>During the early 1960's the then Director of the National Parks Board, Dr R. Knobel, expressed the following sentiments regarding tourist facilities: "Visitor accommodation should in no way detract from nature and should certainly not try to compete with nature as a draw card to any national park or reserve. Visitor accommodation should be simple and not luxurious and it should be such that it does not, in what it offers, attract visitors to the area who do not primarily wish to visit the area, to be recreated through their experience by their contact with nature ... I hold the view that when visitors start demanding entertainment in accommodation areas it is a sure sign that the</p>			<p>Sustainable revenue growth: This must focus better on the three new and growing markets, namely SA Leisure, business tourism, and maintenance of the current market....</p> <p>The KNP must expend energy on sufficient and effective marketing of the KNP as a destination...provision of internal standard facilities and services... SANParks is to keep abreast with top tourist destinations by improving its product and appealing to a wider range of visitors. The strategic focus of the Applicant is to fit into the market gap that exists in wildlife tourism, i.e between the self-catering camps offered by the Provincial Parks and SANParks, as well as the high priced. Low density lodges that are found in numerous wildlife areas, including the KNP existing Concessions. The product offered will be a fully catered, 4 star accommodation, for family, business and incentive markets to foreign and domestic tourists., with a broad spectrum of experience options, focused on wildlife and relaxation, whilst adhering to all the Park Guidelines and Policies to ensure limited ecological and socio economic impacts.</p> <p>One of the core pillars on which SANParks business operations are founded is Nature-based tourism. A significant element of the ecotourism pillar is the Commercialisation Strategy (which through the implementation of PPP) has its objective reducing the cost of delivery, improving service levels by focussing on core business and leveraging private</p>

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<p>concentration is too large and that city-like conditions have been created. Such conditions call for entertainment to allow an escape from reality." Nobel also warned that "... we must never try to combine national parks ... with pleasure resorts. Both would be the loser."</p> <p>In 1981 the Government made a substantial grant available for the expansion of tourism facilities in our national parks, with the purpose of making them more self-sufficient (and less dependent on Government subsidies). A large percentage of this grant was allocated to the KNP for the purpose of renovating existing facilities and creating new ones. Noting the negative effects of overcrowding the Park Warden, Dr Pienaar, warned that, "in the absence of exact criteria (to determine optimal tourist numbers) one must inevitably fall back on more abstract parameters to determine the balance between a unique national park experience ... and the feeling of disappointment and exploitation of visitors in an over-saturated area which has the same urgency, restlessness and tension from which the average tourist tries to escape. (One must assess this) ... in the South African context as opposed to, for example, the American approach." A large number of tourist facilities were proposed, including new rest camps, 'private' camps, picnic spots and roads.</p> <p>The Research Section objected to some of the proposals but supported others subject to the following:</p>			<p>capital and expertise as well as the objective of expansion of tourism products and the generation of additional revenue for the funding of conservation and constituency building. As per the SANParks Strategic Plan for Commercialisation 2006-2011 the Malelane Hotel was identified as a commercial opportunity.</p> <p>In conclusion:</p> <ul style="list-style-type: none"> ■ The development of the Hotel is in line with the future planning in terms of Commercialisation within the KNP; ■ As per the Draft Conservation Development Framework for the KNP the site identified is situated within a High Intensity Leisure Zone. These areas are high density tourist development nodes with modern amenities, incorporating the high volume transport routes. Activities are concentrated and a range of infrastructure and facilities is on offer, although still reflecting the ethos and character of the park; Since making the Draft coping Report available for comment it has been confirmed to ILA that the zoning as indicated in the PPP agreement is not yet formal. However the SANParks is in the process of refining the Conservation Development Framework (CDF). Refer to Figure 5 which indicates the Park's intent in this regard. ■ The development is situated on the periphery of the park as per the peripheral development policy; ■ The development proposal will be subject to the KNP Sustainable Design Principles and Guidelines; applicable Responsible Tourism Standards; Environmental Guidelines for PP for the Construction and Operation of PPP Facilities within the KNP ; Concessions Operations Manual, Broader Park EMP and Site specific EMP prepared as part of this EIA. These measures will serve to limit & reduce the impact on the biophysical environment;

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> ■ The preservation of the pristine qualities of the ecosystems receive precedence over any conflicting tourist facilities. ■ The provision of tourist facilities should be subject to a zoning system, based on ecological sensitivities. Proposed zones were high, intermediate and low development areas, and semi-wilderness and wilderness areas. ■ Development on the peripheries of the Park should take precedence. ■ Roads with accompanying gravel pits should be limited and consideration be given to single lane one-way traffic roads and four-wheel drive tracks. ■ That no artificial water resources would be created for the purpose of increasing animal population densities for the sake of tourists. <p>To address the above issues the Research Section proposed that the existing management plan for the KNP be revised by a Planning Committee, with representation by all sections of the administration of the KNP. The objective of the Planning Committee would be to compile an all-embracing management plan to include all issues relevant to the management of the Park, and to continuously update such issues as the need arose and/or more information became available.</p> <p>During the 1980's and early 1990's three independent assessments of the attitudes of tourists to the KNP were made. In a qualitative, rather than merely quantitative, survey the major results obtained by Dr Odendaal (University of Pretoria) included the following:</p> <ul style="list-style-type: none"> ■ The natural environment was the major interest of visitors, especially the tranquillity and solitude it offered; 			<ul style="list-style-type: none"> ■ The inclusion of local community input into the project (e.g. sale of locally crafted curios etc) will benefit local communities. The provision of long term job opportunities and skills development will serve to benefit local communities; ■ A Park & Ride Facility is proposed at the Malelane Entrance Gate. The facility will provide for parking of vehicles for guests of the hotel. The facility will also provide for parking of vehicles for day visitors to the park in order to utilise park game drive vehicles. The development will therefore not contribute to an increase in traffic in the park. As the establishment of the Park & Ride facility will also cater for day visitors and not just hotel guests it will serve to reduce the number of vehicles travelling within the park; ■ Biophysical and socio-economic impacts will be assessed in depth as part of the EIA and results included in the EIA Report. Appropriate mitigation measures to limit impacts will be prepared in conjunction with the specialist project team and key stakeholders

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none">■ There was a strong need for more trails and opportunities to make closer contact with nature;■ There was a strong need for more environmental education;■ Visitors were averse to recreational facilities (with the exception of swimming pools) and expected an “... introspective experience in which they could find peace of mind and tranquillity”.■ Most visitors were of the opinion that rest camps could be “... even smaller and more primitive”.■ There was a general feeling that camping areas were being neglected.			

Issues And Comments Raised	Commentator/s	Source	Response
<p>In a survey by Du Toit and Van Aswegen a positive correlation was found between the responses of visitors to matters such as service delivery, tariffs, etc. and the quality of the 'nature experience'. The higher the rating of the 'nature experience' the higher the ratings (acceptance) of other services and tariffs.</p> <p>In two separate follow-up surveys Ms Willemse and Prof Puth, both of the University of Pretoria, reported that visitors were satisfied that the Park complied with nature conservation expectations, that they felt that the Park should, first and foremost, be a national park with conservation objectives and that recreational and entertainment facilities do not belong in the Park.</p> <p>TV sets in chalets have consistently been rejected in KNP attitude surveys.</p> <p>Throughout the past 86 years that tourists have had access to the KNP the emphasis by the Park authorities and the demands by tourists for a quality experience have consistently been to promote an intimate engagement with nature, both in terms of the facilities provided and the experiences offered. Recreational facilities and 'modernisation' have been strongly rejected in favour of the tranquility, serenity and wilderness ambience of the natural surroundings.</p> <p>Around 2000 SANParks allocated a number of concessions to private operators in the KNP. Luxury lodges were built and exclusive traversing rights were awarded to the concessionaires. This development was criticised on the grounds that it violated national parks principles and policies. However, the then CEO, Mr Mavuso Msimang, personally conveyed to me that the justification for the concessions was to make SANParks financially more self-sufficient as government grants were likely to be withdrawn. At the same time outlets, such as the restaurants and shops, were also made available to private entrepreneurs, ostensibly for the same reason.</p> <p>It is difficult to imagine how the proposed hotel will differ from the series of concession lodges run in the KNP. These lodges offer exclusivity, full board and lodging and have their own road networks. The concession lodges, as a matter of principle, are</p>			

Issues And Comments Raised	Commentator/s	Source	Response
<p>already difficult, if not impossible, to come to terms with (private enterprise operating in our flagship national park!). The proposed hotel at Malelane, in the busiest and already overcrowded region of the Park, can hardly be regarded as anything but bizarre.</p> <p>Against the background outlined above, the very concept of an up-market hotel, with all associated mod-cons, flies in the face of every value the Board (SANParks) has ever stood for in the provision of tourist accommodation.</p> <p>It would appear that the major motivations for the hotel are to strengthen constituency building, in particular to create opportunities to attract the higher income segment of the Black market and to make provision for income generation to achieve financial self-sufficiency for SANParks. As far as the first priority is concerned the network of concessions is already available, which provides for the exclusivity and services SANParks wishes to provide with the hotel [these lodges are running at an annual occupancy rate of something below 35% (KNP Tourism Management Plan)]. As far as the second is concerned the government is holding the pistol to SANPark's head with the threat that it cannot afford to subsidise our national parks to the tune of some R153 million over the next three years (say, R60 million/year).</p>			
<p>In recent months the following has been aired in the media:</p> <ul style="list-style-type: none"> ■ In a speech by our Minister of Finance, Mr Pravin Gordhan, he castigated his cabinet colleagues for irresponsible over-spending on projects (e.g. building schools for R40 million when they should cost no more than R25 million); ■ The main opposition party, the Democratic Alliance, released a report in which it was stated that the government has incurred expenditure of some R1.5 billion on non-essential items, such as motor cars, hotel expenses and the likes since President Zuma has taken office, and ■ In the 2008 / 2009 financial year a sum of R100 million was stolen from the State by civil servants, and of those found guilty around 90% are still in office (Public Service Commission report). 			

Issues And Comments Raised	Commentator/s	Source	Response
<p>And this government cannot afford to subsidise its national parks with something like R60 million per annum? I find this totally unacceptable and personally I think it is time for the public to be consulted on this issue. In the same vein, it is also time for the government to clearly inform the public regarding its commitment (or otherwise) regarding our national parks. The government cannot continue threatening the withdrawal of grants to our national parks without clearly stating its case. No-one in his right frame of mind will doubt the priority given to the pressing issues of the day, such as health care, education, housing, service provision, etc., and the huge amounts of expenditure they will incur. But many will seriously question the sincerity of this government's commitment towards its national parks by threatening to withdraw a mere R60 million per year for the maintenance and perpetuation of the most precious assets of all the people of South Africa!</p> <p>Since the early 1980's several developments have been undertaken in the name of achieving independence from government grants. The KNP Tourism Management Plan 2007 – 2011 also clearly states that since 1994 "the new democratic government granted less Government subsidies to the KNP and the financial situation deteriorated."</p> <p>So far, however, all attempts to reach financial self sufficiency have been unsuccessful and are likely to continue that way. This is primarily due to the fact that if the preservation of the natural, unspoilt attributes of our national parks (wilderness atmosphere, tranquillity, serenity, sense of place, etc.) are to continue to be the primary objective underpinning the values offered to tourists trendy commercial ventures, resort activities and mod-cons (such as TV's) will be shunned as they do not comply with the established ethos of national parks. This is clearly reflected in all the attitude surveys conducted in the KNP in the past. This was also borne out in the SWOT analysis undertaken by the KNP and in which stakeholders across the board participated.</p> <p>Priorities highlighted were a call for an:</p> <ul style="list-style-type: none"> ■ "appreciation of peace and tranquillity or 'sense of place'; ■ a demand for "more camping and caravan sites"; 			

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> ■ "more roads and tourist infrastructure (picnic sites, hides, stop-over points with toilets, etc.) built in a 'close to nature' rustic style"; ■ "reduced crowding at view sites and congestion on the roads"; ■ "provision of heritage guides in camps"; ■ "cell-phone free zones", etc. (KNP Tourism Management Plan 2007 – 2011); <p>The KNP Tourism Management Plan also repeatedly refers to "nature based tourism", sense of place, dangers of overcrowding, etc.</p> <p>From the statistics provided by the Management Plan it is clear that the level of overcrowding in the Marula region has already reached, possibly even exceeded, its limits.</p> <p>In line with the above the following from the same document is profoundly relevant: 'the concept of overcrowding in a national park leads directly to the very relevant debate around the merits of 'more visitors, more revenue', against the opposing view that 'high wilderness values guarantee quality visitor experiences'.</p> <p>Also see the conclusions reached by Du Toit and Van Aswegen, referred to above, which indicated that a high quality nature experience resulted in more appreciation for other services. In this respect, please refer to the Management Plan for the comments of stakeholders on aspects such as service and maintenance standards and staff attitudes in the KNP – something that you can hardly be proud of.</p> <p>Furthermore, under the caption of Tourism Thresholds for the KNP the following, amongst others, are listed as negatives:</p> <ul style="list-style-type: none"> ■ "vehicles on the roads (especially in the Marula region)"; ■ "noise levels in some camps"; ■ "number of visitors in some camps"; ■ "exposure of visitors to Park non-core personnel (stakeholders find some staff behaviour in the Park unacceptable, e.g. speeding)" and ■ "standards of service delivery". <p>In the light of the above I believe the concept of high-income (4-star) hotels with breakfast and guided drives are totally alien to</p>			

Issues And Comments Raised	Commentator/s	Source	Response
<p>the spirit and ethos of the KNP. That these kind of developments may be a priority in the emerging tourism markets elsewhere in South Africa is quite acceptable but entirely out of place in the KNP. As in the case of government grants I believe that the general public should be consulted on this issue if SANParks decides to persevere with the Malelane hotel.</p> <p>On the issue of state funding the following enters one's mind: what if the proposed hotel (and any others that may be in the pipeline) do not succeed in achieving financial sustainability – what are the next gimmicks that will be enforced upon our national parks? Where is this going to end? Either we have national parks, in the true and proud sense of national parks, or we have a conglomerate of business / recreational resorts. And, in the case of the latter, accept that the heart and soul of our national parks have been shamelessly sacrificed!!</p> <p>Thank you for bearing with me and I am grateful for the opportunity of putting these thoughts on paper.</p> <p>Please register the Crocodile River Major Irrigation Board as a stakeholder.</p> <p>Our interest is only in:</p> <ul style="list-style-type: none"> ■ Source of water and information regarding the license for such water. If Croc River is the source, details of the abstractions works. ■ Water quality – all info i.r.o. treatment of sewerage etc 	<p>Mrs Ronelle Putter</p> <p>Crocodile River Major Irrigation Board</p>	<p>e-mail</p> <p>16 July 2010</p>	<p>■ There is no potable water on site. The closest perennial river is the Crocodile River, although it may dry up during periods of extreme low rainfall. Water for the development will either be supplied from the Crocodile River or boreholes. The quantity and quality of underground water is not known and will have to be determined through a Hydrogeological Evaluation. A license from the Department of Water Affairs will be required to extract water from either the River or from boreholes. The EIA Report will confirm: Point of supply; Water design criteria; Services lay-out; Affected Floodlines.</p> <p>■ A Waste Use License in terms of the National Environmental Management: Waste Act, 2008 will be required for the treatment of effluent, wastewater or sewage with an annual throughput capacity of 15 000 cubic metres or more. Adherence of the proposed system to the requirements of the SANParks Environmental Guidelines will be assessed as part of the EIA Phase. Once specifications of the waste water management system become available the associated impacts relating to approximate volume, discharge and method of treatment will be investigated as part of the EIA.</p>

Issues And Comments Raised	Commentator/s	Source	Response
Registered as an Interested and Affected Party	Mr André Botha Game Rangers Association of Africa	Email 16 July 2010	■ Noted. Mr Botha will be afforded the opportunity to comment on the Draft Scoping Report
Comment will be made once the reports have been made available	Mr Craig Bester Mjeane Parent Game Reserve Home Owners Association Mr Meshack Selinda	Email 5 August 2010	■ Noted. Mr Bester & Mr Selinda will be afforded the opportunity to comment on the Draft Scoping Report

Comments Received On Draft Scoping Report

Issues And Comments Raised	Commentator/s	Source	Response
■ Requests a meeting with ILA to present the application to the members of the Chamber of Business	Mr Hennie Snyman Malalane Chamber of Business	Email 12 November 2010	■ As included in the Draft Scoping Report Focus Group meetings are being considered for 2011, as very little information regarding the provision of services is available at this stage. Members were requested to review the Draft Scoping Report and submit preliminary concerns / questions based on available information.
■ Enquired whether WESSA Lowveld had been registered as an I&AP;	Mr Tony Ferrar WESSA Lowveld	Email 30 November 2010	■ A copy of the Draft Scoping Report and Appendices was sent to Mr Ferrar, and it was confirmed that WESSA Lowveld had been registered as an I&AP.
■ Requested a copy of the BID, Scoping or similar EIA related planning reports;			
■ Feedback on progress on the EIA application;			
■ Requested that WESSA Lowveld be registered.			
■ Wishes to be registered as an I&AP;			
■ A breeding pair of Pel's Fishing Owl is located 200m downstream (along the Crocodile River) from the proposed hotel. The pair has been in residence for over 11 years. On a recent visit to the area a single bird was observed. I feel that the development will do irreparable damage to this pair of birds. These birds are declining at a rapid rate due to habitat destruction as well as disturbance	Mr Scott Ronaldson Endangered Wildlife Trust Lowveld/KNP Large Bird Project Coordinator Birds of Prey Programme	Email 25 November 2010	■ The EWT and Mr Ronaldson have been registered as I&AP's; ■ The comment received on the Pel's Fishing Owl has been sent to the project ecologist for further investigation.
■ We hereby inform you that the Pestana Kruger Park Lodge strongly objects to the proposed development on a social, ecological, economical and institutional basis.	Bokamoso Environmental Ms Lizelle Gregory	Email 1 December 2010	■ Noted; ■ The Plan of Study for EIA is included in the Draft Scoping Report reviewed by Bokamoso;
■ Please supply us with:			■ A copy of the landowner's consent and Application form have

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> - Plan of Study for EIA; - Copy of landowner's consent forms; and - Copy of EIA Application Forms. <p>We will supply you with more information once we have received the requested information and have reviewed the specialist studies.</p> <p>At this stage we are of the opinion that the locality of the proposed development is not the preferred alternative due to ecological, social and economical reasons.</p>			<p>been sent to Bokamoso;</p> <ul style="list-style-type: none"> Impacts associated with the alternative sites identified will be further investigated as part of the EIA. This will include ecological impacts and socio economic impacts such as visual impacts.
<ul style="list-style-type: none"> Read about the development in one of the newspapers in the form of a general communication, and realize that the EIA process is probably well underway – I've missed the notices which probably circulated in the Malelane area only. Stated that his I&AP status is a member of the public with professional links with the conservation fraternity and working on transfrontier conservation areas. I hope it is still possible to register as I&AP, to submit comments and to be informed about further developments. At this stage he'd like to make a general comment that a national park is well within the national public domain and any impacting developments should be made known on a national level – preferable in the national media. If this was done, forgive my ignorance. 	Mr Johan Verhoef	Email 08 December 2010	<ul style="list-style-type: none"> Mr Verhoef was added onto the database and will receive notification and opportunity to comment on the Draft EIA Report; A legal notice was placed in the Sunday Times on 19 December 2010 and Notices were placed on the SANParks website
<p>Thinks this is a very thorough report, and have no comments except for one query with regard to a plant which is listed, namely <i>Leucas martinicensis</i> (Jacq.) R.Br. Although this plant has no significance as far as the report is concerned we do not have it listed for the KNP. We have the following <i>Leucas</i> spp. listed for the KNP:</p> <p><i>Leucas glabrata</i> var. <i>glabrata</i> <i>Leucas neufvilleana</i> <i>Leucas sexdentata</i></p> <p>We also have <i>Acrotome inflata</i> and from what I can see from</p>	Guin Zambatis: KNP: Scientific Services for the Terrestrial Ecology Assessment	Email 15 November 2010	<ul style="list-style-type: none"> A copy of the preliminary terrestrial ecology assessment conducted by ECOREX Consulting Ecologists CC was submitted to the KNP Scientific Services and this comment received from Mr Guin Zambatis pertains to the Ecology Assessment. The comment was sent to Mr Warren McClelland who conducted the assessment. It was confirmed that the <i>Leucas martinicensis</i> is a very common species. Mr McClelland would pass the information on to Mr Zambatis.

Issues And Comments Raised

Commentator/s

Response

the illustrations in books they may look similar. However, I do not think Warren will confuse the two species. If this is a new species for the KNP we should Warren for a specimen.

- Requested to be registered as an I&AP on the project. Requested all correspondence to be sent via email.
- Public Participation Guideline 4 published under NEMA stipulates that all documentation must have the DEA reference number. The adverts and site notices did not include the DEA reference number.
- The river / road name is incorrect in most of the report – Timfenehe Spruit.
- A socio economic assessment concentrating on tourism economics needs to be undertaken to ascertain what the economic impact of the proposed development on the surrounding tourism establishments. This would also assist in clarifying the need and desirability of the project which needs to be expanded. The economic feasibility of the hotel is not represented at all in the report.

- The capacity for this region of the Park needs to be explored further. The Strategic Environmental Assessment that was conducted for the then Marula Region indicated severe pressures in terms of tourist numbers. Regardless of making use of park n ride facilities, the project will increase the car numbers on the road which could impact on the game viewing experiences of other visitors. In addition the traffic pressure on the gate, regardless of the park n ride must not be overlooked as those people still have to get to the park n ride facility when there is a queue from the gate to the TSB. How will this be addressed?
- The actual footprint of the hotel establishment is not stated in the report. Will it take up the entire 35ha site?

Email 10 December 2010

Liesl Koch

- Noted. Ms Koch has been added onto the registered I&AP database;
- A new reference number was issued by the DEA for the project in December. This reference number was indicated in the notice which appeared in the Sunday Times as well as on the notice boards which were erected at the Park gates during December.
- The name of the Spruit was extracted from the SANParks PPP Agreement which refers to the river as the Timfenehe Spruit. According to the Dictionary of Kruger National Park Place Names it is Timfenehe.
- SANParks followed the PPP feasibility and procurement processes set out in the National Treasury's PPP Toolkit for Tourism. An Information Memorandum pertaining to the proposed development was prepared in March 2009. It was confirmed by SANParks Business Development Unit that the Information Memorandum included a feasibility assessment for the viability of the Malelane Hotel development. In addition to such, a financial feasibility was performed which indicated the viability of the hotel.
- The Malelane Hotel development falls within the approved KNP Management Plan for which a consultation process was undertaken. The management plan of the KNP provides for the broad zoning system on which potential tourism and other infrastructure developments may take place. The Conservation Development Framework is the plan that guides development in National Parks. This is supplemented by the various park management plans.
- Trips to be generated by the development proposal will be determined by the project traffic engineers. The Traffic Assessment conducted as part of the SEA will be reviewed by the project engineers and mitigation and upgrades required will be determined. Operation of the Park & Ride Facility and 24hour access will also be investigated further as part of the EIA Process. This information will be included in

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> Maps included in the report need to be improved and contain the generic maps symbols such as a scale, north arrow and be of a better resolution. Information pertaining to the park n ride facility is very vague in the report. The high level issues relating to this facility need to at least be identified in the scoping report. This could relate to removal of vegetation, protected trees etc as these would be pretty generic to a site in the KNP. What about security associated with this facility? Being so close to the gate has to pose a risk in this regard. The operating of the gate with 24hr access to guests from the hotel must be further investigated. Berg n Dal Rest Camp utilises these roads for sunset and night drives and this could negatively impact on the bush experience for these tourists. 			<p>the Draft EIA Report which will be made available for comment.</p> <ul style="list-style-type: none"> The terrestrial ecology assessment will include the proposed Park & Ride area, which will identify sensitive features according to which a lay-out will be determined. At this stage the footprint is estimated between 2 to 3 hectares. This will be confirmed in the EIA Report. Noted
<ul style="list-style-type: none"> Requested clarification on the zoning of the site. According to the KNP zonation plan (2006) the site is considered to be a mixture of primitive and low intensity leisure. The zonation may have changed in the interim. If the zoning mentioned here is correct, the site is only suitable for low intensity tourism activities and lodges which practice touch the earth lightly: principles with an emphasis on self catering and camping. Enquired as to why wasn't the alternative to rebuild the Malelane Sun in Leopard Creek investigated? Alternatives in an EIA must be considered to be technically feasible. It does not appear as if those presented in the report are feasible. In addition, a comparative assessment of alternatives needs to take place otherwise you may as well leave the other sites out. Specialist studies in the EIA phase need to take place on all selected sites or these sites must be removed from the assessment and on site or technological alternative assessed. 	Liesl Koch	Email 10 December 2010	<p>Since making the Draft coping Report available for comment it has been confirmed to ILA that the zoning as indicated in the PPP agreement is not yet formal. However the SANParks is in the process of refining the Conservation Development Framework (CDF). Refer to Figure 5 page 10 of this Report which indicates the Park's intent in this regard.</p>
<ul style="list-style-type: none"> Enquired as to why wasn't the alternative to rebuild the Malelane Sun in Leopard Creek investigated? Alternatives in an EIA must be considered to be technically feasible. It does not appear as if those presented in the report are feasible. In addition, a comparative assessment of alternatives needs to take place otherwise you may as well leave the other sites out. Specialist studies in the EIA phase need to take place on all selected sites or these sites must be removed from the assessment and on site or technological alternative assessed. 	Liesl Koch	Email 10 December 2010	<ul style="list-style-type: none"> The SANParks was not part of the decision whether to rebuild the hotel outside the park boundary. However the suggestion that the hotel could be rebuilt outside the park did inform SANParks decision that there was a market for such development. The development was considered by SANParks within its boundaries for the following reasons: <p>From an Environmental perspective:</p> <ul style="list-style-type: none"> The impacts to the river would be the same irrespective if the

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> ■ Mention is made that an electricity cable will be required along the road however issues associated with this cable are not elaborated on. ■ The requirement for a Waste License is only mentioned in the comments section. Will an integrated authorisation be sought or will this process be undertaken separately. 			<p>building is on either side of the river (the river provides the boundary of the Kruger National Parks in the Matlane area). The burnt hotel was immediately outside the KNP across the river;</p> <ul style="list-style-type: none"> ■ SANParks can reduce the impacts to the environment if the facility is inside the KNP boundary as opposed to if the same is outside; ■ With SANParks sourcing reputable operators, the environmental ethics will be highlighted to such operators and they could influence their operations outside the park – thereby allowing good environmental practices to go beyond KNP's physical boundaries; ■ A site at the periphery of the park will reduce impacts to the environment.
From a Social perspective:			
			<ul style="list-style-type: none"> ■ Should an alternative operation not be sourced to replace the burnt hotel, that could lead to a loss of net jobs in an area that is already in dire need of employment; ■ With SANParks providing an alternative location jobs are restored in alignment with all the legislated social requirements, it allows SANParks to practice Responsible Tourism. SANParks will not be able to ensure social needs and alignment to legislated requirements should the facility be outside our premises/mandate.
From an Economic perspective:			
			<ul style="list-style-type: none"> ■ Various governments around the globe are facing the reality of dwindling economies: funding for conservation is becoming more scarce. South Africa has an even more complex situation when redressing imbalances of the past. Simply put, the govt is now responsible to a larger populous in the last 16 years. While the larger pressing needs of the country's population is taken into account, SANParks therefore has to ensure smarter funding of conservation in a Responsible manner

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> ■ The report mentions that a WULA may be required. A WULA will definitely be required and the following needs to be taken into consideration. The Crocodile River is currently overabstracted and is under severe pressure. A detailed risk assessment will thus be a likely requirement to determine the cumulative impact of further abstraction from the river. The Department of Water Affairs need to be involved in the process. Their details appear on the distribution list however they are not on the database. ■ The proposed development also appears to be close to or in the floodline of the river and a floodline assessment will need to be undertaken. ■ The site is considered to be high conservation value which is not ideal for the level of transformation that is being proposed. In addition the presence of a critically endangered species on the site must be considered a fatal flaw. The ecological assessment does not make mention of the several protected trees which are very likely to be present on the site such as the Marula and Apple Leaf. The Department of Agriculture, Forestry and Fisheries is also not on the project database. A permit will be required from this department. ■ Please could the specialist studies that we conducted be appended as stand alone reports. ■ The following potential impacts should also be included in the report: 	Liesl Koch	Email 10 December 2010	<ul style="list-style-type: none"> ■ Alternatives will be assessed as part of the EIA Phase. Amongst these will be: <ul style="list-style-type: none"> • Alternative lay-outs; • Routes for the access road; • Routes for provision of electrical supply; • Water source for provision of water to the facility; • Placement and operation of park & ride facility; • Recycling of greywater; ■ Information on provision of electrical supply and proposed routes will be included in the EIA Report; ■ WSP has been appointed to submit the waste use license application to the DEA. The waste use activity was included in the Legal Notice which was placed in the Sunday Times. ■ Messrs WSM Leshika have been appointed to determine the geohydrological status of the site and source of water supply. They have also been commissioned to deal with all water use licenses which may be triggered by the development. ■ A floodline determination is currently underway and the layout will be prepared in accordance; ■ Findings of the terrestrial ecology assessment will guide the proposed site lay-out. During the footprint determination the ecologist will be present and large trees and protected trees will be surveyed and marked. It is unlikely that any protected trees will be removed; the lay-out will incorporate protected species. Where it is impossible to avoid the necessary permits will be required. ■ Department Agriculture, Forestry & Fisheries has been added onto the database. ■ ILA was not certain as to which specialist studies Ms Koch referred to. Ms Koch confirmed to ILA that she referred to the specialist assessments that would be conducted as part of this EIA process.
	Liesl Koch	Email 10 December 2010	<ul style="list-style-type: none"> ■ These impacts have been identified in Section 7 of this report.

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> - Increase in alien plant infestation - Pollution of crocodile river from sewage and stormwater discharge - Removal of protected trees - Cumulative impact of abstraction of water from Crocodile River 			
<ul style="list-style-type: none"> ■ The conclusion of the report does not clearly state the studies which are to be undertaken in the EIA. I assume that the following will be undertaken in addition to the others mentioned: <ul style="list-style-type: none"> - Visual impact Assessment - Noise impact Assessment - Floodline determination - Ecological Assessment - Water Risk Assessment (groundwater and river) - Socio Economic Assessment 	Liesl Koch	Email 10 December 2010	<p>The following studies will be included in the Draft EIA Report.</p> <ul style="list-style-type: none"> ■ Vegetation and Fauna Assessments (Consideration of the impact the development will have on the Pel's Fishing Owl amongst others); ■ Visual Impact Assessment; ■ Hydrogeological Investigation; ■ Floodline determination; ■ Preparation of services report containing information on provision of civil and electrical services as well as the re-routing of Rhenosterkoppies Road; ■ Geological Investigation; ■ Socio-Economic Impacts will be investigated however a full assessment will not be conducted.
<ul style="list-style-type: none"> ■ Thank you for the draft Scoping received on the 19th. I have allocated the project to Mr Michael Nyirenda (MNyirenda@mpg.gov.za). Please liaise with him with respect to a site visit (and any further requirements he may have). 	Robyn Luyt Environmental Impact Management (Ehlanzeni District) of Mpumalanga Department of Economic Development, Environment & Tourism	Email 25 November 2010	<ul style="list-style-type: none"> ■ ILA conducted a site visit with Michael Nyirenda on 18 January 2011. To date no formal comment has been received.

Issues And Comments Raised

Commentator/s

Source

Response

<ul style="list-style-type: none"> I apologise for my late application, I know the registration time to participate in the EIA process of this development has passed but I would like to be considered for the following reasons. 	<p>Gerrit Meyer. Concession Manager. Rhino Walking Safaris. Kruger National Park.</p>	<p>Email 14 December 2010</p>	<ul style="list-style-type: none"> Details regarding the placement of notices are indicated in Section 8 of this report.
<ul style="list-style-type: none"> I manage a Concession in the Kruger National Park, and as such I and our Company are "interested and affected parties" Neither I, or any of our staff, or in fact any of the other 7 Concessions or their Managers at any time saw any notices re. an intended EIA displayed at any prominent public areas at Skukuza, Kruger Gate or Malelane Gate, as is required during the EIA process. I only became aware of how far this proposed project has gone through discussions with SANParks employees working in the Kruger National Park. As this proposed development is by its very nature a highly contentious project, I am concerned that this project is being fast tracked to avoid negative publicity, and public concern. 	<p>Tracy-Lee Petersen Strategic Conservation Planner and Environmental Manager SOUTH AFRICAN NATIONAL PARKS KRUGER NATIONAL PARK</p>	<p>Email 03 December 2010</p>	<ul style="list-style-type: none"> Ms Petersen's comment regarding placement of the waste water facility is noted and will be considered during finalisation of a lay-out plan; The EMP will also be applicable to the Park & Ride; Notice boards were erected at the Malelane and Skukuza (Paul Kruger gates). Further notice boards were erected at gates and main camps throughout the Park during December. Concessions in the southern region of the park were afforded an opportunity to comment on the Draft and Amended Draft Scoping Reports.
<ul style="list-style-type: none"> I have no comments thus far wrt to the report as I still need to go into it in more detail. But will have them ready before the end of next week. 	<ul style="list-style-type: none"> I am aware that mitigation would be detailed in the EIA report and EMP but following my site visit I noted the following: 		
<ul style="list-style-type: none"> The waste water treatment facility is planned to be situated right next to the no-go area for the Adenium swazicum species. I am concerned that in the event of a leakage or spill from the facility it might pose a threat. Although the slope follows in the opposite direction it would be preferable that the facility be placed somewhere else. Would you be doing the EMP for the site for the park-and-ride facility as well? During the site location exercise for the park and ride it was mentioned that 2 grave sites were found. 			

Issues And Comments Raised

- As seen in the report you have fulfilled the public participation process requirements although the Kruger National Park and its activities are of national interest I would like to request that notices are put at all camps in the KNP. You could forward me the notice and I could distribute it to all the receptions in the park to be put up on the notice boards. Also some of the KNP concessions have also indicated that they would like to be I&APs. Could I send them the draft scoping report and your details in order for them to register?

Commentator/s

Source

Response

Comments Received On Amended Draft Scoping Report

I wish to voice my vehement opposition to this development:

- There has not been a thorough study to confirm the tourism viability and sustainability of this type of development
- The proposed development should be outside the Kruger national Parks boundaries so that natural vegetation, visual impact and sense of place are not impacted upon
- Should the development not be sustainable an eyesore will result in what should be a wilderness area
- This Wilderness Areas cannot be expanded further southwards and the area cannot be returned to a natural state after being violated
- It is violation of the Kruger National Parks long term management plan

Please register the Crocodile River Major Irrigation Board as an affected stakeholder. We represent all the agricultural activities on the southern side of the Crocodile River and require the following information:

Andrew Schaffner
Honda Auto & Wing Vaal

Email 26 January 2011

■ SANParks followed the PPP feasibility and procurement processes set out in the National Treasury's PPP Toolkit for Tourism. An Information Memorandum pertaining to the proposed development was prepared in March 2009. It was confirmed by SANParks Business Development Unit that the Information Memorandum included a feasibility assessment for the viability of the Malelane Hotel development. In addition to such, a financial feasibility was performed which indicated the viability of the hotel.

■ The Malelane Hotel development falls within the approved KNP Management Plan for which a consultation process was undertaken. The management plan of the KNP provides for the broad zoning system on which potential tourism and other infrastructure developments may take place. The Conservation Development Framework is the plan that guides development in National Parks. This is supplemented by the various park management plans.

06 January 2011

Ronelle Putter
Secretary
Crocodile River Major Irrigation Board

■ There is no potable water on site. The closest perennial river is the Crocodile River, although it may dry up during periods of extreme low rainfall. Water for the development will either be supplied from the Crocodile River or boreholes. The quantity and quality of underground water is not known and

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> What will the source of water be for this development. If the Crocodile River, tributary or borehole, please supply a copy of the permit or license obtained from Department of Water Affairs How will sewerage be treated and run-off water 			<p>will have to be determined through a Hydrogeological Evaluation. A license from the Department of Water Affairs will be required to extract water from either the River or from boreholes. The EIA Report will confirm: Point of supply; Water design criteria; Services lay-out; Affected Floodlines.</p> <p>■ A Waste Use License in terms of the National Environmental Management: Waste Act, 2008 will be required for the treatment of effluent, wastewater or sewage with an annual throughput capacity of 15 000 cubic metres or more. Adherence of the proposed system to the requirements of the SANParks Environmental Guidelines will be assessed as part of the EIA Phase. Once specifications of the waste water management system become available the associated impacts relating to approximate volume, discharge and method of treatment will be investigated as part of the EIA.</p>
<ul style="list-style-type: none"> Requested to be registered as an interested and affected party for the proposed development <p>The EIA notice in the Sunday Times dated 19 December 2010 regarding the proposed development of a hotel at the confluence of the Timfene and Crocodile Rivers within the Kruger National Park (Maklani) - Mpumalanga Province (ref 12/12/20/610/1/69), refers.</p> <p>This e-mail serves as a request to please register myself, Francois Retief (representing North West University) as an interested and affected party to this development - contact details below. Also please forward the draft Scoping Report so that we can comment.</p> <p>At this early stage we would like to point out that Regulation 54(8) of GNR 543 states:</p> <p>"Unless justified by exceptional circumstances, as agreed to by the competent authority, the applicant and EAP managing the environmental assessment process must refrain from conducting any public participation process during the period of 15 December to 2 January"</p>	<p>Fiona Macleod</p> <p>Francois Retief</p> <p>Associate Professor School of Environmental Sciences and Development North West University (Potchefstroom campus)</p>	<p>13 January 2011</p> <p>26 January 2011</p>	<p>■ Noted, has been registered</p> <p>■ Mr Retief has been added onto the registered I&AP database.</p> <p>■ The dates for extension of time on comment period on the Draft Scoping Report and placement of advertisement on the 19 December was discussed and approved by DEA.</p>

Issues And Comments Raised

Since the advertisement was placed on 19 December (after 15 December) - we suggest that the applicant re-advertise in line with the provisions of the GNR 543. We will therefore provide our comments on the draft Scoping Report according to the time frames set out in the new advertisement.

Commentator/s

Source

Response

<ul style="list-style-type: none"> Can you please inform us as to the 'exceptional circumstances' which allowed you to advertise during December 2010? Therefore, the basis on which DEA allowed the advertisement during December? Of course this could form the basis for a procedural appeal - so I am just checking if such justification has been formally granted i.e. trying to understand the rational? Merely saying that DEA approved does not explain the 'exceptional circumstances'. 	<p>Francois Retief</p> <p>Associate Professor</p> <p>School of Environmental Sciences and Development</p> <p>North West University (Potchefstroom campus)</p>	<p>26 January 2011</p>	<ul style="list-style-type: none"> The dates for extension of time on comment period on the Draft Scoping Report and placement of advertisement on the 19 December was discussed and approved by DEA. Details regarding the Public Processes followed up to date are described in Section 8 of this report.
<ul style="list-style-type: none"> Also, was this a second advertisement - after one in November? Stated that the reasons for excluding certain time frames for other forms of public participation such as publishing in national newspapers remain the same, independent of the annual visitor profile within the park itself? Therefore the visitors to the national park has no bearing on the participation of the overall national constituency (i.e. general South African public). 	<p>Francois Retief</p> <p>Associate Professor</p> <p>School of Environmental Sciences and Development</p> <p>North West University (Potchefstroom campus)</p>	<p>26 January 2011</p>	<ul style="list-style-type: none"> As above
<ul style="list-style-type: none"> Argues that this should not qualify as 'exceptional circumstances' - for the press advertisement per se. Also in view of the importance of the advertisement to inform the general public Requested to be registered as and interested and affected party 	<p>Friedemann Essrich</p>	<p>Email 28 December 2010</p>	<ul style="list-style-type: none"> Mr Essrich was registered as an I&AP.
<p>My concerns regarding this development are of a fundamental nature as is evident from the list of issues below, all relevant to the application. The project intends:</p>	<p>Friedemann Essrich</p> <p>SiM Mining Consultants (Pty) Ltd.</p> <p>Director</p>	<p>Email 18 January 2011</p>	<ul style="list-style-type: none"> The site boundary extends to approximately 35 hectares. The anticipated development footprint extends to between 2-3 hectares.

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> the development of a 35ha area including a full service hotel facility in a high conservation area; the transformation or removal of indigenous vegetation (3ha or more) from a critically endangered eco-system; the abstraction of ground water from the Crocodile River environment, which is a water stressed river system; the building of infrastructure within the 100-year flood line; Various activities that fall under the Hazardous Substances Act, the Air Quality Act, the Waste Act and eight other acts passed into legislation to prevent harm to people and the environment. The amended draft scoping report lists activities expected to occur during the construction and operation phase which may have a negative impact on the social and natural environment. The adverse effects outnumber the beneficial impacts by 38:7. It is evident that this project is completely unacceptable from an environmental point of view. The question must be asked why a certain area would be declared 'protected' or should be awarded 'high-conservation' status if this status can be revoked to accommodate the commercial interest of a developer. Surely, a critically endangered eco-system needs to be protected. Why else would it be classified as such? On these grounds, I object to the proposed development Concerned that commercialization in the Kruger Park can only have a negative environmental impact locally, and together with similar commercial developments in other sensitive ecosystems around the world it will contribute globally to permanent damage to the earth. The simple rule of returning something in the same condition after you 	<p>Gerhard Hofmann Senior Mine Seismologist</p> <p>Rock Engineering Anglogold Ashanti</p>	<p>Email 28 January 2011</p>	<ul style="list-style-type: none"> A floodline determination is being conducted and no development will be supported below the 1:100 year floodline; The source of water is still in process of being investigated. Utilisation of boreholes is being considered as an alternative to abstracting water from the Crocodile River. Information on water sources to be utilised including demand will be included in the EIA Report; The development of the Hotel is in line with the future planning in terms of Commercialisation within the KNP; The development is situated on the periphery of the park as per the peripheral development policy; The development proposal will be subject to the KNP Sustainable Design Principles and Guidelines; applicable Responsible Tourism Standards; Environmental Guidelines for PP for the Construction and Operation of PPP Facilities within the KNP ; Concessions Operations Manual, Broader Park EMP and Site specific EMP prepared as part of this EIA. These measures will serve to limit & reduce the impact on the biophysical environment;
			<p>The following information has been extracted from the SANParks Strategic Plan for Commercialisation 2006</p> <p>'In September 1998, the Department of Environmental Affairs & Tourism articulated the need for SANParks to prepare for a lesser dependence on state funding, which would increasingly be aimed</p>

Issues And Comments Raised	Commentator/s	Source	Response
<p>have used it should be adopted also regarding our time spent on the planet Earth.</p> <ul style="list-style-type: none"> Developments such as the one proposed here, together with all the other battles lost attempting to protect the environment, will leave the earth in a poorer condition for the next generation, that is our children. In summary, apart from short term financial gain by the developers, I don't see any advantage from the proposed commercialization of the Kruger Park, on the contrary, it will lead to losing more natural habitats and as such make the earth a worse place for our children to live in. Requested acknowledge of comments provided 	Gerhard Smit	Email 28 January 2011	<p>at funding the essential conservation requirements. This formed the basis of the Commercialisation Strategy adopted by SANParks in 2000 with its foundation in the economic theory which defines the State's responsibility as one of performing a regulatory function and intervening in the market place only where there is a market failure. The objective was to reduce the dependence on state funding and improve existing operational efficiencies. This does not imply that SANParks has to be independent of the State but rather that the collective funding sources (i.e. state funding, private donations, NGO and international donations, SANParks' tourism activities and commercialisation) must be able to 'sustain' the total business of SANParks. Sustainable tourism development depends on partnership and balance between the social, technological, economical, the environment and political values and benefits. Hence should one source of funding be threatened, SANParks must be able to absorb such withdrawal without compromising its sustainability.'</p> <p>■ The development proposal will be subject to the KNP Sustainable Design Principles and Guidelines; applicable Responsible Tourism Standards; Environmental Guidelines for PP for the Construction and Operation of PPP Facilities within the KNP ; Concessions Operations Manual, Broader Park EMP and a Site specific Environmental Management Plan (EMP) prepared as part of this EIA. These measures will serve to limit & reduce the impact on the biophysical environment;</p> <p>■ A strategic decision by SANParks on the Malelane Hotel Development is in place, the Environmental Impact Assessment is therefore being conducted on an approved land use proposal in terms of Park Management Plans. ILA can not provide comment on the Strategic Decision made as it is a separate process from this EIA Process. (Also Refer Section1.1 of this Scoping Report). A separate platform should therefore be created for discussion of the Strategic Decision and Affected Parties and SANParks must</p>
<ul style="list-style-type: none"> I am sending this and request that I be listed as a concerned person objecting to the construction and running of a Hotel in the Malelane area of the KRUGER NATIONAL PARK, for the reasons given here below. I as a concerned and caring nature lover am forwarding this to you as you are the consulting company for the assessment of the environmental impact of the Radisson - 			

Issues And Comments Raised	Commentator/s	Source	Response
<p>Blu hotel at Malelane in the Kruger National Park.</p>			<p>correspond directly in this regard.</p>
<ul style="list-style-type: none"> I have been visiting the KRUGER NATIONAL PARK since 1967 and to date have made 127 visits to National Parks. The intention of SANPARKS to build a hotel at Malelane, and the possibility of another at Skukuza, is causing serious concern. This is a change from the norms and ethos, nature lovers expect from a Nature Reserve and in this case the KRUGER NATIONAL PARK 			<p>The following response has been extracted from the Kruger National Park Management Plan December 2008.</p> <p>■ Park Management</p> <p>Plans were not formulated in isolation of national legislation and policies. Management plans comply with related national legislation such as the National Environmental Management: Biodiversity Act, national SANParks policy and international conventions that have been signed and ratified by the South African Government.</p>
			<p>Coordinated Policy Framework Governing Park Management Plans</p> <p>■ The SANParks Coordinated Policy Framework provides the overall framework to which all Park Management Plans align. This policy sets out the ecological, economic, technological, social and political environments of national parks at the highest level.</p> <p>■ In accordance with the NEM: Protected Areas Act, the Coordinated Policy Framework is open to regular review by the public to ensure that it continues to reflect the organisation's mandate, current societal values and new scientific knowledge with respect to protected area management. This document is available on the SANParks website.</p> <p>■ The key functions of this management plan are to:</p> <ul style="list-style-type: none"> ensure that the KNP is managed according to the reason it was declared; be a tool to guide management of a protected area at all levels, from the basic operational level to the Minister of Environmental Affairs and Tourism; be a tool which enables the evaluation of progress against set objectives; be a document which can be used to set up key performance indicators for Park staff; and set the intent of the Park, and provide explicit evidence for the financial support required for the Park

Issues And Comments Raised	Commentator/s	Source	Response
			<p>■ This management plan for KNP comprises four broad sections:</p> <ul style="list-style-type: none"> 🦒 the background to and outline of the desired state of the KNP and how this was determined; 🦒 a summary of the management strategies, programmes, projects and initiatives that are required to move towards achieving the desired state (obviously these strategies, programmes and projects can extend over many years but the management focus until 2013 is presented); 🦒 an outline of the Strategic Adaptive Management methodology and strategies that will ensure that the KNP undertakes an adaptive approach to management. It focuses park management on those critical strategic issues, their prioritisation, operation and integration, and reflection on achievements to ensure that the longer-term desired state is reached; and 🦒 presentation of a high level costing.
			<p>Implementation of SANParks' Sustainable Tourism Framework</p> <p>■ Sustainable Tourism is defined as "tourism which is developed and maintained in an area (community environment) in such a manner and at such a scale that it remains viable over an indefinite period and does not degrade or alter the environmental (human and physical) in which it exists to such a degree that it prohibits the successful development and wellbeing of other activities and processes" (Butler 1993). The KNP tourism programme is aimed at simultaneously addressing and supporting the 6 key goals and associated strategic objectives of the DEA strategic plan and the SANParks strategic tourism principles and objectives. In order to achieve the desired nature-based tourism destination state in KNP, tourism activities and experiences must optimise the parks' unique attributes and special features as the preferred focus to ensure sustainability and a unique product compatible with the overall desired state whilst applying the principles of responsible tourism. Amongst others the following aspects</p>

Issues And Comments Raised	Commentator/s	Source	Response
			will require focused attention:
			■ Visitor management: Taking heed of a recent demand analysis, it is anticipated that should the demand continue to grow at its current rate, the KNP will not be able to manage its visitors, particularly in the southern region. Creative alternatives to 'self drive' tourism model will need to be investigated, possibly incorporating a type of 'park and drive' concept in the next 20 year horizon. Attention will need to be given to the current quota system, particularly since 70% of visitors currently comprise day visitors and The KNP will need to consider converting these to overnight visitors, limiting day visitors. The development proposal includes the construction of a Park & Ride Facility at the Malelane Entrance Gate, which will cater for all of the Hotel guests and some day visitors. This will serve to reduce the number of vehicles entering the park.
■ The Sabi Game Reserve was proclaimed in 1898 and was then followed by the Shingwedzi Game Reserve. The Proclamation of the KRUGER NATIONAL PARK followed in 1928 when proposed by the Hertzog Government and seconded by Genl J Smuts - the then leader of the opposition; this indicates although the two groups differed politically they were united in this matter.	Gerhard Smit	Email 28 January 2011	■ Sustainable revenue growth: This must focus better on the three new and growing markets, namely SA Leisure, business tourism, and maintenance of the current market... The KNP must expend energy on sufficient and effective marketing of the KNP as a destination...provision of internal standard facilities and services... SANParks is to keep abreast with top tourist destinations by improving its product and appealing to a wider range of visitors. The strategic focus of the Applicant is to fit into the market gap that exists in wildlife tourism, i.e between the self-catering camps offered by the Provincial Parks and SANParks, as well as the high priced. Low density lodges that are found in numerous wildlife areas, including the KNP existing Concessions. The product offered will be a fully catered, 4 star accommodation, for family, business and incentive markets to foreign and domestic tourists., with a broad spectrum of experience options, focused on wildlife and relaxation, whilst adhering to all the Park Guidelines and Policies to ensure limited ecological and socio economic impacts.
■ Tourism developed from three motor vehicles visiting KRUGER during 1923. With the assistance of the SAR, tours by train through the Transvaal Lowveld making a stop over in the Park tourism was encouraged. Much effort was made to develop KRUGER into a tourist destination, her below is a copy of an advert by the SAR drawn by the artist H.S. Caldecott as part of the campaign			
■ The SAR (South African Railways) proposed to erect a hotel in SKUKUZA during the 1920s, fortunately this was rejected by the National Parks Board.			
■ Many different types of accommodation were developed			

Issues And Comments Raised	Commentator/s	Source	Response
<p>from the real basic room with beds with a steel stand and wash basin and a jug or a bucket of water and chamber pot, an example of this is the Selby hut in the SKUKUZA rest camp.</p>			
<ul style="list-style-type: none"> ■ Later huts with amenities being beds with bedding, curtains, a wash basin, a shower and a flush toilet, fridges were added and even later crockery and cutlery; this was regarded as absolute luxury by all who made use of these self contained units. 	Gerhard Smit	Email 28 January 2011	<ul style="list-style-type: none"> ■ One of the core pillars on which SANParks business operations are founded is Nature-based tourism. A significant element of the ecotourism pillar is the Commercialisation Strategy (which through the implementation of PPP) has its objective reducing the cost of delivery, improving service levels by focussing on core business and leveraging private capital and expertise as well as the objective of expansion of tourism products and the generation of additional revenue for the funding of conservation and constituency building. As per the SANParks Strategic Plan for Commercialisation 2006-2011 the Malelane Hotel was identified as a commercial opportunity.
<ul style="list-style-type: none"> ■ At a later stage family units were added with two or three bedrooms, a kitchen, a sitting room and a dining area on the verandah – in of the larger camps Skukuza, Mopani, Letaba. 			<p>In conclusion:</p> <ul style="list-style-type: none"> ■ The development of the Hotel is in line with the future planning in terms of Commercialisation within the KNP; ■ As per the Draft Conservation Development Framework for the KNP the site identified is situated within a High Intensity Leisure Zone: These areas are high density tourist development nodes with modern amenities, incorporating the high volume transport routes. Activities are concentrated and a range of infrastructure and facilities is on offer, although still reflecting the ethos and character of the park; Since making the Draft coping Report available for comment it has been confirmed to ILA that the zoning as indicated in the PPP agreement is not yet formal. However the SANParks is in the process of refining the Conservation Development Framework (CDF). Refer to Figure 5 which indicates the Park's intent in this regard.
<ul style="list-style-type: none"> ■ Small Bush camps were later added for those who preferred the peace and quiet away from the noise and traffic in the larger camps. 			<ul style="list-style-type: none"> ■ The development is situated on the periphery of the park as per the peripheral development policy;
<ul style="list-style-type: none"> ■ Still later a rustic camp with approximately 25 camping sites (Tsendze) was built near the Tsendze River in the northern area of the Park, also for those who prefer being in the bush away from the traffic and the noise of the larger camps 			<ul style="list-style-type: none"> ■ The development proposal will be subject to the KNP Sustainable Design Principles and Guidelines; applicable Responsible Tourism Standards; Environmental Guidelines for PP for the Construction and Operation of PPP Facilities within the KNP ; Concessions Operations Manual, Broader Park EMP and Site specific EMP prepared as part of this EIA. These measures will serve to limit & reduce the impact
<ul style="list-style-type: none"> ■ Today the old Punda Maria rest camp is still regarded as a gem as it still has the ambience of the OLD AFRICAN BUSH 			
<ul style="list-style-type: none"> ■ Many other proposals were submitted to the Board for Tourist Development in the Park, fortunately sanity prevailed and they were rejected 			

Issues And Comments Raised

Commentator/s

Source

Response

on the biophysical environment;

- The first Warden of the Park Col. James Stevenson-Hamilton who served during the period 1902 to 1946, under whose supervision the Kruger National Park emerged as one of the great National parks of the World stated: "... any hotels and in future new camps should be sited outside the Park's western boundary The enlargement and/or increase of rest camps in the midst of the Park should in future be avoided."
- He soon after his appointment realized that the Sabi Game Reserve could not be a burden to the State, he envisaged that the area be:
- A Game Sanctuary where animals could live and multiply in peace in a place similar to what it like was before being touched by man.
- A place where paying tourists could come to and enjoy nature in a place similar to what it was like before being touched by man.
- On his retirement he summarized his basic philosophy, typed in bold capitals as follows:

KEEP IT SIMPLE, KEEP IT WILD.

In his book "South African Eden he mentioned:

"If and when man would disappear from earth it will be remembered that all his so-called improvements, his capture and drilling of the natural, were designed solely for his own benefit; viewed from any but a human standpoint they are mainly destructive, wherever he goes he scars the face of the land, cuts down or burns vegetation, exterminates the animals. Wasteful exploitation of natural products is inherent to the human race, and the civilized rises superior to Savage man only in possessing alongside as much enhanced powers of destruction, the occasional appreciation of whither he is drifting".

He also quoted the following from an American periodical:

"My boy you are an American, of which you should be proud. I bequeath to you our great land, which we love so well. I hand

Issues And Comments Raised	Commentator/s	Source	Response
<p>the heritage to you, as my father passed it to me: but altered and developed a bit. Our forests of course have been cut to the last tree: the last head of game has been shot from the hillside; the last bird from the fields, and the streams no longer fish nor fur. Our vast public domain has been fed to the gravel, and is swiftly becoming a desert. The National parks are being shot out. So stay in town my son, and don't stray beyond the pavements; but, if you venture out, remember this - Don't go near the water - our once crystal streams are leprous now. Should you go to the old swimming hole, your feet will mire in bottomless slime and sewage, while the poisonous fumes assail your nostrils. All this is yours, my son - your heritage - the great outdoors of America".</p>			
<ul style="list-style-type: none"> ■ Col Sandenbergh his successor stated that "the primary object of the KNP is that it shall provide a sanctuary wherein nature will be left undisturbed" but also said that unfortunately many do not realise the meaning of the word sanctuary ■ The Board appointed the one man Hoek Commission in 1953 to investigate the future development of the Park. ■ The Hoek Commission strongly recommended that control over tourist numbers be exercised and was of the opinion that the Southern District had already reached its maximum. It was emphatic that "a standpoint must now be taken: must the KNP become simply a holiday resort or must it be a sanctuary in the true sense?" 			
<p>At the 1955, Fifth International Congress on Tourism that "all authorities charged with the administration of national parks and nature reserves be requested to undertake detailed scientific research into the effects of tourism on wildlife and, based on the findings of such research, to determine the development of tourism in the parks. " The KNP Biologist Dr. Nell, quoted from <i>The paradox of National Parks</i> (Boyle) that "the spirit and force behind the National Park idea has, in all countries, been the demand for the preservation of nature; so that something shall remain as it used to be, unspoilt by the advance of civilization. There has, of course, also been a demand for places of</p>			

Issues And Comments Raised

Commentator/s

Source

Response

recreation, but that quite different demand can be satisfied in quite a different way, by the development of holiday resorts of many different kinds. There is in humanity a very deep-seated love of wild nature, which National Parks must satisfy, or else degenerate to become merely 'playgrounds' for the people".

Dr Nel cautioned that the pursuit of commercial gains was rapidly eroding away the primary objective of nature conservation and warned that the unchecked growth in tourist numbers resulted in the Board "... being forced to provide more and better amenities ... which in turn draw more 'popularity' and 'money' ... The result in the long run is the debasement of the higher and lasting values of wildlife conservation, that is the cultural values which call for sacrifices and not reward, and which endanger the purpose of a national park."

Gerhard Smit

Email 28 January 2011

The Knobel philosophy was "Visitor accommodation should in no way detract from nature and should certainly not try to compete with nature as a draw card to any national park or reserve. Visitor accommodation should be simple and not luxurious and it should be such that it does not, in what it offers, attract visitors to the area who do not primarily wish to visit the area, to be recreated through their experience by their contact with nature ... I hold the view that when visitors start demanding entertainment in accommodation areas it is a sure sign that the concentration is too large and that city-like conditions have been created. Such conditions call for entertainment to allow an escape from reality." Knobel also warned that "... we must never try to combine national parks ... with pleasure resorts. Both would be the loser."

In 1981 the Government made a substantial grant available for the expansion of tourism facilities in our national parks, with the purpose of making them more self-sufficient (and less dependent on Government subsidies). A large percentage of the substantial Government grant in 1981 was spent on renovating existing facilities and creating new ones. Dr. Pienaar

Gerhard Smit

Email 28 January 2011

Issues And Comments Raised

the then Warden warned that "in the absence of exact criteria (to determine optimal tourist numbers) one must inevitably fall back on more abstract parameters to determine the balance between a unique national park experience ... and the feeling of disappointment and exploitation of visitors in an over-saturated area which has the same urgency, restlessness and tension from which the average tourist tries to escape. (One must assess this) ... as many tourist facilities were proposed, including new rest camps, 'private' camps, picnic spots and roads.

Whilst considering the improvements the Research Section objected to some of the proposals but supported others subject to the following:

- The preservation of the pristine qualities of the ecosystems receives precedence over any conflicting tourist facilities
- The provision of tourist facilities should be subject to a zoning system, based on ecological sensitivities. Proposed zones were high, intermediate and low development areas, and semi-wilderness and wilderness areas
- Development on the peripheries of the Park should take precedence
- Roads with accompanying gravel pits should be limited and consideration be given to single lane one-way traffic roads and four-wheel drive tracks
- That no artificial water resources would be created for the purpose of increasing animal population densities for the sake of tourists

The Research Section proposed that the existing management plan for the KNP be revised by a Planning Committee, with representation by all sections of the administration of the KNP. The objective of the Planning Committee would be to compile an all-embracing management plan to include all issues relevant to the management of the Park, and to continuously update such issues as the need arose and/or more information became available.

During the 1980's and early 1990's three independent assessments of the attitudes of tourists to the KNP were made.

Commentator/s

Gerhard Smit

Gerhard Smit

Gerhard Smit

Source

Email 28 January 2011

Email 28 January 2011

Email 28 January 2011

Response

Issues And Comments Raised

The major results obtained by Dr Odendaal (University of Pretoria) included the following:

- The natural environment was the major interest of visitors, especially the tranquillity and solitude it offered
- There was a strong need for more trails and opportunities to make closer contact with nature
- There was a strong need for more environmental education
- Visitors were averse to recreational facilities (with the exception of swimming pools) and expected an “... introspective experience in which they could find peace of mind and tranquillity”
- Most visitors were of the opinion that rest camps could be “... even smaller and more primitive”
- There was a general feeling that camping areas were being neglected.

- In a survey by Du Toit and Van Aswegen of the Potchefstroom University a positive correlation was found between the responses of visitors to matters such as service delivery, tariffs, etc. and the quality of the “nature experience”. The higher the rating of the ‘nature experience’ the higher the ratings (acceptance) of other services and tariffs!

- In two separate follow-up surveys Ms Willemse and Prof Puth, both of the University of Pretoria, reported that visitors were satisfied that the Park complied with nature conservation expectations, that they felt that the Park should, first and foremost, be a national park with conservation objectives and that recreational and entertainment facilities do not belong in the Park.

- TV sets in chalets and other add on's have consistently been rejected in KNP attitude surveys.
- Tourists indicated that they required a quality experience and an intimate engagement with nature, both in terms of the facilities provided and the experiences offered. Recreational facilities and “modernisation” have been strongly rejected in favour of the tranquillity, serenity and

Commentator/s

Source

Response

Email 28 January 2011

Gerhard Smit

Email 28 January 2011

Gerhard Smit

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> wilderness ambience of the natural surroundings. Luxury Lodges were erected on Private Concessions within the Park Boundaries from 2000 onwards. This development was criticized on the grounds that it violated national parks principles and policies. The argument from SANPARKS Senior Management was that these would make SANParks financially more self-sufficient as government grants were likely to be withdrawn. Shops and restaurants were also made available to private entrepreneurs, for the same reason. The Hotel in our Prime National Park will be offering facilities alien to Nature Reserves in the busiest and already overcrowded region of the Park, and can hardly be regarded as anything but bizarre! The proposed hotel is in contradiction with most of what the man in the street's opinion of what a Nature Reserve or a National Park should be. It had been mentioned that the hotel would cater for higher income segment of the Black market and to make provision for income generation to achieve financial self-sufficiency for SANParks. Surely the existing concessions already allow for these people. It was also published that the occupancy rate of the concessions is not more than 40%. Should the objective of SANPARKS also be to earn revenue, I suggest they approach the Government for the required grant – after our country earns from visiting tourists with our National parks one of the major attractions, why should they not be entitled to a share of the income. The KNP Tourism Management Plan 2007 – 2011 clearly states that since 1994 “the new democratic government granted less Government subsidies to the KNP and the financial situation deteriorated.” Surely there are ways and means in which this can be addressed and one of them is not by building hotels in our heritage. 	Gerhard Smit	Email 28 January 2011	

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> The preservation of the natural, unspoilt attributes of our national parks (wilderness atmosphere, tranquility, serenity, sense of place, etc.) should continue and be the number one priority; all the other add ons can be sought elsewhere by those who require them, true nature lovers are trying to get away from the noise and the rat race and the hustle and bustle which we leave behind when we pass through the Park entrance gates. 			
<p>True nature lovers do not require a hotel with a spa and fancy bars and fancy pools and the accompanying noise and activity. This is clear from the surveys mentioned earlier. There is a requirement for</p> <ul style="list-style-type: none"> “appreciation of peace and tranquility or ‘sense of place’; “more camping and caravan sites”; “more roads and tourist infrastructure (picnic sites, hides, stop-over points with toilets, etc.) built in a ‘close to nature’ rustic style”; “... reduced crowding at view sites and congestion on the roads”; “provision of heritage guides in camps”; “cell-phone free zones”, etc. (KNP Tourism Management Plan 2007 – 2011). <p>Some negatives listed in the KNP Management plan are:</p> <p>“too many vehicles on the roads (especially in the Manula region)”;</p> <ul style="list-style-type: none"> “high noise levels in some camps”; “number of visitors in some camps”; “high exposure of visitors to Park non-core personnel (stakeholders find some staff behaviour in the Park unacceptable, e.g. speeding)” and “poor standards of service delivery”. 	Gerhard Smit	Email 28 January 2011	
<ul style="list-style-type: none"> I again request that this be entered as an objection to the construction of a hotel in the Malelane or any other area in the KRUGER NATIONAL PARK <p>Concerned about the following vulnerable species in the area:</p> <ul style="list-style-type: none"> The African Fish Eagle <i>Haliaeetus vocifer</i> frequent the Crocodile River, their call can often be heard 	Gerhard Smit	Email 28 January 2011	<p>Noted</p>
	Gerhard Smit	Email 31 January 2011	<p>Impacts associated with development of the proposed site on habitat and behaviour of avi-fauna will be investigated further during the EIA. Mr Scott Ronaldson of the Endangered</p>

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> During their recent survey by the EWT (Endangered Wildlife Trust) it was found that the Pels Fishing Owl (<i>Scatopelia peli</i>) numbers are declining in the KRUGER NATIONAL PARK. The only area where they are still to be found in reasonable numbers are the Levhuu River surrounds. Only two pairs of these birds were found along the total length of the Olifants River within the borders of the KRUGER NATIONAL PARK, many more were found during earlier surveys. Very few Pels Fishing Owls are still left in the Crocodile River surrounds; there is a known pair to breed on the island at the confluence of the Crocodile River and the Timfenheni close by to where the planned hotel is to be erected. The construction of a hotel at the Timfenheni site will have an impact on the Fish Eagles visiting the area. It will also most definitely have a negative impact on the pair of the already uncommon Pels Fishing Owls on the island, not only during the site preparation and construction period but also as long as the hotel is in operation, no matter how many "no go areas" are decreed – human habitation in the area will negatively impact on their habitat. No matter how much of afterwards corrective/punitive action will rectify the situation once the damage had been done. The protected Impala Summer Lily (<i>Adendinium swazicum</i>) is well represented in the allocated area; this piece of land will be ruined during the site preparation and construction period, destroying many of this and other valuable/protected species It has also come to my attention that the Radisson group intends at a later stage to apply to reroute the S114 road 	<p>Gerhard Smit</p> <p>Gerhard Smit</p> <p>Gerhard Smit</p>	<p>Email 31 January 2011</p> <p>Email 31 January 2011</p> <p>Email 31 January 2011</p>	<p>Wildlife Trust Birds of Prey Programme will be contacted to provide input on the lay-out alternatives and mitigation proposals in conjunction with the project ecologist EcoRex.</p> <p>■ The terrestrial ecological assessment has captured the location of this species in areas within the proposed site boundary. A lay-out proposal will be developed which will exclude these areas. Mitigation measures will be developed to ensure that the specie is not disrupted during the construction phase. Impacts to the specie associated with soil disturbance will be further investigated during the EIA Phase.</p> <p>■ Rerouting of the Rhenosterkoppies Road has been included as an activity in the Draft Scoping Report Project Scope. At</p>

Issues And Comments Raised	Commentator/s	Source	Response
<p>which will include another crossing of the Timfheneni, the reason for doing so at a later stage being that it may delay their current application if submitted now.</p> <ul style="list-style-type: none"> My question now; why is this not applied for now, the reason is obvious, amongst others – another crossing of the Timfheneni and the destruction of the Impala Lily habitat and then also what other additional add-ons may come at a later stage with pleas in mitigation that the whole project may have by then already been approved, huge expenses had been incurred and whatever else, reducing the possibility of rejection to an absolute minimum. I again confirm my objection to construction and operation of any hotel in this or any other area of the KRUGER NATIONAL PARK which after all is a Nature Reserve, for whatever reason there may be. Should there be a demand for this, type of accommodation and entertainment they could be free to do provide for, outside the perimeters of the Park. Requested to register Jock Safari Lodge (Mitomeni River Lodge PTY LTD) as 'interested and affected party' An economic impact assessment has not been undertaken. This should be demanded as there is real cause for concern that the proposed development may overwhelm the much smaller existing KNP lodge concessions, exacerbating the current challenging trading conditions and taking away market share. Note comment from Developer/Environmental Consultant that the 4-star hotel will offer "much lower rates than those of the lodges". (Another concessionaire, Lukimbi Lodge, consisting of 32 beds, has expressed serious concerns regarding economic/financial impacts) 	<p>Gerhard Smit</p> <p>Louis Strauss General Manager Jock Safari Lodge</p> <p>Louis Strauss General Manager Jock Safari Lodge</p>	<p>Email 31 January 2011</p> <p>Email 07 January 2011</p> <p>Email 25 January 2011</p>	<p>this stage alternative routes are still in process of being considered based on ecological sensitivities. These alternatives as well as the proposed route decided on based on the outcome of the terrestrial ecological assessment will be included in the Draft EIA Report.</p> <p>■ Noted</p> <p>■ Mr Strauss has been registered on behalf of the Jock Safari Lodge as an I&AP</p> <p>■ In March 2009 an Information Memorandum was issued by the SANParks in respect of the proposed Public Private Partnership Project for the Malelane Hotel Development in the Kruger National Park. The Information Memorandum includes the feasibility assessment for the viability of the Malelane Hotel development. In addition to such, a financial feasibility was performed which indicated the viability of the hotel.</p> <p>■ The Strategic Plan for Commercialisation does indicate that internal and external stakeholders will be identified. External stakeholders were accordingly identified from a tourism perspective in order to assess the demand for such product i.e. Southern Sun etc.</p> <p>■ Other concessionaires were not consulted as part of the feasibility process as the Malelane Hotel Development does</p>

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> A proper traffic and transportation impact assessment has not been undertaken. This should be demanded as there is real cause for concern that the impact of up to 240 additional visitors using game viewer vehicles on a daily basis has not been properly comprehended and this must be considered in the context of existing traffic congestion in this part of the Park (translates to around 30 or 40 game viewer vehicles at full passenger capacity). The response to such concerns by the Developer/EIA consultant that the "development will not contribute to an increase in traffic in the park" is spurious and without any empirical base. As the Hotel guests would be offered night drives on the Kruger public roads, it will increase traffic, noise and light pollution in the vicinity of the Jock Concession. We are situated less than 1 km from the H3 and both our Lodges face in the direction of this road. Whilst the proposed Hotel may fall within the approved "Kruger National Park Management Plan" (as noted in the Scoping Report), this does not automatically infer that the development is right sized, appropriate, sustainable or desirable The development proposal is text book 'tragedy of the commons', namely a limited resource being overloaded to the extent that it ultimately fails to deliver the primary 	<p>Louis Strauss General Manager Jock Safari Lodge</p>	<p>Email 25 January 2011</p>	<p>not compete with their products and as such, cannot have an impact on their viability. The existing concessionaires operate 5-star lodges, each situated within an exclusive traversing area for their purposes only and hence with achieved rates between R4500 per person per night and R13,000 per person per night. The Malelane Hotel development is a 4-star product, focused on conferences and with average rates of approximately R1300 per person per night. In addition, the hotel development has no exclusive traversing area and will make use of SANParks infrastructure and vehicles for purposes of game drives only on the KNP public roads.</p> <p>Impacts associated with additional game drives will be assessed as part of the EIA Process. A traffic assessment was conducted in 2008 which formed part of the Marula Region Strategic Environmental Assessment. This information will be reviewed by the project traffic engineer and traffic impacts of the Malelane Development will be determined and associated mitigation / or upgrades required.</p> <p>The SANParks Information Memorandum includes the feasibility assessment for the viability of the Malelane Hotel development. In addition to such, a financial feasibility was performed which indicated the viability of the hotel.</p> <p>A strategic decision by SANParks on the Malelane Hotel Development is in place, the Environmental Impact Assessment is therefore being conducted on an approved land use proposal in terms of Park Management Plans. ILA can not provide comment on the Strategic Decision made as</p>

Issues And Comments Raised	Commentator/s	Source	Response
benefits for which it is needed.			it is a separate process from this EIA Process. (Also Refer Section 1.1 of this Scoping Report). A separate platform should therefore be created for discussion of the Strategic Decision and Affected Parties and SANParks must correspond directly in this regard.
<ul style="list-style-type: none"> A scheme of this magnitude should not be located within a primary protected area and the proposal is in direct conflict with generally agreed international best practice. A more far-sighted, sustainable, integrated planning approach would be to situate a project of this scale outside of the main park and to use it to leverage real benefits in terms of community equity, enlarging the extent of protect areas contiguous to Kruger National Park etc. The hotel will have an unfair advantage over Jock Safari Lodge in terms of 24 hour access granted to their visitors. We've been restricted to KNP gate times for the pasts 9 years and lost out on a huge amount of bookings due to this! We would like to get clarification on where the staff would be accommodated. If not on site they would obviously be transported in by taxi that will add to the impact on the environment, road traffic and entrance gate. They will also be allowed to travel at night. To run a hotel of this size the number of staff will be significant (+/- 200). Night time driving is the main cause of "road kills" in the park. Will staff be transferred by vehicles with drivers that are not Ranger trained at night? This is an area with high elephant and hippo numbers. At night these animals can act aggressively towards vehicles and an untrained driver will not be able to handle the situation. This pose as a huge Safety risk to the passengers and animals. The TSB dumping site outside the Malelane Gate can't handle much more volume. A Hotel of this magnitude will contribute hugely to more waste. There is also no recycling taking place at this site. This is in huge contrast with 	<p>Louis Strauss General Manager Jock Safari Lodge</p> <p>Louis Strauss General Manager Jock Safari Lodge</p> <p>Louis Strauss General Manager Jock Safari Lodge</p>	<p>Email 25 January 2011</p> <p>Email 25 January 2011</p> <p>Email 25 January 2011</p>	<p>■ The Malelane Development is aimed at a different target market that that of the 5 star lodges. The 24 gate access is therefore not considered to impact on the clientele of the lodges.</p> <p>■ The bed limit (240) includes all staff beds and relates to the maximum number of persons on the project site at any point in time. The Private Party must accommodate as many staff as practical off site as doing so commonly reduces the environmental and social impacts of the development. Only staff that are essential for the operation of the project after normal KNP gate closing times are to be housed on site. The Private Party is responsible for the transport of its employees from their workplace to their living quarters.</p> <p>■ The Private Party shall adhere to the SANParks normal operating hours for transporting of goods and services.</p> <p>■ Details regarding accommodation and transportation of staff will be included in the EIA Report.</p> <p>SANParks encourages Private Parties to implement a policy of sorting and recycling solid waste. Wastes that can not be removed from the project site and the Park must be removed and disposed of appropriately. Landfills are not permitted at any</p>

Issues And Comments Raised

SANParks green management approach.

Commentator/s

Source

Response

project sites. Biodegradable wastes must be disposed of in approved waste sites outside of the Park. A waste management plan as well as estimates of volumes of solid waste for different waste categories will be included in the EIA Report. It will also be confirmed which landfill site will be made use of.

- Requested to be registered as an interested and affected party
 - Stated that the timeframe for review of the draft SR is not according to Regulations which state that public participation should not take place from 15 Dec to 2 Jan. Since we only received your letter on 15 December 2010 we request an extension on the timeframe to submit comments on the Draft SR until 15 February 2011.
 - Please supply us with the following information:
 - What is the progress on the DFA Scoping Report?
 - Do you have a date for the Hearing?
 - Will there be a public meeting?
 - Plan of Study for EIA (not included in the draft SR).
 - Requested a copy of the approval letter from DEA for the extended comment period from 19 December 2010.
 - Requested an indication of the amendments to the draft Scoping Report (page numbers).
 - There exists an approved Hotel Site at the Mjejane Game Reserve (MGR) downstream. The MGR is managed as a Contractual Park in conjunction with the KNP and will soon have its own access into the KNP. Why is the approved site not considered for this development?
 - This will address many of the issues which you now have to gain permission for.
- | | | |
|---|------------------------|--|
| Linky & Craig Manuel | Email 29 December 2010 | ■ Noted. Have been added onto I&AP database |
| Mientjie Coetzee
Bokamoso
Consultants | Email 24 January 2011 | ■ The Draft Scoping Report was made available from 11 November – 10 December 2010 [Bokamoso was notified and requested to comment] Thereafter an extended comment period was afforded from 19 December – 31 January. Bokamoso was notified of the extended comment period on the 14 th of December. |
| | | ■ No DFA process is required' |
| | | ■ No Hearing is applicable as there is no DFA process required; |
| | | ■ Focus Group Meetings will be scheduled for early March; |
| | | ■ Plan of Study for EIA was included in both the Draft and Amended Draft Scoping Reports. |
| Mientjie Coetzee
Bokamoso
Consultants | Email 24 January 2011 | ■ ILA forwarded a copy of the email correspondence from DEA received approving the public period; |
| | | ■ The amendments where indicated in the Amended Draft Scoping Report. Ms Coetzee was referred to the relevant Section of the Report |
| Martin Heyneke
General Manager
Mjejane Game Reserve/ Luggedlane
Developments | Email 27 January 2011 | ■ SANParks proposed the development within its boundary for management purposes. |

Issues And Comments Raised		Commentator/s	Source	Response
<ul style="list-style-type: none"> With a new hotel you are increasing the tourist load in the south even more. How will the Mjejane guests be influenced, as well as our access over the new Mjejane low-level bridge? 		Martin Heyneke General Manager Mjejane Game Reserve/ Luggedlane Developments	Email 27 January 2011	<p>■ Mjejane is a game reserve located approximately 18km east of the proposed development site. The reserve is partly owned by the Community, as it came about as a result of a land claim. Because of the Community involvement, the management of KNP has been sympathetic to the application to allow a low bridge access from Mjejane into the KNP across the Crocodile River. KNP has also assumed responsibility for the land and game management of the Reserve. The granting of access to KNP via the low level bridge is subject to certain rules and restrictions imposed by the KNP management, the details of which must be obtained from SANParks. The Malelane Applicant has entered into discussions with Mjejane representatives regarding the manner in which they can co-operate in ensuring the success of both of our ventures.</p>
	<ul style="list-style-type: none"> More than 57% of the tourists to the Kruger National Park are found south of Tshokwane. Now you want to add to an area which is already stretched to accommodate tourists and increase the tourist loads in the southern KNP. How can you motivate such an approach? 	Martin Heyneke General Manager Mjejane Game Reserve/ Luggedlane Developments	Email 27 January 2011	<p>■ SANParks followed the PPP feasibility and procurement processes set out in the National Treasury's PPP Toolkit for Tourism. An Information Memorandum pertaining to the proposed development was prepared in March 2009. It was confirmed by the SANParks Business Development Unit that the Information Memorandum included a feasibility assessment for the viability of the Malelane Hotel development. In addition to such, a financial feasibility was performed which indicated the viability of the hotel.</p> <p>■ The Malelane Hotel development falls within the approved KNP Management Plan for which a consultation process was undertaken. The management plan of the KNP provides for the broad zoning system on which potential tourism and other infrastructure developments may take place. The Conservation Development Framework is the plan that guides development in National Parks. This is supplemented by the various park management plans. In terms of the Conservation Development Framework the Draft Zonation Map has zoned the Malelane area for High Intensity Leisure.</p>
	<ul style="list-style-type: none"> There are 4 concessions and the Mjejane Development located in the southern KNP. In some cases and during certain times of the year occupancy figures are low. How 	Martin Heyneke General Manager Mjejane Game Reserve/ Luggedlane	Email 27 January 2011	<p>■ The Information Memorandum compiled by SANParks for the Malelane development included a feasibility assessment (dated March 2009)</p>

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> can you justify adding to the competition for an already over-subscribed industry? What will the cost per room/night, per person be at the new hotel? What is this section of the Kruger National Park zoned as in terms of the Wilderness- and Recreational Zonation Plan? How has the broader South African public been consulted? The KNP is a National treasure and surely all South Africans should be included in the decision to construct a hotel INSIDE the KNP? Will new game drive roads be created in the Southern Kruger to absorb the extra traffic? The Mpumalanga Tourism and Parks Agency (MTPA) is concerned about the construction of a 240 bed hotel with its associated infrastructure in an area considered to be of high to very high conservation value and within a declared protected area. <p>Stated , the following issues is regarded as important and should be addressed in the Scoping Report and beyond:</p> <ul style="list-style-type: none"> Disturbance of <i>Adenium swazicum</i> subpopulation Location of site within a Protected Area Location of accommodation units within Riparian Zone Disturbance of breeding seasons of Red List species during construction Destruction of vegetation within a Threatened Vegetation Type 	<p>Developments</p> <p>Martin Heyneke General Manager Mjejane Game Reserve/ Luggedlane Developments</p> <p>Martin Heyneke General Manager Mjejane Game Reserve/ Luggedlane Developments</p> <p>Martin Heyneke General Manager Mjejane Game Reserve/ Luggedlane Developments</p> <p>Martin Heyneke General Manager Mjejane Game Reserve/ Luggedlane Developments</p> <p>MR C.V. Ndabeni Chief Executive Officer Mpumalanga Tourism and Parks Agency</p>	<p>Email 27 January 2011</p> <p>Email 27 January 2011</p> <p>Email 27 January 2011</p> <p>Email 27 January 2011</p>	<p>■ The Malelane Hotel development is a 4-star product, focused on conferences and with average rates of approximately R1300 per person per night. In addition, the hotel development has no exclusive traversing area and will make use of SANParks infrastructure and vehicles for purposes of game drives only on the KNP public roads.</p> <p>■ Low Intensity Leisure and Primitive.</p> <p>■ The Malelane Hotel development falls within the approved KNP Management Plan for which a consultation process was undertaken. The management plan of the KNP provides for the broad zoning system on which potential tourism and other infrastructure developments may take place.</p> <p>■ Not to ILA's knowledge</p> <p>■ Noted</p> <p>■ These comments have been forwarded to the project ecologist for further investigation.</p> <p>■ The location of the <i>Adenium swazicum</i> has been recorded and a lay-out will be developed which excludes affected areas from the development footprint.</p> <p>■ Riparian zones have been identified and these areas will be excluded from the development footprint. It is anticipated that these areas will also fall within the 1:100 year floodline which will be considered a no-go area.</p> <p>■ Mitigation measures will be developed and reflected in the Draft EIA Report and Environmental Management Programme. These measures will aim to limit the impacts anticipated with the disturbance of vegetation and rehabilitation. Impacts to fauna during both construction and operational phases will be investigated and mitigation</p>

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> Potential illegal hunting by members of the construction team Loss of nocturnal fauna through road kills due to night driving by staff 			measures determined.
<p>The MTPA further recommend that the following specialist investigations must be undertaken as part of the environmental impact assessment:</p>			
<ul style="list-style-type: none"> Vegetation and fauna assessments including reptiles and the possible effects of pollution and disturbance on crocodiles because the Malelane gate area is important Nile crocodile breeding area Hydrogeological investigation if borehole water is be utilised; Floodline determination; Report on the provision of civil and electrical services as well as the re-routing of Rhenosterkoppies Road; Geological investigation 			<ul style="list-style-type: none"> A vegetation and faunal terrestrial assessment has been conducted. Results will be included in the Draft EIA Report; A Hydrogeological Investigation is underway for use of borehole water. It must be noted however that as also applicable to the geotechnical assessment it is anticipated that the drilling of boreholes as part of the geohydrological assessment will be not allowed if a environmental authorisation has not been granted by DEA; A floodline determination is underway; Services reports relating to the provision of civil and electrical services to the site will be included in the Draft EIA Report. Detailed information on the re-routing of Rhenosterkoppies Road will be included in the Draft EIA Report; A Geological investigation is underway, again due to certain restrictions the investigations are walk over studies. Excavation and test pits may only be conducted if an environmental authorisation has been granted by DEA.
<ul style="list-style-type: none"> Requested to be registered as an interested and affected party 	Philip Ayres	Email 31 January 2011	
<ul style="list-style-type: none"> Studies riparian vegetation (and disturbances thereof) and would like to be kept in the loop concerning the Malelane Hotel project. 	Philip Ayres	Email 31 January 2011	<ul style="list-style-type: none"> Noted. Riparian zones are considered as ecologically sensitive not only as it provides habitat but also due to the functional importance for services such as flood attenuation and bank stabilisation. Riparian zones have been identified and will be considered as no-go areas.
<ul style="list-style-type: none"> Would also like to know what are the plans to preserve the riparian corridors (the areas close the proposed hotel) of the Timfene and Crocodile River systems, interns of 			

Issues And Comments Raised		Commentator/s	Source	Response
<ul style="list-style-type: none"> general biodiversity and habitat loss, erosion, ext? 				
<ul style="list-style-type: none"> Stated that he manages a Concession in the Kruger National Park, and therefore himself and Rhino Walking Safaris are "interested and affected parties" 		Gerrit Meyer. Concession Manager. Rhino Walking Safaris. Kruger National Park.	Email 14 December 2010	<ul style="list-style-type: none"> Noted. Have been added to the I&AP database.
<ul style="list-style-type: none"> Stated that neither himself, nor any staff, or in fact any of the other 7 Concessions or their Managers at any time saw any notices re. an intended EIA displayed at any prominent public areas at Skukuza, Kruger Gate or Malelane Gate, as is required during the EIA process. 		Gerrit Meyer. Concession Manager. Rhino Walking Safaris. Kruger National Park.	Email 14 December 2010	<ul style="list-style-type: none"> Refer to Section 8 for details on the Public Process followed up to date. Concessions within the Southern Region of the KNP where notified of the availability of the Draft Scoping Report.
<ul style="list-style-type: none"> Stated he only became aware of how far this proposed project has gone through discussions with SANParks employees working in the Kruger National Park. 		Gerrit Meyer. Concession Manager. Rhino Walking Safaris. Kruger National Park.	Email 14 December 2010	<ul style="list-style-type: none"> Refer to Section 8 for details on the Public Process followed up to date.
<ul style="list-style-type: none"> Stated that as this proposed development is by its very nature a highly contentious project, he is concerned that this project is being fast tracked to avoid negative publicity, and public concern. 				
<ul style="list-style-type: none"> Requested to be listed as an Interested and Affected Person, i.e. a Stakeholder and that what he has to say should be considered in the context of the EIA and proposal. 		Sal Davies	Email 29 January 2011	<ul style="list-style-type: none"> Noted. Has been added onto the I&AP database.
<ul style="list-style-type: none"> Stated that he considers himself a stakeholder because he is one of SANParks's clients. He has visited the Kruger Park every year for the last 29 years, and often more than once in the year. States that he would say that he has made approximately 43 visits and have thus contributed financially to various aspects of conservation and the maintenance and running of the park. Further states that he is a stakeholder because what happens to or in the park impacts on him personally even though he may not live right up against the boundary. He quotes from a SANParks document entitled 'Stakeholder Participation in Support of Developing and Implementing Management Plans for South African National Parks' 				

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> SANParks recognises that National Parks belong to the people of South Africa. As custodians of these national assets, we encourage stakeholder participation processes which strengthen community-park relations by incorporating local communities in support of the management and conservation of our natural and cultural resources' Stated that he is not part of the local community, but National Parks belong to ALL the people of South Africa and that includes him. Stated the legal mandate with regard to stakeholder participation is encapsulated in Section 39 (3) of the National Environmental Management: Protected Areas Act No. 57 of 2003 which states that all persons who may be interested in, or affected by the plan, are to be given the opportunity to comment on the plan. He will be considerably affected by the plan for the proposed hotel in the Malelane area; thus he is availing himself of this opportunity to comment. Stated he has some questions and some comments. The questions may seem very simple, but since the plans for this hotel were kept under wraps until it was almost a done thing, we, the ordinary SANPark clients have not had access to any information regarding the development and as a stakeholder he believes he has the right to know certain things A luxury hotel will need a great deal of servicing and, initially, large amounts of materials ferried in for construction purposes by heavy construction vehicles. Are we to expect that service vehicles will be permanently using the Crocodile River road in increasing numbers? Bearing in mind the appalling standard of driving exhibited by the drivers of such vehicles already supplying the park, is there to be stringent control over these and over the construction vehicles or will they just add to the speeding, the thick clouds of dust and the 	<p>Sal Davies</p> <p>Sal Davies</p> <p>Sal Davies</p> <p>Sal Davies</p>	<p>Email 29 January 2011</p> <p>Email 29 January 2011</p> <p>Email 29 January 2011</p> <p>Email 29 January 2011</p>	<p>■ Mitigation measures relating to the construction period which includes heavy vehicle access & routes will be included in the Environmental Management Plan. Measures pertaining to driver competence and awareness will be included in the EMP. The EMP must be made binding to the main contractor as well as individual contractors and must be included in tender documentation for the construction contract.</p> <p>■ Contract with contractor to include penalties in the event of non-compliance with the EMP. A penalty system will be devised prior to commencement of construction, during the</p>

Issues And Comments Raised	Commentator/s	Source	Response
<p>general slaughter of night-jars, diurnal birds, and small mammals that we are presently experiencing?</p>			<p>■ planning phase.</p> <p>■ It is the contractor's responsibility to ensure that the workforce is aware of and conforms to the environmental guidelines that are applicable in the EMP. An Environmental Control Officer will be commissioned to conduct environmental audits during the construction period. During this time an Environmental Liaison Officer will also be present on site daily. It is recommended that drivers whose driving is considered negligent and reckless be fined.</p> <p>■ Construction times will be considered as part of the EIA. At this stage it is recommended that construction hours be restricted to week days and that no construction be allowed over weekends or on public holidays. Confirmation on best suitable times for construction during the week to be obtained from SANParks Conservation and the project Ecologist, to ensure minimal impact to animal migration.</p> <p>■ The Private Party shall undertake the Construction Works subject to a Project Schedule, incorporating the requirements of this PPP Agreement, prepared by the Private Party. The purpose of the Project Schedule is to enable SANParks to monitor the Construction Works. No construction activity shall commence prior to approval of the Design Plan by SANParks [extracted from the PPP / SANParks Agreement]).</p> <p>■ Boreholes are being investigated for use of water. Details will be included in the EIA Report.</p> <p>■ Information pertaining to the sewerage system to be utilised including re-use of grey water will be included in the EIA Report</p> <p>■ It is not considered economical for vehicles to be used for a small number of guests and the obvious intention will be to maximise the number of guests per vehicle, thereby reducing the number of vehicles on the road. Only public roads may be used by the development</p> <p>■ This will be confirmed during the EIA Process. Currently only one road exist to access the proposed site. This road will be utilised by construction vehicles for construction of the Hotel.</p>
<p>■ The Crocodile River road is a major crossing both in the early morning and in the evening for a vast number of animals going down to and coming away from the river. This includes large animals such as hippo, buffalo and elephant as well as smaller ones. Is there to be any education of drivers of these service vehicles and the construction vehicles in this regard?</p>	Sal Davies	Email 29 January 2011	
<p>■ Is the hotel to draw water from the Crocodile River? If so, what is the daily estimate of water that will be removed from the river system?</p>	Sal Davies	Email 29 January 2011	
<p>■ How will sewage be dealt with? Is the proposed sewage treatment plant going to put water back into the Crocodile River? If so is there an emergency plan in place in case of faulty activity by the sewage plant?</p>	Sal Davies	Email 29 January 2011	
<p>■ Will the game drive vehicles be available to book privately, for example just for two people at a time or will the residents sign down for game drives at specific times, thereby reducing the extra number of vehicles on the road? Will these vehicles be permitted to drive on the private roads and the service roads?</p>	Sal Davies	Email 29 January 2011	
<p>■ What is the estimated increase in traffic volume on the Crocodile River Road as a result of service vehicles and game drives?</p>	Sal Davies	Email 29 January 2011	

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> Will there be a corresponding increase in monies allocated to road maintenance in this area so that other Park users will not have to endure the damage done to the roads? How is the influx of heavy vehicles during the building stage going to affect the roads in the area and who will be financially responsible for damage to the road surface should it occur? 	Sal Davies	Email 29 January 2011	<p>Thereafter the road will be re-routed for use by visitors to the Park (re-routing of Rhenosterkoppies Road).</p> <p>The Private Party will be responsible for damage caused during the construction or operational phases.</p>
<ul style="list-style-type: none"> It appears that the hotel rooms will be fronting onto the Crocodile River. Are there any residences opposite the proposed hotel building? If so, what checks are in place to ensure that visitors to the hotel do not have noisy parties and loud music disturbing to residents on the opposite bank and, incidentally to wildlife in the area? What is the total Ha of the area to be utilized by the hotel including the fenced grounds? How many trees will be removed? How will the ecology of this area be directly affected? Will this impact on any way on the area surrounding the hotel either in terms of plant life or animal life or both? Commented as follows: 'SANParks is 'committed to preserving biodiversity', something which is essential in the long-term survival of the human species. I am aware that SANParks is looking to increase their customer base and to appeal to a population niche that does not, presently, use the Kruger Park in great numbers. However, what is planned in terms of the new hotel appears to be very similar to the several concessions that already exist in the south of the Park and whose occupancy rate has not been 100%. Why cannot these concessions be accepted as suitable for the market niche that SANParks is targeting? Why increase the effect of Man's footprint on this already burdened (in terms of the human carrying capacity in a pristine ecological area) Southern Region? At the 10th biennial Conference of the Parties who signed the Convention on Biological Diversity which was held in Japan in 2010 the target that was set by the Strategic Plan 	Sal Davies	Email 29 January 2011	<p>A Visual Impact Assessment is being conducted and results and associated mitigation will be included in the EIA Report</p> <p>In depth impact analysis will be included in the EIA Report. As far as possible the removal of large indigenous trees will be avoided. The current site boundary extends to approximately 35 hectares with building footprint estimated between 2-3 hectares. Upon finalisation of a development lay-out this can be confirmed.</p> <p>The existing concessionaires operate 5-star lodges, each situated within an exclusive traversing area for their purposes only and hence with achieved rates between R4500 per person per night and R13,000 per person per night. The Malelane Hotel development is a 4-star product, focused on conferences and with average rates of approximately R1300 per person per night. In addition, the hotel development has no exclusive traversing area and will make use of SANParks infrastructure and vehicles for purposes of game drives only on the KNP public roads.</p> <p>The SANParks was not part of the decision whether to rebuild the hotel outside the park boundary. However the suggestion that the hotel could be rebuilt outside the park did inform SANParks decision that there was a market for such development.</p> <p>The development was considered by SANParks within its boundaries for the following reasons:</p>

Issues And Comments Raised	Commentator/s	Source	Response
<p>2011-2020 will increase the area of protected land in the world from 12,5% to 17%, and the area of protected ocean from 1% to 10% by 2020.</p> <ul style="list-style-type: none"> A comment was made that 'we will ultimately have to give back 40% of the land surface back to nature if we really want long-term stability'. I find it hard to see commitment to biodiversity when protected land is handed over to a hotel by the very body that should be protecting it. Why were plans not made for this hotel to be built outside the border of the park and perhaps run by the very people whom the SANParks management deems stakeholders – those living on the borders? Why, when there is conflict between the ecosystem and tourist facilities is the ecosystem no longer the prime factor for consideration? Why are we ignoring global concerns regarding biodiversity? Already several concession camps have been built in the park. How much more land is park management prepared to sacrifice? I do not want SANParks to be seen by upcoming generations as a body that is committed to biodiversity sometimes or in some ways. I want them to be seen to be walking the walk; a true example to the rest of the country. I strongly object to our heritage being destroyed in this way; I strongly object to another step being made to imperil our precious biodiversity because that will, in the long term, affect me and mine; I therefore request that my objection be recorded in the documents pertaining to the EIA. 			<p>From an Environmental perspective:</p> <ul style="list-style-type: none"> The impacts to the river would be the same irrespective if the building is on either side of the river (the river provides the boundary of the Kruger National Parks in the Malelane area). The burnt hotel was immediately outside the KNP across the river; SANParks can reduce the impacts to the environment if the facility is inside the KNP boundary as opposed to if the same is outside; With SANParks sourcing reputable operators, the environmental ethics will be highlighted to such operators and they could influence their operations outside the park – thereby allowing good environmental practices to go beyond KNP's physical boundaries; A site at the periphery of the park will reduce impacts to the environment. <p>From a Social perspective:</p> <ul style="list-style-type: none"> Should an alternative operation not be sourced to replace the burnt hotel, that could lead to a loss of net jobs in an area that is already in dire need of employment; With SANParks providing an alternative location jobs are restored in alignment with all the legislated social requirements, it allows SANParks to practice Responsible Tourism. SANParks will not be able to ensure social needs and alignment to legislated requirements should the facility be outside our premises/mandate. <p>From an Economic perspective:</p> <ul style="list-style-type: none"> Various governments around the globe are facing the reality of dwindling economies: funding for conservation is becoming more scarce. South Africa has an even more complex situation when redressing imbalances of the past. Simply put, the govt is now responsible to a larger populous in the last 16 years. While the larger pressing needs of the

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> Historically, the Kruger Park has been a protected area where the denizens of the bush take precedence over the needs of man. The idea, in its creation, was that Man could come to experience the natural environment as it should be, NOT to change it. Man came as a visitor and treated the natural environment with respect and love and was renewed thereby. As Wallace Steiger said in his 'Wilderness Letter' of 1960 <i>"We simply need that wild country available to us, even if we never do more than drive to its edge and look in. For it can be a means of reassuring ourselves of our sanity as creatures, a part of the geography of hope."</i> 	<p>Sal Davies</p>	<p>Email 29 January 2011</p>	<p>country's population is taken into account, SANParks therefore has to ensure smarter funding of conservation in a Responsible manner</p> <p>■ A strategic decision by SANParks on the Malelane Hotel Development is in place, the Environmental Impact Assessment is therefore being conducted on an approved land use proposal in terms of Park Management Plans. ILA can not provide comment on the Strategic Decision made as it is a separate process from this EIA Process. (Also Refer Section 1.1 of this Scoping Report). A separate platform should therefore be created for discussion of the Strategic Decision and Affected Parties and SANParks must correspond directly in this regard.</p>
<ul style="list-style-type: none"> The importance of Kruger to the enhancement of the human spirit has always lain in the simplicity of the camps; they way they blend in with their surroundings; the controlled numbers of vehicles; the adherence to a carrying capacity in regard to the number of humans the land could take; the emphasis on respect for the natural environment; the space that one could find to listen to the silence and breathe the clean air; the knowledge that the biodiversity of the region was being preserved for future generations 	<p>Sal Davies</p>	<p>Email 29 January 2011</p>	
<ul style="list-style-type: none"> It has been apparent on the SANParks forum that even a first visit, just one visit, makes a difference to the way one perceives and interacts with the environment and will thus live the rest of one's life.. Why is this essential environment permitted to undergo repeated attrition as more areas are given over to concessions and now the projected hotel? 	<p>Sal Davies</p>	<p>Email 29 January 2011</p>	
<ul style="list-style-type: none"> We South Africans, simply, NEED this wild country to reassure ourselves of our sanity and spirituality if we are to survive. Building luxury hotels in such a place which, I remind you, belongs to us all, is simply not the way to go. Affecting or altering the ambience of an area valued for 	<p>Sal Davies</p>	<p>Email 29 January 2011</p>	

Issues And Comments Raised

these qualities all over the world is not an action that should be taken lightly; it is an action which may deprive future generations of something infinitely precious – access to a truly natural environment and the healing power therein. On this basis, I **again strongly** object to further building of tourist facilities which conflict with the entire ethos of one of the last, great, preserved environments remaining in Southern Africa where the human can reconnect with his (or her) spiritual identity before he loses touch with his humanity.

Commentator/s

Source

Response

- Request that this submission be entered as an objection to the construction of the proposed hotel in the Maklane Area of the Kruger National Park.
Sal Davies
Email 29 January 2011
- Stated that Appendix 2: The locality map only shows one site. All the sites that have been investigated needed to be indicated.
Dr F J Venter
GM: Conservation Management
KRUGER NATIONAL PARK
Email 26 January 2011
- Stated Appendix 3: Due to the discovery of more of the **Critically Endangered** Swazi impala lilies on the site, it is my view that this site is not suitable and should not be used. The very high conservation value area is bigger than indicated on the map. This is one of only 3 sites in Kruger where this plant has been found. There are also other rare plants and animals that possibly occur in this area (see specialist report of W McClelland). The NEMPA Act No. 31 of 2004 states in Section 50 (2) that "An activity allowed in terms of subsection (1) (a) or (b) (this refers to commercial development- Freek Venter) may not negatively affect the survival of any species in or significantly disrupt the integrity of the ecological systems of the park, nature reserve or world heritage site." This specific issue warrants further detailed investigation (see attached email and specialist report)
Dr F J Venter
GM: Conservation Management
KRUGER NATIONAL PARK
Email 26 January 2011
- Appendix 8: This is not a typical report on comments received (Table 3 in Scoping Report is more in line). It

■ Dr Venter is referring to the Terrestrial Ecological Assessment Report compiled by EcoRex. An amended report is in process of being prepared which will provide information on ecological conditions of alternative sites. This report will be sent to Dr Venter once completed for comment.

■ Noted impacts associated with utilisation of the proposed site will be investigated in depth as part of the EIA.

■ A comment and response report was included in the Draft Scoping Report. Focus Group meetings will be arranged

Issues And Comments Raised	Commentator/s	Source	Response
<p>contains mostly copies of emails of people that registered for the process. There needs to be proper reporting on comments received, classifying them into different categories of comments etc. Furthermore, there have not been any public participation meetings with focus groups, which means this report is not complete</p> <p>Request the following to be amended in the Scoping report:</p> <ul style="list-style-type: none"> ■ P 1 – add Biodiversity Act. ■ P 11 – 150 l/person per day is less than half the amount other concessions have been allocated, which they consider not to be adequate. ■ P 30 – Site 1, the comments of looking directly at the Leopard Creek area is not relevant as at Site 2 the development follows the Timfene stream to mitigate similar issues. A similar approach at this site as well as other sites needs to be followed. ■ P 34 – add "Disturbance of nocturnal fauna through night driving". The scale of the development has the potential to significantly increase the night driving activities which need to be further investigated. 	<p>Dr F J Venter GM: Conservation Management KRUGER NATIONAL PARK</p>	<p>Email 26 January 2011</p>	<p>once more information pertaining to services and the re-routing of Rhenosterkopjes Road is available.</p> <p>■ Noted</p> <p>■ Ecological conditions on alternative sites including associated visual impacts (visibility) will be investigated and findings reflected in the EIA Report.</p>
<ul style="list-style-type: none"> ■ The decision by the South African National Parks Board (SANParks) to approve a hotel, in the league of a resort, in the Kruger National Park (KNP), is a dramatic deviation from the accepted ethos established for the KNP over almost a century. During this period the KNP acquired not only national but also international acclaim. Importantly, the ethos established for the KNP was underpinned by the mandate delegated to SANParks by way of the National Parks Act (now the Protected Areas Act, as amended). ■ The scope of an Environmental Impact Assessment (EIA) is not restricted to the physical environment only but also includes archaeological, historical and cultural interests, and the real or potential impact of a proposed development on such issues. In this respect it would have been expected of the EIA undertaken of the proposed Malelane hotel project to examine to what extent it complied with the legally prescribed mandate, to consider 	<p>Dr SCJ Joubert</p>	<p>Email 24 January 2011</p>	<p>■ A strategic decision by SANParks on the Malelane Hotel Development is in place, the Environmental Impact Assessment is therefore being conducted on an approved land use proposal in terms of Park Management Plans. ILA can not provide comment on the Strategic Decision made as it is a separate process from this EIA Process. (Also Refer Section 1.1 of this Scoping Report). A separate platform should therefore be created for discussion of the Strategic Decision and Affected Parties and SANParks must correspond directly in this regard.</p> <p>■ The Malelane Hotel development falls within the approved KNP Management Plan for which a consultation process was undertaken. The management plan of the KNP provides for the broad zoning system on which potential tourism and other infrastructure developments may take place. The Conservation Development Framework is the plan that guides development in National Parks. This is supplemented by the various park management plans. In terms of the</p>

Issues And Comments Raised	Commentator/s	Source	Response
<p>the development of the intertwined environmental/tourism ethos of the KNP and the threats of the proposed hotel development to the established values.</p>			<p>Conservation Development Framework the Draft Zonation Map has zoned the Maklane area for High Intensity Leisure.</p>
<ul style="list-style-type: none"> Not least of all, our national parks are a national asset. The peoples of South Africa are the legitimate stakeholders of our national parks, SANParks merely being the custodian on behalf of the people. In this respect the values and expectations of the people are of prime importance and should demand consideration in evaluating the need for a development which deviates so drastically from the established norms. In addition to consulting the results of repeated attitude surveys over the years it would have been expected of the EIA to gauge the opinion of the public on a national scale rather than only the limited legal exposure required by law through the EIA process. 	Dr SCJ Joubert	Email 24 January 2011	Refer to Section 8 for details in the public process followed up to date.
<ul style="list-style-type: none"> The fact that this EIA was commissioned six months after the project had been awarded to a developer raises serious concerns, possibly even doubts about the legality of the process. 			
<p>The Mandate of SANParks</p>			
<ul style="list-style-type: none"> The National Parks Board was created in 1926, with the promulgation of the National Parks Act (Act). SANParks also has the distinction of being the oldest parastatal in South Africa. In terms of the original Act, as amended, and more recently incorporated under Clause 20, Section 2 of the National Environmental Management Protected Areas Act 57 SANParks is charged to manage national parks subject to the following conditions: 	Dr SCJ Joubert	Email 24 January 2011	
<p>(2) A declaration under subsection (1)(a) may only be issued to – (a) protect –</p> <ul style="list-style-type: none"> (i) the area if the area is of national or international biodiversity importance or is or contains a viable, representative sample of South Africa's natural systems, scenic areas or 			

Issues And Comments Raised	Commentator/s	Source	Response
<p>cultural heritage sites; or</p> <p>(ii) the ecological integrity of one or more ecosystems in the area;</p> <p>(b) prevent exploitation or occupation inconsistent with the protection of the ecological integrity of the area;</p> <p>(c) provide spiritual, scientific, educational, recreational and tourism opportunities which are environmentally compatible; and</p> <p>(d) contribute to economic development, where feasible.</p> <p>From this clause in the Act, and in particular subsection (c) and to some extent subsection (d), it is clear that the underlying purpose of making national parks accessible to visitors is to afford them maximum exposure - educationally, spiritually and recreationally - to the natural environment. In every respect the focus is, and is intended to be, on the natural environment. This is precisely in line with, and intended to perpetuate, the ethos established for the KNP since its inception in 1926, as outlined below.</p> <p>In the spirit of the Act it is fair to conclude that the only purpose with the provision of facilities should be to facilitate the achievement of the primary objective of making access to visitors possible. It is clearly not intended for the facilities to be the drawcard (attraction), nor for national parks to generate income at the cost of their primary attractions (the natural environment and its wilderness aura). In terms of the latter, it is not only imperative on SANParks to take the lead in preserving the natural pristine qualities but also to heed the expectations of their stakeholders in this respect.</p>	Dr SCJ Joubert	Email 24 January 2011	

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> As far as subsection (d) is concerned it has been clearly established that the national parks make a very significant contribution towards the economy. Quoting from a study done by Urban Econ and peer reviewed by the University of Pretoria, it has been shown that SANParks has “... created approximately 100 000 jobs directly and indirectly ...” (Mabunda, Sunday Independent 30 August 2009). A study undertaken in 1993 also indicated that the KNP was a major regional economic force. It was shown that the entire area from the escarpment eastwards to the Lowveld was a prime ecotourism destination and a large percentage of the 300 000 day visitors to the KNP spent some time at other venues in the region. In 1993 there were 33 hotels, 12 game parks and a host of guest houses available for tourists. In addition, the KNP ordered goods worth R41-million per annum from 194 suppliers in the Nelspruit area (Engelbrecht and Van der Walt 1993). Since 1993 the tourism industry has mushroomed in the areas adjoining the KNP and, though no exact figures are at hand, it is reported that there are currently approximately 3 000 tourist beds available in a radius of about 20 km around Hazzyview! It is possible that the Urban Econ study referred to above could have more information on these aspects and the knock-on economic values, which may be expected to very considerable. 			
<p><i>On the above grounds alone the proposed Radisson Blu Safari Resort flies in the face of SANParks’ mandate and provides sufficient justification for the termination of the project.</i></p>			
<p>DEFINING THE INTRINSIC VALUES OF A SPIRITUAL, EDUCATIONAL AND RECREATIONAL EXPERIENCE</p> <ul style="list-style-type: none"> According to Stevenson-Hamilton (c. 1940’s) Gen JC Smuts (prominent South African politician and naturalist) once wrote of the Lowveld: “The Guardian Spirit (is) the mysterious, eerie Spirit which broods over this vast solitude where no human pressure is felt, where the 	Dr SCJ Joubert	Email 24 January 2011	

Issues And Comments Raised	Commentator/s	Source	Response
<p>human element indeed shrinks into utter insignificance, and where a subtle spirit, older than the human spirit, grips you and subdues you and makes you one with itself</p> <ul style="list-style-type: none"> Over the years successive generations have expressed their awe at this intangible and often difficult to define source of energy, fulfillment, spiritual enrichment and perfect harmony. 			
<ul style="list-style-type: none"> As the KNP developed and Stevenson-Hamilton could sense the awareness it created amongst the public he used the metaphor of Cinderella who turned into a most beautiful Princess. He also firmly believed in educating the public in the secrets of the natural environment to create an awareness of its intrinsic values. 			
<ul style="list-style-type: none"> Immediately after the Second World War serious attention was paid to the restoration and renovation of tourist facilities that had been neglected during the War. In the process, strong opinions were formed regarding the ethical and aesthetic values of the KNP. Bowling (1946), of the town-planning firm Bowling and Floyd, was co-opted to assist and he expressed the following sentiments: "I dislike the use of the word 'Park', as such a word by common usage smacks of pleasure grounds the term 'Wild Life Sanctuary' is more appropriate ..." (or even 'Reserve' as an alternative). Furthermore, "... if the Reserve is to retain its character of the primeval forest, nothing which can be avoided must be superimposed thereon which is alien to the natural background." 			
<ul style="list-style-type: none"> Sandenbergh (1947), Stevenson-Hamilton's successor, was equally adamant in his opinion: "... there seems a deplorable lack of the real conception of what the word 'sanctuary' really means ... our object should be to create an atmosphere wherein the people will feel that the KNP is not only a Sanctuary for wildlife but also a Sanctuary for them from the hustle and bustle, the cares and tribulations, and the squalors of civilised life." 			

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> ▪ In the mid-1950's Nel (1956) (the first Biologist of the KNP) addressed the Fifth International Congress on Tourism and, quoting from Boyle (The Paradox of National Parks) stated that ".... there is in humanity a very deep-seated love of wild nature, which National Parks must satisfy, or else degenerate to become merely 'playgrounds' for the people." Furthermore, "if the enjoyment of the public is to be considered, that enjoyment should be in the Park itself and not any extraneous exploitation which merely considers the Park as a means to an end ... We should boldly ask ourselves whether we want the national parks to duplicate the features and entertainments of other resorts, or whether we want them to stand for something distinct and, we hope, something better in our national life." 			
<ul style="list-style-type: none"> ▪ Towards the end of the 1950's and early 1960's the values and qualities of experiences offered to tourists were again highlighted. Knobel (1960, the first Director of our National Parks) expressed the view that "... the most important value of a national park, therefore, appears to be the recreational value, not in the narrow sense of physical recreation but in the true sense of the word which includes spiritual, intellectual and physical renewal." Knobel (1961) elaborated on this by stating "... it is only a half-truth to say that people go to the Park to see animals ... It is also not even the whole truth to say they go to see animals in their natural surroundings. There is much more than that – there is that nostalgia of the romantic past ..., the return to a little adventure, to a simple lifestyle, to camp fires ..., to bright starlit skies, to the inconvenience of roasting meat on glowing embers, to get away from neatly and fully-set tables, to have eyes burning from Mopane smoke, to feel the heat from fore and the cold from aft, and so many things that are unique to the outdoors. Things of which we may never deprive our children." 			

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> ▪ Brynard (1962) added to the above: "the future may be approached with great confidence as long as the Park is conserved primarily for its cultural, aesthetic and scientific values. However attractive it may seem, financial considerations may never take precedence at the cost of these values. We would otherwise be responsible to the nation for having exploited its greatest single cultural heritage." ▪ Following proposals for the expansion of tourist facilities in the early 1980's the KNP Research Section expressed a qualified approval of the expansions as it believed that "... man has a right to learn more of such a (pristine) ecosystem, to see it and also to experience it. With a greater appreciation, knowledge and respect for the ecosystem as a whole ... man could be depended on to ensure the preservation of its uniqueness for future generations" (Joubert et al 1981). ▪ From the mid to late 1980's a series of formal attitude surveys have been undertaken amongst visitors to the KNP to gauge their preferences and expectations. By using a combination of questionnaires and personal interviews Dr A Odendaal, of the University of Pretoria, drew the following conclusions regarding the preferences of visitors: <ul style="list-style-type: none"> ◦ The major concern was the natural environment, in particular the tranquility and solitude it offered; ◦ Visitors were averse to recreational facilities and expected an "... introspective experience in which they could find peace of mind and tranquility", ◦ There was a strong need for more hiking trails and opportunities to experience nature in a more intimate way (Odendaal 1986). ▪ Du Toit and Van Aswegen (1991) undertook an extensive survey of overnight visitors to all the South African national parks and gauged their responses to a wide range of experiences, facilities and services. A most significant trend was the positive correlation between several of the 			

Issues And Comments Raised	Commentator/s	Source	Response
<p>responses and the quality of the “nature experience”, i.e. the higher the rating for the “nature experience” the higher the ratings for associated services and tariffs!!</p> <ul style="list-style-type: none"> ▪ In an evaluation of a variety of proposed tourism developments Puth and Willemse (1992) and Willemse (1993) recorded the highest ratings for the following: guided day walks, night drives, natural botanical gardens, bird/game hides, information tape cassettes, traditional South African outdoor meals and guided research excursions. All ‘close-to-nature’ experiences! ▪ Exactly the same trends were borne out in a more recent (c. 2007) SWOT analysis undertaken by the KNP and in which stakeholders across the board participated. Priorities highlighted were a call for an <ul style="list-style-type: none"> ◦ “appreciation of peace and tranquility or ‘sense of place’; ◦ a demand for “more camping and caravan sites”; ◦ “more roads and tourist infrastructure (picnic sites, hides, stop-over points with toilets, etc.) built in a ‘close to nature’ rustic style”; ◦ “... reduced crowding at view sites and congestion on the roads”; ◦ “provision of heritage guides in camps”; ◦ “cell-phone free zones”, etc. (KNP Tourism Management Plan 2007 – 2011). ▪ In a series of bi-annual surveys conducted during June/July and December/January of each year from 2006, by the University of the North-West, responses reflecting an appreciation of nature and the peace and tranquility of the wilderness atmosphere were overwhelmingly prominent. This is distinctly evident in the majority of reasons, and inferred in the remaining reasons, for selecting the Kruger National Park as a holiday destination of preference: <ul style="list-style-type: none"> ◦ Nature experience and appreciation; ◦ Unique atmosphere of the Park ◦ Experiencing the peacefulness and tranquility; ◦ Uniqueness to South Africa; 			

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> <ul style="list-style-type: none"> o Great game viewing opportunities; o Conviction that it is the best Park in the world (Kruger et al 2010). ▪ From the reasons received for selecting particular rest camps the following conclusions were drawn: "It seems that visitors prefer secluded camps where they can experience nature, and enjoy the quietness of nature. Wildlife and proximity play an important role in deciding which camps to visit. Tranquility and atmosphere are, however, important factors when deciding to stay in smaller camps" (Kruger et al 2010). ▪ In terms of visitor centres an overwhelming 89% indicated that no other forms of activities or entertainment are required than an auditorium for nature videos, slide shows, specialist talks and entertainment for children (Kruger et al 2010). ▪ Surveys undertaken specifically to gauge the attitudes of the Black Diamond market revealed that "a third of Black Diamonds claim national parks are too expensive to warrant visiting or staying at them. Special deals on accommodation were rated as being most likely to draw Black Diamonds to national parks. Family deals will be key – especially for the established Black Diamonds" (TNS research surveys 2008). ▪ The most realistic conclusions to be drawn from the attitudes of both the managers of the KNP and the staunch support base that has been built up over close on 100 years is that the Lowveld ecosystems have an intrinsic source of energy and an emotional/spiritual impact that can aptly be defined as a Guardian Spirit, and which has variously been portrayed as its wilderness atmosphere, peace, tranquility, remoteness, solitude, harmony, sense of place, a place where people can meet their God, and many more in similar vein. ▪ It is also sufficiently clear that there has always been great concern that this Guardian Spirit be protected and perpetuated for the sake of posterity and as a "sacred responsibility" for future generations of South Africans. ▪ From the above account it is clear that the value system 			

Issues And Comments Raised	Commentator/s	Source	Response
<p>on which the Kruger National Park has been founded since its inception, is underpinned by:</p> <ul style="list-style-type: none"> o A Guardian Spirit encompassing the intricacies of a spiritual, emotional and educational experience derived from the wilderness ambience, solitude, tranquility, serenity, remoteness provided by unfettered natural ecosystems. o The simplicity and functionality of the infrastructure, and o The endorsement of this value system by managers and stakeholders alike. <p>It is clearly evident that the Radisson Blu Safari Resort strongly deviates from all these values and is directly in contravention of the established ethos of the Kruger National Park and the expectations of an overwhelming majority of its stakeholders.</p> <p>MAJOR THREATS TO THE ESTABLISHED ETHOS OF THE KRUGER NATIONAL PARK</p> <ul style="list-style-type: none"> ▪ During the early formative years of the KNP there were no preconceived ideas of what architectural styles would be adopted for providing tourist accommodation nor a formal plan for siting rest camps. In terms of the former a variety of designs were experimentally put to the test (including 'cottage' tents) while rest camps merely developed along the main communication line that connected the early ranger stations with one another. Scenic attractions were a secondary consideration and the view was held that "... the scenery and general layout to all, excepting a very small minority of artistic and highly cultured people, are purely secondary considerations. What the public most wants is comfort at night with good catering and camp arrangements." Several rest camps were erected and by the outbreak of the War thatched rondavels (or squaredavels) were the preferred units, not least because of their compatibility with the natural surroundings. ▪ During this period hotels were considered on a number of occasions but consistently rejected by the Board. In support of this standpoint, the Transvaal Publicity 	<p>Dr SCJ Joubert</p> <p>Dr SCJ Joubert</p>	<p>Email 24 January 2011</p> <p>Email 24 January 2011</p>	

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> Conference urged the Board in May 1935 "... to strictly maintain the natural beauty of the Park by resisting any attempt to establish hotels within its borders." During the mid-1930's the first warnings of overcrowding as a major threat to the values of the KNP were issued: "if it is to exist at all, the area set aside should be kept primitive, and not be converted into a typical imitation of wild nature by being cramped and artificialised. South Africa has in the Kruger National Park something not to be found elsewhere, i.e. Nature as she has always been from the beginning" (Stevenson-Hamilton 1945). With the increase of tourists the dangers of overcrowding to the wilderness spirit also became evident. Begging the question where this spirit could still be found Stevenson-Hamilton (c. 1940's) lamented: "Surely not in the Kruger National Park on a Bank Holiday, amid the clouds of dust, the crowding cars, the shouting tourists, the fragments of orange peels and empty bottles hurled out on the road sides!" The increase in popularity, reflected in the rapidly increasing numbers of tourists and associated developments, also harboured lethal threats to the Great Lady into which the KNP had matured. "Might her success, and the gifts increasingly showered upon her, not at last permanently affect her character and transform her into a dame so bedecked by human art that her natural loveliness would be hidden and her simple nature spoilt. Might those holding her future in their hands, realize the true nature of their trust, and not, by estimating her worth at artificial values only, cause her to languish and ultimately perhaps to perish. Absit omen" (Stevenson-Hamilton 1993). Bowling (1946) also emphasized the dangers of overcrowding. To overcome this it was suggested that the larger rest camps be situated on the boundaries of the Park and that a limited number of smaller camps be allowed in the Park, at selected scenic sites. He also urged control over the numbers of visitors entering the Park and believed this could be achieved through limiting entry from 			

Issues And Comments Raised	Commentator/s	Source	Response
<p>the peripheral camps.</p>			
<ul style="list-style-type: none"> Col Sandenbergh elaborated on rest camps on the periphery and suggested that they be built on but outside the borders of the KNP. In a personal interview Sandenbergh told me (undersigned) that the idea was that there would be no objection to hotels, recreational (sport) facilities and other forms of entertainment in such rest camps but that on entering the Park there would be a sign reading You are now entering a sanctuary which would help to put visitors in the right frame of mind. This would be further enhanced by the fact that, with the camps outside the Park, visitors entering would have no other interest than leisurely driving and enjoying nature. The above concept was to be taken a step further by the Hoek Commission (1953) which proposed that the KNP be subdivided into five compartments and that visitors not be allowed to enter adjoining compartments in a north-south direction, and that a highway be built parallel to the western boundary, but outside the Park, from south to north, to facilitate traveling in a north/south direction. This was intended to prevent speeding from one rest camp to another inside the Park. 			
<ul style="list-style-type: none"> Shortly after the War the problem of overcrowding was again addressed. To address the issue it was suggested that the maximum number of visitors to be allowed into the KNP on any one day be limited to 4 000 (at the time there were 2 600 beds, the remainder of 1 400 being day-visitors). Advocating a system of 100% advanced booking Sandenbergh hoped the following would be achieved: <ul style="list-style-type: none"> Effective control of the number of visitors to the Park; Reduction of tourist traffic during July; No more excessive demands on ablutions and sanitary conveniences; A more equitable distribution of tourists in the Park and throughout the year. 			
<ul style="list-style-type: none"> The Hoek Commission (1953) fully appreciated the dangers of overcrowding and suggested that a limit be placed on the maximum number of visitors allowed into 			

Issues And Comments Raised	Commentator/s	Source	Response
<p>each of the five compartments. At that time the southern section of the KNP (Marula district) had already been identified as threatened by overcrowding and it was stated that “... a standpoint must now be taken: must the KNP become simply a holiday resort or must it be a sanctuary in the true sense?”</p> <ul style="list-style-type: none"> During the mid-1950's the problem of overcrowding again received prominence. Steyn (1956) (Sandenbergh's successor) stated that “... the uncontrolled and unplanned growth in the number of tourists allowed in the Park, which in turn draws more 'popularity' and 'money' is a vicious circle. The result in the long run is the debasement of the higher and lasting values of wildlife conservation, ... which endanger the purpose of a national park.” At this time the Warden (Steyn), Biologist (Nel) and Senior Ranger (Rowland Jones) were in agreement that overcrowding had already led to the degeneration of the natural attributes of the KNP, and was most acutely problematic in the Skukuza-Lower Sabie-Tshokwane area. To address this problem, the following, amongst others, were proposed: <ul style="list-style-type: none"> Closure of a number of roads around Pretoriuskop; Restricting the maximum number of visitors to 80 000 per year; Limiting the number of beds in Skukuza to 400; Not to open further roads, areas, add to existing camps or build new ones for a period of five years; and Inform the Government that the “... the Board cannot institute such measures of control and management which it thinks necessary for the safekeeping of the KNP whilst it is dependent on tourist moneys to finance its primary functions. The Government grant should be increased to meet the demand.” (unpublished reports to Board 1956). In 1957 a limit was placed on the number of day visitors allowed to enter the KNP. The number was revised from time to time and in 1970 the Tourist Manager (Van der 			

Issues And Comments Raised	Commentator/s	Source	Response
<p>Veen) argued that day-visitors had the greatest impact on the KNP, stating "Heavy concentrations of traffic are ... the greatest disruption to the atmosphere." Day visitors traveled much more extensively than overnight visitors, up to twice the distance traveled by overnight visitors, in addition to congesting ablutions, restaurants and other amenities during school and public holidays.</p> <p>Knobel (1962) stated that "... the most important purpose of a national park is to afford the visitor the opportunity to commune with nature ... and thus become mentally and spiritually re-created. To allow so many persons into a natural area that the visitor becomes more conscious of the large number of people surrounding him than of nature itself, defeats the whole object of such a Park."</p> <p>Awareness of the dangers of overcrowding was also carried over to the next generation. In presenting a strategic plan for the development of tourism facilities Pienaar (1981) cautioned that "... in the absence of exact criteria one must inevitably fall back on more abstract parameters to determine the balance between a unique national park experience, in an optimally utilized tourism area, and the feeling of disappointment and exploitation of visitors in an over-saturated area which has the same urgency, restlessness and tension from which the average tourist tries to escape. (One must assess this) ... in the South African context as opposed to, for example, the American approach." In justifying the proposed tourism plan the view was expressed that "... by improving the traffic distribution resulting in a more even utilization of the under-occupied northern areas, and providing a considerable number of additional parking areas at dams and other scenic areas as well as a series of new picnic spots, we are convinced that the additional traffic will be absorbed without the loss of the particularly treasured pristine and tranquil atmosphere, which should be part of a visit to the KNP."</p> <p>The Research Section objected to some of the proposals but supported others, subject to the following: That...</p>			

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> ◦ The preservation of the pristine qualities of the ecosystem's receives precedence over any conflicting tourist facilities. ◦ The provision of tourist facilities should be subject to a zoning system, based on ecological sensitivities. Proposed zones were: high, intermediate and low development areas, and semi-wilderness and wilderness areas. ◦ Development on the peripheries of the Park should take precedence. ◦ Roads with accompanying gravel pits should be limited and consideration be given to single lane one-way traffic roads and four-wheel drive tracks. ◦ That no artificial water resources would be created for the purpose of increasing animal population densities for the sake of tourists. 			
<ul style="list-style-type: none"> ▪ As the 1981 tourism plan unfolded follow-up revisions were made and in 1987 it was found that "... the major area of concern was the real or perceived threat to the tranquility and wilderness atmosphere of the Park. This was due to pressure exerted by excessive numbers of visitors ... judging by the amount of hustle and bustle that was experienced during peak periods this year ..." ▪ As early as 1962 it was conceded that many of the aspects related to the KNP and the values it strived to preserve were abstract by nature. To address this issue Knobel (1962) suggested that "... the most practical method of determining this number is for visitors to fill in questionnaires periodically. Well-prepared questions should be put to them, the answers to which will give the administering authority a very good indication as to whether the number of persons visiting a park is irksome to most visitors or not. If there is any doubt let us rather err on the conservative side." While this referred to overcrowding it was also assumed that results from questionnaires could be considered a good measure of the expectations of visitors in other areas as well. 			

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> ■ From the results of a 2007 survey done amongst KNP visitors and given under the caption of Tourism Thresholds for the KNP, the following, amongst others, are listed as negatives in the KNP Tourism Management Plan 2007 - 2011: <ul style="list-style-type: none"> ○ "vehicles on the roads (especially in the Manula region)"; ○ "noise levels in some camps"; ○ "number of visitors in some camps"; ○ "exposure of visitors to Park non-core personnel (stakeholders find some staff behaviour in the Park unacceptable, e.g. speeding)" and ○ "standards of service delivery". ■ Results from the 2006 to 2010 surveys undertaken by the University of the North-West (referred to in the previous section) showed an overwhelming vote of less important to not important at all to conferences [mean 89%; with a spread of 88% (Nov 2006); 85% (July 2007); 84% (Dec 2007/8); 94% (June 2008); 93% (Dec 2008/9); 94% (June/July 2009); 87% (Dec 2009/10)]. A similar, clearly negative trend was recorded for "events in the area", with a mean of 85%. ■ The recent fracas in the KNP, highlighted in the press, and the spate of 130 letters of complaint from the public are symptomatic of the overcrowding in the Park. Much of the problem may be rooted in the frustration and irritations experienced from the atmosphere of "urgency, restlessness, tension, hustle and bustle, and squalor of civilised life" created by overcrowding. Day-visitors already total between 800 000 to a million per year and has prompted Dr Mabunda, CEO of SANParks (Beeld 16 January 2011) to remark: "there is a lack of respect for the Park. People ignore the rules and regulations and alcohol abuse is a major problem." ■ And SANParks wants to add a hotel(s) to this already overcrowded situation? ■ From the foregoing it is clear that the following are strongly rejected and considered alien to the ethos of the Kruger 			

Issues And Comments Raised	Commentator/s	Source	Response
<p>National Park:</p> <ul style="list-style-type: none"> Too many people, i.e. congestion of roads and overcrowding of picnic spots, ablutions, other visitor amenities and even some rest camps (primarily due to overcrowding of campers/caravaners). The southern region of the KNP, in particular, having been identified and still being regarded as overcrowded. Any artificial attractions, eg. mod-cons (TV's), conferences, 'events', etc. which are all considered distractions to the natural allure of nature. <p>Through the years the object has been to keep the rest camps as uncomplicated as possible, providing only basic facilities to ensure comfortable accommodation and fulfilling essential needs.</p> <p>The Radisson Blu Safari Resort stands in stark violation of all these established values.</p>			
<p>STATUS OF THE KRUGER NATIONAL PARK IN A SOUTH AFRICAN CONTEXT</p> <ul style="list-style-type: none"> The KNP has become a household name in South Africa. It is the flagship of our national parks, it is a source of national pride. This recognition and fame is, to the credit of South Africans, not only confined to South Africa but is also echoed by the international community and is evidenced in the standing it enjoys as a major, possibly the prime, drawcard for international tourists to this country. The intrinsic factors which have earned it this high regard are essentially the following: <ul style="list-style-type: none"> The Guardian Spirit, which is so richly evident in the contagious energy and emotions generated by its remote, tranquil and unspoilt wilderness; The leadership that has been given in the preservation and management of its natural resources, and The simple, uncomplicated infrastructure which has 	Dr SCJ Joubert	Email 24 January 2011	

Issues And Comments Raised	Commentator/s	Source	Response
<p><i>provided comfort and access to visitors but has harmonised remarkably with the surroundings.</i></p>			
<ul style="list-style-type: none"> For these very reasons it is felt that due to the radical deviation from the established ethos with the envisaged hotels (at least at Maklane and Skukuza at this stage), the change in direction should be gauged by a far more extended process of public participation than the limited opportunities offered by the EIA. It is accepted that the minimum prescribed legal requirements for public participation have been met by the EIA team but are regarded as totally inadequate in consideration of the national iconic status enjoyed by the KNP. Very few South Africans scan the SANParks website for opportunities to respond to lengthy and cumbersome EIA's and the few responses received can hardly be considered representative of the broad public support-base of our national parks. There is a strong perception that SANParks has quietly tried to slip in via the back door, specifically to avoid vigorous public debate. It is in the interests of their own credibility that they engage their strong public stakeholder support-base in such a debate. In the series of stakeholder surveys commissioned by SANParks not a single question is included to gauge the public's attitude regarding hotels. As pointed out above, responses showed a 89% aversion for conferences and "events". One can only surmise what the reaction would be to a hotel. 			
<p>The question may well be asked: for what reason (and at what cost) have the SANParks attitude surveys been done if the results are so blatantly ignored and disregarded? They do, after all, represent the views, preferences and expectations of the legitimate stakeholders!</p>			
<p>From the foregoing it may be concluded that SANParks has exceeded the limits of its mandate in terms of the prescription under Clause 20, Section 2, Subsection (c) of the Protected Areas Act.</p>			

Issues And Comments Raised

For this reason the Radisson Blu Safari Resort project should be terminated.

Commentator/s

Source

Response

MOTIVATION FOR THE MALELANE HOTEL (RADISSON BLU SAFARI RESORT)

- Two motivations have been offered by SANParks for the Radisson Blu Safari Resort. These are to achieve financial sustainability, especially in the light of the announced withdrawal of the State subsidy, and as a 'constituency building' effort to attract more visitors from the Black Diamond group, with the hope of stimulating more interest in the KNP, and other national parks. The latter motivation does not only apply to the Radisson Resort but also to the conference centres that have been built.

Dr SCJ Joubert

Email 24 January 2011

ATTAINING FINANCIAL SUSTAINABILITY

- With the inception of the KNP, in 1926, the State undertook to subsidise the recurrent (administrative) budget of the management staff. The initial annual subsidy was £7 000.00. This was not regarded as sufficient and the Transvaal Provincial Administration then agreed to provide an additional £3 000.00 (Transvaal was the only province with a national park at that stage). The subsidisation of the KNP, and other national parks, has been in force ever since, even through the most trying times in the history of our country. On a number of occasions the State also made ad-hoc, once-off funds available for capital expenditure on projects such as tourism infrastructure, water-for-game, etc. The last major loan received in this respect was one of R1-million/year for a period of five years and was used, amongst others, to fund the elaborate tourism expansions during the 1980's.

Dr SCJ Joubert

Email 24 January 2011

- Since the mid-1980's signals have been received that the State intends to reduce its subsidy, with the ultimate goal of withdrawing it, ostensibly to meet the challenges of socio-political developments. This has led to various exercises in finding ways in which to generate more funds. In recent years projects of this nature included outsourcing

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<p>various previously in-house services, such as the shops and restaurants, and making concession areas available to private entrepreneurs.</p> <ul style="list-style-type: none"> In the latest development the State has threatened to withdraw some R170-million of its subsidy over the next three years and as of January 2011 has withdrawn R80-million. This opens at least three serious issues, i.e. <ul style="list-style-type: none"> What if the currently proposed developments (hotels at Malelane and Skukuza) do not result in financial sustainability? How many more hotels? What will the next generation of gimmicks be if the pressure from Government continues and the revenue from the hotels is not sufficient to meet the needs? What commitment can be expected from Government to help sustain the most precious heritage of all South Africans? 			
<p>Towards financial sustainability</p> <ul style="list-style-type: none"> The expansions and renovations of tourist facilities in the 1980's and early 1990's did yield favourable results for the Board. In spite of the difficult political situation and the culmination of one of the deepest drought periods recorded for the KNP, and major parts of South Africa, the KNP reached financial self-sufficiency for the first time in the 1992/93 and 1993/94 financial years. At best, this provided some relief for the organisation but it was still dependent on the State subsidy to run its other national parks. Since the late 1990's or beginning of this millennium, various services in the KNP have been outsourced and a total of eight concessions granted to private entrepreneurs. It has been stated by SANParks officials that the restaurants and shops made a loss prior to outsourcing but that they are now contributing "... significantly towards the sustainability of the parks as these operations now, through guaranteed income, co-fund conservation" 	Dr SCJ Joubert	Email 24 January 2011	

Issues And Comments Raised	Commentator/s	Source	Response
<p>(Phillips Nov 2010). It was also stated that “since inception up to 31st March 2010, in addition to infrastructural developments worth over R340-million with the assets reverting to SANParks, commercialisation has resulted in a total PPP income of R361-million to SANParks for the funding of conservation” (Phillips Nov 2010). In addition, the Research Section has apparently benefited by some millions of Rands from the US-based Mellon Foundation for its programmes.</p> <ul style="list-style-type: none"> ■ In addition, the numbers of day-visitors have also been increased and the vehicle ratio on the roads has been increased from one/km to two/km. The implications for the tranquility of the KNP are enormous. All the attitude surveys indicate the aversion shown by tourists to the level of overcrowding already experienced on the roads, at picnic sites and in rest camps, situations not confined to, but particularly severe in the southern region. ■ If the KNP could previously fend for itself in financial terms without the income generated from the concessions and outsourced restaurants and shops, where then have all the funds generated from these sources gone? How can it still be expected of the KNP to generate additional funds to help SANParks towards sustainability? How much does SANParks need to reach “sustainability”? 			

Has the stage not now been reached where SANParks is prepared to prostitute Stevenson-Hamilton’s Great Lady at the cost of her charm and dignity!

What next?

- Since its very inception, including the ad-hoc funding received from Government, the National Parks Board has never been able to achieve financial independence from its own sources. Neither is it likely to ever succeed by virtue of the nature of the restrictions placed on it by the very values it needs to protect and perpetuate. National parks are something quite apart from any other nature-based enterprises: biodiversity and the Guardian Spirit of the wilderness are their prime attraction and core business.

Dr SCJ Joubert

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<ul style="list-style-type: none"> ▪ Speculation is rife that hotels at Skukuza and Malelane are not the end of the line in the planning of SANParks. Orpen and Phalaborwa have been mentioned in this regard, though these speculations have officially been denied. But what if the hotels under present consideration (Radisson and Skukuza) do not materialise or produce the magical and ever-elusive sustainability? ▪ At this stage there are conference facilities at Berg-en-Dal, Skukuza (new), Olifants, Letaba, Mopani (new), Shingwedzi (new) and Bateleur, and one planned for the Radisson Blu Safari Resort. If this is "where the money lies" as Dr Mabunda assured me, why the need for the hotels? ▪ If these conference facilities and hotels are not the magical financial windfall, as expected, what could the next step towards sustainability entail – more hotels, extravaganzas, casinos?? Only a year ago the possibility of a hotel in the busiest and most overcrowded part of the Park, let alone two, was unthinkable, impossible!! ▪ As recently as 30 August 2009 (Sunday Independent) Dr Mabunda asserted: "the Protected Areas Act of 2003, as amended, excludes any form of extractive use, including mining and hunting in national parks. We can't even dig river sand for construction ... or 'harvest' firewood." In December 2010 SANParks released a press statement to the effect that permission had been given to neighbouring communities to 'harvest' mopane worms in the Xanatsene region of the Park! ▪ In a paper on the evolution of the conservation history of the KNP, Venter et al (2008) argued that the reversible footprint of hunting is much smaller than that of mass tourism. In addition, it was determined to be 4 to 5 times as profitable. In a 2002 study it was found that 20% of the KNP could generate about R49-million annually, with minimal infrastructure and services required. And what prevents SANParks from exploiting this lucrative market?? The Act, national park ethics or principles? No! "It is considered to be a much more emotional and sensitive 			

Issues And Comments Raised

activity; one prone to severe criticism by animal rights groups and members of the public, especially because hunting in KNP was never previously practiced" Venter et al (2008). So what about the 94% of respondents in attitude surveys that voiced their opinion against conferences and events, not to mention hotels?

The responsibility of the State

- The importance of the KNP, both nationally and internationally, has already been alluded to. In addition to distinguishing itself as an international leader in the field of wildlife management, it reportedly features, together with Cape Town, as one of the two most prominent attractions for tourists to this country.
- It is not certain to what extent SANParks is being subsidised annually but it cannot be by more than R80-million to R100-million. While it is conceded that the State has tremendous poverty relief and socio-economic upliftment obligations, the question still remains whether an annual subsidy of R80-million to R100-million is really beyond its means? For the sake of the most precious cultural and natural heritage of this nation?
- As recently as 16 months ago Dr Mabunda, CEO of SANParks, proudly stated: "I thank the South African government for its commitment to fund conservation in this country, thus saving us from the vagaries ... of animal rights and welfare organisations as is the case in other African countries where these NGO's rule the roost" (Sunday Independent 30 August 2009). If the South African Government is serious about relinquishing that commitment, to whose vagaries will SANParks then be subjected? To avoid such an unfortunate, and potentially catastrophic, situation it is imperative that an urgent appeal be made for the Government to reconsider its obligation towards our national parks.
- The laudable achievements of SANParks in acquiring large tracts of new land to add to the natural heritage of our people, the driving force of Dr Mabunda in realising these achievements and the role of the State in making

Commentator/s

Dr SCJ Joubert

Source

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Response

Issues And Comments Raised	Commentator/s	Source	Response
<p>them possible, are sincerely acknowledged. However, together with these achievements also come responsibilities in the fields of management and financing. It is in this respect that the State is called upon to meet its obligations, just as all the governments of the day have done over that past 100 years.</p> <p>At this important point in time it is considered prudent that the State be engaged in a debate on its role in maintaining our national parks and the commitment it is prepared to undertake in this respect.</p>			
<p>In competition with the concessions?</p> <ul style="list-style-type: none"> In the KNP Tourism Management Plan 2007 – 2011 it is stated that the average annual occupancy rates of the KNP concessions is 32%. These concessions, as controversial as they are, offer (with the exception of mass conference facilities) all the services to be offered by the Radisson Blu Safari Resort. Could the Radisson development not be considered unfair competition, especially as adequate conference facilities already exist at other rest camps in the KNP? 	Dr SCJ Joubert	Email 24 January 2011	
<p>CONSTITUENCY BUILDING</p> <ul style="list-style-type: none"> In neither the six-monthly attitude surveys undertaken between 2006 and 2010 nor the surveys specifically targeting the Black Diamond segment of the population, were attitudes tested regarding the acceptability of a hotel, nor were any responses given to suggest a preference for a facility of this nature. It is impossible to see that the Radisson Blu Safari Resort can make any contribution, in addition to the opportunities already existing in the Park, towards constituency building. 	Dr SCJ Joubert	Email 24 January 2011	
<p>IN CONCLUSION</p> <ul style="list-style-type: none"> At this stage it may well be appropriate to, once again, take note of the incisive and visionary warning issued by the first Warden of the Kruger National Park, Col J Stevenson-Hamilton, in the twilight years of his long and 	Dr SCJ Joubert	Email 24 January 2011	

Issues And Comments Raised	Commentator/s	Source	Response
<p>distinguished career:</p> <p><i>"Might her success, and the gifts increasingly showered upon her, not at last permanently affect her character and transform her into a dame so bedecked by human art that her natural loveliness would be hidden and her simple nature spoilt. Might those holding her future in their hands, realise the true nature of their trust, and not, by estimating her worth at artificial values only, cause her to languish and ultimately perhaps to perish. Absit omen"</i> (Stevenson-Hamilton 1993).</p> <ul style="list-style-type: none"> ▪ The Maklane hotel (Radisson Blu Safari Resort) project is ill-conceived and should be terminated on, amongst others, the following grounds: <ul style="list-style-type: none"> ◦ It exceeds SANParks' mandate as prescribed in the Protected Areas Act (2003), as amended; ◦ It is alien to the established ethos of the Kruger National Park; ◦ SANParks stakeholders have not been adequately consulted regarding the change of direction; ◦ It falls within the busiest and most overcrowded region of the Park; ◦ The EIA was only commissioned six months after the project had been awarded to the contractor. <p>On the above grounds it is proposed that the EIA be regarded as fatally flawed.</p> <ul style="list-style-type: none"> ▪ Concerned visitor to Kruger and I am of the opinion that this proposed development will have a very negative influence on the whole area. ▪ Thinks there is no market for such a development and would like to have a look at the formal EIA study, ▪ The roads in the Southern portions of Kruger will not be able to handle another influx of visitors. The roads are already very congested ▪ This development will have a very negative impact on the environment with an influx of traffic carrying building materials, potential pollution to the Crocodile River, potential road kill, etc. 	Theuns Hurter	Email 31 January 2011	<ul style="list-style-type: none"> ■ Mr Hurter will be afforded the opportunity to comment on the Draft EIA Report, which will amongst other contain details on the ecological impacts associated with the development and proposed mitigation. ■ Impacts associated with traffic created by the development will be investigated as part of the EIA.



Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none">▪ Stated that "I am a true nature lover and had visited Kruger since the late 1960's on a regular basis. Last year I have visited Kruger four times and the experience had always been very positive. I don't think this Hotel development is a positive move in protecting and looking after my heritage and therefore I am very concern indeed!"			

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<ul style="list-style-type: none"> Wishes to be listed as an affected and interested party regarding this project. As per the National Environmental Management: Protected areas act No. 57 of 2003 described in section 39(3), takes this opportunity to comment on the proposal as well as formally give my objections. All comments and objections to follow are mine and not in any way representative of the ideas of other parties. What is the total size of the land surface area upon which the proposed site will be built? <p>There are obvious direct impacts on the ecology of the area in terms of the following:</p> <ul style="list-style-type: none"> Loss of current and future potential habitat to a range of organisms. Including foraging areas as well as nesting/roosting and mating sites; Disruption of and the subsequent decline in the size of home ranges and territories; Human induced influence of the environment through increased human exposure and habitation including related pressures such as increased traffic, possible utilization of natural resources in a way that is not sustainable, contamination of water sources through potential sewage leaks and the treatment of water that is used for domestic purposes Loss of animal diversity related to a decline in the natural structure and complexity of the environment The use of hazardous and wasteful building materials that could jeopardise the natural integrity of the site. Following on with this point what steps will be taken to ensure that the construction of the hotel is in keeping with modern global trends in which construction is aimed at minimizing or rather completely eradicating the ecological footprint of the construction. In other words to use a popularly coined term, how will the hotel be made "green"? Further a new field combining engineering, biology and architecture has arisen called Biomimicry, "nature inspired design" where buildings are built to emulate nature and reduce the impact on the environment. Is this something that will, or has been considered by the developers as I believe it this should be stipulated. 	<p>Wesley Hattingh</p>	<p>Email 30 January 2011</p>	<p>Mr Hatting has been registered in the EIA Process</p> <p>The site boundary extends to approximately 35 hectares. The building footprint is anticipated to be between 2-3 hectares. This will be confirmed upon finalisation of development layout.</p>

Issues And Comments Raised	Commentator/s	Source	Response
<p>There are also however indirect influences that cannot easily be predicted.</p> <ul style="list-style-type: none"> The construction will most definitely have an impact on the immediately surrounding fauna and flora, however with varying spheres of influence the fauna and flora further away will also in some ways be effected Have the indirect influences, both in the long term and short term been considered? What are these influences? And how will they, if at all be addressed by the developers? Who are by law held accountable for the state of the environment which they disturb? The Kruger National park, and hence SANParks has stated in their corporate values and I shall quote "Embrace, and be guided by, environmental ethics". Further the organization has also stated that they have an aim, and I quote again, of "conserving an ecologically sustainable and representative sample of South Africa's biodiversity and landscapes". I then pose this question, why if the goal of the organization is to increase diversity, and the land taken up by wildlife areas will they allow a portion of it to be consumed by development? The proposed construction site within the Kruger National Park is surely not the most suitable location for a hotel. If SANParks aims to meet their promises of incorporating surrounding stakeholders, would it not be a more feasible option to build the hotel outside of Kruger, where the local community could then be tasked and guided in the running of the hotel. I do not believe that the construction of a new hotel is the sole option for SANParks to achieve its goal of attracting a wider range of potential customers. Is it not more feasible to use an already existing site such as the Malelane camp in the Kruger National park and utilize this previously occupied space for a hotel? This way water and power infrastructure is already in place and would therefore result in a greatly reduced impact on the natural environment. Unlawfulness is a major concern currently in our National Parks and often employees are the first to neglect existing rules especially when it comes to speeding. Will a system be in place to ensure construction vehicles of all types are monitored closely? 	Wesley Hattingh	Email 30 January 2011	<p>Response</p> <p>As per the signed agreement between SANParks and the Private Party the development proposal will be required to adhere to the KNP Sustainable Design Principles and Guidelines.</p> <p>The project team consisting of the specialist sub consultants conducting assessments to determine conditions relating to ecology, geohydrology, geotechnical, cultural heritage & visibility on the different sites have been provided with the requirements of the KNP Sustainable Design Principles & Guidelines. Assessments will take these requirements into consideration and the proposal which will be reflected in the EIA Report will be prepared as per these specifications. Mitigation measures will be determined and included in the Environmental Management Plan to ensure the development proposal's adherence to Sustainable Design and Responsible Tourism.</p> <p>The proposal will be developed and assessed in terms of amongst others some of the following principles:</p> <p>Ecological Sensitivities</p> <ul style="list-style-type: none"> The type of development will determine the level of permanence and should if necessary, be easily removed from the landscape with minimum impact or permanent damage to the site category of development. The site selection and foundation conditions need to enhance the application of ecological sensitivity principles. Natural materials, textures and colours should be utilized wherever possible to ensure structures blend into the natural landscape. The natural landscapes should in effect "flow" through and over structures where possible. <p>Green Building Principles</p> <ul style="list-style-type: none"> Passive design principles should allow for maximum use of natural renewable resources like light and ventilation, etc. to reduce energy requirements. Passive as well as energy efficient designs should be applied holistically to all the development components, including the support services. The promotion of usage of re-usable, recyclable and non-hazardous materials in designs.

Issues And Comments Raised	Commentator/s	Source	Response
<ul style="list-style-type: none"> In order for construction to proceed a large number of vehicles will have to convey supplies daily to the site. Where will these vehicles enter? and how will this influence gate quotas, and potential stress on the environment through repeated entry. Will contractors of building supplies be checked daily upon entry for compliance to rules? 	Wesley Hattingh	Email 30 January 2011	<p>DEAT has recently commenced with the development of a National Standard for Responsible Tourism, a national accreditation scheme that tourism operators will be accredited by. The Private Party shall be obliged to comply with the accreditation in terms of the National Standard for Responsible Tourism, once completed. Such accreditation will be compulsory and should be obtained within 12 months from Operation Commencement Date and renewed thereafter on an annual basis.</p>
<ul style="list-style-type: none"> Requested information on specific flora and faunal assessments that have been, or will be conducted. Have ecological assessments, which are species specific determined the suspected loss in numbers of individuals and the subsequent loss of biodiversity in the area from a landscape as well as a community level. A riparian area, which falls into the proposed construction area is considered by ecologists a three dimensional habitat (3-Dimensional). What impact will the construction of such a hotel have on this 3-D environment? This is a natural area and first and foremost SANParks is legislated to conserve the natural environment and this can be achieved through a number of ways which do not involve the destruction of natural spaces and more importantly the disruption of an essential ecological system. 	Wesley Hattingh	Email 30 January 2011	<ul style="list-style-type: none"> The Private Party shall appoint an ECO who shall be responsible for ensuring that the Construction Works and Operations, Management and Maintenance are performed in accordance with SANParks' Requirements and relevant environmental Regulatory Provisions and for monitoring and ensuring the implementation and effectiveness of mitigation measures and other requirements and targets set forth in the EIA and the EMP. The Private Party shall ensure delivery of monthly reports prepared by the ECO to SANParks during the Pre-Construction and Construction Phases and thereafter twice-yearly reports. A Terrestrial Ecology Assessment has been conducted and will be included in the Draft EIA Report which will be made available for comment by Mr Hattingh
<ul style="list-style-type: none"> States that he firmly objects to the development of this hotel within the Kruger National Park and wish this to be 			<p>Noted</p>

Issues And Comments Raised	Commentator/s	Source	Response
<p>entered as an objection.</p> <ul style="list-style-type: none"> Feels this project should be stopped altogether As I can remember from the meeting at Ngwenya, by Southern Kruger association and NECTA the comments re the building of a hotel in the Kruger was not well met. Stated that there are more vehicles travelling the already congested park, more people, and more land area interfered with and taken from the park area. When will it stop? Stated there is enough accommodation in the park with existing camps and pvt concessions. Why not put this proposal to open public vote? <p>Requested a meeting.</p> <p>Some issues have been raised by members amongst these the following:</p> <ul style="list-style-type: none"> Why was the tender awarded prior to the EIA process? Do you believe the development will generate more income and business activity for Nkomazi/Malelane and to what extent? Will the proposed development be accessible for the general public and visitors to the Park? The development will impact on the budget and development planning for Nkomazi Municipality. <ul style="list-style-type: none"> Was the proposed development communicated the Nkomazi Municipality? Was it an item on the Integrated Development Plan and budget for Nkomazi Municipality in 2010/2011? Who will be employed by the KNP to work in/at the development? Will land claimants/previous disadvantage communities benefit from the proposed development, and how? Will the KNP become more or less accessible for the general public because of the development? Are other hotels/similar projects planned in or in close proximity in the Southern region of the KNP? Will the KNP/SANParks, in addition to the development, 	<p>Ros McEwan Lodge owner</p> <p>Malelane Business Chamber</p>	<p>Email 15 December 2010</p> <p>Email 8 February 2011</p>	<ul style="list-style-type: none"> A strategic decision by SANParks on the Malelane Hotel Development is in place, the Environmental Impact Assessment is therefore being conducted on an approved land use proposal in terms of Park Management Plans. ILA can not provide comment on the Strategic Decision made as it is a separate process from this EIA Process. (Also Refer Section1.1 of this Scoping Report). A separate platform should therefore be created for discussion of the Strategic Decision and Affected Parties and SANParks must correspond directly in this regard. A Public Participation Process is being conducted as required in terms of Regulation 56 of the EIA Regulations 2006. A meeting will be arranged with the Business Chamber in March. The Malelane Hotel development falls within the approved KNP Management Plan for which a consultation process was undertaken. The development proposal was made available for tender however the selected site would still be subject to an EIA Process and the findings thereof, to ensure that the development proposal does not result in significant impacts to the environment. Local Communities will be afforded an opportunity to provide services to the development during the construction and operational phase (this includes employment). A trust will also be established where a percentage of the development profits will be utilised to improve local communities (e.g. construction of schools etc). The Applicant is working with the Head of Department KNP People & Conservation Directorate and a profile of community beneficiaries is currently being compiled; The Nkomazi Municipality has been afforded an opportunity to comment; Details regarding the Park & Ride Facility are not yet available. Impacts associated with additional traffic at the Malelane Gate resulting from the development will be assessed. Upon confirmation of these impacts and the re-routing of Rhenosterkoppies Road a response on impacts to

Issues And Comments Raised	Commentator/s	Source
<p>also see to the upgrading of existing infrastructure; improved booking and administration procedures; improved training and service enhancement; improved gate control and access facilities; and other threshold concerns?</p> <ul style="list-style-type: none"> Do you plan an extra/separate entrance to the KNP for this development? When do you expect to start with the building work? Are there enough resources for the planned development with specific reference to water and electricity? 	<p>■ accessibility for other visitors to the park will be drafted.. ■ The Park & Ride Facility will not only serve the development but will also provide additional parking for day visitors; ■ A separate entrance is being proposed; ■ Malelane has been identified in the Draft Conservation Development Framework for High Intensity Leisure. The Park also supports development along its periphery. ILA is not aware of development proposals in the near future in this area of the Park. This will however be confirmed with SANParks; ■ Construction can only commence if an environmental authorisation for the development is granted by DEA. It is anticipated that the EIA Process may be finalised toward the end of September 2011.</p>	<p>■ Response ■ The Park & Ride Facility will not only serve the development but will also provide additional parking for day visitors; ■ A separate entrance is being proposed; ■ Malelane has been identified in the Draft Conservation Development Framework for High Intensity Leisure. The Park also supports development along its periphery. ILA is not aware of development proposals in the near future in this area of the Park. This will however be confirmed with SANParks; ■ Construction can only commence if an environmental authorisation for the development is granted by DEA. It is anticipated that the EIA Process may be finalised toward the end of September 2011.</p>
<p>The development of a 240 room Hotel is proposed close to the Malelane Gate. According to the specialist report dense vegetation was encountered during the survey limiting ground visibility. A single archaeological site was identified, a Middle Stone Age tool scatter consisting of a few flakes and cores on the right bank of the Timfeneheni River. No other heritage resources were identified during the survey. It was indicated in the specialist report that the MSA site did not hold any significance since it was a surface site and in secondary context. However even though it is understood that the site might be of low significance it is difficult to make a significant assessment since very limited information is provided. No indication is given regarding the density of the site, the range of artefacts present and no scaled photographs are provided. It is essential that this information be included in the impact assessment report. If the site is regarded as low significance or ephemeral this acts as the last record of the site before destruction and development takes place.</p>	<p>■ South African Heritage Resources Agency – Mr Phillip Hine ■ Letter of Correspondence dated 26 January 2011</p>	<p>■ Noted. ■ An updated report is in process of being prepared by the Heritage Specialist which also includes information on alternative sites. This report will be sent to SAHRA. ■ SAHRA recommendations will be included in the Environmental Management Programme.</p>

SAHRA Recommendations

Considering that this is a relatively large project there are some concerns how this development will impact on the 'sense of place' of the Kruger National Park. Furthermore there remains the question whether this type of development will fit within the

Issues And Comments Raised	Commentator/s	Source	Response
<p>overall mission of a National Park which goal is the biological and ecological conservation of one of South Africa's most iconic Parks. However, since no archeological or other heritage resources of significance were identified during the survey, SAHRA APM Unit does not object to the proposed development in terms of the archaeological component of the heritage resources.</p> <p>If any new evidence of archaeological sites or artefacts, palaeontological fossils, graves or other heritage resources are found during the course of development, construction, SAHRA must be alerted immediately (Mr. P Hine, Mrs Nonofho Ndobochani) and an archaeologist may need to inspect the findings at the expense of the developer.</p>			
<p>Where bedrock is to be affected, or where there are coastal sediments, or marine or river terraces and in potentially fossiliferous superficial deposits, the developer must ensure that a professional Palaeontological Desk Top study is undertaken to assess whether or not the development will impact upon a palaeontological resource. If this is deemed unnecessary, a letter of recommendation for exemption from a professional Palaeontologist is needed. If the area is deemed sensitive a full Phase 1 Palaeontological Impact Assessment will be required and if necessary a Phase 2 rescue operation may be necessary.</p>			

Also refer to email correspondence received from Elzet Hurter. ILA was copied on the correspondence. Ms Hurter has not requested ILA to register her in the process. However she has been included on the database and will be notified of availability of the Draft EIA Report (Refer Appendix 11.)