



Fostering the enduring values of wilderness for people.

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**WAG'S PRELIMINARY COMMENTS ON THE PROPOSED DEVELOPMENT OF A
DRAKENSBERG CABLEWAY**

The Wilderness Action Group (WAG) hereby lodges its comments and concerns associated with the proposed cableway.

WAG has commented on previous proposals for cableways in the Drakensberg that, for various good reasons, were never pursued. Many of the objections and concerns raised for these previous proposals still apply and it is unfortunate that the developers and consultants involved with the current proposed development have not familiarised themselves with these well-considered and well-informed documents prepared with due consideration and at great cost by experts in various fields, who were familiar with this area of the Drakensberg.

WAG is an advocacy group concerned about fostering the enduring values of wilderness for people. We recognize the value of wilderness for our health, well-being and very survival through the eco-system services it provides, particularly as a source of clean water on which all life depends. We also recognize the increasing value of wilderness worldwide as its scarcity increases. While it is very easy to destroy wilderness, it is extremely costly and virtually impossible to restore it and we strongly advocate that any proposal that threatens to impinge on wilderness is carefully scrutinized and assessed before any decision or approval is given.

In this context it is worth quoting the following recommendation to the IUCN Commission on Sustainable Development:

“The true values, and full economic and environmental costs and benefits of mountain resources, should be recognised in calculating the economic returns of development initiatives in mountainous areas. Such full-cost accounting will help to counter inappropriate development and ensure the equitable allocation of benefits to mountain people”. (Earth Summit, Rio de Janeiro, 1995.)

WAG has not had sufficient time to scrutinize the available documents regarding the proposed cableway but some of the Group's preliminary concerns are listed below, not necessarily in order of importance:

Ø In developing the documents for the cableway due consideration does not appear to have been given to the Constitution, the National Environmental Management Act 1998, the National Environmental Management: Protected Areas Act, No. 57 of 2003 (NEM: PAA 2003) The National Environmental Management: Waste Act 2008, the National Environmental: Biodiversity Act 2004, the National Water Act, the KZN Planning and Development Act, The Environmental Conservation Act, the KZN Natural Conservation Management Act, the World Heritage Convention Act 1999, as well as other relevant provincial and national legislation

Ø Maps used to indicate the boundary of the Park are inaccurate and project documents stating that the proposed site lies outside of the boundaries of the Maluti-Drakensberg Park World Heritage Site (MDPWHS) are incorrect.

Ø WAG is concerned about the inaccuracy and inadequacy of the information provided for the current proposal and the haste with which it appears to be pushed through without an adequate public participation process taking place.

Ø The proposed cableway lies within the MDPWHS and is therefore of local, national as well as international interest and concern given that UNESCO considers it in the interest of the international community to preserve each site. The MDP was granted World Heritage site status for its extensive undisturbed natural landscapes and its cultural values including the Bushmen rock paintings. The park is also in the List of Wetlands of International Importance (under the Ramsar Convention). Consequently the public participation process needs to be far more extensive than it has been to date to include national and international I&PS.

Ø It appears WAG has yet to be registered as an Interested & Affected Party (I&APs) despite requests at several meetings to have WAG, a well-known advocacy NGO in KZN, added to the list of I&APs.

Ø The available proposal documents appear to have completely omitted wilderness in their conceptualization of the project and their calculations despite the fact that large areas of MDPWHS are designated as wilderness. Consequently there has been no attempt to cost the negative impacts that the proposed cableway will have on wilderness in the MDPWHS, an increasingly rare resource worldwide that is becoming all the more valuable for its recreational, spiritual and cultural value, its rich biodiversity and its priceless eco-system services, particularly water, found in mountain catchment areas like the Drakensberg.

Ø The “potential footprint” of the development has not been adequately investigated, described or quantified and thus negative impacts cannot be assessed in terms of their ecological, socio-economic and cultural costs, as well as the impacts on wilderness.

Ø In terms of EIA requirements, alternative sites for the cableway needs to be considered.

Ø Consideration also needs to be given to alternative income-generation sources in the area, such as wilderness guiding and conserving the area as a wilderness area. These are sustainable sources of income, which a growing number of community members are advocating, especially those who understand the short and long term value of wilderness after attending wilderness awareness training courses conducted in the area by WAG.

Based on the above WAG is of the firm view that a full EIA is required that includes:

1. An up-to-date list of registered I&APs.
2. Consideration of alternative sites for the siting of the cableway and associated developments.
3. Accurate information of the siting of the cableway, precisely what the cableway and the associated development will comprise, and the extent of the “potential footprint” of these proposed structures, as well as costs associated with the negative impacts from this footprint on local communities and on the natural environment, including wilderness.
4. A comparison of the positive and negative impacts of the cableway weighted against the value of the natural resources, particularly water sources that could potentially be destroyed, damaged or disturbed by the proposed cableway.
5. Comprehensive detailed information of the market research/survey or whatever other study was conducted to come up with a peak demand of between 400 and 500 persons per hour in each direction for the main cableway from Busingatha to Mount Amery. Include the name of the company or consultants/researchers who produced this information and the methodology used and relevant raw data. Also include predicted number of days per annum when the cableway will be unable to operate because of poor weather conditions, especially wind, rain, ice and snow, and the effect this will have on income.
6. Consideration of alternative income generation sources in the area.

WAG trusts the above comments will be given due consideration and acted upon as requested.

This report has been compiled and submitted by:

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Deputy Chair: WAG