

AFRICAN CONSERVATION TRUST

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Trust No: IT 2174/00 NPO No: 030-243 PBO No: 930014758 IUCN No: NG/25190

Graham Muller Associates:
Att: Graham Muller

TRANSMITTED BY EMAIL
29 October 2013



INITIAL COMMENTS ON THE DEVELOPMENT OF A DRAKENSBERG CABLEWAY

These comments relate to the following three documents prepared for the provincial Department of Economic Development and Tourism (DEDT):

- Final draft of a Feasibility Study for the Development of a Drakensberg Cableway dated 19 July 2013, (Graham Muller Associates);
- Final Draft Business Plan for the Development of a Drakensberg Cable Car dated 14 October 2013 (Graham Muller Associates);
- Drakensberg-Busingatha Cableway: Updated technical description and Pre Feasibility Study dated 20 September 2013 by (Kuka Mining Logistics (Pty) Ltd which has a co-operation agreement with Leitner and their subsidiary company Agudio. (Submitted to Graham Muller Associates)..

The proposed route provided to KUKA consists of three sections of distances, each over two kilometers long, with two intermediate stations where people disembark and embark on the cable-cars. The study was based on a peak demand capacity of between 400 and 500 persons per hour in each direction for the main cableway from Busingatha to Mount Amery. It was not clear whether a proper market survey had been done to establish the likelihood of this number of people utilising the cableway. We also feel that the initial estimates are grossly over any real tourism visits and request more in depth market research based on actual visitors to existing facilities in the area.

The Kuka Study also mentions an "extension of the ropeway from the top of Mount Amery to the top of Mont Aux Sources utilising 8 person gondolas". Kuka apparently also "recently completed a system design for a cableway up the Sentinel for PKX Mountain Cableway / National Empowerment Fund". Since the cover picture of the Kuka study showed the top station of the Busingatha-Drakensberg Cableway on top of the middle of the Amphitheatre, and not Mount Amery, it is not clear whether the Sentinel cableway is part of the extension of the Busingatha/Mount Amery cableway to the top of Mont-aux-Sources or whether it is in addition to these cableways. (Notably, a site inspection of the proposed route was promised earlier this year for the Steering Committee, the inspection never materialised.)

The three studies are obviously preliminary studies, with several flaws and inaccuracies which we assume will be remedied in further detailed studies.

- For example: It is stated that the site is outside of the boundaries of the Maluti-Drakensberg Park World Heritage Site (MDP WHS). From our investigations we have found that the site is in fact being managed as part of the MDP WHS. (**Note:** The name of the Ukhahlamba-Drakensberg Park World Heritage Site, UDP WHS, was recently changed to the MDP WHS)
- In the Business Plan (page 19) the map is incorrect with regard to the existing boundary for the Park, as well as the proposed fenced area to be added to the Park.

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- It was expected that changes would be made to the plans and that a final plan would also be made available, with a second deadline for comments to be lodged, because the documents are still marked as “ draft” and are missing certain items (For example, information in item 6 Page 20 of the Business Plan).. However no second deadline for comments was provided. It seems, from the most recent Cableway Steering Committee meeting in October that, for whatever reason, the draft Feasibility Study by-passed the Steering Committee, with unnecessary and rather unseemly haste, and has already been accepted by DEDT. Please confirm the process from here on.
- Page 42 of the Business Plan refers to the proposed cableway being located in the Mnweni area. The proposed site is NOT in the Mnweni area which is located miles away in a different Traditional Authority Area.
- On page 44 of draft Business Plan the use of an illegal jeep track is being punted “on an existing route” when in fact it is an illegal track used by Afriski.
- The tourism statistics are highly questionable since many assumptions are made (For example: an average of 3 international tourists per car visiting. The 300,000 visitors at R300 each and growing at 10% per year is a large number for these areas, given that total numbers to the northern berg are about half this. Drive-by visitors are possible, but visitors to KwaZulu-Natal mostly all migrate at the same time, and to assume a section of this is optimistic. R300 per person may be too expensive for a family (R1200 to R1500 per family)
- The studies allude to the “potential footprint” but this has still not been quantified taking into account that, by the consultants’ own admission, a large amount of supporting infrastructure is required to try and create economic viability for the cableway and community beneficiation. The studies allude to craft shops, bars, restaurants, cafés, outlets for merchandise and accommodation not to mention the large parking areas required for the anticipated thousands of people. Thus the claim that the cableway would “ensure that only minimal and sustainable impacts on the ecology and environment will occur” cannot be substantiated.
- Consultants confirmed that the cableway itself would provide only about 30 local jobs. Any other community beneficiation would need to rely on jobs from the creation of what is referred to as “a Drakensberg village”. It is not clear what would happen to a displaced community who would need to give way to the creation of such a village. However it seems the Okhahlamba Municipality could benefit through a large number of jobs and rates.

The preliminary studies referred to therefore do not contain sufficiently accurate and substantiated details which would enable comment in any depth. In addition, further obligatory studies are required in terms of the National Environmental Management Act 1998 and related Acts such as The National Environmental Management: Waste Act 2008, the National Environmental: Biodiversity Act 2004 as well as other international, national and provincial legislation including the World Heritage Convention Act 1999.

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Since any detailed comments on the studies to date are not possible some general but pertinent comments are provided as follows:

1. A full Environmental Impact Assessment needs to be conducted

There are over 35 environmental aspects which need to be exhaustively investigated in a development of this nature if any sort of informed decision is to be made. For example, to mention only a few:

- Physical characteristics of the site and its surrounds
- Ecological characteristics
- Current and potential land use and landscaper
- Cultural resources: The impacts on both the mountains and community are of particular importance and include the loss of homes and grazing land, the presence of graves, areas of cultural and historical importance and rock art and archaeological sites. A separate Cultural Assessment would need to evaluate the long-term consequences of these losses and the extent to which the cultural and societal fabric of resident communities will be affected in the long-term.
- The effects of infrastructure services including energy supply, water, waste management, transport networks
- Social services such as emergency services
- Risks and hazards
- The nature and level of present and future environmental pollution including air, water, visual, noise and light pollution.
- Cumulative and synergistic effects that can also give rise to negative unintended consequences and set undesirable precedents.

2. The true economic value of the Drakensberg

The proposed development should be placed within the context of the true economic value of the Drakensberg (especially its upper reaches) as the “water-tower” of the county. These mountains are an inter-related system with all of its parts contributing to its critical role of water production. The true economic value of this area, in terms of its national water production, is generally not fully acknowledged, nor sufficiently taken into account, by most levels of government. Estimates from a draft Final Report of the PES Baseline Study, Page 16: MDTP 2005 states that the ecological “commodities” or services of the Drakensberg bioregion indicate some R3.98 billion per annum.

We enquire to what extent potential for tourism development (especially the massive nature of the current proposal) can be allowed to over-ride national economic imperatives of water production in terms of quantity and quality, especially given the fact that South Africa is a water-scarce country. The Water Commission recently warned that the country could “run out of water” in less than 10 years’ time. Water is the life-blood of the country, its people, its’ industry and food production. In our view nothing should over-ride or place this at risk. In this regard the cumulative and synergistic effects referred to above are of particular importance and require far more extensive investigation and quantification before any tourism enterprise such as the envisaged cable-car can be taken further.

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We request a comprehensive Environmental Audit, and a Value of Ecosystems Economics evaluation, prior to any further movement on the proposed cable-car.

3. A note on mountain communities

IUCN Guidelines 2004: The spiritual and cultural values of people are at stake. Mountain areas of cultural and spiritual significance are more complex in that their qualities are not only physical and biological but also spiritual and emotional.

Greater understanding is needed about the impacts of large scale Eurocentric developments on communities who still retain deep-seated values and traditional beliefs. There needs to be recognition that the knowledge, rights, lifestyles and cultural values of people, in and near mountains, include an identity grounded in an ancestral landscape.

There could be serious unintended social and cultural consequences of destroying, or wrenching communities from, ancestral landscapes which are imbued with profound significance, however well-meaning the initiative might be. The western mind often tends to dismiss these aspects with an "out with the old and in with the new attitude", and sometimes with an arrogance more reminiscent of colonialism than the respect and affirmation of indigenous knowledge and lifestyles which is supposed to characterise society today.

Thus detailed studies relating to cultural and social impacts need to be undertaken before one can even think of transforming ancestral and largely untouched landscapes into a monument of western technology.

The mountain communities of the northern Drakensberg have over a prolonged period of time, received considerable skills-training ranging from computer literacy, financial management, cultural and nature-based tourism to donga reclamation techniques, alien weed eradication, fire management, environmental and rock art monitoring.

There is long-term commitment and enthusiasm of many community members with regard to conserving the natural scenic beauty of their areas. They have attained proficiency in environmental reclamation techniques and constantly endeavour to raise community awareness about their cultural heritage. A range of community groups and committees, including donga reclamation teams have recruited, trained and supervised a wide range of activities which have benefited hundreds of community members by providing jobs and a transfer of skills. This in strong contrast to the small number of permanent community jobs which the cableway itself would generate.

We know there is strong support for the development of a community wilderness area and nature reserve which has been GPS'd by community wilderness groups and other community members, many of whom who perceive wilderness as an ancestral landscape. We understand, from the Stewardship Programme, that consensus was reached on the extent of this area after a year of consultation with community members, representative of a wide range of community sectors. The community nature reserve and wilderness area would stretch from Royal Natal National Park to Cathedral Peak. Preparation for the proclamation of such an area is expected to soon start.

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The proposed cableway would invade the heart of the community de facto wilderness area in the Busingatha section. It should be noted that a Biodiversity Survey conducted by Mr. K. Zunckel (M.Sc. Environmental Management) of the upper Busingatha, two years ago, rated the quality of biodiversity at 80% - the highest biodiversity rating in KwaZulu-Natal for Stewardship sites thus far.

In 1995 over 100 NGOs from 40 countries attending the Rio de Janeiro Earth Summit noted 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”.

Given this recommendation from nearly 20 years ago it is unfortunate that, to date, it has not been applied nor even acknowledged in any of the current studies. A professional Environmental account and audit Study should accompany all large-scale development proposals in the Drakensberg.

To sum up

From our experience of working with deep rural and mountain communities over a prolonged period of time we have come to realise the desire of mountain communities to retain control and management of their areas and to benefit from the many hundreds of jobs which could be created through environmental restoration which is highly labour-intensive. We do not think the establishment of a cableway in any mountain community is appropriate.

We question the Eurocentric nature of this proposed massive development in an area which is still deeply imbued with traditional values and ethics and the oral history of its people. We believe this would be completely contrary to the long-term objective, and very real possibility, that the areas in question could achieve Living Cultural and Natural World Heritage status and could ultimately be managed as such by mountain communities. We also think that the **cumulative** environmental, cultural and social impacts of a cableway would be extremely detrimental, not only to the scenic beauty and biodiversity of the area and its value as a major source of water production for South Africa, but also to the societal fabric and culture of resident communities.

It is unfortunate that despite the years of commitment by mountain communities to manage their natural and cultural resources in a sustainable manner, and their many achievements, their efforts have not been recognised in any of the studies. In our view the option of “kick-starting” the community nature reserve and wilderness area with a large cash injection, in such a way that the funds could be retained within community structures as a financial resource, and used to employ large numbers of people, should also be considered. This would affirm and build on years of work already undertaken and would also satisfy requirements of the World Heritage Commission that communal land currently separating the two section of the MDP WHS obtain the necessary degree of environmental protection. Failing this, the integrity of the MDP WHS could be seriously compromised.

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In addition, both the AmaZizi and AmaNgwane communities have identified two sites, just outside the buffer of their wilderness area that are eminently suitable for large tourism developments (hotels , up-market camps or cultural villages for tourism purposes etc) which would not impinge on their wilderness area.

We strongly recommend that these options be considered before embarking on any further studies for the single option of a cableway.

Yours faithfully



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