

Comments to Bot/Kleinmond Draft Estuarine Management Plan of August 2021

I appreciate and welcome the commitment of CapeNature and Overstrand Municipality to develop a five-year Estuary Management Plan and would like to support, and add emphasis to, some key issues that are elaborated in the Draft of August 2021. Please read the following as a constructive contribution of a person with a long-standing private and professional commitment to facilitating pro-poor social and economic development and community-based natural resource management.

I am mostly quoting from the Executive Summary of the 2021 Draft EMP (with page numbers in brackets) as key issues of concern are concisely expressed here.

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The Draft EMP reflects a past situation

The analysis and the data used are relatively old. It is stated under "Document Use" *that the work of the original authors and input received from stakeholders remains largely unchanged* (p. iii). Version 1 of the plan was produced in 2009 (p.ii). The SAR is of 2011 and some of the data used for it are much older. The Census was conducted in 2011 (p.9) and no longer reflects the actual population nor the expansion of the built areas that came with it. The Category C (moderately modified state) classification of the estuary is also of 2011. The observed *"loss and/or change of natural habitat and biota"* may well be aggravated by now, and the judgment that *"the basic ecosystem functions and processes remain predominantly unchanged"* (p.iv) deserves a review as *"the major pressures contributing to the diminished health of the estuary are: little to no river inflow in summer, poor water quality, artificial breaching and over exploitation of fish"* will most likely have grown rather than eased. The Ecological Water Requirements Study was conducted in 2013/2014. The original EMP was revised in 2016.

Since these times, the condition of the estuary and various contributing factors have probably become more concerning. The *Management Objectives for Water Quality and Quantity* (p.vii) indicate that I thus fully support the statements that a *"full review process is therefore still urgently required and should be part of a future revision"* and that the EMP *"must not be considered a once-off compilation but rather a 'living document' that should be regularly updated and amended"* (p.iii).

The understanding of *"major pressures contributing to the diminished health of the estuary"* do not seem to adequately reflect current and future climate change impacts and risks. The time window for action on the climate and biodiversity crisis is closing fast. Next time around might be too late.

The Draft EMP risks missing a rare opportunity for an adequate local response to the global environmental crisis

The urgency of decisive and wide-ranging action has just been most vigorously re-emphasised. On 27 February 2022 the Summary for Policymakers of the IPCC Working Group II report, **Climate Change 2022: Impacts, Adaptation and Vulnerability** was approved, by 195 member governments. The report, with input from 270 scientists from 67 countries, provides the latest evidence of how accelerating climate change is impacting nature and humanity. More than all previous IPCC documents, this report stresses the interrelation of climate change, biodiversity, ecosystems and people.

Working Group II co-chair Hans-Otto Pörtner: *“All the building of our civilisation has been connected with the retreat of nature, and there needs to be a turnaround”.*

“The growth in climate impacts is far outpacing our efforts to adapt to them,” UNEP chief Inger Andersen warned this month. She urged nations, cities, businesses and individuals to turn adaptation efforts *“into a sprint”*.

South African Working Group II co-chair Debra Roberts pointed out that everyone must play their part to transform human systems to the greener and fairer model needed to protect people, the planet and its climate. *“It’s a whole-of-society response — no one can be left out.”*

<https://www.dailymaverick.co.za/article/2022-02-28-as-the-climate-crisis-wreaks-havoc-globally-the-latest-ipcc-report-flags-ways-to-adapt>

“Healthy ecosystems are more resilient to climate change and provide life-critical services such as food and clean water”, said IPCC Working Group II Co-Chair Hans-Otto Pörtner. *“By restoring degraded ecosystems and effectively and equitably conserving 30 to 50 per cent of Earth’s land, freshwater and ocean habitats, society can benefit from nature’s capacity to absorb and store carbon, and we can accelerate progress towards sustainable development, but adequate finance and political support are essential.”*

“Our assessment clearly shows that tackling all these different challenges involves everyone – governments, the private sector, civil society – working together to prioritize risk reduction, as well as equity and justice, in decision-making and investment,” said IPCC Working Group II Co-Chair Debra Roberts. https://www.ipcc.ch/site/assets/uploads/2022/02/PR_WGII_AR6_english.pdf

The **UN Biodiversity Conference** (CBD COP 15, part 2) in April/May 2022 will further stress the urgency of biodiversity conservation.

The critical importance of wetlands is also increasingly recognised internationally. COP 12 of the **Ramsar Convention** emphasised the need to *“upgrade the State of the World’s Wetlands and their Services to People”* (<http://sdg.iisd.org/news/ramsar-cop-12-adopts-declaration-of-punta-del-este-16-resolutions>) and the upcoming COP14 in Wuhan in November 2022 (<https://ramsar.org/event/14th-meeting-of-the-conference-of-the-contracting-parties>) is bound to push further in that direction.

Overall, chances are that 2022 will mark

“(…) the true start of the Decade of Action on the SDGs and the Decade on Ecosystem Restoration. Among the SDGs being considered in depth this year are Goal 14 (life below water) and Goal 15 (life on land).” (<https://sdg.iisd.org/commentary/policy-briefs/2022-a-full-calendar-for-sdg-discussions-and-global-environmental-governance>)

The reference to *Issues of Global, National and Regional Significance* in chapter 2.3 of the Draft EMP (pp.12-13) is rather cursory. The core statement concerning action appears too reassuring, too limited in the envisaged scope of action and too tied up in a technocratic understanding of environmental management: *“Given the extent of scientific and traditional knowledge of the Bot/Kleinmond system, it is considered possible that management interventions can reverse the decline and thus contribute to the global effort of conserving biodiversity.”* (p.13) This is not up to the level of the international debate of 2022.

The estuary and the whole surrounding landscape form an ecosystem that is critical for life-supporting biodiversity and for coping with climate change. This should be better reflected in the EMP. In my view, various aspects deserve a more thorough revision. The following are just some.

A need for further investigations and stakeholder involvement

Terrestrial Conservation Zone (p.vii and ...) There is little indication of exactly what is to be conserved and not enough focus on what needs to be restored (wetlands in particular). The EMP's key objective regarding ("**Land use & development planning: Estuarine health is prioritised in land use management practices**" (p.v) is adequate. But the assessment that the "*impacts of the major pressures contributing to the diminished health of the estuary can be mitigated with very little effort*" (p.iv and ...) is obviously no longer adequate. Maintaining that kind of statement risks causing deceptive reassurance and deflecting attention from the scope and urgency of the required action and from the increasing damages and costs that are bound to result from doing too little too late.

The definition and the boundaries of the TCZ should be reconsidered based on in-depth assessment of its functions for the estuary health as well as the biodiversity around it. The revision and implementation of Management Objective 4.2 of the EMP

Develop a terrestrial conservation plan - A plan for identifying and declaring terrestrial conservation-worthy areas adjacent to estuary and in catchment, has been adopted and is being actioned. (p.21)

should be guided by ambitious updated conservation targets.

Land use development and planning appears like one of the most relevant *Key Objectives* of the EMP in this regard. A landscape and watershed management approach is advisable which includes both science-based analyses of the environmental value and services of specific areas and participation of all relevant stakeholders.

The *Bot River Estuary Forum* (BREF) can serve as the main vehicle for active involvement of both governmental and non-governmental stakeholders in planning and implementing a landscape planning and conservation program. BREF's potential towards mobilising civil society contributions to planning, implementing and monitoring a landscape management program deserves a review. Modifications of its role, mandate, responsibilities and organisational setup might turn out to be advisable and should not be excluded a priori.

Livelihoods: Overfishing and rights of access are correctly raised in the Draft EMP as primarily regulatory issues. But in the view of the worsening socio-economic conditions for a large and growing part of the population, other livelihood options deserve more attention. Chapter 2.4 of the Draft EMP deals briefly with this issue:

"There is an urgent need for alternative livelihood options. Urban development will generate economic development opportunities in construction and business sectors. However, many of the affected people are descendants of families of fishers that go back generations to when the town was founded in 1859. Being employed as a gardener or builder is not consistent with their cultural heritage. Sustainable estuarine-based livelihood alternatives are required." (p.14)

This is correct and commendable. But the perspective should be widened to include **livelihood opportunities in a wide range of environmental rehabilitation, conservation and protection works**. The work of activists concerned with the Paddavlei in Hawston has already shown that a substantial part of this community of traditional fishermen perceives other environmental and livelihood issues to be connected with fishery but also to reach beyond. Their list of concerns include issues like pollution, sewerage and alien vegetation.

The most obvious options with considerable job creation potential are wetland rehabilitation, control of alien invasive vegetation and reduction of fire risks in the catchment area of the estuary. Various options such as partially financing the removal of alien vegetation by using it as a feedstock for commercial production of charcoal, biochar (nutrient-enriched charcoal), fertiliser, mulch and compost deserve to be considered under technical, economic and employment aspects.

Water quality and flow:

“Water quality is relatively good in the Bot River estuary at the current time, a situation ascribed to the vigilance of BREF but, in order to maintain the situation and achieve a Class A or B water requirement, as proposed in the regional Estuaries Conservation Plan (Turpie & Clark 2007), the Municipality needs to address shortfalls in sewerage reticulation and treatment infrastructure, and remain vigilant on the disposal of solid waste. This is particularly relevant to the Kleinmond portion of the system where, up until recently, the estuary was sometimes artificially breached to maintain water quality to acceptable standards for recreational use.” (pp.14-15)

This concern is relevant far beyond the Kleinmond portion of the estuary system and beyond the issue of artificial breaching. It does, as indicated, include sewerage and waste disposal, which can be addressed through investments in sewerage technology and infrastructure with corresponding regulatory measures. The more challenging parts are the upstream land and water use issues that affect the estuary inflow. These call for a **landscape or watershed management approach** with all concerned stakeholders such as farmers and other land owners/users.

Eco-tourism development: The prominence given tourism and recreation in the Draft EMP should be put into perspective. There can be no question that the role of tourism for local livelihoods must be considered, also the social, cultural and identity issues mentioned in the Draft EMP. But the accelerating environmental crises call for a clear definition of “eco-tourism” that reflects the current need to prioritise ecosystem restoration and conservation. Tourism and recreation need to be focused on and limited to what can be harmonised with this priority. The Draft EMP mentions some issues primarily under regulatory aspects, e.g.:

“A kitesurfing and parasailing zone needs to be considered but to date these are prohibited activities throughout the system because of their alleged disturbance to birds. Similarly, all forms of netting and fish trapping are prohibited, except for throw nets and cast nets (restricted to bait collection in Zone 3) in line with national regulations.” (p.viii)

In the interest of protecting and where possible rehabilitating biodiversity this kind of regulations need to be maintained and better controlled. Enforcing them implies a loss for a very small number of estuary users. This loss can be more than compensated by enabling a far greater number of people secure, non-intrusive and non-trespassing access to the estuary shore and mouth. An obvious solution would be a clearly delimited and managed walkway with some boardwalk passages along the high water line of the estuary up to the mouth, possibly including birdwatching infrastructure.

Opportunities for adjustment

Most of the above points can obviously not be fully elaborated in this version of the EMP. Amendments require both further investigation and stakeholder consultation; whereas at the same time the adoption and implementation of the EMP should not be further delayed. I therefore support that the EMP document is conceived as “*strategic planning document*” (p.5) that needs both regular revision and continuous “*adaptive management*” to adapt to the new and urgent challenges. Regular reviews seem to form part of the M&E concept. They are likely to result in significant plan revisions which can be reflected in detailed operational plans. Both the strategic reviews and adaptive M&E can be scheduled in the suggested operational plan.

“The key to the success of the EMP is the identification and adoption of a set of objectives that provides a channel for all parties to exercise their particular interest. Thereafter, during the implementation phase of the EMP, it will be achieved through the on-going maintenance of stakeholder support and the involvement of a facilitative/co-ordinating agency.” (p.16)

Funding and capacity development

Section 5.1.2 Objective 1.2: Funding & Capacity of the Draft EMP observes the following:

“Because there was previously no formal mandate for estuarine management, funds for related projects were not readily available and people were not familiar with what is involved in estuarine management. Low levels of capacity are particularly noticeable in units responsible for enforcing by-laws and regulations that are designed to protect estuarine health and resources.

Funds need to be secured for implementation of the actions and projects identified in the EMP and, for the next cycle of implementation in order to ensure a seamless transition. Provision is also made for attendance at training courses in estuarine management and enforcement.” (p.22)

All of this refers to government funds and role players. This indicates a planning approach that is highly, if not exclusively focused on the roles and understanding of (semi-)governmental bodies. Based on my 30 years of experience as a project manager, consultant and facilitator in non-governmental, community-based development and natural resource management in Africa, I recommend widening the perspective towards

- ⇒ including the largely untapped interests and capacities of the local civil society in terms of environmental conservation, livelihood options, financial and labor contributions;
- ⇒ planning for adequate mobilisation and capacity building activities that include non-governmental role players;
- ⇒ tapping into the considerable fundraising potential in the South African private sector and especially the wide range of potential international donors (UN, governmental and non-governmental development cooperation agencies, environmental trusts, charities, etc.) in the light of the greatly increased opportunities provided in 2022 by the high and growing awareness and media coverage of the need to locally address the climate change and biodiversity crises.

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