

Comments on the EIA for Northgate

Why the Diamond Birding Route (now Natural Diamond Route) is an Interested and Affected party for this EIA

These responses are based on the Diamond Birding Route's recognition of the Lesser Flamingos of Kamfer's Dam as a vital tourist asset for Kimberley. We believe that the flamingos will become the natural equivalent of the Big Hole as a tourist attraction.

The goal of these comments is to aim for an integrated and credible development based on transparent fact.

Attached is statement of the Purpose, Vision, Objectives and Approach of the Diamond Birding Route (to become Natural Diamond Route) which places our interest within a conservation and socio-economic context.

Material examined

I have examined the following hard copy and electronic reports:

Scoping report for the Northgate Development on certain Portions of the farm Roodepan No 70, Kimberley, Northern Cape. MVD Kalahari/group 1.Hennie Erasmus.

Potential impacts of the proposed Northgate development (Roodepan, Kimberley) on the flamingos and other waterbirds of Kamfer's Dam. Specialist report. Marienne de Villiers; Fourie, De Villiers & associates CC

Group 1. Northgate Kimberley. CD presentation

Group 1. Northgate Kimberley. Development philosophy.

Two emails from Lionel Koster, MD of Group 1, to me dated 19 November 2007.

Overall comment

There are two overriding themes which pertain to the entire EIA.

The first theme is that it was impossible to get a clear understanding of several critical issues because of a lack of information. Critical elements which are not fully examined are (1) clarity on the current and future state of Homevale Water treatment plant, with or without development (2) insufficient detail on the developer's contributions to environmental conservation (e.g. location and plan of flamingo viewing hide, location structure and environmental centre and details of operation, details of dog-proof barriers and analysis of alternative sites). Even if these have been adequately planned, this information is not presented here which makes it impossible to provide a fully informed opinion.

Within the body of my comments, I repeat these points in more detail, and it is my opinion that without this detail, it is impossible to make an informed decision on whether the Northgate development will negatively impact the flamingos of Kamfer's Dam in the long-term.

The second theme is the undercurrent suggesting an apparent conflict between human development and the natural environment. This is not evident in the publicity material, scoping or specialist reports, but rather in an email from Mr Lionel Koster to Mark Anderson which was copied to me on 19 November 2007 as one of the I&AP. The particular sentence that creates this impression is:

"I will not accept any delaying tactic's from anyone and we have the full support of the National Ministry of Housing and the Northern Cape Premier."

In terms of the aims of the Diamond Birding Route, and in terms of my personal integrity, I would like to make it very clear that any of my comments which are aimed at ensuring that the Northgate development does not negatively impact the flamingos of Kamfer's Dam are not a delaying tactic, but have the goal of ensuring the best outcome for an integrated development, and result in the long-term persistence of the flamingos.

By way of further explanation, I would like to draw an analogy. I suggest that no-one would suggest using the Big Hole as a municipal rubbish dump, because of its value as a tourist attraction, and as part of Kimberley's historical heritage. As a tourist attraction, the Big Hole creates wealth, jobs and a source of pride for the residents of Kimberley. The Diamond Birding Route regards Kamfer's dam as the natural tourist equivalent of the Big Hole, although currently undeveloped. Kamfer's Dam will also generate wealth, jobs and a source of pride in Kimberley's residents in the long term. Kamfer's Dam and the Big Hole are unique selling propositions which separate Kimberley from any other tourist destination. It is therefore in the best interests of Kimberley and all of its residents to ensure that this potential is not destroyed through a development which may not have fully considered the impact of this development.

This EIA should not be cast in the context of flamingos versus human development, because the flamingos are a long-term valuable tool in the human development of the Kimberley region.

Theme 1. The need for more information

1.1. The question of alternative sites

There is no evaluation of alternative sites. The scoping report states "A number of sites were considered but land for this type of development around and in Kimberley is scarce." However, the developers make the point in more than one presentation that they the site was chosen in part because of its natural setting. Thus the selection of this site is based in part on commercial exploitation of a natural asset.

It is my view that the following question should be answered by an EIA:

“What are the alternative sites and why is the current Northgate site preferable?”

1.2. Homevale Water Treatment plant

The Group1 CD presentation and email from Mr Koster to me (19 November 2007) states that the current breeding island for flamingos will be under water within 12 months.

Clearly, the issue of the Homevale Water treatment works is a critical issue which is not clarified in this EIA. Specifically, to make an informed decision, one would need to have the following information:

- a) The current state of Homevale Water treatment plant and projected situation over the next five years relating to quality and quantity of water entering Kamfer's Dam.
- b) The scenario of water quality in Kamfer's Dam resulting from water input from Homevale Water Treatment plant with Northgate development and without upgrade.
- c) The scenario of water quality in Kamfer's Dam resulting from water input from Homevale Water Treatment plant with Northgate development and with an upgrade of the Homevale Water Treatment plant.
- d) Are there any human health issues?

This information would allow an informed independent opinion to be made on this vital impact. Without this information, I believe the EAI to be inadequate.

1.3. Dog-proof and sound-proof barriers

I believe that another potentially massive impact on the flamingos, in my view, lies with human and dog disturbance of the flamingos. Whilst flamingos have clearly adapted to predictable disturbance such as road and rail traffic in terms of continuing to feed at the dam, they have never bred successfully, suggesting that disturbance is a critical factor.

The problem with disturbance by dogs and humans is that such incidents would be irregular and unpredictable. It is also critically different in that people and dogs can directly access breeding sites. And one such incident can effectively wipe out a breeding attempt.

The specialist report recommends a dog-proof barrier which would seem to deal with this type of intrusion. However, no specifications are given to ensure a long-term success of this strategy in say 10, 30, 100 years. What is the mechanism for ensuring that repairs are made?

The following information is required:

- a) Specifications for the fence – location, barrier specifications (height, length, underground aspects, materials), lifespan.

- b) How will this fence be maintained and repaired in the long-term?

I propose the following suggestion, which also takes into account the fact that Group 1 marketing this development as a permanent attraction, and therefore need to take every measure from a commercial marketing point of view that they can guarantee a long-term presence of the flamingos.

- a) The developers establish a trust fund which is sufficiently large to permanently hire two guards, and which will from time to time allow for the repair of any permanent barrier. This trust fund would be placed under the control of the Flamingo Environmental Trust.

In addition, a sound-proof barrier is proposed to diminish the effects of blasting.

- a) Is this practical and what are the specifications of such a barrier?

1.4. Detail on environmental aspects of the development

There is simply insufficient information to confirm the stated commitment of the developers to the environment. The following information would clarify their commitment:

- a) Location and plans for flamingo viewing platform and awareness information.
- b) Location and plans for environmental centre, as well as operating philosophy (who would fund staffing, awareness material etc).

Unused viewing platforms and environmental centre have no value.

The importance of this material is that it would give credibility to the developers' statement that they are committed to the environment.

Theme 2. The undercurrents suggesting that this development will be contrary to human needs and development in the region.

This point has been made above. There is a due legal process for EIAs which is in place to ensure that unnecessary environmental damage does not occur. The EIA process should follow this due process, particularly for an asset which has international recognition.