

12 April 2006

Dear Guillaume

Thank you for the opportunity to comment on the Draft Scoping Report for this project.

Our correspondence of 27 January 2006 refers.

1. As noted telephonically this morning, we were concerned at the incomplete summary of our comments in the 'Issues and Responses Report' for this project. These comments deal specifically with biodiversity considerations, and were presented under the headings:

- Succulent Karoo: Biodiversity hotspot
- Succulent Karoo Ecosystem Plan (SKEP)
- Spatial recommendations and specialists' workshop
- National Environmental Management Principles
- Recommendations: Biodiversity ToR

However, the 'Issues and Responses Report' deals exclusively with our proposed ToR for the consideration of biodiversity and environmental assessment and recommended use of the Fynbos Forum Ecosystem Guidelines for Environmental Assessment in the Western Cape; none of the other aspects are reflected in the report in question.

We deliberately included published references on the global biodiversity status of the Succulent Karoo, and the conservation priorities identified by the SKEP programme, to ensure that decisions that could result in adverse impacts on biodiversity pattern and process were adequately contextualised, understood and appropriately dealt with in project planning and impact assessment.

As stated this morning, failure to consider these referenced informants pre-emptively may result in them developing into issues that can cause unnecessary delays (and costs) further along the decision-making process, especially once it has already moved into the EIA phase.

Any biodiversity ToR that are drafted without reference to these contextual informants are very likely to be called into doubt.

It is for this reason that we still recommend that Eskom considers convening a workshop of biodiversity specialists who are acquainted with the western Succulent Karoo and the SKEP programme and products to identify major issues that can be dealt with through positive planning.

2. In order to ensure that our concerns are adequately reflected in the Final Scoping Report, we have attached to this e-mail:

- The BotSoc CU's letter of 27 January 2006; and
- Recommended biodiversity ToR.

3. We also strongly recommend that the Final Scoping Report includes a section on:

- The international biodiversity importance of the Succulent Karoo Biome;
- The western Succulent Karoo in the context of the National Spatial Biodiversity Assessment and the identification of national priorities for conservation action; and
- The SKEP programme and its chief implications for planning relating to the Kudu Integration Project.

4. We appreciate your swift response to our queries this morning, and have the fullest confidence that these issues will be effectively dealt with in the Final Scoping Report.

Please do not hesitate to contact the undersigned in the event of queries.

Yours sincerely,

Charl de Villiers  
Biodiversity in Environmental Assessment Project  
Conservation Unit  
Botanical Society of South Africa  
Private Bag X10, CLAREMONT 7735  
Tel +27 21 799 8826/4  
Cell 083 785 0776  
<http://www.botanicalsociety.org.za/>