

PORT OF NGQURA

STRATEGIC ENVIRONMENTAL ASSESSMENT

QUESTIONNAIRE

INSTRUCTIONS:

1. This questionnaire serves to obtain input from stakeholders as part of the development of the Strategic Environmental Assessment (SEA) for the Port of Ngqura (the “Port”).
2. Please complete and return the questionnaire to Nemaï Consulting (donavanh@nemaï.co.za) by **8 December 2023**.
3. You are welcome to include any additional information deemed pertinent to the development of the SEA.
4. Please advise if you require the MS Word version of the questionnaire to facilitate the completion of the electronic version.

Date:	08 December 2023			
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1) Governance Framework for the Port

- 1.1** There are various pieces of legislation (including existing environmental approvals), as well as policies, strategies, plans and programmes that form part of the governance framework for the Port. Are there any specific provisions in the aforementioned governance framework that you want to highlight, with accompanying reasons?

The Biodiversity Law Centre (**BLC**) uses the law to protect and restore indigenous species and ecosystems in Southern Africa. We are particularly concerned about the impact of port activities on endangered sea birds, including specifically the Africa Penguin. The BLC works with partner organisations, including BirdLife South Africa, to develop legal solutions and advocate for law reform in the context of activities that are harmful to South Africa’s biodiversity, and seabirds in particular. It is in this context that we provide the list below of key legislation, policies, plans and international law to which the consultant must have regard. This list is by no means exhaustive, noting in particular that a significant nexus of legislation governs port, coastal and marine environmental protections, developments and activities – as well as legislation applicable to specific activities referenced in the PDFP Report 2022 Update presentation provided to stakeholders (including but not limited to legislation pertaining to the petroleum products and infrastructure, mineral and hazardous waste handling and storage and freshwater usage and conservation). Accordingly, we reserve our right to raise additional legislation, existing approvals / permits, policies, strategies, plans, programmes, guidelines or other documents for consideration as the SEA process moves forward, and interested and affected parties are afforded an opportunity to comment on the relevant reports.

Legislation:

1.1.1. The National Environmental Management Act, 107 of 1998, and in particular:

- a) the principles contained in section 2 (including those specifically applicable to ecologically sustainable development) that:
 - i) the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied;
 - ii) pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied;
 - iii) a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions;
 - iv) negative impacts on the environment and on people’s environmental rights be anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied;
 - v) participation of all interested and affected parties in environmental governance must be promoted;
 - vi) social, economic and environmental impacts of activities, including disadvantages and benefits, must be

- considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment;
- vii) must be taken in an open and transparent manner, and access to information must be provided in accordance with the law;
 - viii) sensitive, vulnerable, highly dynamic and stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure.
- b) Chapter 5 (read with the section 2 Principles, including section 2(4)(b) relating to integration of environmental management) with regard to the general objectives of integrated environmental management set out in section 3 including those relating to integration of the environmental management principles into decision-making and ensuring opportunity for public participation and the objectives of clear, accurate and comprehensive identification, predication and evaluation of potential and actual impacts on the environment, socio-economic conditions and cultural heritage and associated risks and consequences (including minimizing negative impacts in line with environmental principles); ensuring that adequate consideration is given to actions to prevent adverse impacts on the environment as well as full and proper consideration is given to the environmental attributes pertaining to the Port (noting its situation on the Eastern Cape Coast and within Algoa Bay). We also draw attention to the "relevant considerations" set out in section 24O of NEMA read with the relevant considerations in the EIA Regulations, 2014 (and in particular taking guidance from the EIA Regulations, 2014 Appendices). Notwithstanding these applying to EIA, we would emphasise that such considerations cannot be omitted in the SEA process itself.
 - c) The duty of care provisions of section 28 of NEMA (including those obligations falling to the TNPA as well as operators / authorities associated with the Port).
- 1.1.2. Specific Environmental Management Acts including:
- a) The National Environmental Management: Air Quality Act, 39 of 2004 and instruments passed in terms of such act – particularly as they relate to noise, dust, emissions and other pollutant controls;
 - b) National Environmental Management: Biodiversity Act, 10 of 2004, in particular provisions relating to threatened and protected marine species (of which the African Penguin is one such species)
 - c) The National Environmental Management: Integrated Coastal Management Act, 24 of 2008, and in particular the provisions relating to protection of the coastal environment; pollution prevention and the State's trusteeship role in respect of coastal public property and obligations in relation to estuarine ecosystems (whether within Port limits or affected by downstream / upstream impacts and also with reference to the National Estuarine Management Protocol). Regard should also be given to any planning instruments developed in terms of the provisions of this Act (including the relevant provincial and municipal coastal management plans).
 - d) The National Environmental Management: Protected Areas Act, 57 of 2003, in particular insofar as any upstream / downstream / inland impacts of the Port affect protected areas / marine protected areas in its vicinity (as well as with regard to the National Protected Area Expansion Strategy and South Africa's 30/30 targets under the Global Biodiversity Framework). We draw particular attention to potential impacts on the Algoa Bay included in the Addo Elephant National Park MPA as well as the Sardinia Bay MPA. The relevant management plans and regulations should be considered (see Regulations for the Management of the Addo Elephant National Park Marine Protected Area, GN777 in GG42479 of 23 May 2019).
 - e) The National Environmental Management: Waste Act, 59 of 2008 with particular reference to its provisions relating to waste management measures and contaminated land and the associated norms and standards;. This will be particularly relevant in relation to any land rehabilitation, effect on seabirds as well as handling of waste / oil.
- 1.1.3. The Marine Living Resources Act, 18 of 1998, with regard to the objectives and principles set out in section 2 include the need to conserve marine living resources for present and future generations; the need to apply precautionary approaches in respect of marine living resource management; the need to protect ecosystems as a whole; preserve marine biodiversity; to minimize marine pollution and the achieve broad and accountable participation in decision-making
- 1.1.4. The suite of legislation giving effect to the IMO Conventions, including MARPOL and with particular reference to:
- a) The Marine Pollution (Control and Civil Liabilities) Act, 6 of 1981, and in particular the provisions relating to SAMSA's authority to permit the transfer of certain harmful substances and/or oil or for certain other acts in respect of ships or tankers; the general prohibitions regarding discharge of oil, pollution of the sea by discharge of a harmful substance, liability for loss or damage caused as a result of oil spills; and the infrastructure required to enable implementation of the measures contemplated in respect of prevention and remedying of pollution of the sea through discharge of harmful substances.
 - b) Marine Pollution (Prevention of Pollution from Ships) Act, 2 of 1986.
- 1.1.5. Marine Spatial Planning Act, 16 of 2018 with particular reference to the intersection of the marine spatial planning principles with the basis on which Port expansion is assessed and considered (as well as ensuring that Port planning is consonant with measures taking under the MSPA). Note that this needs to be read with the Maritime Zones Act, 15 of 1994 as well as the National Environmental Management: Integrated Coastal Management Act, 24 of 2008 noted above). We see the SEA as an important opportunity to contribute to the existing processes of marine planning in the Southern Zone under the Marine Spatial Planning Act and also as needing to interface with the relevant planning process. We note that marine spatial planning in Algoa Bay is of particular importance in light of the sensitive habits of African Penguins as well as other sea birds and marine biodiversity and the increasing pressure on this ocean environment from shipping, bunkering, seismic survey activity and recreational ocean-use. In this regard, we note that the Marine Spatial Planning process needs to be considered in relation to the shifting focus of both the Port of Ngqura and Port of Port Elizabeth (which we understand to be connected) – as well as in relation to the Port of East London where ocean-based activity is also likely to have an impact on the inherently dynamic ecosystems in Algoa Bay.
- 1.1.6. National Ports Act, 2005, and National Ports Rules, 2009, particularly Chapter 4 and the requirement that vessels must operate with due regard to safety, security and the protection of the environment, and Rule 148 in terms of which

bunkering in Algoa Bay is authorised.

- 1.1.7. Sea Birds and Seals Protection Act, 46 of 1973 and associated regulations in particular as they apply to the relevant Algoa Bay islands and African Penguins.
- 1.1.8. Certain legislation is likely to have particular application depending on which impacts are being considered. In this regard, please consider the potential applicability of:
- Sea Fishery Act, 12 of 1988;
 - Regulations under the Sea-Shore Act, 21 of 1935;
 - South African Maritime and Safety Authority Act, 5 of 1998;
 - Special Economic Zones Act, 16 of 2014;
 - World Heritage Convention Act, 49 of 1999; and
 - Wreck and Salvage Act, 94 of 1996.

Policies and plans

- 1.1.9. The Draft African Penguin Biodiversity Management Plan (2022). While this plan is still in draft form, it forms a critical roadmap for the protection of African Penguins. The Plan details the main threats facing African Penguins, including human disturbance in colonies, breeding habitat modification, catastrophic events (including oil spills), all of which are relevant to proposed Port development activities (the Port being in close proximity to key African Penguin breeding colonies). The Plan also details the management actions which must be implemented, and these are relevant to Port development as development should not be inconsistent with the prescribed management actions.
- 1.1.10. The Algoa Bay Management Plan (December 1999). The Management Plan contains important management recommendations and guidelines regarding activities in Algoa Bay which may have a negative impact on the marine environment, including impacts by shipping, small crafts, ballast water etc. Importantly, the Plan recognizes that increased shipping is a threat to marine birds in Algoa Bay. This needs to be taken into account by the SEA.
- 1.1.11. The National Ports Plan, 2019. This Plan details the proposed expansion of the Port of Ngqura, its becoming the primary central port with Port Elizabeth transitioning to providing complementary services to Ngqura.
- 1.1.12. The White Paper Ports Policy, 2002, and in particular its emphasis on environmental sustainability (see for example section 9.1.: "It is an accepted norm that all transport infrastructure development investment decisions consider the environmental implications early on during the decision-making process and not only once the project is fully planned.")
- 1.1.13. The White Paper on the Conservation and Sustainable Use of South Africa's Biodiversity, 2023, in particular the policy goals around biodiversity conservation, and sustainable use. These policy goals become important in the context of port development activities that stand to impact the biodiversity of Algoa Bay.
- 1.1.14. The relevant conservation planning tools including (but not limited to):
- Eastern Cape Biodiversity Conservation Plan (2019) (PN173 in Eastern Cape PG 4460 of 19 October 2020);
 - Nelson Mandela Bay Municipality Bioregional Plan (PN13 in PG3362 of 30 March 2015);
 - Nelson Mandela Bay Climate Change and Green Economy Action Plan, 2015; and
 - National Coastal and Marine Spatial Biodiversity Plan, 2022.

International law:

- 1.1.15. The Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA). This treaty covers several seabird species occurring in Algoa Bay, including the African Penguin (which is listed in Column A of AEWA's Table 1, making it a priority species under the Agreement). South Africa is obliged to take measures to maintain populations of AEWA species at/restore them to a favourable conservation status, including by addressing threats from disturbance and pollution and taking steps to conserve their habitat (see AEWA Annex 3). <https://www.unep-aewa.org/en/documents/agreement-text>
- 1.1.16. The Convention on the Conservation of Migratory Species of Wild Animals (CMS). Some marine species (such as the Southern Right Whale) are listed on Appendix I to this Convention, with the result that various conservation measures are required in terms of Article III(4)-(5) of the Convention. <https://www.cms.int/en/convention-text>
- 1.1.17. The Benguela Current Convention. Article 4 of this Convention requires that South Africa take measures to protect the marine ecosystem against adverse impacts. <https://www.benquellacc.org/>
- 1.1.18. The Convention on Biological Diversity (CBD), Article 8 of the CBD includes commitments regarding, *inter alia*, the protection of natural habitats and maintenance of viable populations of species, and environmentally sound development in areas adjacent to protected areas. <https://www.cbd.int/convention/text/>
- 1.1.19. The various international treaties and conventions governing shipping and marine pollution, including: the UN Convention on the Law of the Sea (UNCLOS); Convention of the International Maritime Organisation, 1948; Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter, 1972; the International Convention for Prevention of Pollution from Ships 1973/1978 (including its Annexes); the Safety of Life at Sea Convention, 1974; International Convention on Oil Pollution Preparedness, Response and Cooperation, 1990; International Convention on Civil Liability for Oil Pollution Damage, 1992; International Oil Pollution Compensation Fund, 1992; International Convention on the Control of Harmful Anti-fouling Systems on Ships, 2001; International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004

1.2 Besides the SEA, what other Integrated Environmental Management tools are you aware of for the Port? Are there specific aspects of these tools that you want to highlight (please also indicate why)?

- We understand there are existing assessments pertaining to the Port which should be considered. In addition, we are

aware of the recent processes. In particular, we consider that regard should be had to the assessments and public comments (as well as appeals) in relation to:

- Karpowers SA (Pty) Ltd
- CGG seismic survey
- TNPA Bunkering environmental risk assessment.

1.3 From your perspective, please indicate the key Government Departments with mandated environmental management functions for the Port.

All organs of state have a responsibility to make decisions affecting the environment in line with the principles contained in section 2 of NEMA (and the constitutional right to which they give effect). However, oversight ought to be exercised by Department of Forestry, Fisheries and the Environment (given environmental expertise), which also provides for a “check” in terms of the exercise of power of other organs of state. However, there needs to be co-operative governance with Department of Transport and Department of Agriculture, Land Reform and Rural Development. At present, we understand that primary responsibility falls to TNPA and SAMSA. We would flag that attention should also be paid to the role of Nelson Mandela Bay Municipality, the Eastern Cape Provincial Departments assuming waste management, water / sewerage and other responsibilities connecting to the Port and that, similarly, SANParks should be considered as a key organ of state in relation to surrounding protected areas (including the Addo Elephant National Park MPA).

2) Current State of the Environment within and surrounding the Port

2.1 What are the **sensitive** environmental features associated with the Port? Please explain why you have mentioned these specific features.

The BLC is particularly concerned about the declining African Penguin populations in Algoa Bay. In 2015, Algoa Bay supported 54% of South Africa’s population of African Penguin. St Croix Island was the largest colony of this species by a significant margin, contributing 40% of the South African population. Since then, the Algoa Bay population has decreased from 10,906 pairs¹ and now constitutes 28% of the South African population, with the St Croix colony now being the fourth largest colony in South Africa.

The *Draft Biodiversity Management Plan for the African Penguin*² (**Penguin BMP**) records that the African Penguin is Africa’s only extant penguin and is endemic to both Namibia and South Africa. The species has suffered an enormous reduction from over one million pairs in the 1920s, to numbers of approximately 10 041 pairs in 2022.³ It is currently classified as Endangered by the International Union for Conservation of Nature (**IUCN**) and under the Threatened or Protected Marine Species Regulations (**TOPMS**)⁴ published under the National Environmental Management: Biodiversity Act, Act 10 of 2004. We are advised that a census count which is currently underway, points to further population declines and the likelihood that the African Penguin will soon be liable for IUCN listing as “Critically Endangered”. In this context, all impacts on this population should be carefully considered and African Penguin habitats be considered sensitive.

As an indicator species, African Penguin population declines stands to affect the entire ecosystem of which they are part. We have previously alerted the TNPA to the 2022 published study noting the correlation between the advent of bunkering and increased noise impacts affecting African Penguin habitats within Algoa Bay – including in relation to Anchorages 1 and 2 and with reference to increased shipping traffic (see: *Impacts of vessel-derived marine noise pollution associated with bunkering near St Croix Island on the endangered African Penguin: Pichegru, L., Vibert, L., Thiebault, A., Stander, N., Ludynia, K., Charrier, J., Lewis, M., Carpenter-Kling, T., & McInnes, A. (2022). Maritime Traffic Trends Around the Southern Tip of Africa – Did Marine Noise Pollution Contribute to the Local Penguins’ Collapse? Science of the Total Environment, 849, 157878.*). This makes it particularly critical that Port expansion is considered in light of the effect of ocean-borne noise on African Penguins (as well as other sensitive sea creatures in the Port vicinity). We note that such impacts are inherently not restricted to Port limits but extend to traffic and noise resulting from an expansion of Port capacity and activities. It is, accordingly, critical that the SEA be appropriately scoped and that all cumulative impacts of proposed Port expansion and developments, as well as existing developments / proposed developments in and around Algoa Bay, are considered in order for a SEA to achieve its purpose in operating at a programmatic / policy level and “integrating environmental considerations into the future development of the Port to ultimately promote sustainable planning and development, based on inherent qualities of the receiving environment.” (SEA, BID).

In addition to specific issues relating to noise, vessel traffic and the African Penguin, we flag that African Penguin prey availability is of concern. This specifically refers to the population health of small pelagic fish (i.e. anchovy and sardines). These fish species – and their availability – are also relevant to other ocean-based food chains and particular attention needs to be paid to how the cumulative impacts of developments within this region affect small pelagics.

2.2 Are you aware of any key environmental **trends** (i.e. apparent patterns of change with regards to the receiving environment) in the Port, as well as the driving forces involved?

- Significant increase in marine noise pollution levels due to more than double the vessel traffic since 2016 due to bunkering activities in Algoa Bay. Animals affected by marine noise include mammals, seabirds, fish and invertebrates.
- Oil pollution – 4 events since 2016 influencing African Penguins and other seabirds.
- Habitat displacement of endangered African Penguins from St Croix Island, on which penguins have decreased by >80% since ship-to-ship bunkering commenced in this area in 2016.

¹ Makhado, Crawford, Sherley and Upfold “The ongoing decrease of African penguins globally and in South Africa” (2022) page 7.

² Draft Biodiversity Management Plan for the African Penguin, GN2302 in *Government Gazette* 47061 of 22 July 2022 (“Draft African Penguin BMP”).

³ Makhado, Crawford, Sherley and Upfold “the ongoing decrease of African Penguins globally and in South Africa, 1989–2022”, Table 1, page 7.

⁴ GN 476 in *Government Gazette* 40875 of 30 May 2017.

- Impacts on marine biodiversity have cascading impacts on other sectors of the South African economy. Marine wildlife is a critical component of ecotourism in South Africa. This industry generates much revenue and creates many jobs, which stand to be lost if the biodiversity on which the sector depends is compromised.

2.3 What are the environmental **opportunities** associated with the Port?

- The planned SEA provides an important opportunity to examine the cumulative impacts of increased Port activity in an area surrounded by sensitive environmental areas, including the key African Penguin breeding colonies of St Croix and Bird Islands with reference to, *inter alia*, cumulative sub-marine and terrestrial noise impacts; pollution risks (and pollution management and response planning); climate change impacts and adaptation measures; and upstream/downstream impacts of ecological pollutants including those which are airborne and waterborne.
- There is also an opportunity to build on recent studies and comments prepared for purposes of the TNPA Bunkering Environmental Risk Assessment (noting its limited scope) as well as expertise and studies focused on the various applications filed by Karpowership and CCG where significant public comments have highlighted important environmental risks and impacts. The SEA provides an opportunity to aggregate the risks identified at project-level to determine the extent to which the ecological environment of the Port and Algoa Bay have reached ecological thresholds / the limits of acceptable change in terms of industrial development – and to provide a basis for prioritizing Port activities as a consequence.
- We flag that this is particularly critical given increasing pressures on the Algoa Bay environment in respect of vessel traffic and noise, including but not limited to, impacts of Bunkering activities in Anchorages 1 and 2; the potential Karpowership project; and increasing applications for ocean-based seismic studies (and the inherent prospect of oil and gas exploration). At the level of generality, there are opportunities to flag key infrastructural needs in terms of managing pollutants, emergency environmental measures and complying with best international practice in this regard. Similarly, there is opportunity to identify no-go areas within Port limits which may be rehabilitated and restored for purposes of preserving and protecting ecological services and habitats.

2.4 What are the environmental **constraints** associated with the Port?

- Need to consider impacts on surrounding Protected Areas and Important Bird Areas (including Addo Elephant National Park; the Swartkops Valley Local Authority Nature Reserve; Grassridge Private Nature Reserve; Penhurst Rly State Reserve; Addo MPA; the Alexandria coastal Belt; Algoa Bay Islands and Swartkops Estuary). Insofar as current regulations and management plans for these areas contain specific restrictions / requirements, these should be considered as relevant environmental constraints. In addition, the fact that the Port is surrounded by sensitive areas should itself inform how impacts and cumulative impacts are treated in relation to the potential for mitigation / minimization / avoidance of adverse environmental impacts and environmental harms.
- Need to adhere to conditions and limitations provided in previous Environmental Authorisations associated with the Port, Coega SEZ and developments in the Port area.

2.5 What are the environmental **management priorities** for the Port?

- Ensure that cumulative impacts of developments remains below ecological thresholds – including noise impacts and oil pollution
- Ensure that port developments do not have adverse impacts on surrounding protected areas, IBAs and CBA/ESA areas – in particular those affecting African Penguin breeding colonies and seabird nesting sites
- Avoid stranded assets and ensure that changed Port use / expansion is accompanied by sound rehabilitation and restoration plans based on best available science
- Adhere to commitments to operate as a “green Port” through regular and stringent environmental controls of specific developments, listed activities, vessel operations and ensure standard operating procedures and planning is informed by best available science and the precautionary principle.

3) Environmental implications of Future Developments in the Port

3.1 Are you aware of any developments planned in the Port or its hinterland?

- Newlyn Manganese Container and Storage Facility, Coega
- Karpowership SA (Pty) Ltd project, Port limits
- CCG Services SAS (CGG) speculative 3D seismic survey (offshore and south-west of Port)
- Ongoing bunkering activities in Algoa Bay

3.2 What are the concerns associated with developments planned in the Port?

- Increased interference with already-threatened birding habitats, including the African Penguin breeding colonies in Algoa Bay as well as in relate to migratory bird routes (noting both the expansion of LNG / Bulk storage as well as planned off-shore renewable energy construction – both of which require careful consideration of cumulative impacts).
- Increased pollutant risks including through Mn storage facility (including, but not limited to Mn dust dispersal)
- Increased ocean-based noise caused by increased vessel traffic and container berthing.

3.3 Do you have any recommendations on how these concerns can be addressed? This may include mitigation measures or specific objectives, targets and indicators to assess planned developments.

We will be able to comment more meaningfully once provided with further information regarding precise anticipated impacts. In this regard, we are happy to engage further as soon as this information is made available. We note, however, that very careful attention needs to be paid to the requirements of avoiding, minimizing and mitigating cumulative impacts and the very limited scope for biodiversity offsets which are not appropriately considered in relation to the SEA process which operates at too great a level of generality to make consideration of offsets at all viable. This is particularly the case given the nature of the marine and coastal environment.

4) GENERAL

4.1 Do you have any suggestions of key stakeholders that need to be engaged with during the development of the SEA for the Port?

- BirdLife South Africa
- SANCCOB
- Prof Lorien Pichegru, Nelson Mandela University
- The Centre for Environmental Rights
- Natural Justice
- Green Connection
- GroundWork
- SAMSA
- SanParks (in particular the management authority for the Addo National Park)
- Nelson Mandela Bay Municipality
- TRAFFIC Southern Africa
- The Addo National Elephant Park MPA Forum

4.2 Do you have any specific requirements of the SEA?

- The SEA needs properly to consider the upstream and downstream effects of the proposed Port developments – including impacts on Algoa Bay in its entirety (it is of concern that the Port of Port Elizabeth and Port of East London do not appear to be contemplated as part of the study). We note that this is particularly important in light of the dynamic nature of the Algoa Bay marine and coastal environment as well as the interaction between the three ports, the MPA and the critical bird islands in the bay.
- The SEA needs to ensure that cumulative impacts are properly considered with particular attention to both Portside developments and those in and around the bay (including seismic activity and proposed developments such as Karpowership). This is particularly so in light of the restricted nature of the EIAs for these activities. It is critical that the SEA considers the requirements of integrated marine spatial planning and considers the progress made in respect of the Southern Area Plan (including liaising with the relevant task teams). It is possible for the SEA to support this process and provide an important environmental management framework which establishes the ecological thresholds beyond which development cannot be absorbed by this environment. In this regard, we emphasise that the SEA should not be regarded as a replacement for specific EIAs per project – nor be used as a basis for providing exemption from the requirement to apply for environmental authorisations and other necessary licences by each development project in the Port and its vicinity.

General Comments / SEA Considerations:

Thank you for your participation. For any queries, please contact the person below.



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