

# **APPENDIX F4: COMMENTS AND RESPONSE REPORT**

**Comments received during the first PPP (start: 29 January 2021)**

<b>COMMENTS RECEIVED DURING THE 30 DAY PPP</b>				
<b>Number</b>	<b>Organisation</b>	<b>Name</b>	<b>Tel/Cell</b>	<b>Email</b>
<b>1</b>	DEA&DP Western Cape	Keshni rughoobeer		keshni.rughoobeer@westerncape.gov.za
<b>Comments Received:</b>	<p>Dear Megan,</p> <p>Hope you are doing well.</p> <p>The Draft MMP dated January 2021 for the proposed restoration and maintenance of the blue stone quarry (“BSQ”) wall and the reinstatement of the limestone pathway along the top of the BSQ wall, Robben island, has reference.</p> <p>Thank you for the opportunity to comment. Please find attached this Department’s consolidated comments on the Draft MMP.</p> <p>Please acknowledge receipt of this e-mail.</p> <p><b>(Please see the attached letter in Appendix F41)</b></p>			
<b>Response from EAP:</b>	Please see attached Comment and Response Report (Appendix F47)			

<b>COMMENTS RECEIVED DURING THE 30 DAY PPP</b>				
<b>Number</b>	<b>Organisation</b>	<b>Name</b>	<b>Tel/Cell</b>	<b>Email</b>
<b>2</b>	City of Cape Town	Sandra Hustwick		Sandra.Hustwick@capetown.gov.za
<b>Comments Received:</b>	<p>Dear Megan</p> <p>Please see the City’s comments attached. Apologies for the delay. We have had numerous technical challenges recently.</p> <p>We will definitely require a site inspection in order to obtain further comments from various City departments, if you could please arrange that soon.</p>			

	<p>Kind regards Sandy</p> <p><b><u>Please see the attached letter in Appendix F42</u></b></p>
<b>Response from EAP:</b>	<p>Hi Sandra,</p> <p>I trust that you are well.</p> <p>The comments have been received and I will respond formally shortly.</p> <p>As you know, the commenting period for the Maintenance Management Plan ended on 1 March 2021 and I have already given the City of Cape Town an extension to comment. On 3 February 2021, I sent you and Thandeka the photographs of the site and assumed that you would let me know in good time whether photographs will be sufficient or if you will require a site inspection. If we were to give another extension to the City of Cape Town to comment on the proposed restoration works, it would result in a major setback in the project's timelines. Therefore, unfortunately I cannot meet the project deadlines and also arrange for site inspection and allow for the other City departments to comment on the Maintenance Management Plan. Nevertheless, I have given the City of Cape Town at least 30 days to comment on the proposed development (i.e. the legislated time frame) and will take into the consideration the comments that have been received thus far.</p> <p>I trust that you will find the above mentioned in order, but please do not hesitate to contact me should you have any more queries.</p>
<b>Comments Received:</b>	<p>Hi Megan</p> <p>Thank you for your consideration of our comments.</p> <p>However, we did request the site inspection early on (1 Feb 2021), which request was declined.</p> <p>Thereafter you sent photographs, which were very slow to open each one separately. They were unlabelled and not orientated or located on a map. It was very time-consuming to open them and nobody seemed to engage with the project through the photos. I thereafter requested a site inspection again on 23 February. You then sent the photos by drop box on 26 February.</p> <p>I advised that the photographs were inadequate for the purpose of assessing the existing structure and proposed construction work.</p>

	<p>We reiterate that we will require the site inspection in order to provide informed comment on the proposed work within our Municipal area, and we will require further detailed information and drawings of the existing and proposed work, prior to the site inspection commencing, ideally.</p> <p>We have always been accommodated by the Robben Island Museum in the past for various other projects, which we appreciate, and we are sure they would accommodate a team of officials again to inspect this site for the purposes of enabling an informed comment.</p> <p>We look forward to a constructive engagement with you on site sometime in the future.</p> <p>Thank you</p> <p>Kind regards Sandy</p>
<p><b>Response from EAP:</b></p>	<p>Hi Sandra,</p> <p>Please kindly note that the site inspection was not declined in response to your and Thandeka’s comments on 1 Feb 2021. The photographs were sent because that is our usual procedure if a site inspection is requested. Due to COVID-19 regulations, we do aim to limit the amount of contact with other people and thus, we first make sure if site photos are sufficient to limit the amount site inspections that are required. As per the correspondence attached, I did explicitly mention if the photos are not sufficient, a site inspection may be arranged.</p> <p>Nevertheless, I will be in touch with Robben Island Museum regarding a site inspection and will get back to you soonest. Please note that due to COVID-19 regulations, only person from each City of Cape Town department can be accommodated for the site inspection to limit contact with other people.</p>
<p><b>Response from EAP</b></p>	<p>Site inspection to Robben Island and the City of Cape Town was conducted 15 March 2021. Attendees: Charmaine Janet Oxtoby: Biodiversity Management – with a background specialising in birdlife ( CoCT)</p> <p>Bongani (ED) Mnisi: Head Nature Conservation (operations) (CoCT)</p>

	<p>Mashudu Mashau: Coastal Management (CoCT)  David Hart: Heritage (CoCT)  Sandra Lyle Hustwick: Environment (CoCT)  Vusimuzi Bila: Project Manager (RIM)  Megan Smith: EAP (Enviroworks)</p>
<b>Comments Received:</b>	<p>Dear Megan</p> <p>Please see the City's further comments based on our site inspection on 15 March 2021.</p> <p>These are in addition to our earlier comments, which still stand.</p> <p>Thank you once again for organising the site inspection with the Robben Island Museum and SANCCOB representatives.</p> <p>Kind regards</p> <p>Sandy</p> <p><u><a href="#">(Please see the attached letter in Appendix F43)</a></u></p>
<b>Response from EAP:</b>	<b>Please see attached Comment and Response Report (Appendix F47)</b>

### COMMENTS RECEIVED DURING THE 30 DAY PPP

Number	Organisation	Name	Tel/Cell	Email
3	City of Cape Town	David Hart		DavidGraham.Hart@capetown.gov.za

<b>Comments Received:</b>	Dear Colleagues  Thank you for a really informative site inspection yesterday.  I found this 2006 letter from SAHRA refusing permission to rebuild the wall: thought that this would be of interest.  Kind regards  David
---------------------------	---



9/2/018/0004

**SOUTH AFRICAN HERITAGE RESOURCES AGENCY**

Ron Viney

P.O. BOX 2771, CAPE TOWN, 8000

18 January 2006

TEL: (021) 465 3622 FAX: (021) 461 0738

WEBSITE: WWW.SAHRA.ORG.ZA

THE CEO  
ROBBEN ISLAND MUSEUM  
Box 51806  
Waterfront  
8002

ATTN: T. Nemahehi  
By fax: 021 425 0206

**RE: BLUE STONE QUARRY: APPLICATION FOR PERMIT.**

The above-mentioned application was reviewed at a meeting of the SAHRA *ad hoc* Permit Committee on Friday 4 November 2005 as per agenda item 5.9.

**It was noted that:**

An application and supporting documentation was received for the rebuilding of the wall at the Blue stone quarry.

The committee was of the opinion that the proposed rebuilding and strengthening of the wall would result in the central part being stronger than the two outer sections which may cause later collapse of the outer edges. An alternative method of breaking the force of the sea needed to be found.

An environmental impact assessment may be required if 'dollosse' were used to protect the wall from the sea.

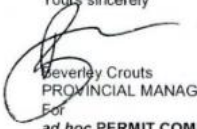
The heritage value of the wall is that it historically symbolised the futility and hardship of prisoners having to repack the wall against the elements and therein lay the **significance of the wall**. In this regard the significance of the heritage resources is more intangible in nature; any intervention should therefore be done through the ceremonial repacking of the stones by ex-political prisoners or their descendants and not by permanent stabilisation techniques.

Blue stone from Tygerberg had been stockpiled to assist with the strengthening and repacking of the wall.

A management plan had been drawn up based on more permanent models used especially at Great Zimbabwe.

**Committee Decision:**

After careful consideration and much deliberation the committee decided that no rebuilding or any other rehabilitation should take place other than as a ceremonial act by ex-political prisoners or their descendants.

	<p>The feasibility of placing the stockpile of blue stone at the edge of the sea to slow down further deterioration should be investigated.</p> <p><b>It is further recommended that:</b></p> <p>The site be interpreted appropriately by means of interpretive materials to reflect the history of the quarry and the suffering of the prisoners.</p> <p>Yours sincerely</p>  <p>Beverley Crouts PROVINCIAL MANAGER: WESTERN CAPE For ad hoc PERMIT COMMITTEE</p>
<p><b>Response from EAP:</b></p>	<p>Hi All,</p> <p>Thank you, David for forwarding the comment.</p> <p>We are currently consulting with SAHRA as they were also invited to comment on the Maintenance Management Plan for the proposed restoration works. Since the proposed scope of works have drastically changed since the 2006 comment from SAHRA was issued, we have applied for a new permit for the current proposed works. We are currently awaiting further comment from SAHRA, but their initial opinion was that they are in favour of the wall being repaired.</p>

<p style="text-align: center;"><b>COMMENTS RECEIVED DURING THE 30 DAY PPP</b></p>				
<p><b>Number</b></p>	<p><b>Organisation</b></p>	<p><b>Name</b></p>	<p><b>Tel/Cell</b></p>	<p><b>Email</b></p>
<p>6.</p>	<p>The Oceans &amp; Coasts (O&amp;C) Branch of the Department of Environment Forestry and Fisheries (DEFF)</p>	<p>N/A</p>	<p>021 819 2499</p>	<p>OCEIA@environment.gov.za</p>
<p><b>Comment received</b></p>	<p>Good day Megan</p>			





	<p>Kindly find attached comments for your perusal and implementation on the Proposed Restoration and Maintenance of the Blue Stone Quarry Wall, Robben Island in the Western Cape.</p> <p>Kindly note that all future correspondence and documentation, Enquiries, Meetings and site inspection requests related to EIA applications (hard copy and an electronic copy) must be submitted to our office or via <a href="mailto:OCeia@environment.gov.za">OCeia@environment.gov.za</a> / or Physical Address: Department of Environment Affairs (DEA), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.</p> <p><b><u>Please see attached letter in Appendix F44</u></b></p>			
<b>Response from EAP:</b>	<b>Please see attached Comment and Response Report (Appendix F47)</b>			
<b>COMMENTS RECEIVED DURING THE 30 DAY PPP</b>				
Number	Organisation	Name	Tel/Cell	Email
6.	EarthWatch, SANCOBB, UCT, BirdLife	Peter Barham, Alistair Mcinnes, Les Underhill, Katta Ludynia		<a href="mailto:katta@sancob.co.za">katta@sancob.co.za</a> ; <a href="mailto:alistair.mcinnes@birdlife.org.za">alistair.mcinnes@birdlife.org.za</a> ; <a href="mailto:Peter.Barham@bristol.ac.uk">Peter.Barham@bristol.ac.uk</a> ; <a href="mailto:les.underhill@uct.ac.za">les.underhill@uct.ac.za</a>
<b>Comment received</b>	<p>Dear Megan,</p> <p>Please find attached our joint comments that we compiled together with Dr Alistair McInnes from BirdLife South Africa, Prof Peter Barham and Prof Les Underhill.</p> <p>I also attach our Registration form as an Affected Party which contains another comment not included in the joint document.</p> <p>Best regards, Katta</p> <p><b><u>Please see attached letter in Appendix F45</u></b></p>			
<b>Response from EAP:</b>	<b>Please see attached Comment and Response Report (Appendix F47)</b>			
<b>COMMENTS RECEIVED DURING THE 30 DAY PPP</b>				

Number	Organisation	Name	Tel/Cell	Email
6.	Department of Environmental Affairs	Zama Langa		ZLanga@environment.gov.za
<b>Comment received</b>	<p>Good day.</p> <p>Please find herein the attached letter for the above mentioned.</p> <p>I hope you find all in order.</p> <p>Thank you.</p> <p>Kind Regards, Integrated Environmental Authorisations: IEM Systems and Tools Coordination Tel (012) 399 8630 / 9370 / 9367 <b>Please find attached letter in Appendix F46</b></p>			
<b>Response from EAP:</b>	<b>Please see attached Comment and Response Report (Appendix F47)</b>			
<b>COMMENTS RECEIVED DURING THE 30 DAY PPP</b>				
Number	Organisation	Name	Tel/Cell	Email
6.	EarthWatch,	Peter Barham	n/a	<a href="mailto:Peter.Barham@bristol.ac.uk">Peter.Barham@bristol.ac.uk</a> ;
<b>Comment received</b>	<p>Dear Megan</p> <p>Thank you arranging the site visit on Monday and for explaining the true scope of the project.</p> <p>However, I wish to complain in the strongest terms about the fact that the documentation sent out in the Management Plan itself failed to reflect the actual state of affairs as presented at the site meeting. The Management Plan itself contains many references to the original much larger plan where heavy machines are said to be used, etc. The many contradictions between the different appendices mean that those of us who were asked to comment and had to read all the documentation were left wondering what</p>			

	<p>was and was not supposed to happen. So much so that we ended up wasting a good deal of time considering how actions that we are now told will not happen could be mitigated, etc.</p> <p>I trust that you will now produce a completely rewritten set of documentation where all references to plans that have since been abandoned will be removed so that it that properly describes the actual proposal. In particular, if we are to be able to assess that likely impact on the Avifauna the document will need to include at a minimum:</p> <ul style="list-style-type: none"> <li>• Maps showing the precise routes to be used to transport people and materials to the site</li> <li>• Maps showing the location of ablution and rest areas for the site workers</li> <li>• Details of the sizes and types of any vehicles to be used</li> <li>• The dates on which work may begin and by which it will finish</li> <li>• The time of day during which activities may take place</li> <li>• The number of people present at the site at any time</li> <li>• A description of the level of noise to be expected at the site (I recall during the discussion a the site meeting mention of workers being encourage to sing as they work – while that may help with the hard labour, it may also act as a real disturbance to the birds!)</li> <li>• A detailed time line of the works</li> <li>• A clear statement of how any delays in completing the work will be handled – including what would happen in the event of the project not being completed in the proposed six month timescale.</li> </ul> <p>Regards</p> <p>Peter</p>
<p><b>Response from EAP:</b></p>	<p>Hi Peter,</p> <p>Please note that your comments have been noted and a revised Maintenance Management Plan will be compiled taking into consideration that points that you have requested to be included.</p> <p>Kind regards,</p> <p>Megan</p>

COMMENTS RECEIVED DURING THE 30 DAY PPP				
Number	Organisation	Name	Tel/Cell	Email
6.	SANParks	Esther Howard	n/a	esther.howard@sanparks.org
<b>Comment received</b>	<p>Dear Ms Smit</p> <p>Thank you for contacting SANParks, however we have no jurisdiction on Robben Island and will therefore not be registering as an I&amp;AP.</p> <p>Kind regards Esther</p>			
<b>Response from EAP:</b>	<p>Hi Esther,</p> <p>The comment has been noted, thank you.</p>			
Number	Organisation	Name	Tel/Cell	Email
7.	DEFF	Nandipha Bhengu	n/a	NBhengu@environment.gov.za
<b>Comment received</b>	<p>Dear Megan,</p> <p>Kindly find the attached. Please note we will send the signed letter as soon as possible.</p> <p>Kind regards, Xola</p> <p><b><u>Attached letter:</u></b></p>			

	 <p><b>environment, forestry &amp; fisheries</b> Department: Environment, Forestry and Fisheries REPUBLIC OF SOUTH AFRICA</p> <p>Private Bag 2447, Pretoria, 0001, Environment House, 473 Steun-Beito Road, Pretoria, 0002 Tel: +27 12 359 9000, Fax: +27 89 625 1042</p> <p>Ref: EDMS202672</p> <p>Enquiries: Nandipha Bhengu Tel: 012 399 9560 Email: <a href="mailto:NBhengu@environment.gov.za">NBhengu@environment.gov.za</a></p> <p>Ms Megan Smith Suite 1064 Private Bag X2 CENTURY CITY 7446 Email: <a href="mailto:megan.smith@enviroworks.co.za">megan.smith@enviroworks.co.za</a></p> <p>Dear Ms Megan Smith,</p> <p><b>COMMENTS ON THE BAR IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998): EIA REGULATIONS, 2014 AS AMENDED IN SUPPORT OF AN APPLICATION FOR AN ENVIRONMENTAL AUTHORISATION IN RESPECT OF PROPOSED RESTORATION AND MAINTANACE OF THE BLUE STONE QUARRY, ROBBERN ISLAND, SOUTH AFRICA</b></p> <p>Robben Island World Heritage Site is located off the coast of Western Cape province in South Africa. The site was inscribed in 1999 by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) as one of the Site containing historical significance in the country and the world, therefore the historical event which happened in the site constituted what is referred as an Outstanding Universal Value (OUV). Robben Island was inscribed using the criterion iii) the building of the Robben Island bears</p> 	<p><b>COMMENTS ON THE BAR IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998): EIA REGULATIONS, 2014 AS AMENDED IN SUPPORT OF AN APPLICATION FOR AN ENVIRONMENTAL AUTHORISATION IN RESPECT OF PROPOSED RESTORATION AND MAINTANACE OF THE BLUE STONE QUARRY, ROBBERN ISLAND, SOUTH AFRICA</b></p> <p>eloquent witness to its sombre history, vi) Robben Island and its prison buildings symbolizes the triumph of the human spirit of freedom and of democracy over oppression.</p> <p>The remains of the island as a landscape reflect the history of the 17<sup>th</sup> century and all the attributes that convey its value. It contains the blue stone quarry as part of the site situated on the North West side. This quarry is considered to have significant heritage value, since it is where political and other law prisoners were forced to work during their sentence.</p> <p>In terms of national monument act of South Africa, the area was declared as national monuments in 1996. Robben Island and its buffer zone is legally protected as a national heritage site through the National Heritage Resources Act (25 of 1999); the World Heritage Convention Act (49 of 1999); National Environmental Management Act (107 of 1998); National Environmental Management Protected Areas Act (57 of 2003). Robben Island museum council is the designated Management Authority ensuring the day-to-day management of the site and the conservation matters reside with the Chief Executive Officer (CEO).</p> <ol style="list-style-type: none"> <li>→ The request is made for the developer to consult SAHRA for their comments as per the National Heritage Resource Act 25 of 1999, section 36 (4), since the site is a cultural heritage site and contains significance cultural important artefacts.</li> <li>→ The developer must ensure that comments from SAHRA are attached on the Final Maintenance Management Plan.</li> <li>→ The Maintenance Management Plan (MMP) should include the methods and processes that the applicant will make as precaution measures to prevent any damage to an existing artefact.</li> <li>→ National Environmental Management Air Quality Act, 2004 (Act No. 39 of 2004) section 2 (1), provides that developer must ensure that they use of equipment that generate less amount of dust, hence the activities will cause negative impact on the environment. The applicant is requested to adhere with the National Environmental Management Air Quality Act, 2004 (Act No. 39 of 2004) to ensure a visible vicinity of the area and put in place precautionary measures to safeguard the environment.</li> <li>→ The department requests the applicant not to use heavy machinery as the site is considered a sensitive area and protected by the National Heritage Resource Act 25 of 1999.</li> </ol>
--	---	--

COMMENTS ON THE BAR IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998); EIA REGULATIONS, 2014 AS AMENDED IN SUPPORT OF AN APPLICATION FOR AN ENVIRONMENTAL AUTHORISATION IN RESPECT OF PROPOSED RESTORATION AND MAINTANACE OF THE BLUE STONE QUARRY, ROBBEN ISLAND, SOUTH AFRICA

¶  
¶

6. → The developer must draft the health and safety plan as per Occupation Health and Safety regulations to safeguard both the employees and environment from the damage that will emanate during the operations. ¶

¶

The **Directorate: Protected Areas Multilateral Programmes** is not supporting the proposed project awaiting you to provide the requested documents on the final Scoping Report/EIA. ¶

¶

Should you wish to correspond further on this matter kindly quote Reference No: EDMS202672\_Enquiries may be directed to the contact information provided at the top of this correspondence. ¶

¶

Yours sincerely ¶

¶

¶

**Ms Nomfundo Tshabalala** ¶

**Director-General** ¶

**Department of Environment, Forestry and Fisheries** ¶

**Letter signed by: Mr Sydney Nkosi** ¶

**Designation: Chief Director: Protected Areas Systems Management** - ¶

**Date:** ..... ¶

¶

<b>Response from EAP:</b>	<p>Dear Xola,</p> <p>Please see my responses to your comments below:</p> <ol style="list-style-type: none"> <li>1. The request is made for the developer to consult SAHRA for their comments as per the National Heritage Resource Act 25 of 1999, section 36 (4), since the site is a cultural heritage site and contains significance cultural important artefacts. EAP Response: SAHRA has been consulted during the Public Participation Process (PPP).</li> <li>2. The developer must ensure that comments from SAHRA are attached on the Final Maintenance Management Plan. EAP Response: SAHRA's responses have been included in the Comment and Response report of the MMP.</li> <li>3. The Maintenance Management Plan (MMP) should include the methods and processes that the applicant will make as precaution measures to prevent any damage to an existing artefact. EAP Response: These measures have already been included in the MMP, but they will be reviewed to ensure all measures to prevent damage to artefacts have been included.</li> <li>4. National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) section 2 (1), provides that developer must ensure that they use of equipment that generate less amount of dust, hence the activities will cause negative impact on the environment. The applicant is requested to adhere with the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) to ensure a visible vicinity of the area and put in place precautionary measures to safeguard the environment. EAP response: The comment has been noted, however no heavy construction equipment will be used during the proposed works on site and thus, large amounts of dust will not be generated.</li> <li>5. The department requests the applicant not to use heavy machinery as the site is considered a sensitive area and protected by the National Heritage Resource Act 25 of 1999. EAP response: The comment has been noted, no heavy machinery will be used during the proposed works on site.</li> <li>6. The developer must draft the health and safety plan as per Occupation Health and Safety regulations to safeguard both the employees and environment from the damage that will emanate during the operations. EAP response: The MMP is approved under the National Environmental Management Act ( 107 of 1998) and thus, inclusion of the Occupational Health and Safety regulations or health and safety plan is beyond the scope of the MMP. However, the contractor's Health and Safety officer will be informed that the regulations must be included in their health and safety plan.</li> </ol> <p>I trust that you will find the abovementioned in order.</p>
---------------------------	--

	Kind regards/vriendelike groete Megan			
Number	Organisation	Name	Tel/Cell	Email
8.	EPPA association	Mpho Masemola	n/a	eppaassociation@gmail.com
<b>Comment received</b>	Received, thank you. The EPPA/DAC/RIM is currently engaging on all heritage matters that will be finalized in the work shop, currently the EPPA has called on the Minister to halt any infrastructure development at RIM without consulting the main stakeholders, EPPA. The narrative, interpretation of the site must be designed according to the contribution of those prisoner's who worked there during the years of incarceration. We urge all those interested to benefit from our sweat and suffering to be patient until this matter is resolved amicably by RIM. Thanks EPPA secretary General Mpho Masemola			
<b>Response from EAP:</b>	Dear Mpho.  The comment has been noted and will be relayed to Robben Island Musuem.			
Number	Organisation	Name	Tel/Cell	Email
9.	SAHRA	Palmira de Almeida	n/a	
<b>Comment received</b>	Morning Magen Smith,  Mr. Ben Mwasinga, forwarded the email that was sent to him regarding the restoration and maintenance of the BSQ wall at Robben Island. I am in total agreement that the BSQ wall requires intervention and maintenance. So, with that regard could you please upload all the relevant information stated in the email onto a SAHRIS case application, and I will assess all the information and issue the permit once the case application has been created.  If you require any assistance creating a case application there are instructions in the FAQ sections on SAHRIS ( <a href="https://sahris.sahra.org.za/node/114397">https://sahris.sahra.org.za/node/114397</a> ), however if you still require assistance please contact our Inventory Unit (Leomile Mofutsanyana - <a href="mailto:lmofutsanyana@sahra.org.za">lmofutsanyana@sahra.org.za</a> ).  Please see attachment for the filled out registration form for interested and affected parties.  Have a wonderful day further, and if you require any other assistance, do not hesitate to contact me.			



	Kind Regards Palmira De Almeida
<b>Response from EAP:</b>	Dear Palmira,  We will apply for a permit on behalf of Robben Island Musuem.  Kind regards,  Megan

**Comments received during the revised PPP (start: 25 May 2021)**

<b>COMMENTS RECEIVED DURING THE 30 DAY PPP</b>				
<b>Number</b>	<b>Organisation</b>	<b>Name</b>	<b>Tel/Cell</b>	<b>Email</b>
<b>1</b>	DFFE	Zamalanga Langa		zlanga@environment.gov.za
<b>Comments Received:</b>	Good day.  Please find herein the attached decision for the above mentioned.  I hope you find all in order.  Thank you. <b>Please see attached letter (Appendix F48)</b>			
<b>Response from EAP:</b>	<b>Please see attached Comment and Response Report (Appendix F415)</b>			
<b>Number</b>	<b>Organisation</b>	<b>Name</b>	<b>Tel/Cell</b>	<b>Email</b>
<b>2</b>	Earthwatch	Peter Barham		peter.barham@bristol.ac.uk
<b>Comments Received:</b>	Dear Megan  I have attached a document with my comments on this proposal on behalf of the Earthwatch Penguin Project on Robben Island.			

	I look forward to learning the outcome of the proposal in due course.			
	Regards			
	Peter			
	<b>Please see attached letter (Appendix F49)</b>			
<b>Response from EAP:</b>	<b>Please see attached Comment and Response Report (Appendix F415)</b>			
<b>Number</b>	<b>Organisation</b>	<b>Name</b>	<b>Tel/Cell</b>	<b>Email</b>
<b>3</b>	OCEI	ACTING DIRECTOR: COASTAL CONSERVATION STRATEGIES		OCEIA@environment.gov.za
<b>Comments Received:</b>	<p>Good Day Megan</p> <p>I trust this email finds you well. Please find the attached comments on the Revised Maintenance Management Plan for the Proposed Restoration and Maintenance of the Blue Stone Quarry Wall, Robben Island in the Western Cape for your perusal and implementation.</p> <p>Kindly note that all future correspondence and documentation, enquiries, meetings and site inspection requests or information relating to EIA applications (hard copy and an electronic copy) should be submitted to our office or via OCEia@environment.gov.za / or Physical Address: Department of Forestry, Fisheries and the Environment (DFFE), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.</p> <p>Regards</p> <p>OCEIA</p> <p>Thandeka Mbambo</p> <p><b>Please see attached letter (Appendix F410)</b></p>			
<b>Response from EAP:</b>	<b>Please see attached Comment and Response Report (Appendix F415)</b>			
<b>Number</b>	<b>Organisation</b>	<b>Name</b>	<b>Tel/Cell</b>	<b>Email</b>
<b>4</b>	DEA&DP	Adri LaMeyer		Adri.LaMeyer@westerncape.gov.za
<b>Comments Received:</b>	Dear Megan,			

	<p>Trust you have been keeping well.</p> <p>Your e-mail below dated 26 May 2021 and the Revised Maintenance Management Plan (MMP) dated May 2021 for the proposed restoration and maintenance of the BSQ wall and the reinstatement of the limestone pathway, Robben island has reference.</p> <p>Thank you for the opportunity to comment on the above report. Please find attached this Department's consolidated comments on the Revised MMP.</p> <p>Kindly acknowledge receipt of this e-mail.</p> <p>Thank you,</p> <p>Regards</p> <p>Keshni Rughoobee</p> <p><b>Please see attached letter (Appendix F411)</b></p>			
<b>Response from EAP:</b>	<b>Please see attached Comment and Response Report (Appendix F415)</b>			
<b>Number</b>	<b>Organisation</b>	<b>Name</b>	<b>Tel/Cell</b>	<b>Email</b>
5	City of Cape Town	Nausheena Parker-Mallick		Nausheena Parker <Nausheena.Parker@capetown.gov.za>
<b>Comments Received:</b>	<p>Good Morning Megan</p> <p>Please find the City's comments on the Revised Maintenance Management Plan for the Blue Stone Quarry, Robben Island attached.</p> <p>Please confirm receipt of these comments.</p> <p>Kind regards</p> <p>Nausheena Parker-Mallick</p> <p><b>Please see attached letter (Appendix F412)</b></p>			
<b>Response from EAP:</b>	<b>Please see attached Comment and Response Report (Appendix F415)</b>			
<b>Number</b>	<b>Organisation</b>	<b>Name</b>	<b>Tel/Cell</b>	<b>Email</b>

<b>6</b>	SANCOBB	Katta Ludynia		katta@sanccob.co.za
<b>Comments Received:</b>	Dear Megan Please find attached SANCCOB's comments on the Revised Management Plan for the Blue Stone Quarry.  Best regards Katta <b>Please see attached letter (Appendix F413)</b>			
<b>Response from EAP:</b>	<b>Please see attached Comment and Response Report (Appendix F415)</b>			
<b>Number</b>	<b>Organisation</b>	<b>Name</b>	<b>Tel/Cell</b>	<b>Email</b>
<b>7</b>	Cape Nature	Ismat Adams		Ismat Adams <iadams@capenature.co.za>
<b>Comments Received:</b>	Good day  See attached CapeNature's comment on this application.  Kind regards, Ismat Adams <b>Please see attached letter (Appendix F414)</b>			
<b>Response from EAP:</b>	<b>Please see attached Comment and Response Report (Appendix F415)</b>			
<b>Number</b>	<b>Organisation</b>	<b>Name</b>	<b>Tel/Cell</b>	<b>Email</b>
<b>8</b>	EPPA	Mpho Masemola		Mpho Masemola <eppaassociation@gmail.com>
<b>Comments Received:</b>	Noted with thanks. But who appointment your company? When and why are you so interested in our heritage? Who told you that we don't have any capacity to restore our heritage?  Thanks			
<b>Response from EAP:</b>	Dear Mpho,			

	<p>I trust that you are well.</p> <p>To answer your questions, please see the replies in red below:</p> <p>But who appointment your company?</p> <p>Robben Island Museum (RIM) have appointed Enviroworks to compile and submit a Maintenance Management Plan for the restoration and maintenance of the Blue Stone Quarry wall. RIM are currently responsible for maintaining structures on Robben Island especially those that have significant heritage value. As part of this responsibility, RIM propose to maintain the Blue Stone Quarry and outstanding heritage value by restoring the breached section of the wall.</p> <p>When and why are you so interested in our heritage?</p> <p>Enviroworks were appointed in October 2020 to compile and submit a Maintenance Management Plan on behalf of RIM.</p> <p>Who told you that we don't have any capacity to restore our heritage?</p> <p>An analysis of who has the capacity to restore the wall is beyond the scope of Enviroworks appointment. We are only appointed to compile and submit the Maintenance Management Plan on behalf of RIM.</p> <p>Please note that second commenting period on the Maintenance Management Plan opened on 25 May 2021. You should have received an email from me with the documents attached. If not, please do indicate so. You are welcome to submit a formal comment on the plan by 24 June 2021.</p>
--	---

	<p>I trust that you will find the above mentioned in order, but please do not hesitate to contact me should you have any queries.</p> <p>Kind regards/vriendelike groete</p> <p>Megan</p>			
Number	Organisation	Name	Tel/Cell	Email
8	Earthwatch	Peter Barham		
<b>Comments Received:</b>	<p>Hi Megan</p> <p>I'll try to be brief. I very strongly disagree with many of your responses especially those that make false statements. In particular you state in your very first comment that "Please note that the works are proposed start at 09:00 and end at 17:00, both times suit the general comment of starting 120 minutes after sunrise and 60 minutes before sunset." A glance at any Almanac will show this is far from true. in fact there are 152 or 153 days in every year when sunrise on Robben Island is less than 120 minutes before 09:00 and/or sun set is less 60 minutes before 17:00. So anywhere your response is that the mitigation that limiting the hours of work to 9 to 5 is adequate to avoid conflict with the penguins you should change the text to make clear that this is only true in the summer months (or change the recommendation to limit the working hours to not early than 120 minutes after sunrise and not later than 60 minutes before sunset (which would only restrict the working hours on 112 days of the year).</p> <p>On discussing the route, you first dismiss out of hand the evidence that the southerly route will pass at least as many penguins crossing the road as the northerly route because the data on the number was collected after 5pm. To do so is nonsensical – the relative numbers along either route will be similar provided the times the data are collected are similar in both data sets as they here. The time the data is collected is completely irrelevant. I find such an out of hand dismissal not only insulting but also an affront to my own scientific reputation. Further on the same point you state: "The discussions between the appointed specialists and stakeholders including Earthwatch and SANCOBB (sic) has already occurred. During the compilation of the avifaunal assessment report, both Earthwatch and SANCOBB (sic) were consulted to ensure that all impacts on avifauna were taken into consideration in the avifaunal assessment. This correspondence is included as an appendix to the avifaunal assessment report." Yet if you look at appendix C2 where the full correspondence is presented you will see that there has been no discussion of the route – the first I was aware of the suggestion of using a northerly route it was when I read the MMP. So please do not suggest that Earthwatch and SANCCOB were consulted on this or that Prof Underhill or anyone on his team discussed the suggestion with me. This is why I feel it necessary to get round a table and try to work out the least harmful route. I am not saying which may be the least bad route, although my gut feeling is that the southerly route is likely to be preferable, only that this is something that needs to be thrashed out and not set in stone at this stage.</p>			

	<p>Finally, I am gravely concerned about the issues about where the works end – and what will happen at the Southern end. You regularly state that because the crossing is 20 to 30m south of the place where they cross the revetment wall the works will not impinge on them. This is at best inaccurate if not downright misleading. The route the penguins take to cross the wall as noted in the diagram and photo in my comments, shows they walk southwards along the bottom of the wall on the sea side from roughly the centre of the existing collapsed wall and then continue along the sea side of bottom of the existing revetment wall to a point about 30m south before turning back in a north-east direction to climb the wall getting to the top just before end of the overhang (see diagram submitted as part of my comments – it shows that the penguins have to turn back on their path). Hence they will be disturbed by any work on the sea side of the wall. Further it is clear from the comments from Dr Edward Matenga that there is a plan to deal with the overhanging part of the wall. This must involve works at least up to the end of the overhang which is precisely where the penguins end their climb over the wall and so will most certainly affect them. It also suggests by what is not said that this plan may be different from the purely manual process that is being used elsewhere and tuis possibly not in accord with the purely manual methods and process described in the MMP.</p> <p>Please let me know what changes, if any, you make before submitting the MMP</p> <p>Yours</p> <p>Peter</p>
<p><b>Response from EAP:</b></p>	<p>Hi Peter,</p> <p>Please see my responses in red below:</p> <p>I'll try to be brief. I very strongly disagree with many of your responses especially those that make false statements. In particular you state in your very first comment that <i>"Please note that the works are proposed start at 09:00 and end at 17:00, both times suit the general comment of starting 120 minutes after sunrise and 60 minutes before sunset."</i> A glance at any Almanac will show this is far from true. in fact there are 152 or 153 days in every year when sunrise on Robben Island is less than 120 minutes before 09:00 and/or sun set is less 60 minutes before 17:00. So anywhere your response is that the mitigation that limiting the hours of work to 9 to 5 is adequate to avoid conflict with the penguins you should change the text to make clear that this is only true in the summer months (or change the recommendation to limit the working hours to not early than 120 minutes after sunrise and not later than 60 minutes before sunset (which would only restrict the working hours on 112 days of the year).</p> <p><i>EAP response: The comment is acknowledged. As per your comment to Professor Underhill, the general consensus of Penguin is as follows: We have some data on the time of day penguins cross the transponder reader. From that data we can see that ca. 90% of the activity takes place after 5pm and before 9am; and ca. 95% after 4:15 pm and before 9:45am.</i></p>

If any Penguins do decide to cross the Quarry after the above times, the proposed works will not affect the southern route nor the middle route straight through the quarry (initially). As the wall is restored, the middle penguin route is expected to be impacted, as already mentioned. By this time (as per the avifaunal assessment), the 10% of penguins that use the middle route are expected to be habituated by the presence of humans and would have started using the southern route. As already mentioned, the southern is not expected to be impacted. Should any penguins decide to make their way to the ocean during working times, mitigation measures have been included to reduce road kill and any “harassment” that may occur. Please note that I do mention:

*Should fog occur, extra stringent mitigation measures will be implemented to avoid the movement of penguins including avoiding the penguin pathway stipulated in the avifaunal assessment.*

On discussing the route, you first dismiss out of hand the evidence that the southerly route will pass at least as many penguins crossing the road as the northerly route because the data on the number was collected after 5pm. To do so is nonsensical – the relative numbers along either route will be similar provided the times the data are collected are similar in both data sets as they here. The time the data is collected is completely irrelevant. I find such an out of hand dismissal not only insulting but also an affront to my own scientific reputation. Further on the same point you state: *“The discussions between the appointed specialists and stakeholders including Earthwatch and SANCOBB (sic) has already occurred. During the compilation of the avifaunal assessment report, both Earthwatch and SANCOBB (sic) were consulted to ensure that all impacts on avifauna were taken into consideration in the avifaunal assessment. This correspondence is included as an appendix to the avifaunal assessment report.”* Yet if you look at appendix C2 where the full correspondence is presented you will see that there has been no discussion of the route – the first I was aware of the suggestion of using a northerly route it was when I read the MMP. So please do not suggest that Earthwatch and SANCCOB were consulted on this or that Prof Underhill or anyone on his team discussed the suggestion with me. This is why I feel it necessary to get round a table and try to work out the least harmful route. I am not saying which may be the least bad route, although my gut feeling is that the southerly route is likely to be preferable, only that this is something that needs to be thrashed out and not set in stone at this stage.

EAP response: Firstly, it was not mentioned that the southerly route will pass as many penguins as the northerly route. My point was that the data that you presented were recorded after 5 pm and was specifically referring 17:52 which is irrelevant to the scope of works since vehicles are not expected to pass through Cornelia road during this time nor are any personnel expected in the quarry. As you have mentioned, most penguins are active after 5pm which is exactly what your observations proved. Hence, the mitigation measures to limit personnel activity to 17:00 has been suggested. Please note that should Professor Underhill and his team have observed any penguins during their site inspection (which occurred after 09:00 and before 17:00), it would have been included in their assessment.

Regarding the choice of route, it was based on the avifaunal assessment compiled by Professor Underhill. The Northern Route was suggested not only due to impacts to Penguins, but also other avifauna:



	<p><i>Approaching from the south involves a longer route that, in spring and summer, will disturb breeding Kelp Gulls and Swift Terns. It will also cause unnecessary traffic at the point where penguins cross the paved road on their routes to and from their nests and the quarry.</i></p> <p>Nevertheless, I do mentioned the following comment is response to your previous comments:</p> <p><i>However, should DFFE find it necessary that additional discussions must take place, these discussions should be led by Robben Island Museum and relevant specialists including Earthwatch.</i></p> <p>The above comment still stands.</p> <p>What I will also include in the Final MMP is that the Northern Route should be confirmed with the Earthwatch and SANCOBB prior to the construction works begin.</p> <p>Finally, I am gravely concerned about the issues about where the works end – and what will happen at the Southern end. You regularly state that because the crossing is 20 to 30m south of the place where they cross the revetment wall the works will not impinge on them. This is at best inaccurate if not downright misleading. The route the penguins take to cross the wall as noted in the diagram and photo in my comments, shows they walk southwards along the bottom of the wall on the sea side from roughly the centre of the existing collapsed wall and then continue along the sea side of bottom of the existing revetment wall to a point about 30m south before turning back in a north-east direction to climb the wall getting to the top just before end of the overhang (see diagram submitted as part of my comments – it shows that the penguins have to turn back on their path). Hence they will be disturbed by any work on the sea side of the wall. Further it is clear from the comments from Dr Edward Matenga that there is a plan to deal with the overhanging part of the wall. This must involve works at least up to the end of the overhang which is precisely where the penguins end their climb over the wall and so will most certainly affect them. It also suggests by what is not said that this plan may be different from the purely manual process that is being used elsewhere and tuis possibly not in accord with the purely manual methods and process described in the MMP.</p>
--	--

	<p>EAP response: Please note that ALL impacts to the Penguins have already been assessed in the avifaunal assessment. Within the avifaunal assessment, the penguin landing area (for the southern access route) is clearly demarcated and the report clearly states that no works will be completed in this area. Nevertheless, taking your photographs and maps into account, the landing area is still approximately 10 m or more away from the overhang or any potential works (please also note that the avifaunal assessment clearly states that there is approximately a 20-30 m no go area north of the penguin route where not works are allowed to be conducted). Therefore, negating any significant impacts to the Penguin routes as mentioned in the Avifaunal Assessment. I will, however, include in the final Maintenance Management Plan that should the landing route be affected in any manner, adequate mitigation measures must be implemented in consultation with an avifaunal specialists (which may included the installation of a penguin ramp). Direct conflict with any penguins is also expected to be a minimum since the works are expected to take place within the penguins least active crossover times.</p> <p>In terms of disturbing the southern access route, the avifaunal assessment clearly states that no works will be conducted within the access route.</p> <p>Please note that the MMP is also based on the 2020 implementation plan which clearly stipulates a manual process for restoring the wall. Any other process than this manual process should not be implemented unless the correct authorisation is obtained.</p> <p>Kind regards/vriendelijke groete</p> <p>Megan</p>
--	---