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22 June 2021

Attention:

Ms Megan Smith
Enviroworks

Comments on Revised Management Plan for Blue Stone Quarry (BSQ) Restoration on Robben Island

Dear Ms Smith,
Please find below SANCCOB's comments on the Revised Management Plan for the Blue Stone Quarry restoration on Robben Island.

As stated in previous comments (submitted in February 2021), following correspondence and during the site visit conducted in May 2021, SANCCOB opposes the planned restoration of the Blue Stone Quarry due to the impact it will have on at least two endangered seabird species breeding in close proximity to the site as well as to other seabirds and biodiversity on Robben Island.

SANCCOB fully acknowledges the historic importance of the Blue Stone Quarry but does not agree to the need to restore the wall in its full extent, deliberately accepting the loss of biodiversity in the process, especially of species listed as Endangered by the International Union of for Conservation of Nature (IUCN) as well as protected under South African legislation (TOPS Marine under the National Biodiversity Management: Biodiversity Act). During the site visit, several options were discussed to allow Robben Island Museum's responsibility to its heritage and the need to preserve and convey the important messages to the public as well as to preserve its biodiversity. None of these options have been incorporated into the Revised Management Plan.

The duration of the proposed restoration work is also longer than initially discussed. It is now expected to take one year whereas previously 6 months or shorter had been discussed. The future need for maintenance is not clearly defined in terms of frequency and possible extent. Regular maintenance of the wall will be required due to the high risk and probability of future destruction of parts of the wall due to wave action and increasing storm driven swell heights (according to Climate change predictions and modelling done by the CSIR for the South African coastline) leading to increased coastal erosion which is already evident in close proximity to the BSQ wall. Thus, disturbance to biodiversity must be assessed for the entire five years (and longer), not just for the initial restoration period. However, the current Management Plan does not take any long-term maintenance and the disturbance caused into account. The plan assumes future damage and required maintenance would be of minor extend, however, the initial storm damaging the BSQ wall already took out several metres of wall which is not minor and would require extensive restoration work to take place, possibly several times a year, most likely in winter which is the main breeding period for the endangered African penguin in the area.

Please find some more specific comments to the document below:

- 4.3.: Anticipated restoration and maintenance activities and site layout plan:
 - Large rocks will need to be moved from the stockpile close to BSQ to the warehouse at the harbour, thus vehicle use will be more than just for personnel transport, most likely several times a day.

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Dr A Makhado, Dr A Wolfaardt, V Boule.

- It is doubtful that the large rocks can be only transported from the stockpile to the road by wheelbarrow. How will they be lifted from the stockpile and transported to the road and loaded onto the vehicle?
- How many daily trips to the site are expected, for staff transport, transport to ablution facilities, for rock transport etc? During the site visit, it was discussed that either no vehicle access would be allowed or limited to once in the morning and once in the afternoon, this is clearly not that case.
- Will there be any shade provided for the laydown area? The risk is that nearby vegetation will be used for shade if no other shade is provided (as well as for quick toilet breaks).
- The access to the stockpile is located south of where the penguins cross, thus the statement that the access via Cornelia Road from the north will avoid disturbance to penguins crossing is not correct. How close will the vehicle be allowed to be to the stockpile? Where is the turning around area for the vehicle on the road?
- Please correct the spelling of SANCCOB on page 13 (and page 33 &40).
- Monitoring requirements going forward would need to be discussed with SANCCOB regarding the use of the SANCCOB Ranger as this position is funding dependent and SANCCOB cannot commit to have a ranger based on Robben Island for the entire duration of the proposed monitoring period (especially if future maintenance is required).
- Table 4:
 - Noise impact: Movement of vehicles and restoration activities will not only be nuisance to the local bird population but cause severe disturbance preventing birds from breeding in the area. The species affected include endangered seabirds like African penguins and Cape cormorants, whose breeding attempts should not be discouraged but rather encouraged seeing their current population declines.
 - Small amounts of domestic waste will be generated by the personnel during refreshment intervals. Lack of proper management of the waste on site may lead to wind-blown litter –a proper management of domestic waste needs to be implemented.
 - Ecology Fauna: The removal of the stockpile will result in disturbance and loss of suitable habitat for indigenous fauna using the stockpile. Has there been a specialist report on the reptile fauna on Robben Island?
 - Ecology Avifauna:

The plan does not adequately describe the level of sensitivity and should state the conservation status of the African penguin and Cape cormorants. The restoration work will certainly impact these species.

 - **African penguins:** the restoration does not only alter the pathways and access points but operations of up to a year (and then repeatedly if further maintenance is needed which is suspected) may also prevent birds breeding in the area, which would reduce the number of breeding pairs of this endangered species. In recent years, the area around the Blue Stone Quarry has become more important for the birds. Numbers of African penguins breeding on Robben Island have declined over the last years and this, together with the dramatic decline of the species at some of the other main colonies, may lead to the species being classified as “Critically endangered” by the IUCN soon. Any disturbance of this species, including displacement from potential breeding sites (by reducing access roads or

disturbance along the way), will lead to further population declines and can push this species over the edge of extinction. Robben Island Museum (RIM) might need to re-evaluate their stance on biodiversity, seeing that the African penguin and other seabirds are already used as a tourist attraction for people to visit Robben Island.

- **Cape cormorant:** In 2021 (and in previous years), the Cape cormorants bred on the harbour breakwaters AND on the stockpile at the BSQ, thus having breeding space available at the harbour does not mean Cape cormorants won't attempt to also breed close to the BSQ. As for African penguins, breeding of Cape cormorants must be encouraged, seeing their population declines, not discouraged. We are also not sure where other potential breeding areas mentioned in the Avifaunal Report are? We have spoken to several researchers that have worked on seabirds on Robben Island for several years and we can't remember Cape cormorants breeding at different sites besides the harbour and the BSQ. Large numbers of Cape cormorants are currently (June 2021) roosting at the BSQ and it is to be expected that these birds will initiate breeding at the site in the near future again. Being a TOPS listed species, any form of harassment (in terms of approaching nest sites, destruction of nest sites, removing of eggs or birds) will result in legal action being taken against the person responsible.
 - Other species: Swift terns are not mentioned here, however, Robben Island is South Africa's largest breeding colony for this species and swift terns have used the area around the BSQ in previous years to breed. The species has been disturbed at other sites closer to the inhabited parts of Robben Island, however the BSQ site has experienced the least human disturbance making it an important refuge and breeding area for the Swift terns. Disturbance of swift terns at the BSQ will lead to birds breeding at the settlement or at other sites with planned development, like Alpha 1.
 - Seeing that maintenance is planned or predicted for several years following the reconstruction of the quarry wall, the "temporary disturbance" mentioned would rather be permanent or repeated disturbance which would lead to birds not being able to breed in the area at least for several years. Seeing that other areas of the island are also being disturbed regularly or affected by planned developments (like the Alpha 1 development, extension of tourism activities etc), this will lead to cumulative disturbance and reduced breeding space at different sites on the island and threaten the successful breeding of several seabird species, including those listed as threatened by the IUCN and protected under the TOPS regulations, in the long run. The biodiversity and its protection should be in RIM's interest as besides the historic importance of the island, an important draw card for future tourism activities and thus the financial sustainability of RIM is the biodiversity, especially the seabird and bird species found on the island.
- 6.3. ECO's role: ECO visits are required before the start of the restoration activities to assess bird activity on site. If birds are being found to actively breed in the close proximity to BSQ, restoration work will not be able to commence, especially if it is a TOPS listed species, such as

African penguin, Cape cormorant or swift tern. Bi-monthly visits are not sufficient to identify disturbance issues to the local avifauna or misbehaviour on the side of the construction team. Daily monitoring is recommended, however, roles and responsibilities of ECOs and avifaunal monitors need to be clarified, as well as the financial reimbursement for monitoring and assessments.

- 8. Specialist Assessment:
 - Looking at Figure 4 it is not clear how the area around the penguin crossing can be a no-go area but the stockpile south of the penguin crossing will need to be accessed for rock collection. Again, where will be the furthest southern location the vehicle can access to collect rocks? Will all rocks be transported by wheelbarrow to the vehicle stationed north of the penguin crossing? Where will the vehicle turn around?
 - As mentioned above, Cape cormorants have always bred at the Murray Harbour, including in years when also breeding at the BSQ location. Thus, even though a call for no disturbance at the breakwater at the harbour is desired (and should already be the case), this will be by no means a security that Cape cormorants won't also attempt to breed at the BSQ site. Once breeding has commenced by the Cape cormorants, all work would have to stop as approaching a breeding Cape cormorant by less than 5m, destruction of nests, removal of nest content etc is all considered as "harassment" in the TOPS regulations and legal actions may be taken against any person contravening to these regulations.
 - Who will fund the independent bird monitor and will that be a separate person than the ECO? Will the bird monitor have the authority to stop work with immediate effect?

- 9.1. Mitigation measures for environmental impacts associated with proposed maintenance activities: 1:10 Ecology
 - a & b) Is there an Incident Response Plan for handling bird incidents? What incidents do you envisage?
 - f) Mr Andile Mdluli is the RIM/SANCCOB Seabird Ranger, Mr Sabelo Mdlala is RIM's Environmental Manager
 - g) What is a minimum regarding vehicle traffic? Several trips to and from the quarry are anticipated which will cause major disturbance along a long section of the African penguin colony (starting at the harbour all along Cornelia Road). What are rules regarding road kills, disturbance of nests close to the road, penguins observed running away?
 - q) what do you consider necessary harassment? Seeing that harassment is strictly prohibited.
 - aa) further consultation between SANCCOB and RIM is needed to determine the role of the RIM/SANCCOB Seabird Ranger in this process
 - gg) what is the process for maintenance work in regards to breeding birds, will maintenance work be delayed if birds are observed breeding at the site?
 - Ll) the access to the stockpile in relation to the no-go zones and especially the penguin crossing is still not clear.
 - Mm) is there a snake handler permanently on the island?

In our opinion, the Revised Management Plan does not recognize the potential long-term threats to several endangered seabird species and overall biodiversity on Robben Island and does not give sufficient information regarding the management and mitigation during the proposed development, not only for the initial work (estimated to last up to one year) but also for ongoing maintenance.

Access to the site and the frequency of road traffic along Cornelia Road is not clear to us and needs to be quantified and proper rules and regulations put in place.

We are also not sure of alternative strategies for the highly likely situation that birds start breeding in close proximity before or during the construction and during planned maintenance work in the future.

As part of SANCCOB's commitment to the protection of seabirds, we are closely monitoring the situation on Robben Island to ensure the safety of the birds on the island. SANCCOB is working with the relevant stakeholders to make sure that all parties involved are acting in accordance with all relevant legislation and properly performing their legal obligations.

Kind regards



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