

MANYONI

— PRIVATE GAME RESERVE —

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Manyoni Private Game Reserve Opposition to ESKOM's Northern KwaZulu-Natal Strengthening Project

The Manyoni Private Game Reserve represents the following interested in affected parties in the ESKOM Northern KZN Strengthening Project:

SHAREHOLDERS
Rhino River Lodge (Pty) Ltd
Autumn Star Trading 629 Pty Ltd
C J Watkins Trust-Trustees
Denzil Andrews Family Trust-Trustees
Flack Family Trust-Trustees
Hadedda Trust-Trustees
Little Swift Investments 322 (Pty) Ltd
Rockwood Leisure (Pty) Ltd
Thuleni Trust-Trustees
268 Florida Road Cc
Luthuli Homeowners Association
Buffshelf 15 Trust-Trustees
Civinetix (Pty) Ltd
Cornelis Moll
Prinwal Ranch (Pty) Ltd
Cricket Settlement Trust
African Spirit Safaris (Pty) Ltd
Pmb Office Solutions (Pty) Ltd
G P Moodley Family Trust
Glen Eden Trading 134 Cc
Jr Vivier Family Trust
Langton Close Trust
Loophole Trading & Investments 115 Pty Ltd
Mike Sneddon As Nominee
National Government Of Rsa
Saddle Path Props 5 (Pty) Ltd
Shazagistix Pty Ltd
Tongaat-Hulett Group Limited
Sharman & Campbell (Pty) Ltd
Manyoni Private Game Reserve

Table of Contents

Abbreviations	3
Forward	3
Appendices	4
Appendix 1 – Provincial Gazette Vol. 3 No. 259	4
Appendix 2 – Provincial Gazette Vol. 9 No. 1522	4
Appendix 3 – Lepidopterists' Society of Africa Letter	4
Appendix 4 – MPGR Vulture Incidents	4
Appendix 5 – ZAP-Wing opposition to Eskom lines at Manyoni	4
Appendix 6 – Heligistix opposition letter	4
Appendix 7 – IBA Status	4
Appendix 8 – How do High Voltage Overhead Transmission Line impact the environment	4
A. Significant socio-economic impact	5
B. Impact on the biophysical environment, flora and fauna	9
C. Legal implications	13
Final statement	16

Abbreviations

EAP – Environmental Assessment Practitioner

EKZNW – Ezemvelo KZN Wildlife

IBA – Important Bird Area

IUCN – International Union for the Conservation of Nature

MPGR – Manyoni Private Game Reserve (formerly Zululand Rhino Reserve)

NEMA – National Environmental Management Act (Act No. 107 of 1998)

NEMBA – National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)

NEMPAA – National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003)

NFA – National Forests Act, 1998 (Act No. 84 of 1998)

WWF – World Wildlife Fund

ZRR – Zululand Rhino Reserve

Forward

Manyoni Private Game Reserve (MPGR) is a **21,190.98** hectare big-5 game reserve, situated in Northern Zululand, KwaZulu-Natal. The reserve was proclaimed a Nature Reserve under Section 23 of the National Environmental Management: Protected Areas Act 2003 (Act No. 57 of 2003) via Government Gazette Notice No. 65 on 23rd April 2009 and Government Gazette Notice No. 1522 on the 9th October 2015. Please refer to Appendix 1 and 2. MPGR was granted the highest conservation status due to the contribution the reserve makes to national and provincial conservation targets. The reserve plays a critical role in conservation on both a provincial and national level, as well as to the local economy, providing employment to the people of the UMkhanyakude District Municipality.

ESKOM Holdings Limited SOC Ltd (ESKOM) is proposing a Northern KwaZulu-Natal Strengthening Project, which aims to reduce voltage drops experienced in the area and prevent a voltage collapse in light of increasing demand. The proposed project consists of 4 smaller projects:

1. Iphiva 400/132 kV Main Transition Substation (MTS)
2. 150 km Normandie-Iphiva 400 kV Transmission Powerline
3. 165 km Iphiva-Duma 400 kV Transmission Powerline
4. 132 kV Distribution Powerlines

This document aims to outline our reasoning for contesting particular sections of two of the abovementioned projects:

- **the Eastern Iphiva-Duma 400 kV Transmission Powerline.**
- **the Iphiva 400/132 kV Main Transition Substations 1 to 5.**

Reasons for contesting the aforementioned applications:

- A. Significant socio-economic impact
- B. Impact on the biophysical environment, fauna and flora
- C. Legal implications

Appendices

Appendix 1 – Provincial Gazette Vol. 3 No. 259

Appendix 2 – Provincial Gazette Vol. 9 No. 1522

Appendix 3 – Lepidopterists' Society of Africa Letter

Appendix 4 – MPGR Vulture Incidents

Appendix 5 – ZAP-Wing opposition to Eskom lines at Manyoni

Appendix 6 – Heligistix opposition letter

Appendix 7 – IBA Status

Appendix 8 – How do High Voltage Overhead Transmission Line impact the environment

A. Significant socio-economic impact

MPGR consists of 9 commercial lodges as well as 11 private villa's, camps and lodges. There are currently another three new commercial lodges in the development phase.

- 1) Bayete Zulu Boutique Lodge - Commercial
- 2) Little Bayete Lodge – Commercial
- 3) Bayete Private Lodge – Commercial
- 4) Rhino River Lodge – Commercial
- 5) Rhino Sands Lodge – Commercial
- 6) Zebra Hills Lodge – Commercial
- 7) Leopard Mountain Lodge – Commercial
- 8) Mavela Game Lodge – Commercial
- 9) African Spirit Game Lodge – Commercial
- 10) Manyoni Tented Camp – Private
- 11) Hlekhani Homestead – Private
- 12) Fever Tree Lodge - Private
- 13) Chaos House – Private
- 14) Cycad House – Private
- 15) Chick's House – Private
- 16) Denzil's House – Private
- 17) Guy's House – Private
- 18) Nonile Lodge – in development
- 19) Manyoni Lodge – in development
- 20) Ibhubesi Lala – in development

The reserve as a whole employs 246 people the majority from the local communities bordering the reserve and therefore supports over 200 families. Many of these staff were unskilled and have acquired skills and experience in hospitality, maintenance, construction and conservation over the years of working for MPGR. Furthermore temporary employment opportunities create between 400 and 600 man-days a year, supporting mainly women from the local communities.

MPGR follows an eco-tourism model, with most of our income generated by tourists and visitors to the reserve. Many of these visitors come to the bush to experience natural wild environment undisturbed by humans. The core of the reserves business model is based on providing a high-quality wildlife experience in a wild environment with little to no human footprint. The proposed powerlines will impact the reserve aesthetics and the visual impact will affect every single lodge and camp as the tourists traverse the whole the reserve.

Powerlines destroy the sense of place, the remote and untouched experience as the skyline, sunsets and sunrises are contaminated with a huge manmade structure.

The eastern Iphiva-Duma line will impact the lodge occupancies and therefore the financial sustainability of these lodges which will lead to job losses and negatively impact of the local economy. The wildlife tourism industry is a fiercely competitive environment and therefore every component of the guest experience has to be top-class to ensure return clients and good reviews.

As a consequence of visual scarring from both the proposed Iphiva substations and the proposed eastern corridor would undoubtedly lead to job losses for local communities impacting on their

livelihoods. The socio-economic impact cannot be stressed enough as communities will be affected. These communities comprise of low-skilled individuals from an area where the unemployment rate currently is 42,3%. The Living Standards Market (LSM) segmentation classifies this community as LSM 1-3 which are of the poorest in the country. Below is a summary of the various LSM groups based on income:

	Average Household Income	
	Jun10	Jun11
LSM 1	R1,496	R 1 363
LSM 2	R1,732	R 1 929
LSM 3	R2,052	R 2 258
LSM 4	R2,829	R 3 138
LSM 5	R3,832	R 4 165
LSM 6	R6,398	R 6 322
LSM 7	R10,066	R10 255
LSM 8	R13,698	R 14 014
LSM 9	R18,414	R 19 654
LSM 10	R27,143	R 29 512

Figure 1: Summary of the LSM groups based on income

Travel and tourism directly generated 679,500 jobs in 2014. This constitutes 4.5 per cent of total employment. This was forecasted to grow by 3.8 per cent in 2015 to 705,500, which constitutes 4.6 per cent of total employment. Figure 3 illustrates the direct contribution of travel and tourism to employment. This includes employment through hotels, travel agents, airlines and other passenger transportation services (excluding commuter services). It also includes, for example, the activities of the restaurant and leisure industries directly supported by tourists. By 2025, travel & tourism will account for 948,000 jobs directly, an increase of 3.0 per cent pa over the next ten years. See Figure 2 below.

SOUTH AFRICA: DIRECT CONTRIBUTION OF TRAVEL & TOURISM TO EMPLOYMENT



Figure 2: Direct contribution of travel & tourism to employment in South Africa

Unemployment remains one of the key socio-economic challenges facing South African society. Despite employment growing more rapidly than the working age population, the unemployment rate has continued to inch upwards as labour force participation rates rise. By 2015, 26.3 per cent of the labour force was unemployed.

Figure 8 "Tourism in the community"



Source: The South African tourism planning toolkit

Figure 3: Impacts of tourism in the community

Empowering the community through “on the job training” has had a dramatic impact on the community and the generations to come.

Over the last decade, tourism has continued to grow and diversify, becoming one of the fastest-growing economic sectors in the world. It is therefore encouraging that the South African Tourism (SAT) council recently presented a briefing on its vision, mandate and governance, as well as its strategic objectives and performance measurements up until 2020.

SAT plans to raise the number of annual tourist arrivals in the country to 13.7 million by 2020, and in doing so, increase the total revenue contribution of the tourism sector to the economy from R99.4 billion in 2015 to R155 billion in 2020. SAT also aims to boost domestic tourism in terms of domestic holiday trips taken from 3.1 million in 2013/14 to 3.5 million by 2020. According to hospitality studies done by PWC, caravan/camping sites, bush lodges and other accommodation is projected to grow at a compound annual rate of 9.8 per cent and will be the fastest-growing category, raising its share of the market from 19.8 per cent in 2012 to 20.4 per cent in 2017. Strategically, the MPGR is well-positioned to enjoy growth in the industry, made apparent through increased occupancy rates, which provides an ideal opportunity for eco-tourism lodges. We therefore cannot put such potential growth, as well as potential increased socio-economic opportunities at risk.

As mentioned, three new commercial lodges, all on the eastern side of the reserve, are in the planning or development phase, revealing that the reserve has attracted investors wanting to establish eco-tourism businesses within MPGR. One of these planned commercial lodges is a community-owned lodge – owned by the Mbulungwane Communal Property Trust. The proposed

ESKOM Iphiva-Duma eastern corridor will go through community-owned land within the reserve and jeopardise the success of this project. The presence of powerlines within wildlife areas devalues land by a significant number.

Not only will the lodges suffer from lower occupancies and lower income, their land values will be much lower. The powerlines could also result in disinvestment in the reserve, which will have ramifications such as job losses and negative impacts on the local economy. MPGR was valued close to half a billion rand and therefore devaluation will result in significant loss. High tension lines do impact on tourism potential (See Appendix 8).

B. Impact on the biophysical environment, flora and fauna

The IUCN began compiling a Red List of Threatened Species in 1964. The list aims to comprehensively evaluate the extinction risk of thousands of species and subspecies globally, and categorise them in the following order of increasing threat level: Least concern, Near Threatened, Vulnerable, Endangered, Critically Endangered, Extinct in the Wild and Extinct. The following IUCN Red List animal species currently occur and are being protected with the reserve:

- African Elephant (*Loxodonta Africana*) – Vulnerable
- African Wild dog (*Lycoan pictus*) – Endangered
- Black Rhinoceros (*Diceros bicornis*) – Critically Endangered
- Brown Hyena (*Parahyaena brunnea*) – Near threatened
- Cheetah (*Acinonyx jubatus*) – Vulnerable
- Giraffe (*Giraffa Camelopardalis*) – Vulnerable
- KwaZulu-Natal Hinged-back Tortoise (*Kinixys natalensis*) – Near Threatened
- Leopard (*Panthera pardus*) – Vulnerable
- Mountain Reedbuck (*Redunca fulvorufula*) – Endangered
- Plains Zebra/Burchell's Zebra (*Equus quagga*) – Near Threatened
- White Rhinoceros (*Ceratotherium simum*) – Near Threatened

In 2007, we received a letter from the Lepidopterists' Society of South Africa stating that our reserve is the only locality that they know of, which hosts the rare butterfly *Anthene minima*. This species is listed as rare in the Red Data Book published by CSIR in 1989. They also explained that a widely-occurring geometrid moth *Nychiodes tyttha* has been found on the reserve. This species is rarely seen in eastern and south-eastern Africa, and the reserve is the only locality in which it has been found in South Africa. They found 101 species of moths from the Geometridae family alone on the reserve, giving an indication of the high level of biodiversity in the MPGR. Please refer to Appendix 3.

MPGR contains an endangered vegetation community – 17,054 hectares of Zululand Lowveld. Conserving this vegetation type contributes a further 15 % to provincial conservation targets for this vegetation type.

MPGR ecosystems comprise of vegetation which hosts the following tree species, protected under the National Forests Act, 1998 (Act No. 84 of 1998):

- *Balanites maughamii* – Torchwood
- *Boscia albitrunca* – Shepard's tree
- *Breonadia salicina* – Matumi
- *Sclerocarya birrea* – Marula
- *Sideroxylon inerme* – White milkwood

The ecosystems found within the MPGR carry out vital ecosystem services, including carbon sequestration, water production (as part of a catchment) and purification (from the formation of seasonal wetlands around the Msunduzi and Sekane river tributaries, which filter water and replenish the ground water). The high level of heterogeneity, in combination with large reserve size enables resilience against disturbances and natural disasters.

The proposed Iphiva-Duma eastern corridor will directly impact on over 800 hectares of Zululand Lowveld. The destruction of vegetation or habitat to this extent is prohibited by the Protected Areas Act (Act No. 57 of 2003), which governs the management of the reserve.

The construction of this powerline will negatively impact black rhino habitat. MPGR was the second property to receive Black rhino as part of the EKZNW/WWF Black Rhino Range Expansion Project. This project has so far been successful in expanding the range and increasing the growth rate of the Black rhino in the region. The servitude rights for maintenance associated with the line post-construction will jeopardise the safety of this rhino population which is at huge risk. In addition, the cutting of trees and vegetation clearance under the line, for the servitude, and for maintenance access roads, will impact on the endangered Zululand Lowveld vegetation, browse availability for black rhino, and additionally, the aesthetics of the park with long and wide corridors denuded of woody plants.

Other protected fauna within the park:

Insects:

Little hairtail – *Anthene minima* (Rare, only locality where this butterfly can be found)

Geometrid moth – *Nychiodes tyttha* (unusual for this locality)

Reptiles:

African rock python – *Python sebae* (Vulnerable)

Nile crocodile – *Crocodylus niloticus* (Vulnerable)

Plants:

Ansellia gigantea

Acacia borleii

Acacia daveyji

Huernia histris (V)

Haworthia limifolia (V)

Bowiea volubilis (V)

Crinum accula (Endemic to SA)

The proposed ESKOM project will impact both the flora and fauna throughout all phases (construction, operational and decommissioning). As well as impacting individual species, the project will have knock-on effects for the reserve ecosystems and thus the ecosystem services which they provide.

During the construction phase, there will be a risk to both workers and wild animals including protected species, within the reserve. Throughout construction, the presence of tools, wires, poles, steel, equipment and scraps present an unacceptable risk to wildlife and could result in injury and death. The entire area cannot be fenced off during construction and therefore wildlife will walk through the construction sites. Stringing lines with helicopters will create significant disturbance, which will cause animals moving away from the area, resulting in increased conflict (both inter-specific and intra-specific) between animals, in particular black rhino, which are a territorial species, and aggressive encounters between individuals are often fatal.

(NB: *inter-specific* means between species and *intra-specific* means within species.)

The nature of the project is likely to result in the presence of leftover wire, metal and fittings beneath and around the work area, which could cause unnecessary injury and death to individuals within our wildlife population. Once constructed, ongoing maintenance and repair-work

throughout the operational phase of the project would present an increased safety risk for maintenance workers and an increased security risk for the reserve and limit our ability to protect the animals, which would come at a cost.

ESKOM require a 55m corridor for servitude rights. Such servitude would require vegetation clearance for roads to be created and maintained for access, as well as further vegetation clearance for the servitude. ESKOM stated that vegetation will be restricted to a particular height, so it is possible that vegetation would have to be cleared in order to install the transmission line. This would negatively impact biodiversity, and reduce ecosystem functioning. Removal of vegetation will also reduce MPGR carrying capacity and ultimately the wildlife stocking rate, which would have financial implications for the reserve.

There is a major concern for wildlife, particularly bird species in the area, with risks of disturbance, habitat alteration and destruction, during all phases of the project. MPGR hosts a number of endemic species listed on the IUCN Red Data List. We have had a number of incidents in which vultures, and even a secretary bird, have been killed by electrocution and collisions with existing powerlines on the reserve. Not only is that a big problem for the conservation and protection of biodiversity within the reserve, but such incidents are also likely to disrupt the power supply. We have also recently discovered a Lappet-faced vulture nest site in the South-East of the Reserve, see Figure 4 below, and refer to Appendix 4.



Figure 4: Lappet-faced vulture (*Torgos tracheliotis*) nest in the South-East of MPGR.

Co-ordinates S -27.793280 E 32.097303

Our security operations and wildlife management (of rhino populations in particular), involve low-flying aerial monitoring with fixed-wing aircrafts and helicopters. Powerlines are extremely dangerous to pilots, due to fact they aren't visible and have no markers. Aircraft collisions with powerlines are common and lead to death of staff and pilots. We carry out a lot of wildlife management from a helicopter, namely darting, game capture, game counts and surveillance. We are also members of Project Rhino KZN, and employ the ZAP-Wing fixed-wing aircraft for regular anti-poaching patrols as part of our wildlife protection programme. The construction of additional

lines will affect our ability to perform such wildlife management and protection effectively. The risks to the pilots carrying out patrols will be increased, as they will have to avoid more objects, resulting in compromised effectiveness of aerial monitoring and patrols, due to pilots having to avoid certain areas all together, or having to fly higher, reducing visual detection of animals, suspects or suspicious activity. Please refer to Appendix 5 and 6 for statements from ZAP-Wing and Heligistix.

MPGR has been declared an Important Bird and Biodiversity Area (IBA), due to the diversity of avifauna occurring within the reserve. See Appendix 6.

C. Legal implications

There are 3 laws which MPGR must adhere to with regards to reserve management activities:

- National Environmental Management Act (Act No 107 of 1998) – NEMA
- National Environmental Management: Protected Areas Act (Act No 57 of 2003) – NEMPAA
- National Environmental Management: Biodiversity Act (Act No. 10 of 2004) – NEMBA

Collectively, these laws recognize the importance and complexity of ecosystems, and the provision of ecosystem services which support human life. They aim to provide protection for endangered and vulnerable ecosystems and species, and promote sustainable use of resources. These laws were enacted to prevent or minimize damage to ecological integrity, and maximize benefits to both the environment and local communities.

National Environmental Management Act (Act No 107 of 1998)

According to the principles laid out in Section 2:

(4)

(a) Sustainable development requires the consideration of all relevant factors including the following:

(i) That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied;

(ii) that pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied;

(iii) that the disturbance of landscapes and sites that constitute the nation's cultural heritage is avoided, or where it cannot be altogether avoided, is minimised and remedied;

.....

(viii) that 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.

(b) Environmental management must be integrated, acknowledging that all elements of the environment are linked and interrelated, and it must take into account the effects of decisions on all aspects of the environment and all people in the environment by pursuing the selection of the best practicable environmental option.

This project would have a negative impact on the environment, including the reserve ecosystems, resulting in an unavoidable loss of biological diversity, to some degree, and degradation of the environment in this area which is protected by national legislation. This would have knock-on effects, socio-economically also.

In accordance with Section 2, subsection (4)(a)(i) of NEMA, to avoid disturbance of ecosystems within the reserve and loss of protected biological diversity, ESKOM will either have to adopt Western 1 (preferably) or Western 2 corridors. These suggestions would be the best practicable environmental option, and the only potential resolutions between MPGRs legal obligations, and the proposed plans by ESKOM, as enforced by this Act.

Section 23 states that integrated environmental management aims to minimize negative impacts and maximize benefits with respects to both actual and potential impacts environmentally, socio-economically and culturally.

Section 30A refers to incident control of emergency situations. Such emergencies that we can foresee may consist of fires from sparks, electrical faults, or fallen poles at any point along the transmission powerline. MPGR is often exposed to very strong winds, which can cause a lot of damage. These winds have knocked over fully grown trees, and in the recent past knocked over poles. We had a line come loose, which was live and thrashing about in the bush, which caused

great concern to the management team. Powerline that have snapped have caused fires within the reserve and low-lying lines have resulted in electrocution of species such as giraffe.

National Environmental Management: Protected Areas Act (Act No 57 of 2003)

MPGR was declared a nature reserve on 23rd April 2009 (and a portion in xxx of 20xx) under Section 23 of the Protected Areas Act, 2003. The Protected Areas Act aims to manage and conserve South Africa's biodiversity, and "promote sustainable utilisation of protected areas for the benefit of people, in a manner that would preserve the ecological character of such areas".

MPGR is protected with the highest protection status, highlighting the importance of the ecosystems contained within the reserve. Much of the land in Northern Zululand and surrounding areas is used for conservation of biodiversity and ecosystems, namely Greater St Lucia Wetland Park*, Hluhluwe Imfolozi Park*, Mkuze Game Reserve*, Mkuze Falls, Phinda, Phongolopoort Nature Reserve*, Somkhanda, Thanda, Ubombo Mountain Nature Reserve*. (*=protected area in KZN). Keeping these ecosystems in-tact and undamaged by infrastructure such as the proposed projects by ESKOM, is a high priority, because it is likely that these conservation areas will be connected in the future, to create wildlife corridors in which species and game are able to move between selected conservation areas.

Section 17 of NEMPAA outlines 12 purposes of declaring an area as protected. ESKOMs proposals contravenes at least 10 of these purposes (parts a-i and l). See below

Purpose of protected areas

17. The purposes of the declaration of areas as protected areas are-

- (a) to protect ecologically viable areas representative of South Africa's biological diversity and its natural landscapes and seascapes in a system of protected areas;*
- (b) to preserve the ecological integrity of those areas;*
- (c) to conserve biodiversity in those areas;*
- (d) to protect areas representative of all ecosystems, habitats and species naturally occurring in South Africa;*
- (e) to protect South Africa's threatened or rare species;*
- (f) to protect an area which is vulnerable or ecologically sensitive;*
- (g) to assist in ensuring the sustained supply of environmental goods and services;*
- (h) to provide for the sustainable use of natural and biological resources;*
- (i) to create or augment destinations for nature-based tourism;*
- (j) to manage the interrelationship between natural environmental biodiversity, human settlement and economic development;*
- (k) generally, to contribute to human, social, cultural, spiritual and economic development; or*
- (l) to rehabilitate and restore degraded ecosystems and promote the recovery of endangered and vulnerable species*

Section 41 of NEMPAA states that a management plan is required to "ensure the protection, conservation and management of the protected area concerned in a manner which is consistent with the objectives of this Act and for the purpose it was declared."

Section 50 subsection 2: states that commercial and community activities "may not negatively affect the survival of any species in or significantly disrupt the integrity of the ecological systems of the nature reserve or world heritage site."

Section 50 subsection 5:

"No development, construction or farming may be permitted in a nature reserve or world heritage site without the prior written approval of the management authority."

Section 86 subsection 1 part d: administration of the Act

"86. (1) The Minister may make regulations that are not in conflict with this Act-

.....

(d) prohibiting or restricting-

(i) activities that have an adverse effect in protected areas

....

(iii) land uses in protected areas that are harmful to the environment”

Section 88 subsection 2:

“88. (2) Regulations made under section 86 or 87 may provide that any person who contravenes or fails to comply with a provision thereof is guilty of an offence and liable on conviction to a fine or to imprisonment for a period not exceeding five years or to both a fine and such imprisonment.”

National Environmental Management: Biodiversity Act: Act No. 10 of 2004

This Act aims to enable national protection of species and ecosystems. In accordance with this Act, MPGR has a biodiversity management plan to ensure the long-term survival of species and ecosystems in the natural environment. Chapter 4 outlines the following purposes *“(a) provide for the protection of ecosystems that are threatened or in need of protection to ensure the maintenance of their ecological integrity; (b) provide for the protection of species that are threatened or in need of protection to ensure their survival in the wild”*. Under the terms of that legislation, Zululand Lowveld ecosystem is listed as endangered.

Final statement

The proposals contained within Eskom's Northern KwaZulu-Natal Strengthening Project, would jeopardise MPGR's legal obligation to adhere to the following laws:

- National Environmental Management Act (Act No. 107 of 1998)
- National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)
- National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003)
- National Forests Act, 1998 (Act No. 84 of 1998)

In allowing this project to go through will impact on MPGR in that it would:

- jeopardize our ability to effectively monitor and protect both protected species and vulnerable/endangered species
- degrade endangered ecosystems and the associated ecosystem services
- negatively impact on local communities and result in increased unemployment and negatively impact the local economy
- negatively impact on our business model and result in a loss in income
- devalue land within the park and result in disinvestment
- impact on the sense of place as well as the visual impact polluting the scenic value