

No	Authority Comment	Response
1	CAPE NATURE	
1	1. New PAMP does not differ significantly from the previous version with content staying much the same.	1. Agreed
1	2. Appendix 2: Local Context, Ashbourne Vineyards Biodiversity Agreement added, this is supported by CapeNature.	2. Noted
1	3. The legend and labelling on this map must however be updated to accurately reflect all of the protected areas and conservation areas.	3. Changes will reflect
1	4. Support for adding the R43 road upgrade to Stanford but needs to be clear whether this is the old road or new upgraded version. This has important implications that needs to be understood.	4. Changes will reflect where possible (depending on the status of the road construction)
1	5. The Municipal Groundwater abstraction should be included on this map, as previously requested.	5. Changes will reflect
1	6. Rotary drive has been included in Appendix 9: Management Units map, however the R43 should also be indicated as for Appendix 8).	6. Both Rotary Drive and the R43 are reflected on the 1:50 000 backdrop.
1	7. Is Rotary drive part of the Fernkloof Nature Reserve?	7. It is a Provincial Road but incorporated in the boundary of the Reserve.
1	8. In general CapeNature gives support to the new updated PAMP as it adheres more or less to the CapeNature template.	8. Noted, thank you.
No	Authority Comment	Response
2	WHALE COAST CONSERVATION	
2	1. The document fails to meet basic legislative requirements and is unimplementable.	1. The PAMP has been developed on a framework and template provided and supported by CapeNature.
2	2. The contents of the PAMP do not satisfy NEMP:PAA S41(2)(a).	2. NEMP:PAA 41 2 a) refers to " any applicable biodiversity management plan." To our knowledge there are currently no applicable biodiversity management plans that are relevant to the FNR.
2	3. No co-ordinated policy framework appears in the PAMP.	3. Chapter 3 and Chapter 9 in the document refers to all relevant legislations, regulations and policies applicable to the various aspects of management of the PAMP.
2	4. There is no prioritisation of the management activities, responsible person, nor resource allocation, no implementation schedule, nor any budget estimate for any of them.	4. The management actions identifies the actions that needs to be implemented and once the PAMP as been approved by council and signed off by the MEC the priority will be set per short, medium and long-term goals. At his point budget, time-frames and responsible officials will be identified.
2	5. There is no programme for the implementation of the PAMP.	5. The management actions identifies the actions that needs to be implemented and once the PAMP as been approved by council and signed off by the MEC the priority will be set per short, medium and long-term goals. At his point budget, time-frames and responsible officials will be identified.
2	6. There is no dedicated municipal environmental services staff member competent to draw up an APO based upon the contents of the PAMP.	6. Chapter 7 clearly states the requirement for the Fernkloof staff component which is sufficient.
2	7. The PAMP needs to include the APO's likely to be approved by council for the first year or two of the PAMP's implementation, to illustrate that this is a viable and credible approach.	7. The management actions identifies the actions that needs to be implemented and once the PAMP as been approved by council and signed off by the MEC the priority will be set per short, medium and long-term goals. At his point budget, time-frames and responsible officials will be identified.
2	8. The PAMP should contain a bylaw formalising the FAB. The future amendment of the bylaw should be subject to public participation and to authorisation by the MEC for local government and the environment.	8. FAB is established and operates in terms of the Western Cape Nature Conservation Ordinance and the FAB Bylaw. This is not a matter for the PAMP which is an operational document for the reserve manager.
2	9. The Overstrand OS1 Zoning is not consistent with the protection NEM:PAA provides, nor is it in alignment with the W.C Provincial model zone scheme provision for municipal nature reserves.	9. The Overstrand Municipal Zoning Scheme, Gazetted by the Western Cape Provincial Government in 2013, zones the FNR as Open Space Zone 1: Nature Reserve (OS1) where the primary use is listed as a nature reserve and consent uses are defined in conjunction with the Development Rules applicable. The Municipal Spatial Planning Categories must not be confused with "Management Units", as determined in the PAMP. The "Management Units" describe, at a much finer scale, the allowable land-uses and activities in clearly defined areas as described in Table 2. The approved protected area management plan determine the allowable and prohibited activities within each management unit.
2	10. The consent use clause in the OSM Integrated Zoning Scheme Regulations needs to be amended to avail FNR, and other nature reserves, the maximum from development intended by the NEM:PAA.	10. The consent uses of the Municipal Zoning will only apply to the FNR (which is declared in terms of NEM: PAA) where this Management Plan has made provision for such activities.
2	11. a) A map is provided in appendix 9 that shows three management units, identified as Conservation Unit, Transformed Units and New Proposal to Council. Section 8.2 however, titled Zonation and Land use within the FNR, gives the management units as Conservation Units, Transformed Units, Special Management Units for Cultural Feature Protection and Buffer Zones. b) This section refers to table 3 for details, which should be table 2 as there is no table 3.	11. a) Map has been corrected to include all 4 management units and the new proposal to council which is not a separate unit. B) Thank you, 8.2. has been corrected to Table 2.
2	12. The buffer zones, which lie outside the reserve boundary, are not shown on the appendix 9 map. So there is a difference between the management units on the map and those name in section 8.2, that being the "new proposal to council".	12. The buffer zones will be included.
2	13. The "new proposal to council" management units, if they are such, are highly transformed and alien-vegetation infested to the point where they are not conservation worthy. The motivation of their inclusion into the reserve must be questioned. The Guiding Principles for Reserve Expansion set out in section 9.1.6 of the PAMP need to be amended to include a detailed rehabilitation plan and associated budget allocation, before it is included.	13. It is important the municipality makes more land available for conservation. The rehabilitation will be dealt with in the APO.
2	14. The contention expressed and implied in various sections of the PAMP that the FNR must be managed "sustainably" and generate funds to sustain itself is inappropriate and should be removed from the PAMP.	14. References "to income generation in order for the reserve to sustain itself" have been removed and/or revised. The Management Authority does not see any conflict with the generation of funding or income from activities that do not compromise the purpose for which the Protected Area was declared.
2	15. The Fernkloof Management should not be responsible for a tourism and marketing plan, the tourism department in the Municipality should develop an overall tourism plan within which the FNR should feature prominently.	15. The document will be developed in consultation with the Tourism Department.
2	16. The PAMP should be revised to include the three headings NEM:PAA S41 (3) (a) to (c) and indicate how the FNR can contribute to these important needs without them becoming the responsibility of the staff and partners engaged in meeting the requirements of the sole object of the PAMP.	16. Although S41 (3) (a) to (c) are not formal headings in the PAMP it is discussed in the document.
2	17. PAMP should include signed partnership agreements with HBS as the primary management agent for FNR into perpetuity.	17. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests. Section 9.2. of the PAMP deals comprehensively with cooperative governance, co-management agreements and partnerships.
2	18. FAB should comprise of representatives of the HBS, HRPA, HBC, HT,HH, HBC, HPMG, EMS, CapeNature and Ward 3 councillor and possibly other civil society conservation organisations. FAB should have oversight an advisory functions over all matters relating to Fernkloof. Deviation from FAB should only be allowed following a process of appeal.	18. FAB is established and operates in terms of the Western Cape Nature Conservation Ordinance and the FAB Bylaw. This is not a matter for the PAMP which is an operational document for the reserve manager.
No	Authority Comment	Response
3	HERMANUS BOTANICAL SOCIETY	

3	1. So much of the FNR PAMP plan appears to be a documentation of what would be desirable to accomplish. It is obvious the OSM will not be in the position to provide all that the FNR PAMP requires without forming meaningful partnerships with other community organisations. Over the years the Hermanus Botanical Society (HBS) volunteers have sustainably shouldered the mammoth part of the care and maintenance of the FNR. The efforts of HBS require recognition, support and encouragement. It is suggested that the HBS partnership should be entrenched in the PAMP as the major management agent for the FNR.	1. The OSM EMS are grateful for the contributions made by the Hermanus Botanical Society's (HBS) and the contribution by the HBS to the management of the FNR is acknowledged throughout FNR PAMP.
3	8.1. Municipal Zoning. FNR is zoned as Open Space Zone 1. No consent use for this zoning should apply within the FNR. In the Overstrand Municipal Wide Spatial Development Framework and the Overstrand Environmental Management Framework a nature reserve is classified as Core Conservation Zone 1 (CON1) wilderness area where no consent use is permitted.	The Overstrand Municipal Zoning Scheme, Gazetted by the Western Cape Provincial Government in 2013, zones the FNR as Open Space Zone 1: Nature Reserve (OS1) where the primary use is listed as a nature reserve and consent uses are defined in conjunction with the Development Rules applicable. The Municipal Spatial Planning Categories must not be confused with "Management Units", as determined in the PAMP. The "Management Units" describe, at a much finer scale, the allowable land-uses and activities in clearly defined areas as described in Table 2. The approved protected area management plan determines the allowable and prohibited activities within each management unit.
3	Management Action Table 1.3 1. a) Ecosystem and Biodiversity management, General Actions. All research data is managed by the HBS. 1 b) Indigenous Vegetation. HBS conducts all the vegetation inventory and contribution to the HBS Herbarium as well as post vegetation monitoring and Millennium seedbank collection.	1. a) Please refer to: 6.7 FNR Context: Vegetation 1. b) Please refer to: 7.2. Important contributors to the Operational Management of the FNR
3	2. Management Action Table 1.11, item 77 It is suggested that there should be no consideration of any extraction of any resources from the FNR any stage except the allowance for flower picking for the Visitors' Centre and the Flower Festival and for controlled research purposes.	2. The document states: "Review any existing CapeNature and DEA&DP policies and develop a Policy Guideline Document for the Evaluation of extractive resource use applications within the FNR and therefore the action is that FNR has an extractive resource policy in place." This process will ensure that a scientific approach is taken to determine whether extraction of resources can or cannot take place.
3	3. Management Action Table 1.16 Tourism Development Framework, item 95 Establishment of a Botanical Garden with OSM Support.	3. Included.
3	4. Table 2 Page 118 Certain infrastructure mentioned are deemed undesirable within the Conservation Zone. Only within the Transformed zone can staff accommodation and tarred roads be considered. Only one overnight hut, Galpin hut, to be permitted within the conservation area, no more.	4. The NEM:PAA requires that land use and management in each protected area is governed by a formally approved management plan. Such plans identify allowable activities and allocate them to appropriate zones within the protected area. The only developments and activities that will be included for consideration in the protected area management plan would be those that are in support of the goals and objectives of the protected area. Protected area management plans are not purely spatial, but also deal with issues relating to policy and implementation, staffing, performance criteria and budgets, public participation, resource use and other social and economic opportunities. The management plan must identify allowable activities, which should be consistent at least with the CBA Irreplaceable category; the location of these allowable activities should be captured in a zonation plan in the management plan. Where there is an approved protected area management plan, this will determine the allowable and prohibited activities within each zone. In general, protected areas should be maintained in a natural or near-natural state, with no loss or degradation of natural habitat.
3	5. Page 12 paragraph 5 (6.2 Conservation History of the FNR): Please include the Research Centre as one of the buildings which the Hermanus Botanical Society (HBS) contributed to the infrastructure in the reserve.	5. Included
3	6. Page 23, 5.5 Ecological Values: It is the Hermanus Botanical Society Herbarium and Research Centre not the Fernkloof Herbarium.	6. Corrected, thank you.
3	7. Page 24, 5.5 Ecotourism values: It is the Hermanus Botanical Society Visitors' Centre. The Hermanus Botanical Society Hall and Galpin Hut are for hire through the HBS but not the Amphitheatre.	7. It is officially known as the Fernkloof Visitor Centre, Hall and Galpin Hut.
3	8. Page 26, paragraph 5: Please include the HBS Research Centre in the building infrastructure funded by the HBS.	8. Included
3	9. Page 51, paragraph 1: The Hermanus Botanical Society, Visitors' Centre, HBS Herbarium, HBS Research Centre and HBS Gardens, not Fernkloof.	9. See point 7.
3	10. Page 52, Figure 12. Please exchange the word Fernkloof under Feature Name with HBS before boardroom, kitchen, garage, Main Hall, Herbarium, Visitors' Centre.	10. The website (created and managed by HBS) refers to the Fernkloof Visitor Centre (not the HBS), consistency is required.
3	11. Page 54, Figure 13. Replace Fernkloof with HBS. The website address is incorrect and should read www.fernkloof.org.za Please change the website address on Figure 14 too.	11. Refer to response 10. The website address has been corrected.
3	Page 54 and page 55: 7.9: The word Botanical garden is not correct, it should be HBS Gardens.	12. Corrected to Fernkloof Gardens (removed Botanical). Fernkloof Gardens is the correct name.
3	A memorial auditorium should read memorial arboretum. The botanical Research Centre should be HBS Research Centre(HBSRC) and was not funded by SANBI but by the HBS.	13. Corrected
No	Authority Comment	Response
4	HERMANUS RATEPAYERS ASSOCIATION	
4	1. The HRA is not opposed to modest, sensitively-located, designed and managed tourism facilities within the existing "transformed unit" of the HBS lease area, for example the botanical garden and/or tea/coffee/book shop. It is however opposed to the original proposals in the previous version of the PAMP.	1. Noted, thank you.
4	2. The PAMP must include estimates of the costs associated with the staff proposed in Figure 11, as well as a comparison with existing staffing costs. In addition, cost estimates are needed of the other fixed and variable costs so that there is a clear picture of the overall Fernkloof budget (current desire).	2. The PAMP does not address budgetary requirements as this would be included in the Annual Plan of Action. The PAMP is a document written for the FNR Reserve Manager to give direction and guidance and is therefore written accordingly.
4	3. HRA would like to see the upgrading and management of the cycle trail, insofar as it passes through Fernkloof. This action should be added to Section 10, Management Action Tables.	3. Included refer to Management Action Table 1.9. Infrastructure Management; Item 68.
4	4. In addition to the land surveying and physical demarcating of the Fernkloof boundary, the HRA would like to see that a buffer zone with a minimum of 5m is introduced outside the boundary where developments occur (Example Eastcliff Sports Complex).	4. Agreed and in process
4	5. It is unclear whether the best way forward is to update FAB bylaw, or to replace it with an Advisory Committee provided or in current legislation.	5. The FAB bylaw will not be updated at this stage. Once the PAMP has been approved the new NEM:PAA process for an Advisory Committee will be investigated.
No	Authority Comment	Response
5	VOGELGAT PRIVATE NATURE RESERVE	

5	1. Zoning Scheme 2013 is not in keeping with provincial legislation. This is a critical adjustment that must be made before approval of this PAMP.	1. The Overstrand Municipal Zoning Scheme, Gazetted by the Western Cape Provincial Government in 2013, zones the FNR as Open Space Zone 1: Nature Reserve (OS1) where the primary use is listed as a nature reserve and consent uses are defined in conjunction with the Development Rules applicable. The Municipal Spatial Planning Categories must not be confused with "Management Units", as determined in the PAMP. The "Management Units" describe, at a much finer scale, the allowable land-uses and activities in clearly defined areas as described in Table 2. The approved protected area management plan determine the allowable and prohibited activities within each management unit. Any infrastructure development or layout must follow due process with regard to any environmental application and authorization required. Also, please note that the FNR PAMP is an Operational Document for use by the FNR Reserve Managers, this is not a matter for the PAMP.
5	2. Special documents should be made available i.e. title deeds	2. Special documents will be made available at the Fernkloof Office, at the Environmental Office and Town Planning departments on request.
5	3. co-ordinates of boundaries made available	3. Description of Property boundaries are available in Appendix 10 (FNR Proclamations). 8.6 in the PAMP states that the boundaries must still be surveyed and in the Action Table 10, Management Table 1.1, Key deliverable 2. The FNR boundary is surveyed and demarcated.
5	4. FAB mandate must be made very clear	4. FAB is established and operates in terms of the Western Cape Nature Conservation Ordinance and the FAB Bylaw. This is not a matter for the PAMP which is an operational document for the reserve manager.
5	5. No financial budget	5. The PAMP does not address budgetary requirements as this would be included in the Annual Plan of Action. The PAMP is a document written for the FNR Reserve Manager to give direction and guidance and is therefore written accordingly.
5	6. Where is the APO	6. The management actions identifies the actions that needs to be implemented and once the PAMP as been approved by council and signed off by the MEC the priority will be set per short, medium and long-term goals. At this point budget, time-frames and responsible officials will be identified.
5	7. PPP should be entered as a priority	7. Currently the Management Authority is not looking at this kind of agreement but it can be considered in the future and the Management Plan updated accordingly. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests. Section 9.2. of the PAMP deals comprehensively with cooperative governance, co-management agreements and partnerships.
5	8. Development and sustainable development are mentioned at every possible entry and is an archaic statement.	8. The Management Authority has found that the term sustainable development is used in current and long-term International and National documents. Please refer to the <u>2030 agenda for sustainable development adopted by all United Nation Member States in 2015 and its 17 development goals.</u>
5	9. Many project lists, without proper attainable goals these are futile objectives. Management plan 2001 had many recommendations and 18 years later these haven't been implemented. Where is the accountability to ensure PAMP will be implemented?	9. Please refer to 4.5. Monitoring and Review of the FNR PAMP.
5	10. There is no mention of potential threats to FNR	10. Threats are discussed in various chapters of the PAMP e.g.. Fire, alien species, compliance, disaster management.
5	11. No operational framework for path clearing, maintenance nor alien clearing i.e. when will these take place, number of person days and costings.	11. The PAMP does not address budgetary requirements as this would be included in the Annual Plan of Action. The PAMP is a document written for the FNR Reserve Manager to give direction and guidance and is therefore written accordingly. The Environmental Management Services have strategic document for these aspects of which Fernkloof is part.
5	12. Remove "To ensure any development that is required is undertaken in a sustainable manner" Point is ambiguous. There is no mention of precautionary rule regulations under NEMA to protect and conserve FNR in perpetuity.	12. In heading 3, Legislation Guiding the Administration of the FNR the following statement refers to the management of Fernkloof "Regulations for the Proper Administration of Nature Reserves have been promulgated in terms of the NEM:PAA in Government Notice No. R 99 on 8 February 2012. The PAMP for the FNR must also be interpreted and applied in accordance with the provisions of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA), with the 2014 Environmental Impact Assessment (EIA) Regulations and with the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004).
5	13. The FNR is a declared Protected Area in terms of Section 12 of the NEM:PAA under which nature reserves declared under previous provincial legislation are regarded to be nature reserves under NEM:PAA. The term regarded is not sufficient to indicate the current status of FNR.	13. Please refer to Section 12 NEM:PAA (2003) 12. Provincial protected areas A protected area which immediately before this section took effect was reserved or protected in terms of provincial legislation for any purpose for which an area could in terms of this Act be declared as a nature reserve or protected environment, must be <u>regarded</u> to be a nature reserve or protected environment for the purpose of this Act
5	14. Add the relevant and current documents i.e. title deeds and municipal bylaws pertaining to the FNR "Special Documents" Appendix.	14. On Title deeds, please refer to your previous comment. Municipal bylaws are availed on the Overstrand Website and too many to attach to this document.
5	15. 2.1. The Overstrand Municipality. Under authorisation of the MEC of the Western Cape Department of Environmental Affairs and Development Planning, the Overstrand Municipality (OSM) is the designated Management Authority of the FNR. Please furnish the necessary document from the MEC recording OM as the authority and add it to the Special documents folder.	15. Please refer Appendix 10. Declarations of the FNR and to the comment and response 14.
5	16. 2.2. The Fernkloof Advisory Board (FAB) According to the Western Cape's Nature and Environmental Conservation Ordinance, 1974 (Ordinance No. 19 of 1974) an advisory board must be established for the purpose of advising and making recommendations to the management authority in connection with the management, control and development of a local nature reserve. Advising - Oxford Dictionary- [intransitive, transitive] to tell somebody what you think they should do in a particular situation. This is not merely an opinion.	16. Please refer to FAB bylaw. This is not a matter for the PAMP which is an operational document for the reserve manager.
5	17. 2.2. Fernkloof Advisory Board does not mention the powers of FAB. This should be incorporated into this paragraph. FAB recommendations have no strength if there is no mention of FAB powers. This should be made more secure in order that all parties understand FAB standing with recommendations it gives to the management authority. What is the purpose of a statutory Board who gives advice and this advice is not actioned?	17. Please refer to FAB bylaw. This is not a matter for the PAMP which is an operational document for the reserve manager.
5	18. The new FAB statutory agreement should be included in the "Special Documents" appendix.	18. The current FAB bylaw is available and attached as an Appendix 11.
5	19. To date FAB has been given "lip service" by the OSM and Environmental Department. All references made in the current PAMP to FAB are a mere smokescreen for the objectives of the OSM and EMS to allow further inappropriate development. This can be seen by the current PAMP made public without consultation with FAB as required by your own procedural process for PAMP.	19. FAB is established and operates in terms of the Western Cape Nature Conservation Ordinance and the FAB Bylaw. This is not a matter for the PAMP which is an operational document for the reserve manager.
5	20. It is not good enough to get acceptance from FAB's Chairman (without the FAB board approval) and Cape Nature to allow concurrent process. This goes against EMS procedures for the acceptance of this document. This show a lack of transparency which according to this document is paramount. There seems to be two different sets of standards. Please keep to what has been agreed upon in the procedural process. See 4.3.	20. All comments from I&AP is reviewed and incorporated into the PAMP comments document, including comments from FAB. The Chairperson is the representative for FAB and therefore has the designation to approve document. This is inline with the Procedural process in section 4.3.
5	21. It should be noted that FAB is a compulsory signatory for this PAMP to be accepted before this document is handed over to the MEC for ratification.	21. The Chairperson is the representative for FAB and therefore has the designation to accept the revised document on behalf of FAB. This is inline with the Procedural process in section 4.3.

5	22. 2.7.1. The Hermanus Botanical Society (HBS) please add: The HBS herbarium is recognised internationally. The HBS has recruited and housed many undergraduate, graduates and post-graduates to undertake scientific research that has benefited FNR.	22. Included
5	23. 2.7.2. Cliff Path Management Group (CPMG) add: The CPMG has raised close to R3 million for the upgrading of the Cliff Path.	23. The Management Authority are grateful for the contributions of the CPMG however financial contributions by the CPMG is not relevant to the PAMP document.
5	24. 4.3. Procedures for the approval of the FNR PAMP: The steps outlined here have not been applied i.e. point the PAMP is first endorsed by FAB, Cape Nature and HBS and then this goes out for public comment. This procedure has not been adhered to even though these parties have agreed that they will follow the process concurrently (this procedure was accepted by the Chairman of FAB without the approval of the FAB Board). FAB didn't even know that this PAMP was going for public comment! This process should follow due protocol as stated in your endeavour to keep the process transparent. This action reveals that the motives of the EMS are not transparent, yet merely a document that does not hold true to its statements. Please do remember the public will hold the EMS and the OM accountable. Your actions are not autonomous.	24. These procedures were followed. Multiple meetings were held with HBS and FAB (The FAB includes a CapeNature official). All relevant and legitimate comments and suggestion by the FAB were included in the PAMP. FAB was informed that the document was submitted for public comment.
5	25. Monitoring and Review of the FNR PAMP. <i>An annual environmental and management audit must be conducted by the Reserve Manager or an independent environmental consulting firm.</i> Where is the budget for an independent consultant when there is not even a Reserve manager?	25. The Reserve Manager post has been filled.
5	26. <i>An external environmental and management audit should take place once every five years.</i> What are the costs of this audit? Many management plans and consent use restrictions have the same wording and in practise these actions can never be carried out as they are not practical and no funds available. These costs should be arrived at.	26. This will be included in the APO.
5	27. 5.1. The Purpose of the FNR: <i>Growing human population has created an increased need for urban and economic development that is directly related to the partitioning and degradation of natural ecosystems and therefore increased pressure on ecological infrastructure.</i> Why has this been included here? Surely this sentence should include that due to continuing pressure NEM:PAA must be able to continue to <u>protect these important ecological services.</u>	27. This paragraph is intended to show the need and value of the FNR's ecological services.
5	28. The Purpose of the FNR-the protection and conservation of all faunal, floral, geological, landscape and historical cultural elements of its landscape in order to maintain its ecological functioning. Under NEM:PAA the managing authority of FNR is required to manage the reserve exclusively for the specific purpose for which it was declared. This specific purpose is "As a nature reserve (particularly wild flowers) which includes the preservation, cultivation of indigenous Flora, especially Flora which grows and is known to have grown in the Caledon Divison" This statement seems to be omitted.	28. Included under the Declaration Status of FNR
5	29. The Vision of the FNR <i>The FNR vision is a long-term inspirational determinant of the FNR for achievement of goals toward best management, conservation and development of the FNR.</i> VISION: FNR to be recognised globally as the Biodiverse Hotspot reserve in the fynbos biome. <i>"The FNR is a showcase of the unique indigenous biodiversity of the Kleinriviersberg and the associated coastal lowlands for present and future generations."</i>	29. The Vision for the FNR was formulated by FAB and BOTSOC, in consultation with the Management Authority and is therefore accepted.
5	30. 5.3. Mission Statement of FNR The Mission Statement of the FNR should be acknowledged as the Management Intent and thereby guide management actions: "To sustainably manage and protect the natural assets and cultural heritage resources of the Fernkloof Nature Reserve, in partnership with relevant community organisations in order to conserve and ensure the continued existence of its rich biodiversity, and its associated ecological processes and services". This statement is a politically correct platitude rather than stating the outmost benefit to the environment, irrespective of mankind benefits. It is worded "sustainably" This is being used over and over again to accommodate the whims of human society above the protection and services which are paramount to human existence. Maybe it should read: "For the continued existence of its rich biodiversity, and its associated ecological processes and services in perpetuity.	30. The Vision for the FNR was formulated by FAB and BOTSOC, in consultation with the Management Authority and is therefore accepted.
5	31. 5.4. Sustainable Development within the FNR. This subsection should be removed entirely as the Purpose, Vision and Mission statements encompass all this. Therefore it seems once again that OM and EMS are highlighting the importance of sustainable development <u>above the purpose why FNR was established.</u>	31. The Management Authority has found that the term sustainable development is used in current and long-term International and National documents. Please refer to the 2030 agenda for sustainable development adopted by all United Nation Member States in 2015 and its 17 development goals.
5	32. The Values of the FNR. What has been excluded is: 78% of FNR consists of Critically Endangered Sandstone Fynbos and a further 7.4% of Vulnerable Agulhas Limestone Fynbos, this is over 85% of the reserve. Endemic species; Serves as an outdoor classrooms; International herbarium; Landscape beauty.	32. The percentage value is described under each vegetation type but has been included in the "Values of FNR" as requested.
5	33. Description and Context of the FNR. 6.1. Location and Extent of the FNR. The current registration of all FNR boundaries as specified digitally must be added as a document in Special documents.	
5	34. FNR Context: Climate. Historical rainfall, temperature figures to be added to Special document folder. <i>The FNR Field Rangers collect daily rainfall measurements.</i> Where is the rainfall station? And what are the criteria for rainfall figures collection?	33 to 35. It was decided at special PAMP meetings with FAB that added information of such nature will make the PAMP to cumbersome and that these added documents will be available at the Fernkloof Office.
5	35. 6.5 FNR Context: Geology and Soils Please include geological 1:10 000 maps in Special document	
5	36. 6.6 FNR Context: Vegetation. Please include 1:10 000 vegetation map	36. A scale of 1:13 000 is used as a standard throughout the PAMP in order to fit the reserve boundaries.
5	37. FNR Context: Invasive and Alien Vegetation. To be included Historical IAV maps. Plus clearing programme and current IAV status	
5	38. 6.9 FNR Context: Fire Management Regime include historical fire map	
5	39. 6.10 FNR Context: Mammalian Fauna include species list	
5	40. 6.11 FNR Context: Avifauna include species list	37 to 43. It was decided at special PAMP meetings with FAB that added information of such nature will make the PAMP to cumbersome and that these added documents will be available at the Fernkloof Office.
5	41. 6.12 FNR Context: Reptiles and Amphibians include species list	
5	42. 6.13 FNR Context: Fish: include species list	

5	43. 6.14 FNR Context: Invertebrates include species list	
5	44. 7 Operational Management of the FNR 7.1. Operational staff. No budget allocated to these posts to envisage if these posts can be financially viable	44 and 45. The PAMP does not address budgetary requirements as this would be included in the Annual Plan of Action. The PAMP is a document written for the FNR Reserve Manager to give direction and guidance and is therefore written accordingly.
5	45. 7.3. Financial Management. No proposed budget. Surely staff allocation, path, IAV maintenance has a financial allocation?? Nonsensical to state that the PAMP has to be approved before you can draw up a budget.	
5	46. 7.3. Financial Management PPP should be considered	46. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests. Section 9.2. of the PAMP deals comprehensively with cooperative governance, co-management agreements and partnerships.
5	47. 7.4. Infrastructure The featured items should include the nature of the feature e.g. rock, bricks and schematic diagrams with scales and square meterage.	47. Infrastructure & building plans within the FNR are housed within Building Control Department and the FNR Rangers Office.
5	48. "Tower various" is not sufficient. What KHZ; structure type etc. should be included. Too many towers have been erected unnecessarily.	48. Infrastructure & building plans within the FNR are housed within Building Control Department and the FNR Rangers Office.
5	49. 7.12 Natural Resource Utilisation: for what end? Rather create PPP to obtain funding for FNR	49. Please refer to above responses of your PPP comments.
5	50. 7.12.1. Fauna and Flora Natural Resource Utilisation. No control available due to lack of staff.	50. Chapter 7 clearly states the requirement for the Fernkloof staff component which is sufficient at this stage.
5	51. 7.14. Public Events and Activities . Create PPP to obtain reserve funding and not public event and activities. In the past there has been no controlled measures set in place to monitor potential negative results of such activities	51. Please refer to above responses of your PPP comments.
5	52. The FNR Conservation Development Framework. Crucial to the management approach is the issue of zoning. The document notes the zoning of the FNR (Section 8.1) as OS1 under the OM zoning scheme of 2013 which rewrites the zoning definitions suggested by province. OS1 has been rewritten to give the OM blanket powers to determine consent uses in the FNR. This is a fatal flaw that opposes the spirit of the NEM:PAA and which must be corrected.	52. Please refer to previous comment on Zoning.
5	53. Suggestion: Enter into a Stewardship Nature Reserve agreement with Cape Nature in order to elevate the conservation status of FNR to National Level (which is currently been reviewed by Cape Nature) In this manner all disturbed areas can be zoned to CON2 and rest of the reserve CON1	53. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests. The FNR is protected under NEM:PAA (2003), Provincial protected areas. A protected area which immediately before this section took effect was reserved or protected in terms of provincial legislation for any purpose for which an area could in terms of this Act be declared as a nature reserve or protected environment, must be regarded to be a nature reserve or protected environment for the purpose of this Act. It gives FNR the highest protection under the provisions of the Act.
5	54. • <i>any other use permitted by council.</i> This is open-ended and should be removed	54. Any infrastructure development or layout must follow due process with regard to any environmental application and authorization required.
5	55. 8.8. Concept Development Plan: Tourism and Marketing <i>The Overstrand Municipality has the mandate to sustainably develop the FNR within the framework of its approved Integrated Environmental Management and Conceptual Development Plan (CDP). Such development will be undertaken to help ensure the long-term environmental and economic sustainability of the FNR, whilst respecting and giving access to the FNR's natural and cultural heritage features.</i> There are other financial options that the OM has not investigated. These should be investigated before any attempt is made at any developments are proposed within the boundaries of the FNR.	55. Term " <i>approved Integrated Environmental Management and Conceptual Development Plan (CDP)</i> " has been corrected to read " <i>approved Concept Development Plan (CDP)</i> ".
5	56. <i>The EMS will continue to strive to provide a quality eco-cultural tourism experience for visitors to the FNR. Whilst a range of existing facilities and services are provided for the use of visitors to the FNR, some degree of tourism infrastructure development is required to serve recreational and social needs.</i> No mention is made of what type of developments - where is the future vision? It is left rather flimsy and open for any type of development	56. Please refer to previous comment on Zoning. Please refer to Concept Development Plan.
5	57. <i>Tourism infrastructure development will be guided by the CDP. The compilation and implementation of a Marketing and Tourism Infrastructure Development Plan / Strategy is, however, required in order for the FNR to realise its full income-generating potential.</i> Enter into a PPA that will alleviate the pressure to develop the FNR.	57. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests. Section 9.2. of the PAMP deals comprehensively with cooperative governance, co-management agreements and partnerships.
5	58. 9.1.3. The Proposed Expansions of FNR Detailed explanations should be given why these parcels are proposed to be included into FNR. Many of the portions are heavily infested with IAV and would require huge financial budget to eradicate and maintain these parcels. These parcels must have a high value for the ultimate benefit of the whole FNR rather than being a burden.	58. It is important the municipality makes more land available for conservation. The rehabilitation will be dealt with in the APO.
5	59. 9.5. Fire Management 9.5.1. Management Goals • <i>To implement effective Integrated Catchment Management</i> This should be explained.	59. Guiding Principles for Fire Management makes reference: " <i>Scientific fire management, that mimics natural fire regimes maximises fynbos rejuvenation and subsequent biodiversity.</i> "
5	60. 9.5.2. Legislation and Guidelines • <i>OSM Veld Fire Management Plan;</i> • <i>OSM Fire Management Plan.</i> The above plans should be included in this document. How is one able to comment without these.	60. The PAMP is a document written for the FNR Reserve Manager to give direction and guidance and is therefore written accordingly. The Environmental Management Services have strategic documents for these aspects of which Fernkloof is part and this will be included in to the APO process.
No	Authority Comment	Response
6	BIRDLIFE OVERBERG	
6	1. Correction of reference on page 42.	1. Reference corrected.
6	2. Lack of recognition of the work done by Birdlife SA and Birdlife Overberg	2. The EMS recognises the excellent work Birdlife are doing in the Overstrand Area, we have incorporated the Birdlife contributions into the PAMP under the Avifauna section.
6	3. avifauna and avi-tourism are poorly described and underestimated. Promote FNR as a top bird watching destination comparable to Harold Porter and Karoo Botanical Gardens (Worcester) - the FNR is marketed to domestic and international bird-watchers by Birdlife Overberg.	3. We have included your suggestion under the Avifauna section as well as in the table under heading 5.5. The Values of the FNR.
6	4. PAMP only refers to endemic species associated with the Cape Floral Kingdom/upper gardens of FNR. It is recommended that at least the following species taken from The 2015 Eskom Red Data Book of BIRDS of South Africa be incorporated into the PAMP.	4. Your species list has been included.
	5. Conservation and Environmental Education Projects not mentioned in the PAMP	5. The projects relevant to the operational management to the FNR have been included in the PAMP. We cannot include all environmental and conservation projects in the PAMP and these will be kept separately at the Fernkloof Offices.
6	6. Supports Village News articles "FAB idea for Fernkloof"; "Enable local bodies to manage Fernkloof"	6. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests. Section 9.2. of the PAMP deals comprehensively with cooperative governance, co-management agreements and partnerships.
6	7. Collaboration with many local environmental bodies should be seen as a priority.	7. Noted, this is dealt with comprehensively in 9.2. Integrated Planning, Cooperative Governance and Co-Management Agreements

No	Authority Comment	Response
7	FAB (Duncan Heard (email 1 July 2019))	
7	1. Refer to 6.7. Please update number of identified vegetation species (more than 1250)	1. This is the best information we have at our disposal.
7	2. Definition of sustainability and/or sustainable development in the context of the FNR for inclusion in the definitions.	2. Done. The definition used is from the NEMA.
7	3. Coastal recreational/parking areas should be "transformed units"	3. Noted, will be included in the amendments.
7	4. Improve the clarity of Maps in terms of existing infrastructure.	4. Maps are available on request on A0 pdf format to reflect the true scale
8	Public Stakeholders that support letter from WCC from I&AP 8 to 33 and 35	I&AP's support letter from WCC, please see comment under WCC.
No	INDIVIDUAL COMMENT BY PUBLIC STAKEHOLDERS	Response
34	1. Support letter from Elspeth Ivey	1. See comment for Elspeth Ivey (37)
35	2. Support from WCC	2. See comments for WCC (2)
36	3. Are there plans for zip-lining activities	3 and 4. There are no plans
36	4. Are there plans for 4 x 4 routes?	
36	5. Are there plans for a cableway?	5. There are no plans. A proposal from an operator for a cable car was submitted to the Municipality. There has been no further follow-up from the applicant. A presentation was also presented to the FAB almost two years ago.
36	6. Are there plans for retail activities	6 and 7. There are no plans.
36	7. Are there plans for a coffee shop of sorts?	
36	8. Are there plans for an astronomy centre?	8. There was an application for an astronomy centre but no further follow-up has been received.
36	9. Are there plans for accommodation units?	9. There are no plans.
37	1. Too long, interesting and informative but confuses and obscures, detracts from meaningful public participation and the purpose to establish a PAMP for the FNR. Much of the detail can be continued in the Appendices leaving a simple, direct PAMP which can be understood by the public who can then give a positive contribution.	1. The 2020-2025 FNR PAMP is formatted as per the CapeNature Protected Area Management Plan template.
37	2. Major factor in the preparation of a management plan are the funds available to implement, monitor and control the effectiveness of the plan. The management plan should focus on maintenance and protection of the FNR and not financial self sufficiency as suggested in the document.	2. Financial self sufficiency references have been removed from the PAMP.
37	3. Alternative resources must be found. Mission Statement includes: "in partnership with relevant community organisations". Therefore to form public/private partnership is within the original concept of the FNR and from such partnerships, effective resources (human and funding) can be established decreasing the burden on the OM and the focus of a PAMP will return to management and protection of the FNR with the danger of detrimental development avoided.	3. Section 9.2. of the PAMP deals comprehensively with cooperative governance, co-management agreements and partnerships.
37	4. The Specific Purpose for which the FNR was established conflicts with "The FNR delivers important ecosystem services and is a source of spiritual and cultural wellbeing, and outdoor recreation for the inhabitants of and visitors to Hermanus." There is a significant difference in the interpretation of the purpose. The primary purpose indicates an environmental approach and the secondary emphasises a developmental approach. This is reflected throughout the document. The human activities and the ecological infrastructure are of a secondary benefit of the FNR and must not compromise the initial environmental purpose.	4. The following was inserted in the document under "Purpose of the Nature Reserve". The specific purpose for which the reserve was established, was spelled out by Mr Harry Wood, the then Curator of the reserve, on 25 April 1966 at the request of the Town Clerk. It read, "The specific purpose for which the reserve was established was to conserve the natural association between Fauna and Flora which are indigenous to this area, and to build up a flora (in the lower area of the reserve) that is becoming extinct in the Caledon Division. This includes the planting of forest trees, which when mature will encourage the natural Fauna of the surrounding districts to make a haven in the reserve". In the Town Clerk's letter to the Director of Nature Conservation dated 12 November 1968 it was rephrased to read, "Specific purpose for which Reserve was established: As a nature reserve (particularly wild flowers) which includes the preservation and cultivation of Indigenous Flora, which grows and which is known to have grown in the Caledon Division".
37	5. Conflict of interest with reference to development of the FNR. Maintenance/protection of present FNR as an unique area of biodiversity (an environmental approach) and the development of the FNR as a source of income (a developmental one). Vision Statement and Mission Statement support an environmental approach. Management Objectives speak about a Developmental Approach mainly for human use, to generate funds throughout the document.	5 and 6. References "to income generation in order for the reserve to sustain itself" have been removed and/or revised. The Management Authority does not see any conflict with the generation of funding or income from activities that do not compromise the purpose for which the Protected Area was declared.
37	6. Tourism as described in the Vision Statement is an important attraction to tourists. The indigenous biodiversity is unique and a priority of a PAMP must be maintenance and protection of this asset. This asset when protected and maintained is self sustainable and it must not be compromised by the development of human activities "in order for the FNR to realise its incoming generating potential (Sec 8.8.)	
37	7. Zoning (Sec 8.1.). The 2013 zoning greatly decreases the protection given to FNR by NEM:PAA.	7. The Overstrand Municipal Zoning Scheme, Gazetted by the Western Cape Provincial Government in 2013, zones the FNR as Open Space Zone 1: Nature Reserve (OS1) where the primary use is listed as a nature reserve and consent uses are defined in conjunction with the Development Rules applicable. The Municipal Spatial Planning Categories must not be confused with "Management Units", as determined in the PAMP. The "Management Units" describe, at a much finer scale, the allowable land-uses and activities in clearly defined areas as described in Table 2. The approved protected area management plan determine the allowable and prohibited activities within each management unit
37	8. OS1 gives full authority to council to decide on development applications with a wide range of consent uses. This zoning must be corrected and consent uses excluded from FNR. The major part of FNR should be rezoned Core Conservation Zone: Conservation 1. "The primary use is wilderness and no consent uses are permitted"	8. Section 8.1 has been edited to clearly define zoning definition.
37	9. Lack of Human Resources. FNR is underfunded and in turn under-resourced	
37	10. Staff requirements are listed and it is acknowledged that certain positions which are needed are either not filled or have not been approved. Therefore the goals of protection and maintenance of FNR cannot be achieved under the current management status.	9 and 10. This section has been edited, please see FNR Staff Requirements, Figure 11.
37	11. Operational staff are supported and supplemented by volunteer run organisations e.g. HBS. The contribution of HBS should be further encouraged, acknowledged and funded. The Mission Statement and the Management Objectives envisage this. This example of cooperation may provide initiative for further private/public partnerships	11. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests. Section 9.2. of the PAMP deals comprehensively with cooperative governance, co-management agreements and partnerships.
37	12. Lack of budget/funding: The OM states that a budget will be considered once the PAMP has been approved. It is acknowledged that the FNR is an important attraction to local residents and tourists yet it is severely underfunded. FNR should not be required to be self-supporting as this will compromise the environmental process.	12. Noted, reference to financial self sustaining of the FNR have been removed from the document.

37	13. The OM has budgetary constraints and FNR is not a priority. Alternative methods of funding must be investigated and if feasible initiated. Public/private partnerships provide a positive source of funding and management of the FNR.	13. Please refer to 9.13. Financial and Administration Management
37	14. Management Control: Lists 97 actions necessary to manage the FNR. With a limited budget it is impossible for all these actions to take place, be monitored, controlled and evaluated. The feasibility of these actions should be assessed and then prioritised to comply with budget constraints. Without sufficient funding there is insufficient personnel which results in a lack of management control.	14. Noted, actions will be prioritised in the APO.
37	15. Proposed expansion of FNR, the land demarcated for addition should be assessed as to whether it adds any value to the FNR as an area of unique biodiversity. Only land which has particular value should be added.	15. Land biodiversity value will be assessed. It is important the municipality makes more land available for conservation. The rehabilitation will be dealt with in the APO.
37	16. FNR is under-resourced and should not increase its expense by adding land which requires rehabilitation, maintenance and protection. Quality more than quantity.	16. It is important the municipality makes more land available for conservation. The rehabilitation will be dealt with in the APO.
37	17. Land which is degraded may be used for human activities which do not require pristine or near pristine conditions and unique biodiversity (proposed expansion of FNR)	17. It is important the municipality makes more land available for conservation. The rehabilitation will be dealt with in the APO.
38	1. The HBS herbarium should not be referred to as the FNR Herbarium as it is entirely managed by the HBS.	1. The correct name is the Fernkloof Herbarium. Please refer to the Fernkloof website that is managed by the HBS.
38	2. The Amphitheatre grassed area is not hired out by the HBS for functions. The Hall and Kitchen are hired out to the public by the HBS to raise funds for their maintenance.	2. This has been corrected
38	3. The HBS Visitor's Centre was constructed and is maintained by the HBS. It should not be assumed to be, and designated as, the FNR Visitor's Centre (pg. 51)	3. Although the HBS constructed and maintains the Fernkloof Visitor Centre, it referred to as the Fernkloof Visitor Centre. The HBS are acknowledged for the construction and maintenance.
38	4. " A memorial auditorium was developed in 2010." Correct to: memorial arboretum	4. Corrected
38	5. Management Action Table Item 77. "extractive resource policy" should be considered with great care.	5. Please refer to 7.12.1. Fauna and Flora Natural Resource Utilisation: <i>provided that the Goals of the FNR are not compromised and the effects on species, ecological systems and management functioning (including monitoring of the effects of extraction) are determined to be non-detrimental. The extractive use of animal resources will not be considered, except if such animals are alien or alien invasive species (e.g. fish) as listed by NEM: BA.</i>
38	6. The Conservation Development Framework 7.1. Municipal zoning refers. "any other use permitted by council" is an unwise statement and should be removed as a guideline as it allows unlimited scope to any future council.	6. Any infrastructure development or layout must follow due process with regard to any environmental application and authorization required. Also, please note that the FNR PAMP is an Operational Document for use by the FNR Reserve Managers, this is not a matter for the PAMP.
39	1. 7.9. HBS is applying for registration of the FNR Gardens as a recognised Botanical Society. Cannot call it a Botanical garden until it the process is complete.	1. Noted and corrected.
39	2. 7.13. Acknowledge that the concept and motivation for a Research Centre, process of setting it up and equipping with scientific instruments was undertaken by the HBS. Research is being managed by the HBS. Not adequate acknowledgement of this. This has implications for future research initiatives in FNR.	2. Noted, included this phrase in 7.9, 7.9. The Indigenous Nursery, Gardens and Botanical Research Centre.
39	3. 7.14.2. The cost of maintaining the Hall in FNR and kitchen facilities recently renovated by HBS is carried by HBS. Rental of FNR hall is managed by HBS. Funds raised are for the account of HBS, these funds will be applied back into projects for maintenance and development of FNR at the discretion of HBS.	3 and 4. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests.
39	4. 9.9.3. There is mention of retrofitting existing buildings. The buildings were built and are managed by HBS, it will be the discretion of HBS and their budgetary constraints that any retrofitting can be undertaken. This may be negotiated within the framework of the lease agreement but it cannot be directed by OM alone.	
39	5. 9.14.1 there are only three people who have been given status as Honorary Rangers. They are ageing and frail (except Frank Woodvine). The group of young rangers stationed the Visitors Centre met at least some of the requirements mentioned. This role was discontinued several months ago and the incumbents who had received practical training from HBS were redeployed. There is now no service to visitors to FNR. Travesty in terms of looking after tourists, suggests that OM is not serious about fulfilling this role despite positive sentiment expressed.	5. Four members have Honorary Ranger status (Ms Lee Burman included). Please refer to 9.14.1. Management Goals: iii. To implement mechanisms to enable an Honorary Ranger volunteer programme to assist and improve law enforcement and monitoring programmes within the FNR; Management Action Table 1.3, a) Ecosystem and Biodiversity Management: General Actions, Point 14, iv. The FNR Honorary Rangers Programme (HRP) is utilised to contribute to law enforcement (refer Action 66), management, monitoring and research within the FNR; v. Develop and define the Terms of Reference (ToR) for The FNR. Also refer to MANAGEMENT ACTION TABLE 1.8. LAW ENFORCEMENT AND COMPLIANCE MANAGEMENT, Point 65, ii. Investigate an Honorary Rangers programme for the FNR to improve staff capacity of law enforcement and compliance in the FNR. Also refer to, MANAGEMENT ACTION TABLE 1.13. FINANCE & ADMINISTRATION MANAGEMENT, Point 86, ii. Investigate sponsorship from private enterprises to sponsor projects such as the Honorary Rangers Programme and pamphlet and brochure sponsorship
39	6. Tourism Development Framework. Visitor book and Tripadvisor comments suggest tourists are looking for pristine natural environment. Why not focus on facilitating this by creating a safe environment with adequate signage, paths in walking condition, aliens controlled, informative booklets, labelled specimens - much of which is being taken care of by HBS. Indirect benefits will be felt in the Hermanus community.	6. Agreed, the PAMP is a step towards the realisation of these aspects.
39	7. Creating other ad hoc tourist attractions in the FNR will be the thin edge of the wedge and will risk killing the goose that lays the golden egg. Short term rewards are sometime achieved at the expense of long-term benefits.	7. Tourism infrastructure development will be guided by the Concept Development Plan. South Africa is a free economy therefore your comment regarding the perceived negative impacts to businesses in town cannot be used as a motivation.
40	1. Executive summary of a few pages with the rest as appendices would have been more constructive.	1. The 2020-2025 FNR PAMP is formatted as per the CapeNature Protected Area Management Plan template.
40	2. Falls short in terms of priorities, staffing and funding.	2. Chapter 7 clearly states the requirement for the Fernkloof staff component which is sufficient.
40	3. Co-management agreements: complete misnomer. It is an annual and not necessarily renewable permit for the HBS to "assist in the infrastructure and vegetation maintenance on the reserve". At its own expense and volition. There is no FNR management involved, only management being that of the HBS. The agreement for 2019 has still not been signed. On pg. 65 you say that it is the responsibility of the OSM to develop and maintain co-management agreements!! The same thing under 9.2.3, pg. 69. Similarly for HHG and CPMG.	3. New MOU will be developed that will stipulated guidelines for cooperation between BOTSOC and the Management Authority. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests. Section 9.2. of the PAMP deals comprehensively with cooperative governance, co-management agreements and partnerships.
40	4. 4.2. pg. 18. What do they mean by empowerment? Why should the scope of the PAMP be constrained by the "actual performance capabilities"? Why can't they budget and ensure funding to achieve the annual objectives?	4. Empowerment refers the PAMP as a resource document and tool to guide and direct the staff and stakeholders to implement what is required and improve the management of FNR. Sentence on performance capabilities removed.
40	5. 6.17. 1708 square km?	5. Should be km ² , corrected.
40	6. Operational staff. Surely the operational staffing can be determined, employed and budgeted for as an essential part of OM existence and operations? Really quite pathetic. Then under 9.8.3. stated that sufficient staff be available for patrolling etc.	6. Chapter 7 clearly states the requirement for the Fernkloof staff component which is sufficient.
40	7. pg. 50. Note or emphasise that the HBS and CPMG assist at their own expense.	7. Funding aspect added.

40	8. pg. 51 What are they talking about? An assessment of the "direct and indirect economic value of ecosystem services" should have been done long ago, and not even be up for discussion, let alone as a funding motivation.	8. This is an action that must still be performed and is therefore included in the plan.
40	9. pg. 55 Under usage at the end, delete "the Fernkloof Indigenous Nursery" and put in "Lakewood Village Gardens" Also delete "occasionally sports facilities such as"	9. Thank you, corrected.
40	10. pg. 59 Who is this Reserve Technician??	10. Another word for Reserve Manager. The post has been filled.
40	11. pg. 61. The Fernkloof Hall is 10m square. What a cheek to suggest that fees should be interrogated etc.!	11. Corrected, thank you.
40	12. Zoning: I am still puzzled about where they could be allowed to put up their hotels, cable cars and other delights. Appendix 9 does not help. In the last proposal the development area was right in the middle of the FNR.	12. The Overstrand Municipal Zoning Scheme, Gazetted by the Western Cape Provincial Government in 2013, zones the FNR as Open Space Zone 1: Nature Reserve (OS1) where the primary use is listed as a nature reserve and consent uses are defined in conjunction with the Development Rules applicable. The Municipal Spatial Planning Categories must not be confused with "Management Units", as determined in the PAMP. The "Management Units" describe, at a much finer scale, the allowable land-uses and activities in clearly defined areas as described in Table 2. The approved protected area management plan determine the allowable and prohibited activities within each management unit.
40	13. pg. 62 Table 3 Should be Table 2.	13. Corrected
40	14. pg. 64: The FNR realising its full income-generating potential?	14. Question unclear
40	15. pg. 80; 9.9.3.5. Do you think they will investigate our septic tank system when it overflows??	15. Please refer to: MANAGEMENT ACTION TABLE 1.9. INFRASTRUCTURE MANAGEMENT, Point 72, i. All existing sewage systems in the FNR must be investigated for legal compliance, and must be replaced / upgraded with appropriate sewage systems as funding permits; ii. All leaking sewage and water pipelines, taps and valves must be replaced as soon as their malfunction has been noticed; iii. Ensure that all sewage and potable water pipelines / servitudes are registered with the relevant authorities, are mapped and placed on the appropriate GIS system for easy reference;
40	16.9.15.and 9.16 Tourism development, infrastructure etc. Cable car, theme park, restaurant etc.?	16. Please refer to no. 39 comment.
40	17. Tables: lots on parking fees, counting numbers of visitors, permits, controlled access point at Fernkloof, launching fees etc. They haven't got staff to manage even the basics of FNR - what are they playing at.	17. Chapter 7 clearly states the requirement for the Fernkloof staff component which is sufficient.
40	18. Main concern apart from the ineptitude in managing FNR and lack of staffing is money. How can a "Management Plan" not include a budget or at least an estimate of annual expenditure over the next 5 years and a commitment to stick to it.	18. The PAMP does not address budgetary requirements as this would be included in the Annual Plan of Action. The PAMP is a document written for the FNR Reserve Manager to give direction and guidance and is therefore written accordingly. The Environmental Management Services have strategic document for these aspects of which Fernkloof is part.
40	19. Have they done an APO for the coming year (starting 1 July) How much money did they spend last year and the year before that? They are very glib about passing the PAMP and then talking about budgets, but surely this is arse about face?? If the OSM cannot afford to manage the FNR they should say so.	19. The PAMP is a document written for the FNR Reserve Manager to give direction and guidance and is therefore written accordingly. The Environmental Management Services have strategic documents for these aspects of which Fernkloof is part and this will be included in to the APO process.
40	20. no commitment to the well being of the FNR.	20. The Municipality is fully committed to the wellbeing of Fernkloof and ha dedicated staff and a dedicated budget for this pupose.
40	21. Funding for the various APOs should be guaranteed by OSM.	21. The PAMP does not address budgetary requirements as this would be included in the Annual Plan of Action. The PAMP is a document written for the FNR Reserve Manager to give direction and guidance and is therefore written accordingly.
40	22. Theme parks are still lurking there	22. Please see comments under no. 36.
40	23. Do we need outside environmental consultants?	23. Specialised knowledge will be required from time to time that is not available within the Municipality and in these cases the services of specialised professionals will be identified.
41	1. There is no need to develop the ocean and coastline in a sustainable manner so that it may "realise it's income generating potential.	1. Sustainable development along the coast line is done for the benefit of recreational users.
41	2. There should be no expectation that the FNR should be developed as a source of revenue. Any expectation in this regard is a deviation of the stated purpose of the FNR and should be entirely eliminated.	2 Please see comment below.
41	3. Income generating activity would largely benefit 3rd party business operators and possibly provide little income (or even a loss of income/capital) for the FNR. Why should there be any activity developed for the FNR to realise it's income generating potential.	3. The reference to "income deriving initiatives has been removed.
41	4. Any development of footpaths will destroy the FNR.	4. Any infrastructure development or layout must follow due process with regard to any environmental application and authorization required.
41	5. Length and complexity make the document difficult to read and detracts from meaningful PPP.	5. The PAMP has been developed on a framework and template provided by CapeNature.
42	Lengthy document, does not address the needs of FNR. Objection to the document, believes all errors and inconsistencies need to be rewritten and addressed.	The 2020-2024 FNR PAMP is formatted as per the CapeNature Protected Area Management Plan template. Individual "errors and inconsistencies" have not been identified in your comments and therefore cannot be individually reviewed and addressed accordingly. Please also note that the FNR PAMP 2020 - 2024 is a document to be used by the FNR Reserve Manager to give direction and guidance and is therefore written accordingly.
43	Request to give recognition to the Botanical Society	The contribution to the Hermanus Botanical Society's (HBS) to the management of the FNR is acknowledged in the following sections of the FNR PAMP: 2.The Management Framework of the FNR; 2.7. Co-Management Agreements; 2.7.1. The Hermanus Botanical Society. 2.7.1. The Hermanus Botanical Society (HBS) 9. The FNR Strategic Implementation Framework; 9.2. Integrated Planning, Cooperative Governance and Co-Management Agreements; 9.2.1. Management Goals ii. To continue to refine and develop the FNR PAMP in consultation with the FAB, whilst considering inputs from CapeNature, the CPMG, the HBS, the Hermanus Tourism Bureau, and from any other Non-Governmental Organisations (NGOs) or authorities who wish to assist with the management of the reserve. The FNR PAMP (2019) was developed with consultation, input and guidance from Fernkloof Advisory Board (FAB). Members of the HBS are FAB members and thus contributed to this PAMP.
44	When will they understand it is nature and our unspoilt places that attract people to this area. It would be disastrous for Hermanus business people and visitors if the plan were to be implemented.	It is unclear which part of the Fernkloof PAMP is being referred to or objected against and therefore a response cannot be given.
45	Objection to the proposed development plan for Fernkloof.	The objection does not clearly state which aspects of the development plan is being objected against and therefore response cannot be concluded.

46	The document notes the zoning of FNR (Section 8.1), as Open Space Zone 1: Nature Reserve (OS1) under the OM Zoning Scheme of 2013 which rewrites the zoning definitions suggested by the Province. OS1 has been rewritten to give the OM blanket powers to determine consent uses in FNR. This is a fatal flaw that opposes the spirit of NEM:PAA and which must be corrected. Under both the SDF and EMF the province classifies the nature reserve as Core Conservation Zone: Conservation 1. The primary use is wilderness conservation and no consent uses are permitted. Fernkloof should be zoned CON 1.	This is not the platform to comment/object to the Gazetted Zoning Scheme (2013). Please also note that FNR is divided into Management Units. The Municipal Spatial Planning Categories must not be confused with "Management Units", as determined in the PAMP. The "Management Units" describe, at a much finer scale, the allowable land-uses and activities in clearly defined areas as described in Table 2. The approved protected area management plan determine the allowable and prohibited activities within each management unit
47	1. PAMP does not adequately meet the requisite legislative requirements and could thus be inadequate to inform effective and sustainable implementation.	1. It is unclear which legislative requirements is being referred to? Chapter 3. 3. Legislation Guiding the Administration of the FNR and Chapter 4. 1. Legislation Guiding the FNR PAMP refer to the Legislative requirements for the management and administrative processes required for the management of the FNR. Legislation and regulations applicable to the various aspects of management for FNR are listed in the relevant subsections of Section 9. The FNR Strategic Implementation Framework.
47	2. PAMP does not provide adequate economic and timeline based detail on the longer term sustainable protection of the Fernkloof Nature Reserve.	2. The FNR PAMP (2020 - 2025) is a five year Management Plan document to be used by the FNR Reserve Manager to give direction and guidance and is therefore written accordingly. The FNR Annual Plan of Action (APO) as addressed in Chapter 4.2. "Adaptive management strategies should be recorded and addressed in the annual review to update the PAMP and the Annual Plan of Action (APO) for the FNR. " 7.3. Financial Management: "The FNR is managed according to an Annual Plan of Operations (APO). The FNR APO is constrained by the annual budget allocation that is determined by the OSM for the EMS and various specific projects including infrastructure maintenance, alien invasive species and fire management." 9.12. Management Effectiveness: "iii. To implement APO for the FNR. The FNR must be managed according the APO. Annual budgets for specific goals must be incorporated in the APO"
47	3. PAMP does not provide adequate information on how the protection and access to "green spaces" will be assured for all visitors to the area.	3. The PAMP is a document written for the FNR Reserve Manager to give direction and guidance and is therefore written accordingly. The Environmental Management Services have strategic documents for these aspects of which Fernkloof is part and this will be included in to the APO process.
47	4. No or limited consultation and input from one or more social scientists in to the PAMP.	4. The authors of the PAMP have conferred with various local specialists. Please refer to the Main Contributors and in text references. Social science is an academic discipline that uses the scientific method to study human behaviour.
47	5. The PAMP should address which characteristics of natural settings are most important for triggering a beneficial interaction between diverse cultures, geographic region and socio-economic groups. The PAMP should address the provision and management of this interaction.	5. Beneficial Interactions/natural settings. 8.8. The Concept Development Plan: Tourism and 9.16. Tourism Development Framework; Management Action Table 1.16. refers to the plan for Eco-cultural tourism development within the FNR. Definitions: Eco-cultural tourism means environmentally responsible travel and visitation to relatively undisturbed natural areas in order to enjoy and appreciate nature as well as the past and present cultural and natural history of the area.
47	6. The PAMP is unclear on how unsustainable exploitation of the Fernkloof Nature Reserve will be mitigated against.	6. Sustainable Exploitation is referred to in the Management Action Table 1.11 Socio-economic Framework Management: 7.7. Deliverable: Manage consumptive utilisation of resources in the FNR. Monitoring Activity: Review any existing CapeNature and DEA&DP policies and develop a Policy Guideline Document for the Evaluation of extractive resource use applications within the FNR. Indicator: a) The FNR has an extractive resource policy in place. 7.12. Natural Resource Utilisation also refers. Unsustainable Exploitation (poaching/illegal activities) are addressed in: 9.8.3. Guiding Principles for Law Enforcement and Compliance and Section 10. Management Action Table 1.8 Law Enforcement and Compliance .
47	7. The PAMP does not provide evidence of consideration for green space design.	7. The PAMP is a document written for the FNR Reserve Manager to give direction and guidance and is therefore written accordingly. The Environmental Management Services have strategic documents for these aspects of which Fernkloof is part and this will be included in to the APO process.
47	8. The PAMP does not read easy.	8. The PAMP has been developed on a framework and template provided by CapeNature.
47	9. The PAMP does not define or provide for the allocation of resources. Does not provide an implementation plan with a schedule and not provide an income or operating expenditure plan or any form of budget framework.	9. Allocation of resources; Implementation Plan; Budget (income/expenditure): Refer 7.3. Financial Man. The FNR is managed according to an Annual Plan of Operations (APO). The FNR APO is constrained by the annual budget allocation that is determined by the OSM for the EMS and various specific projects including infrastructure maintenance, alien invasive species and fire management. Schedule: As mentioned in 4.2 The Primary Functions of the PAMP " The PAMP is an adaptive management tool that allows for adaptive/and or refined management processes to respond to the changing factors that may affect the FNR." also refer to: 9.13. Financial and Administration Management; 9.13.1. Management Goals; i. "To receive an Annual Budget from Council specifically for the FNR that includes allocations for running costs and projects that are required to effectively manage the reserve; ii. To compile a five year business plan for the FNR that includes costs and identifies sources of income generation, external funding opportunities. . . ."; For implementation of the PAMP please refer to 4.5. Monitoring and Review of the FNR PAMP.
47	10. No where does it state what the original purpose is for which the FNR was created.	10. 1. Declaration Status of the FNR: A map dated September 1942 indicates a 165 hectare "Existing Nature Reserve", and a "Proposed Nature Reserve" totalling 1 217 hectares. However, formal management for conservation purposes of a portion of the then "Hermanus Commonage" only began in September 1952, with the subsequent proclamation of a so-called "Wild Flower Reserve" (Proclamation No. 129 of 1956).
47	11. PAMP should clearly define and describe the terms of reference, roles, accountability and responsibilities of the key public, private and social partners to the FNR.	11. FNR Co-Management Agreements are discussed in 2.7. ToRs and responsibilities are signed in the Co-management agreements that are available on request from the EMS office.
47	12. PAMP does not satisfy NEM:PAA S41(2)(a). PAMP does not provide a coordinated policy framework. Section 7 is too generic and open to interpretation.	12. Terms and Conditions of biodiversity management as per NEM:PAA: 9.3. Ecosystem and Biodiversity Management; 9.3.3. 9.3.3. Guiding Principles for Ecosystem and Biodiversity Management refers to the ToR of Biodiversity and Ecosystem Management. Management Action Tables 1.3. J-S refer to Biodiversity/Ecosystem Management. Co-ordinated Framework Policy: refer to 2. The Management Framework of the FNR. Policy/Legislation is referred to in 5. The Strategic Implementation Framework of the FNR; Section 7. Operational Management of the FNR refers to the overview, background and current Operational Management of the FNR.
47	13. There is no prioritization of management activities, no resource allocation, no implementation schedule and no budget estimate for any of the points mentioned. There is no programme for the implementation of the PAMP and not costing given or resources allocated to implement the PAMP.	13. Management Activities priorities/resource allocation etc. same response as comment 9.

47	14. The Overstrand OS1 Zoning is not consistent with the protection NEM:PAA provides nor is it in alignment with the Western Cape Provincial model zone scheme provision for municipal nature reserves.	14. The Overstrand Municipal Zoning Scheme, Gazetted by the Western Cape Provincial Government in 2013, zones the FNR as Open Space Zone 1: Nature Reserve (OS1) where the primary use is listed as a nature reserve and consent uses are defined in conjunction with the Development Rules applicable. The Municipal Spatial Planning Categories must not be confused with "Management Units", as determined in the PAMP. The "Management Units" describe, at a much finer scale, the allowable land-uses and activities in clearly defined areas as described in Table 2. The approved protected area management plan determine the allowable and prohibited activities within each management unit. Any infrastructure development or layout must follow due process with regard to any environmental application and authorization required. Also, please note that the FNR PAMP is an Operational Document for use by the FNR Reserve Managers, the Overstrand Municipal Zoning Scheme is not a matter for the PAMP.
47	15. The PAMP should include a signed partnership agreement with the HBS as the primary management agent for the FNR.	15. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests. Section 9.2. of the PAMP deals comprehensively with cooperative governance, co-management agreements and partnerships.
47	16. The PAMP should make provision for a bylaw formalising the FAB. The FAB should comprise of representatives of all Interested and Affected parties and should be elected by the organisation that it represents. FAB should have oversight and advisory functions over all matters relating to the wellbeing of the FNR. FAB should be the local authority that must sign off on the PAMP before it goes to Council and should have powers of veto for proposed developments within FNR, subject to review by he MEC.	16. FAB is established and operates in terms of the Western Cape Nature Conservation Ordinance and the FAB Bylaw. This is not a matter for the PAMP which is an operational document for the reserve manager.
47	17. Effective community collaboration with the many local environmental bodies must be seen as a priority and must be appropriately addressed in any attempt at developing a PAMP for FNR.	17. The PAMP is an Operational Document for day-to-day use by FNR Management. Section 9.2. of the PAMP deals comprehensively with cooperative governance, co-management agreements and partnerships.
47	18. A Public Private Partnership should be proposed and described for FNR.	18. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests. Section 9.2. of the PAMP deals comprehensively with cooperative governance, co-management agreements and partnerships.
48	1. PAMP should consider the conservation principles into the future . Using examples of PAMP apply modern future thinking principles. It should therefore be driven by younger scientists and biodiversity planning specialists with a good level of international experience. Box 4. of the attached IUCN guidelines provides very good pointers on what a PAMP should entail.	1. Agreed.
48	2. Too introspective and old fashioned - needs to be fresh and far sighted. Expected more reference to international modern PAMP principles	2. The PAMP has been developed on a framework and template provided by CapeNature.
48	3. There are too many deliverables and being short on focus. Which are the few items that really matter over the next 5 years?	3 & 4. The management actions identifies the actions that needs to be implemented and once the PAMP as been approved by council and signed off by the MEC the priorities will be set as short, medium and long-term goals. At this point budget, time-frames and responsible officials will be identified.
48	4. Lacking in clarity on detail of implementation to complete deliverables	
48	5. Deliverables must be prioritised and properly budgeted for. Understands it is not easy to obtain necessary financial support through OM's fiscus but there are many examples where co-funding can be successful acquired through international funding, donors, PPPs etc. For this to be successful, the selected projects must be well defined and the applications well drafted and lobbied. This requires time from well trained staff and support from OM.	5. Comments noted, please refer to 9.13. Financial and Administration Management
48	6. Follow Grootbos's of collaboration with academic institutions to improve their importance as a base for interesting research activities. <u>FNR has excellent potential to be utilised as a field area for academic research.</u>	6. Comment noted, please refer to the 7.13 Research and Monitoring and the corresponding Management Action Tables.
48	7. Cliff path and shoreline, lagoon edge: it is important that these receive equal and in some cases different emphasis. There is clear evidence that gulleys serve as exit points for abalone poachers and provide overnight shelter for vagrants.	7. Law enforcement and Compliance within the FNR is dealt with in 9.8. Please also refer to the relevant Management Action Table. 1.8 Law Enforcement and Compliance
48	8. Interpretive facilities: For Hermanus to become a world top biodiversity tourist destination, it needs a holistic interpretive plan for the entire town. Signage and interpretive areas must be coherently and well designed. Budget is essential to adequately maintain these facilities.	8. Noted, but this is not a matter for the PAMP which is an operational document for the reserve manager.
48	9. Safety and Security. The Eastern areas of Hermanus have experienced a spate of housebreaking crimes since Dec 2018. Some of the entrees have been traced to have escaped via FNR. It is important that FNR management collaborate with local security agencies and watch groups especially in terms of surveillance measures.	9. Co-ordination of the various security and enforcement agencies will be facilitated formally through the Hermanus Security Forum. Law enforcement and Compliance within the FNR is dealt with in 9.8. Please also refer to the relevant Management Action Table. 1.8 Law Enforcement and Compliance
49	Peter Hodgkin comment on behalf of Hands Off Fernkloof	Please refer to Hands Off Fernkloof No. 52 comment
50	1. FNR is still the number one attraction in Hermanus according to Tripadvisor. It must be given absolute protection from your department. No development of any sort, sustainable or otherwise, should be invited, contemplated or supported.	1. The "Management Units" describe, at a much finer scale, the allowable land-uses and activities in clearly defined areas as described in Table 2. The approved protected area management plan determine the allowable and prohibited activities within each management unit. Any infrastructure development or layout must follow due process with regard to any environmental application and authorization required. Also, please note that the FNR PAMP is an Operational Document for use by the FNR Reserve Managers, the Overstrand Municipal Zoning Scheme is not a matter for the PAMP.
50	2. FAB is a competent and dedicated body who have the interests of the FNR as their primary focus, whereas your Environmental department is completely compromised by falling under the directorship of Infrastructure and planning - neither of which have any place within the FNR.	2. The organisational structure does not impose any constraints on the EMS. All developments are evaluated on their own merits taking into consideration the environmental impacts.
50	3. The Botanical Society has about 250 members, of which many walk in the mountains throughout the year - they are the eyes and ears of what is happening and therefore custodians and guardians of FNR. FAB and HBS should continue to be the caretakers of the FNR and the OM should pay for the upkeep thereof.	3. New MOU will be developed that will stipulated guidelines for cooperation between BOTSOC and the Management Authority. FAB is a statutory requirement with it's own bylaw and works in collaboration with the Management Authority. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests. Section 9.2. of the PAMP deals comprehensively with cooperative governance, co-management agreements and partnerships.
50	4. The EMS should be given its own autonomous directorship	4. The current organisational structure does not impose any constraints on the EMS and is therefore placed within the correct Directorate to fulfill the planning and operational functions required.

50	5. Right now, this department is just dancing to the Infrastructure and Development tune. It has no teeth and no clout and there are serious environmental issues happening here, far more important than trying to build stupid restaurants on top of koppies. Baboons, poaching, the use of Glyphosate, faecal count in our rivers, bore holes running dry, alien infestation to name just a few.	5. The organisational structure does not impose any constraints on the EMS. All developments are evaluated on their own merits taking into consideration the environmental impacts.
51	1. A lot of background information, expositions on various aspects (cut-and-pasted) makes the document is obsfuscatory.	1. The PAMP has been developed on a framework and template provided by CapeNature.
51	2. The document should be restructured.	2. The PAMP has been developed on a framework and template provided by CapeNature.
51	3. An Executive summary should demonstrate that the management strategy, objectives, action plan in various prioritised stages, management structures and resources unamiguously support the purpose and vision for the FNR	3. Once the document has been finalised the Executive Summary will be completed as per the CapeNature PAMP Template
51	4. Clearly divide the PAMP into a status quo (situation analysis), then a plan for maintenance and improvement which should be in line with the purpose and vision, given in stages and supported by resource needs (management budget) for each stage.	4. to 8. The PAMP has been developed on a framework and template provided by CapeNature.
51	6. The detailed policy and legal framework that guides and regulates the plan should be in appendices for reference purposed.	
51	7. The document does not cover the basics of what a management plan should and cannot be termed a management plan. The document is unnecessarily complicated/complex	
51	8. Assess what needs to be done, what resources are available to accomplish this, what gaps there are in the resources and the implications of these gaps , what plans can be put in place to address resource needs	
51	9. Too many actions in Section 10. Management Action Tables without regard for resources required and not screened for viability.	9 & 10. The management actions identifies the actions that needs to be iplemented and once the PAMP as been approved by council and signed off by the MEC the priority will be set per short, medium and long-term goals. At his point budget, time-frames and responsible officials will be identified.
51	10. Many studies that are outlined in the Action Lists have not been done. The document says that these Actions will form a checklist against performance of the EMS staff responsible. The Actions are too time consuming and beyond the capacity of the EMS.	
51	11. There is contradiction between the vision and mission statements. The concept of sustainable development is an outdated concept. It is a fundamental flaw as an approach to management of the FNR	11. The Mission and Vison statements were developed at a FAB/EMS meeting and agreed upon by all.
51	12. If "sustainable development" is the driver of the managment of FNR sensible, rational and effective management of the reserve that complies with both the spirit and letter of environmental legislatioin will not be achieved.	12. Please refer to the 2030 agenda for sustainable development adopted by all United Nation Member States in 2015 and its 17 Sustainable Development Goals. Here the fine balance between development and conservation is well explained.
51	13. The Vision of the EMS [.....] Because the EMS is housed under Infrastructure and Planning Department constraints are imposed and development is placed as a priority over the environment	13. The organisational structure does not impose any constraints on the EMS. All developments are evaluated on their own merits taking into consideration the environmental impacts.
51	14. Section 5.4. Sustainable Development within the FNR. Using the sustainability approach and tying it to the mission statement is outdated and wholly inappropriate. EMS is trying to give the impression that the PAMP aligns with the principles of NEM:PAA. The use of the "adaptation" of NEM:PAA sees disturbance, loss and exploitation of natural resources under the auspices of Sustainable Development. Section 5.4. Sustainable Development and 5.6. The Objectives of the Management should be deleted.	14. The Management Authority has found that the term sustainable development is used in current and long-term International and National documents. Please refer to the 2030 agenda for sustainable development adopted by all United Nation Member States in 2015 and its 17 development goals.
51	15. Clarity is needed on the status of the "mandate" for "sustainable development" in the FNR	15. The mandate for sustainable development comes from the UN Sustainable Development Goals (2015), the Constitution of the Republic of South Africa (Bill of Rights, Section 24) and the NEMA (2. Principles) .
	16 Clarity is needed on the content of the "approved Integrated Environmental and Conceptual Development Plan	16. Reference to the "approved Integrated Environmental and Conceptual Develop Plan" is a mistake and should refer to the "Concept Development Plan for FNR. This has been corrected
51	17. FNR's importance of an attractor of tourists and a catalyst for and supporter of business activity in and around Hermanus should be stated clearly.	17. The PAMP is not a promotional document for the public. The PAMP is an Operational Management tool for the staff of FNR.
51	18. Providing tourist facilities within FNR of the type envisaged to generate income will impact business in town negatively. The current serious decline in economic growth and its implications is given scant attention and there is no mention made of the 2018 unrest in town and its impact on the area.	18. Tourism infrastructure development will be guided by the Concept Development Plan. South Africa is a free economy therefore your comment regarding the percieved negative impacts to businesses in town cannot be used as a motivation.
51	19. Environmental legislation has been "adapted" to fit an development agenda. FNR must be managed in accordance with NEM:PAA in pursuit of the purpose for which it was proclaimed: "As a nature reserve (particularly wild flowers) which includes the preservation and cultivation of indigenous Flora, especially the Flora which grows and is known to have grown in the Caledon Division"	19. The PAMP is developed in terms of NEM:PAA and the FNR will be managed accordingly.
51	20. Management goals are rich in cliches, are illogical and cannot be achieved: "To develop the commercial eco-cultural tourism potential of the FNR without compromising the biodiversity of the nature reserve" An environmental approach that acknowledges the irreplaceable importance of the FNR's ecology and ecological processes, and that is applied in the management plan will be far more "sustainable" than the approach that is punted. This will be more in line with legislation. It is illogical to aspire to having commercial activities within the FNR that compromises its purpose in order to generate funds to support the maintainance of its purpose .	20. The Strategic Implementation Framework (SIF) addresses 16 management areas with 46 goals. This is a carefully well-balanced framework. The specific goal referred to here deals with the non-consumptive, low impact, eco-cultural tourism activities and events in the FNR that will not compromise the biodiversity of the reserve.
51	21. FNR needs to be funded adequately by the OM directly. FNR provides a drawcard for visitors and a general benefit to the community, as do beaches and other public amenities - none of which are required to be self-funding, but which are funded from the charges paid by ratepayers.	21. Agreed
51	22. Zoning. Zoning is crucial to the management approach. 2013 Zoning scheme rewrites the zoning definitions as suggested by province. OS1 has been rewritten to the OM blanket powers to determine consent uses in the FNR. This is a fatal flaw that opposes the spirit of NEM:PAA and which must be corrected.	23 to 25. The Overstrand Municipal Zoning Scheme, Gazetted by the Western Cape Provincial Government in 2013, zones the FNR as Open Space Zone 1: Nature Reserve (OS1) where the primary use is listed as a nature reserve and consent uses are defined in conjunction with the Development Rules applicable. This is the highest protection possible under the Zoning Scheme. The Municipal Spatial Planning Categories must not be confused with "Management Units", as determined in the PAMP. The "Management Units" describe, at a much finer scale, the allowable land-uses and activities in clearly defined areas as described in Table 2. Any infrastructure development or layout must follow due process with regard to any environmental application and authorization required.The approved PAMP determines the allowable and prohibited activities within each management unit.
51	23. Under the WSDF and EMF the province classifies a nature reserve as Core Conservation Zone: Conservation Zone 1. The definition of Conservation Zone 1: Wilderness Area gives the objective as "to provide for the conservation of predominantly natural, remote and environmentally unspoilt areas. Such areas may be proclaimed nature areas or may not be proclaimed..." The primary use is wilderness conservation and no consent uses are permitted. In contrast, the objective of OS1 "to provide for active and passive recreational areas on public land, in order to promote recreation, and enhance the aesthetic appearance of an area" This is patently not in line with the purpose for which the reserve was declared. The majority of the FNR shoud be zoned CON1. Already disturbed areas could be classified as	
51	24. Development rules attached to the consent uses of the current zoning gives council total power over any development mooted for the management zone set aside for possible development (the so-called "transformed unit" zone), including the power to decide whether (inter alia) an environmental study or management plan for any envisaged development is needed. Should such a development not be in accord with NEM:PAA it would need to be taken on review by objectors - a costly and time-consuming process.	

51	25. Consent uses under the current zoning should be deleted from the document. The document should include a statement that no development will be approved within the transformed unit zones that does not comply with the provisions of NEM:PAA and that the zoning does not lessen, prejudice or jeopardise the protection given to all areas of the FNR by NEM:PAA	
51	26. Management Action Tables: too many actions, with no implications in terms of resources. The list is beyond the capabilities of under-resourced EMS; external assistance will be needed to accomplish many of the actions. The main achievement of the document would then be to ensure that consultant do what is needed to set the basis for the management of FNR rather than set a plan in place that will enable the EMS to manage the reserve efficiently and effectively.	26. to 30. The Management Action Tables identify the actions that need to be implemented and, once the PAMP has been approved by council and signed off by the MEC, the short, medium and long-term priorities and goals will be set. At this point budget, time-frames and responsible officials will be identified. The PAMP is operational tool for the reserve manager and thus lists all activities required in the long and short term.
51	27. The list of actions should have a timeline for the various action, including when they should commence and on what other actions they may depend and to what extent.	
51	28. The action list did not undergo any screening for viability and includes items that should already have been done in order to enable effective management, such as surveying the physical demarcation of the boundary points.	
51	30. The list of actions in the Management Action Tables should be prioritised	
51	31. The action section notes that "...a boundary fence is not envisaged..(but that)..the fencing probability can however be reviewed for specific areas of conflict". Presumably this "conflict" refers to baboons, and if so, this should be placed in the section dealing with them.	31. This section refers to the entire reserve and its boundaries. Conflict refers to illegal or inappropriate activities of human access. For e.g. where rehabilitation is urgently required.
51	32. Page 66. 9.1.3. The Proposed Expansions of the FNR refers to pockets of municipal land that are envisaged as being incorporated into FNR. These areas are degraded and many infested with alien vegetation that should be cleared by the OM. The land at the end of Protea road is a fire hazard and a controlled burn should be undertaken before this land, and any other in a similar situation, is handed over to the FNR. If this is not possible, a water-tight undertaking including timelines for such restoration should be agreed with the OM before incorporation.	32. It is important the municipality makes more land available for conservation. The rehabilitation will be dealt with in the APO.
51	33. The resources needed are more than available. At the heart of the resource problem is the lack of priority given to the environment by the OM, despite the fact that the key tourist attraction to the area. The EMS is under-resourced and FNR is one of its many concerns. The EMS is housed under Infrastructure and Planning, which in terms of providing full protection to the FNR can be expected to give rise to conflicts of interests. This is a common thread throughout the document.	33. & 34. The finalisation of the PAMP will assist in motivation for more resources.
51	34. Human resources: to accomplish what is envisaged in the document would require a strong staff complement, beyond what is currently in place.	
51	35. Section 7 should indicate whether posts noted as vacant have been approved.	34 & 35 This section has been updated.
51	36. Update required: four field rangers no longer employed	
51	37. The continued involvement of HBS in the day-to-day running of the FNR should be encouraged, facilitated and funded.	37. The work that HBS has done and continues to do is recognised throughout the PAMP. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests.
51	38. Signage pg 57 Section 7.11. no mention of HBS involvement in signage management, colour coding and points of interests refer to the FNR hiking trails maps produced by HBS.	38. These points have been included in 2.7.1. The Hermanus Botanical Society (HBS). Also refer to 7.2. Important contributors to the Operational Management of the FNR.
51	39. A public-private partnership (ppp) should be signed between the OM and the HBS (if necessary in a coalition with other environmental NGOs in the area) for the management of the reserve, with HBS et al providing day-to-day management and OM providing funding.	39. The Overstrand Municipality is the Designated Management Authority of the Protected Area and is therefore the institution in which the authority to manage the reserve vests. Section 9.2. of the PAMP deals comprehensively with cooperative governance, co-management agreements and partnerships.
51	40. The OM needs to fund the upkeep of the FNR to a far more significant level than it has to date.	40. We agree. The EMS will prepare annual budgets for the FNR and table it at the Overstrand Municipality Budget Steering Committee where it is considered with all the other needs of the area.
51	41. The reference to "income deriving initiatives that could be ring-fenced" pg. 51 is based on false premise regarding the economic value of the FNR, which is inherent rather than exploitable. The OM needs to recognise that FNR needs funding without any associated expectation than those funds will be recouped through "business" opportunities utilising the reserve's facilities. Adequate funding for the FNR needs to be seen as long-term investment in the overall economic health of the town.	41. The reference to "income deriving initiatives that could be ring-fenced" pg. 51 has been removed.
51	42. Items iv and vi of the Management Goals under Financial and Administrative Management (Section 9.13.1. pg. 83) are ill-founded and should be deleted. Item vii: an ecosystem services assessment should be a motivation for internal funding from the OM.	42. Items iv and vi have been removed.
51	43. Although a broad-brush budget is a management basic, the only reference to such is on pg. 82 (Item 84 of Management Action Table), where it is noted that the EMS and FAB must appeal to Council for an FNR specific budget. No detail is given, nor even the outline of such. This item in the Management Action Tables also notes that a detailed five-year cost budget/business plan must be compiled, but the focus on funding sources such as the World Bank and Trust Funds can most charitably be described as optimistic.	43. to 45.
51	44. Given the extreme resource shortfall, drawing up a management budget for the FNR must be a priority, rather than something to (yet again) be developed at a later date. The budget should be structured to demonstrate the implications of moving from an urgent and immediate situation to a better-resourced future for the FNR. Draw up a practical budget for the FNR using OM funding that is progressively staged.	The budget process for FNR is governed by the Municipal Management Finance Act. EMS prepares an annual budget for all its activities which is tabled at the Budget Steering Committee for consideration. The Budget Steering Committee then allocates funding from available sources to the different departments. Refer to 7.3. The FNR is managed according to an Annual Plan of Operations (APO). The FNR APO is constrained by the annual budget allocation that is determined by the OSM for the EMS and various specific projects including infrastructure maintenance, alien invasive species and fire management. These APO's will be available as subsidiary documents that will be submitted and added to the Management Plan every year.
51	45. Given the massive shortfall between what is required and what is provided by the OM in terms of management of the FNR, the management plan should draw up a priority list that will include the deployment of alternative resources where these are available to address the most urgent needs. The involvement of organisations such as HBS which have on-the-ground knowledge of the immediate needs of the FNR would be invaluable in developing such a list. The list should be costed and form part of the initial management budget needs. Actions that can and should be achieved within the timespan of the management plan should be shown as current commitments. Needs must be prioritised and costed, concentrating on the most urgent and focused on maintaining FNR's ecological integrity and biodiversity.	An assessment to determine the direct and indirect economic value of the ecosystem services that the FNR provide will give additional motivation for funding. The results of such an assessment could be used as an additional motivation to secure additional funding.
51	46. The FAB. When the bylaw is rewritten, it is essential that it covers the status of the advice given by FAB. The OM is on record stating that it is not obliged to act on the advice of FAB and that FAB's recommendations are merely opinions with no authority. This is highly unlikely to have been the intention of the drafters of the ordinance when insisting on the establishment of an advisory board. In this regard, the meaning and definition of "taking advice" in the Oxford Dictionary as including "act according to when it is given" should be noted.	56. to 48. FAB is established and operates in terms of the Western Cape Nature Conservation Ordinance and the FAB Rulow. This is not a matter for the PAMP which is an

51	47. The bylaw should also cover the membership of the FAB. It is suggested that the membership should consist in the main of local conservation and civil society organisations and that these organisations should appoint representatives to the FAB. The organisations could include HBS, the CPMG, the HRA, WCC, Birdlife Overberg and the Hermanus Bird Club.	FAB is established and operates in terms of the Western Cape Nature Conservation Ordinance and the FAB bylaw. This is not a matter for the FAB, which is an operational document for the reserve manager.
51	48. FAB has a key role to play in the management of the FNR. The function, role, powers and authority of the FAB should be integral to the management plan and thus the bylaw should be embedded into the PAMP.	
51	49. Baboon management section should be updated to include the latest attempt using radio collars. The history using baboon monitors also needs to be detailed. Measures available to the OM include tighter controls on waste management (currently not implemented efficiently) and penalties for households not adhering to careful waste management. A bylaw to this effect should be drafted.	49. This section has been updated with the latest information.
51	50. The baboon electrified fence should be scrapped rather than moved.	50. As more information is gathered through the baboon management programme, decisions regarding the fence will be made by the professionals who are qualified to make these decisions.
51	51. Cultural Heritage does not consist of only artefacts and relics of human presence. The unbuilt environment is also cultural heritage, as stated in the legislation, and should be acknowledged and treated as such in the management plan.	51. For the purpose of PAMP, the definition for cultural heritage is taken from the World Heritage Convention Act. <i>Cultural heritage As defined and adapted from Article 1 of the World Heritage Convention Act, 1999 (Act No. 49 of 1999): "Monuments, architectural works, works of monumental sculpture and painting, elements or structures of an archaeological nature, inscriptions, cave dwellings and combinations of features, which are of [outstanding universal] value from the point of view of history, art or science, groups of buildings, groups of separate or connected buildings which, because of their architecture, their homogeneity or their place in the landscape, are of value from the point of view of history, art or science, sites, works of man or the combined works of nature and man, and areas including landscapes and archaeological sites which are of outstanding universal value from the historical, aesthetic, ethnological or anthropological point of view". For the purpose of FNR Protected Area Management Plan (PAMP), features of "living heritage", as well as grave sites (e.g. Hoy's Graves) and archaeological features (Khoekoen middens) are also included under this definition</i>
51	52. Buffer zone: penalties for encroachment need to be developed and implemented. This is crucial to biodiversity and fire management.	52. Agreed and in process
51	53. Item 24 Action Table: The FNR Herbarium contributes to the BRAHMS. HBS has completed this already	53. This is a continuous process. The PAMP is a document to inform the FNR Manager of current and upcoming projects.
51	54. Who will be managing the FNR APO? The biodiversity manager or "an appointed environmental consulting firm"?	54. The EMS.
51	55. The OM attempted implementing an access tariff some years ago - it proved more expensive to administer than the funds so generated.	55. This has been removed from the document.
51	56. Item 93. The number of visitors to the FNR are accurately recorded. How is this to be done?	56. A self-issuing permit book/slip system is being investigated.
52 COMMENT BY PUBLIC STAKEHOLDERS		Response
52 Hands Off Fernkloof		
52	1. FNR needs to be funded adequately by the OM directly. FNR provides a draw card for visitors and a general benefit to the community, as do beaches and other public amenities - none of which are required to be self-funding, but which are funded from the charges paid by ratepayers	1. Noted
52	2. Zoning. Zoning is crucial to the management approach. 2013 Zoning scheme rewrites the zoning definitions as suggested by province. OS1 has been rewritten to the OM blanket powers to determine consent uses in the FNR. This is a fatal flaw that opposes the spirit of NEM:PAA and which must be corrected.	2. & 3.
52	3. Under the WSDF and EMF the province classifies a nature reserve as Core Conservation Zone: Conservation Zone 1. The definition of Conservation Zone 1: Wilderness Area gives the objective as "to provide for the conservation of predominantly natural, remote and environmentally unspoiled areas. Such areas may be proclaimed nature areas or may not be proclaimed..." The primary use is wilderness conservation and no consent uses are permitted. In contrast, the objective of OS1 "to provide for active and passive recreational areas on public land, in order to promote recreation, and enhance the aesthetic appearance of an area" This is patently not in line with the purpose for which the reserve was declared. The majority of the FNR should be zoned CON1. Already disturbed areas could be classified as CON2, which permits a limited range of consent uses under guidance of an approved management plan, there is no reason to apply CON2 to any other part of the reserve.	Chapter 15 of the OSM Zoning Scheme Regulations ¹ allows municipalities to prepare, approve, amend or delete overlay zones for specific areas, therefore the OSM has drafted and intend to adopt the Environmental Management Overlay Zone (EMOZ) Regulations. The EMOZ regulations provide a mechanism for land use management, additional to existing statutory land use controls, whereby Council may give effect to specific guidelines in a spatial development framework or policy plan or address as specific management issue. Any infrastructure development or layout must follow due process with regard to any environmental application and authorization required.

END