

## **Reserve Determination of Water Resources for the Olifants/Doorn Catchments**

### **ISSUES AND RESPONSE REPORT**

**JUNE 2017**

This Issues and Responses Report (IRR) captures the issues raised by stakeholders during the gazetting of the Reserve of water resources for the Olifants-Doorn Catchments. The purpose of this report is to ensure that the concerns and comments raised by stakeholders are noted and adequately considered and where appropriate satisfactorily addressed through the gazetting process. All written submissions received from stakeholders will be summarised in the register and it will be updated on a regular basis during the course of the gazette process.

**STAKEHOLDER COMMENTS ON OLIFANTS-DOORN RESERVE**

COMMENTATOR(S)	COMMENTS, QUESTIONS AND ISSUES	RESPONSE(S)
<p>Felicity Strange (Verlorenvlei Heritage Settlement)</p>	<p><b>Page 2: 1. DESCRIPTION OF WATER RESOURCE</b> In the description of the water resource, the water management area given is the Olifants Doorn Region. The Olifants Doorn Region includes the E, F and G primary drainage regions. Arising from the description several questions follow:</p> <p><b>Question 1:</b> Why have the G regions 30 A – H been excluded from: 2 SURFACE-QUANTITY COMPONENT FOR RIVERS? (Pages 4, 5, 6 and 7)</p>	<p>The E catchment was prioritized for a Reserve determination at a high level of confidence. The information pertaining to the F60 and G30 catchments were not complete and were of a low confidence. Therefore, it was recommended that only the E catchment be gazetted, whilst excluding the F60 and G30 catchments. The Department will henceforth embark on high confidence preliminary Reserve studies for the F60 and G30 catchments, which will include all the associated estuaries.</p>
	<p><b>Question 2:</b> Why have G regions 30 A – H been excluded from: 3. SURFACE-WATER – QUALITY COMPONENT FOR RIVERS? (Pages 7, 8, 9, 10 and 11)</p>	<p>See answer to Question 1 above</p>
<p>Mr. SC Baty (Unifrutti SA Pty Ltd)</p>	<p><b>Question 3:</b> Why has Verlorenvlei Estuary, RAMSAR site and Important Bird Area been excluded from: 4. The Estuary Component? (Page 12)</p> <p>Within The Estuary Component - why is Verlorenvlei Estuary likewise also excluded from:</p>	<p>The Verlorenvlei Estuary Reserve was done <i>circa</i> 2003. Please note that it was conducted at a low level of confidence at a time when the methodology for estuaries was not yet fully developed. Hence it was excluded from this gazette. The Department will henceforth initiate a preliminary Reserve study in 2017/18 financial year for the F60 and G30 drainage regions which will include the Verlorenvlei Estuary.</p>
<p>Dale Wright (Birdlife South Africa)</p>	<p>4.1 The quantification of Estuarine Ecological Reserve? (Page 12) 4.2 The recommended Ecological Flow Requirement? (Page 12) 4.3 The Ecological Specifications? (Page 13)</p>	<p>Also see answer to Question 1 above.</p>
<p>Nick Taylor</p>	<p>Components of Ecological Specifications: Birds Fish Invertebrates Macrophytes Microalgae Water quality Hydrodynamics Sediment dynamics</p>	

	<p><b>Question 4:</b>                  Has an Estuarine Ecological Reserve Determination been completed for Verlorenvlei Estuary?                  If not can you advise if the Reserve Determination for Verlorenvlei Estuary will be undertaken and if possible by when?</p>	<p>See answer to Q1 and Q3 above</p>
<p>Nick Taylor</p>	<p><b>Question 5:</b>                  a. I find it hard to understand the omissions above could possibly constitute an oversight on your part, and I must urge you to rectify this. I have been involved intimately with the Verlorenvallei area since 2005 via: the Verlorenvlei Coalition which formed to oppose tungsten mining in the Moutonshoek, the Verlorenvlei Estuary Advisory Forum [established February 2009] and the Sandveld Grondbewaringskommittee.                  Why have none of these bodies been consulted or kept informed with regard to the water matters above?</p>	<p>Please note that all interested and affected parties were invited to participate in the stakeholder engagement processes to the preliminary Reserve determination, the Water Resource Classification as well as the determination of Resource Quality Objectives for the WMA. Furthermore, these studies were also discussed at Catchment Forums in the area.</p>
	<p>b. As a matter of public interest and in terms of the BILL OF RIGHTS and the South African Constitution, proper consultation processes should have been undertaken. I am aware of only one consultation meeting in Clanwilliam several years ago when this precise issue was pointed out to the officials present. If further meetings were held in connection with the Verlorenvlei catchment/Sandveld area were held, could you kindly provide me with proof of such consultation process?</p>	<p>See answer to Question 5a above</p>
	<p>c. Please could you tell me when you plan to engage with the landowners in the area to make explanation of the omission, and when we can expect to be consulted in terms of the legal rights we have as citizens?</p>	<p>During the planned preliminary Reserve study for the F60 and G30 catchments, there will be adequate opportunity for stakeholder to participate in these process.</p>
	<p><b>d. Ecological Reserve Determination for Verlorenvlei Estuary</b>                  We understand the Ecological Reserve Determination is still pending for the Verlorenvlei Estuary and its main tributary, the Krom Antonies River. This issue has been raised several times at the Western Cape Provincial Coastal Committee meetings and specifically at the meeting of the 16 March 2017. Please could we be given an indication as to when this now long overdue and very important study is likely to take place? We are well aware that government funding is limited at present and are</p>	<p>See answer to Question 1 and Question 3 above</p>

	<p>open to assisting with developing a collaborative project proposal to enable funding for this important work to proceed.</p>	
	<p>e. Based on the work we do with environmental consultants and various provincial and national government departments, we understand that the classification for the Berg WMA and the classification of Breede-Gouritz WMA is underway. This effectively means that the Sandveld Rivers (which includes Verlorenvlei) will be the only rivers not classified in the Western Cape. As it is not likely that this process will be revisited again in the foreseeable future, this means that the Sandveld Rivers will be completely left out of the classification process for a very long time, a situation which undermines the conservation efforts of various NGOs and provincial authorities working in the Sandveld area.</p>	<p>See answer to Question 1 and Question 3 above</p>
<p>Andrew Gordon (DWS Western Cape)</p>	<p>a. Under Description of the Water Resource, section 1.1, reference is made to the Olifants-Doorn Water Management Area. Should it not actually be called the Berg-Olifants Water Management Area, reflecting the new configuration?</p>	<p>Noted, the gazette has been amended to reflect the correct WMA name.</p>
	<p>b. Also in section 1.1, reference is only made to drainage area E, whereas the gazette presents Reserve determinations for selected rivers in drainage area F, and for groundwater in drainage areas F and G. Also in section 1.1, the only river system listed is the Olifants-Doorn, but the gazette presents Reserve determinations for the Brak, Klein-Goerap, Groot-Goerap and Sout rivers located in drainage area F – which are not part of the Olifants-Doorn River System.</p>	<p>See answer to Question 1 above</p>
	<p>c. Lastly, on page 109, Table 2.1, row 'E10K EWR2' the PES and REC are recorded as an E. There is a double asterisk pointing to the following note "In terms of the RDM guideline the Ecotatus Category should not be less than D (DWAf 1999)". As written this note appears to be a compelling argument for the REC NOT to be gazetted as an E category. If there is a compelling reason for the REC to be gazetted as an E category then that explanation needs to be included in the Gazette.</p>	<p>During the EWR Workshop conducted for the Reserve study, an EWR for maintaining a D-category (as per RDM Policy) was determined. However, there was unanimous agreement from the specialists that the risk of the EWR not supporting a D was extremely high as many of the impacts were related to the dam/barrage. Thus, maintenance of a D-category was deemed unrealistic. The EWR provided here is thus for 'maintenance of the PES', viz. E-category.  Refer to:</p>

		<p>DWAF 2006. RDM/V 2/ EWR/02/CON/0505 Olifants Doring Catchment Ecological Water Requirements Study. Riverine RDM Report. Volume 2, compiled by C. A. Brown, C. Pemberton and other key specialists, May 2006.</p> <p>DWAF 2006. RDM/E000/MSR/01/CON/0606 Olifants Doring Catchment Ecological Water Requirements Study. Final summary report, compiled by C. A. Brown, C. Pemberton and R. Magoba, June 2006.</p>
Lachlan Mathews	Having read this document and noticed that there seems to be no figure stating an ecological reserve for the coastal lakes of Wadrift, Verlorenvlei and the Jakals River. Please could you explain why an ecological reserve has been left out for these rivers?	See answer to Question 1 and Question 3 above
Ashton van Niekerk (DWS Western Cape)	<b><u>Groundwater Quantity Component</u></b> a. Has the municipal and private abstraction been incorporated into the reserve?	The groundwater use values considered are those determined during the preliminary Reserve and Classification studies; which include all water uses in the catchment. This is identified through the development scenario planning process as part of the study which looks at existing and future use.
	b. It would be worthwhile to have a column of number of licenses allocated per quaternary and the total volumes allocated	The numbers of licenses allocated and volumes are dynamic values that can change anytime during and after the gazetting process, therefore including them in the gazetted document will not serve any purpose with respect to groundwater Reserves as the Reserve values will remain the same.
	c. When comparing the recharge values with GRAII data certain quaternaries have been given a higher value i.e. E33D - it would be worthwhile to indicate how these values were determined, the method applied, data used? *If possible please forward a copy of the following report: "The Classification of Significant Water Resources in the Olifants-Doorn Water Management Area Final Technical Report"	Latest Recharge data available was used in this process. In this case, it is the data abstracted from the report entitled "The Classification of Significant Water Resources in the Olifants-Doorn Water Management Area Final Technical Report", which is available from the DWS website in the following address <a href="http://www.dwa.gov.za/rdm">www.dwa.gov.za/rdm</a> . The entire process and methodology can be obtained from this report.
	<b><u>Groundwater quality component</u></b> d. The SANS 241 1996 and 2006 has been used interchangeably, not sure if this is a typo? The number of samples used in chemical parameter tables - where was this data sourced from? DWS databases? Consultant's reports?	Noted. The correct document referred to is the "South African Water Quality Guidelines, Volume 1: Domestic Water Use, 2 <sup>nd</sup> Ed. 1996. Department of Water Affairs and Forestry. Pretoria, South Africa." This has been rectified in the updated gazette.

	<p>e. The ambient groundwater quality should be in ranges - perhaps a min max and mean</p>	<p>The ambient groundwater quality values are obtained from the Water Management System (WMS) database of the Department of Water and Sanitation. In order to obtain acceptable range, the process involves the calculation of the 5<sup>th</sup>, median and 95<sup>th</sup> percentile values. The median is selected as the ambient value based on the number of datasets.</p>
	<p>f. The water quality parameters of concern - these concerns should be linked with impacting factors i.e. agriculture, mining.</p>	<p>Parameters of concern in this case refer to those with elevated concentrations when compared to drinking water quality standards. They do not look at the land use impacts. However, such information can be obtained from the technical reports.</p>