

GAZETTING OF THE RESERVE FOR WATER RESOURCES OF THE BERG CATCHMENT IN THE BERG-OLIFANTS WATER MANAGEMENT AREA

Comments and Responses Register

(Draft)

This Comments and Responses Report (CRR) captures the issues raised by stakeholders after the Draft Notice of the proposed Reserve was published for comment in **Government Gazette No. 51556, Gazette Notice No. 5554 of 15 November 2024**. The purpose of this report is to ensure that the concerns and comments raised by stakeholders are noted and adequately and satisfactorily addressed. This study has been commissioned by the Department of Water and Sanitation (DWS). This report will be presented to the Minister with the proposed final Reserve. Once the Minister is duly satisfied with the process and the handling of comments, the final Reserve will be gazetted.

60 Days Public Commenting Period

(15 November 2024 – 15 January 2025)

Commentator	Comment/Issues Raised	Response(s)
Gerhard Gerber Department of Environmental Affairs and Development Planning – Western Cape Government	There are two instances of Chapter 2(1).	This has been corrected
	These sections refer to “Class I Water Quality (drinking water).” The currently applicable drinking water standard is SANS241:2015, which is more relevant than the 1996 South African Water Quality Guidelines (“SAWQG”) guidelines as it addresses acute health risks and no longer uses water classification.	There are two components to the Reserve: the basic human needs component and the ecological water requirement component. The BHN component addresses the needs of the population directly dependent on the resource and without access to formal water supply systems. Hence, SANS 241:2015 is not applicable since it measures the quality of potable water provided by water purification works after treatment. Therefore, South African Water Quality Guidelines are used to assess the ambient groundwater quality in the Reserve.
	The use of "nitrate + nitrite" as a parameter needs to be clearly specified. This parameter is generally expressed as a combined ratio, but in the table, it is measured in mg/l. According to SANS241, the limit for combined nitrate and nitrite is <1 mg/l. The distinction between measuring nitrate, nitrite, and their combined value has caused confusion among laboratories regarding what exactly needs to be analyzed.	Since SANS 241:2015 is not applicable, nitrate + nitrite is used in accordance with South African Water Quality Guidelines, Volume 1: Domestic Water Use, 2 nd Edition. 1996, Department of Water Affairs, Pretoria, South Africa for natural/ambient groundwater quality; where the limit is 10 mg/l.
	How often will the total reserve be monitored?	The Reserve is monitored by Catchment Management Agencies (CMA), and the frequency varies according to their catchment management strategies and plans. Berg-Olifants CMA will determine the monitoring frequency accordingly.

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Gerhard Gerber Department of Environmental Affairs and Development Planning – Western Cape Government	Why are the Disa (Hout Bay) and other smaller estuaries excluded?	EWRs were only determined for significant water resources in the Berg Catchment. Field visits and a specialist workshop were undertaken to determine the EWRs, PES and RECs for these estuaries. Micro-estuaries and river outlets (as per the definition contained in the National Biodiversity Assessment - Estuarine Realm) were not included. Note that the NBA report distinguishes between what they call "fully functional estuary" = "significant water resources" and "micro-systems" - non-significant water resources". The Disa and other smaller estuaries in the Berg WMA are all categorised as micro-systems. The Estuaries table 5.1 was updated to include small estuaries.
	Should specific monthly river flows not be indicated here to replicate seasonal variations?	The Reserve gazette must be used together with technical reports. Total EWR flows are based on the NMAR which include the seasonal variability in flows. The specific information can be found on the rul and tab tables. Monthly flow requirements for all significant estuaries in the Berg WMA are included in Appendix E-K of the EWR Report.
	Why is the Ecological Specifications ("EcoSpecs") related to the groundwater component not included here?	Groundwater is already integrated in the Ecological Specifications determined. It should be noted that groundwater is not in isolation from other resources, hence the reference to "groundwater component of the Reserve" and not "groundwater Reserve."

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Gerhard Gerber Department of Environmental Affairs and Development Planning – Western Cape Government	Where are the water quality and hydrodynamic components for the estuaries within the City of Cape Town?	Ecospecs for the Zandvlei, Wildevolevlei, Eerste and Lourens estuaries are included in the respective Appendices (F-K) of the EWR Report. The remaining estuaries in the City of Cape Town are all micro-systems. Ecospecs, PES, EIS and RQOs were only determined for significant water resources in the Berg CMA. Micro-estuaries and river outlets (as per the definition contained in the National Biodiversity Assessment - Estuarine Realm) were not included. Note that the NBA report distinguishes between what they call "fully functional estuary" = "significant water resources" and "micro-systems" - non-significant water resources". The Disa Estuary and other smaller estuaries in the Berg WMA are all categorized as micro-systems.
	Where are the components related to water quality?	Individual priority estuaries were assessed, and reports are included in the respective Appendices (E-K) of the EWR Report.