

Affiliation	I&AP	Date	Item	Correspondence / Comment / Question / Recommendation / Requirement	Response Date	Client Response
Regulator	DFFE	12/04/2024	Irrelevant	Referral to NEMPAA is incorrect. NFA should be referenced. Ms Mans will consult other departmental personnel and get back to us on this point.	12/04/2024	Noted.
Regulator	DFFE	12/04/2024	Irrelevant	The Kathu Forest Nature Reserve was declared according to Article 8(1) of the NFA. Referral is also made to Article 11(2) of the NFA. Although it is the same Minister, the declaration was not done according to NEMPAA. Head office will be contacted with regards to this matter. The 600 hectares does however show as a NPAES, while the Kathu Forest does not show.	12/04/2024	Noted.
Landowner	SIOM	29/04/2024	Irrelevant	Mr Voight requested that the document be sent to him again since the link is not opening	29/04/2024	Document sent via email. Additional email copied.
Regulator	DFFE	07/05/2024	Irrelevant	Me Jacoline requested that the document be sent to her again since the link is not opening. She further requested that Snsongwe@dffe.gov.za should be copied since she is having trouble with her email.	07/05/2024	Document sent via email. Additional email copied.
Landowner	SIOM	10/05/2024	Irrelevant	Mr Werner Voigt requested a 30 day extension on the commenting period to allow for sufficient time for engagements.	10/05/2024	Extension was given and all stakeholders were notified.
Regulator	DFFE	10/05/2024	Irrelevant	Me jacoline welcomed the extension.	10/05/2024	Noted.
Landowner	SIOM	13/05/2024	Irrelevant	Mr Werner wanted confirmation on the purpose of the BMP and how the stakeholder process will continue. Sishen will propose possible dates for a meeting with KSP.	13/05/2024	The process was explained and EndemicVision will arrange a meeting between the two parties once a date is proposed.
Landowner	SIOM	05/06/2024	Objectives, targets & timeframes	Objectives and targets must be better prioritised with immediate targets instead of only five-year targets.	26/07/2024	An APO have been added. To be reviewed annually.
Landowner	SIOM	05/06/2024	Objectives, targets & timeframes	Urgency of the infrastructure is not evident from the plan.	26/07/2024	An APO have been added. To be reviewed annually.
Landowner	SIOM	05/06/2024	Property Protection	Immediate security and access control is required.	26/07/2024	Items added to APO for 2024.
Landowner	SIOM	14/06/2024	Objectives, targets & timeframes	Will KSP restore or rehabilitate?	26/07/2024	Rehabilitate.
Landowner	SIOM	14/06/2024	Objectives, targets & timeframes	Manage topsoil resources: 5 years may work if there are minimal activities around the topsoil stockpiles. Alternatively, consider shorter delineation timelines.	26/07/2024	Topsoil management removed.
Landowner	SIOM	14/06/2024	Objectives, targets & timeframes	Improve conservation area infrastructure: By when must the boundary roads be reinstated?	26/07/2024	An APO have been added. To be reviewed annually.
Landowner	SIOM	14/06/2024	Monitoring	Monitor biodiversity management effectiveness: (1) This section lacks a clear commitment. (2) When will the veld condition, carrying capacity and stocking rates be monitored?	26/07/2024	An APO have been added. To be reviewed annually.

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Landowner	SIOM	14/06/2024	Review	Ensure the BMP is updated, relevant and accurate: Consider external, independent review as part of an audit	26/07/2024	Annual audit. Annual revision of APO. Revise NRMP every 3 years. Audit report submitted to DAERL and Landowner annually.
Regulator	DAERL	12/06/2024	Purpose	The current draft does not adhere and provide to the execution of the purpose of Biodiversity Offset , use the guidance provided in our recommendations attached.	26/07/2024	Increase level of detail on Execution portion (full APO).
Regulator	DAERL	12/06/2024	Declaration	This department believes that the current legal status of the Kathu Forest Nature Reserve (KFNR) undermines the purpose of a biodiversity offset, which was the rationale behind its formal declaration. The KFNR serves as the biodiversity offset for the significant impacts on protected trees and habitats destroyed during the construction of Phase 1 (100 MW) of the Kathu Solar Park (KSP) Concentrated Solar Power (CSP) facility (DEA 12/12/20/1994/AM2). It is important to note that the National Biodiversity Guideline (2023) was not available when this offset was initiated. However, the Draft National Biodiversity Offset Policy (2017; Government Notice No. 276) and relevant literature, both national and international, were available and emphasized the necessity of securing a biodiversity offset site in perpetuity.	-	Securing a biodiversity offset site in perpetuity. Title Deed + Nature Reserve + Management agency.
Regulator	DAERL	12/06/2024	Declaration	To ensure perpetual protection, an offset should ideally be declared a nature reserve under the National Environmental Management: Protected Areas Act 57 of 2003 (NEMPAA). The current legal status does not obligate the title deed holder or the proponent responsible for the offset to maintain the existing protected area status as per section 35(3)(a) and (b) of NEMPAA.	03/07/2024	Intent to declare a Nature Reserve under NEMPAA initiated. Letter dated 03/07/2024.
Regulator	DAERL	12/06/2024	Agreements	The current draft Biodiversity Management Plan (BMP) specifies that: "The management period of the BMP is for the life of the KSP, which is currently projected to be until 2039. The management period is also linked to the KSP-SIOM lease agreement, which is set to expire in 2034."This further compromises the status of the KFNR as a biodiversity offset for the environmental impacts caused by the KSP development	-	The landowner will be a part of the process for declaration under NEMPAA.
Regulator	DAERL	12/06/2024	Current condition	It is concerning that although the KFNR was declared in 2018, the BMP for the KFNR has only recently been drafted, six(6)years later. This raises questions about whether the supposed biodiversity offset area has been managed as an offset area, its current condition, and whether it still qualifies for the strict NEMPAA category as a nature reserve given its ecological condition.	-	Area will undergo a Biodiversity assessment as per NEMPAA process.
Regulator	DAERL	12/06/2024	Declaration	To ensure the Kathu Forest Nature Reserve (KFNR) fulfils its role as a biodiversity offset, it is recommended that the following actions be taken: (1) Legal status upgrade: Reevaluate and upgrade the legal status of the KFNR to a formal nature reserve under the NEMPAA to ensure perpetual protection and management (See figure 1 in correspondence letter)	03/07/2024	Intent to declare a Nature Reserve under NEMPAA initiated. Letter dated 03/07/2024.

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Regulator	DAERL	12/06/2024	Agreements	To ensure the Kathu Forest Nature Reserve (KFNR) fulfils its role as a biodiversity offset, it is recommended that the following actions be taken: (2) Binding Agreements: Establish binding agreements that hold the title deed holder and the proponent responsible for the continuation of the protected area status beyond the projected life of the KSP and the lease agreement by means of a Biodiversity Offset Implementation Agreement and Biodiversity Offset Management Plan. Subsequently, long-term funding and resources for the management and maintenance of the KFNR biodiversity offset area to maintain its ecological integrity and function as a biodiversity offset should be secured by KSP, in line with the National Biodiversity Offset Guideline (2023).	-	Long-term funding and resources for the management and maintenance of the KFNR in place. The landowner will be a part of the process for declaration under NEMPAA.
Regulator	DAERL	12/06/2024	Management Plan	To ensure the Kathu Forest Nature Reserve (KFNR) fulfils its role as a biodiversity offset, it is recommended that the following actions be taken: (3) Interim Agreements: Expedite the finalization and implementation of the Biodiversity Management Plan (BMP) to ensure the Kathu Forest Nature Reserve (KFNR) is managed effectively and can qualify for nature reserve status.	26/07/2024	The BMP will be updated and finalised by 26/07/2024.
	DAERL	12/06/2024	Title	It is highly recommended that the title of the document be amended to "Protected Area Management Plan." The current title, which includes the term "biodiversity", may give the impression that the focus is solely on biodiversity, whereas the plan pertains to the management of a protected area.	26/07/2024	Title updated to: Kathu Forest Nature Reserve Management Plan.
	DAERL	12/06/2024	Management Plan	The management plan (MP) should include a page where the appropriate Minister or Member of the Executive Council (MEC) can endorse or approve the MP by signature and date stamp.	26/07/2024	Signatory section for approval added.
Regulator	DAERL	12/06/2024	Purpose	The MP should be drafted to ensure that the central focus is on the establishment and management of the KFNR as the offset area. Currently, the MP appears to be an Environmental Management Programme Report (EMPR) for the lease area, with the KFNR offset area included as an afterthought. It is recommended that the MP refer to the details of the KFNR first and then to the larger area included in the MP, in that order, consistently throughout the document.	26/07/2024	Increase level of detail on Execution portion (full APO).
Regulator	DAERL	12/06/2024	Purpose	The MP frequently states that the KFNR acts as a "buffer to the national Kathu Forest". While this is partially correct, it is crucial to clarify that the primary reason for the KFNR's proclamation is to serve as an offset area for the impact caused by the KSP CSP development. This should be clearly reflected throughout the MP, in line with its formal declaration under the NEMPAA.	26/07/2024	Reason for proclamation stated within executive summary. Will be updated once declared under NEMPAA.

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Regulator	DAERL	12/06/2024	Reserve Layout	The draft MP has not established an appropriate buffer around the KFNR to ensure the integrity of the protected area, as required by the Norms and Standards for the Management of Protected Areas in South Africa under the NEMPAA. The MP should also address allowable activities within the buffer zone.	26/07/2024	Included in zonation (section 4.1).
Regulator	DAERL	12/06/2024	Reserve Layout	The MP fails to identify a zoning system for the KFNR. A dedicated zoning system should be mapped, delineating zones such as primitive, leisure, operational, etc., each with its respective characteristics, objectives, and challenges, in accordance with NEMPAA guidelines.	26/07/2024	Included in zonation (section 4.1).
Regulator	DAERL	12/06/2024	Objectives, targets & timeframes	In certain instances, the MP does not outline clear routes for achieving set targets. Steps should be provided, such as identifying and mapping all alien invasive flora within or threatening the KFNR, compiling a Management Clearing Plan, and identifying areas in the maintenance phase. These plans or guidelines, along with target timelines, should be clearly identified in the MP.	26/07/2024	An APO have been added. To be reviewed annually.
	DAERL	12/06/2024	Objectives, targets & timeframes	There are no timeframes associated with the targets set out in the Management Objectives. Specific timelines should be provided for when in the 5-year period these targets should be achieved and the methods for achieving them. The same recommendation applies to the suggestion made on page 47 of the document.	26/07/2024	An APO have been added. To be reviewed annually. Five year plan updated (section 12).
Regulator	DAERL	12/06/2024	Monitoring	The section on Monitoring and Reporting should specify the type of assessment that will be used for annual reviews, such as a spreadsheet-based Management Effectiveness Tracking Tool (METT).	26/07/2024	Specified in APO
Regulator	DAERL	12/06/2024	Financial provision	The MP should include a budget or costing plan to achieve the targets as set out in the document.	26/07/2024	An APO have been added. To be reviewed annually. Five year plan updated (section 12)

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Regulator	DFFE	11/06/2024	Declaration	The declaration of the Kathu Forest Nature Reserve ("KFNR") was requested as a biodiversity offset to compensate for the unavoidable high impacts on protected trees and habitats destroyed during construction of Phase 1 (100 MW) of the Kathu Solar Park CSP facility (DEA 12/12/20/1994/AM2). At the time, there was no National Biodiversity Offset Guideline (See Government Gazette No. 48841 of 23 June 2023, Government Notice No. 3569), hence the declaration as a Forest Nature Reserve under Section 8 of the National Forests Act, 1998 (Act No. 84 of 1998) as amended ("NFA"). Now that a National Biodiversity Offset Guideline is available, it should be followed. It may therefore be necessary to take a few regulatory steps backwards. The offset guideline provides clear guidance on the procedures to follow to ensure that offset properties are effectively conserved through their declaration as Nature Reserves and binding its statutory protected area status under the National Environmental Management: Protected Areas Act (Act No. 57 of 2003) ("NEMPAA") for not less than 99 years. The draft Biodiversity Management Plan ("BMP") also acknowledge that the NEMPAA is the primary legislation for the management of protected areas.	03/07/2024	Intent to declare a Nature Reserve under NEMPAA initiated. Letter dated 03/07/2024.
Regulator	DFFE	11/06/2024	Declaration	The Branch: Forestry Management in the Department of Forestry, Fisheries and the Environment (DFFE) had a meeting with the Northern Cape Stewardship Unit about the draft management plan of Kathu Forest Nature Reserve. Although the NEMPAA acknowledges Forest Nature Reserves, the Stewardship Unit expressed concerns about the regulatory processes regarding Forest Nature Reserves and recommended that the 644 -ha Kathu Forest Nature Reserve, also be declared as a Nature Reserve under the NEMPAA. This will ensure that the correct regulatory processes are followed.	03/07/2024	Intent to declare a Nature Reserve under NEMPAA initiated. Letter dated 03/07/2024.
Regulator	DFFE	11/06/2024	Management Authority	The development of a Management Plan for a Nature Reserve declared under the NEMPAA (or offset site as per National Biodiversity Offset Guideline), is the responsibility of the appointed Management Authority. Section 38 of the NEMPAA states: "The Minister or MEC, in writing, must assign the management of a special nature reserve or nature reserve to a suitable person, organization or organ of state." The draft Biodiversity Management Plan ("BMP") states that Kathu Solar Park ("KSP"), who developed the Concentrated Solar Park ("CSP") and has a long-term lease on the property, is both the proponent and implementing agent for the BMP. In terms of NEMPAA, any suitable person, organisation or organ of state can be appointed as the management authority for nature reserves. Thus, KSP must be appointed as the management authority of KFNR.	-	Part of the NEMPAA Process after declaration.

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Regulator	DFFE	11/06/2024	Agreements	The appointed management authority must conclude a Biodiversity Offset Implementation Agreement with a suitable organisation to give effect to offset required, setting out the long-term protection mechanism(s) to be used, management and funding arrangements, roles and responsibilities and other requirements set out in the National Biodiversity Offset Guideline. The Biodiversity Offset Implementation Agreement is the legal mechanism through which the implementation of a Biodiversity Offset Management Plan is made legally binding and enforceable against the offset liability holder. An implementing authority could be an appropriate conservation authority, a Non-Profit Organisation or private organisation.	-	Part of the NEMPAA Process after declaration.
Regulator	DFFE	11/06/2024	Agreements	The Stewardship Unit is concerned that KSP does not own the offset property, only has a long-term lease of the property. There should be a legal clause in the Biodiversity Offset Implementation Agreement, to make provision for transitional arrangements upon expiry of the long-term lease. This matter needs urgent attention and must be clearly addressed in all relevant documentation.	-	The landowner will be a part of the process for declaration under NEMPAA.
Regulator	DFFE	11/06/2024	Agreements	Page 23 of the draft BMP states: "The signatories of the BMP confirm that this BMP serve as the management agreement between these signatories." Kindly note that Management Plan of the Nature Reserve should be an agreement between the offset liability holder and the Minister or MEC, who must approve the plan.	26/07/2024	Signatory section for approval added
Regulator	DFFE	11/06/2024	Financial provision	The offset liability holder (KSP) is responsible for all costs associated with the offset site and is expected to make provision for the management costs of the nature reserve for a period of at least 30 years.	-	KSP is committed to follow the NEMPAA proclamation process and the management commitment according to the NEMPAA
Regulator	DFFE	11/06/2024	Title deed	The Nature Reserve status must be reflected against the Title Deed of the property.	-	Title deed amendment is prioritised to be completed by 2026 (Five year plan)
Regulator	DFFE	11/06/2024	Title	The title of the document "Kathu Solar Park Biodiversity Management Plan" does not reflect that the plan is for the management of the Kathu Forest Nature Reserve. The title must be amended, to clearly indicate that the document is the management plan for the Kathu Forest Nature Reserve.	26/07/2024	Title updated to: Kathu Forest Nature Reserve Management Plan.

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Regulator	DFFE	11/06/2024	Purpose	The DFFE does not agree with the statement in the executive summary that "the purpose of the proclamation was to secure and conserve the woodland habitats and to conserve the wetland habitats as prescribed in the environmental management plan linked to the environmental authorization (EA)." The 644 ha Nature Reserve is a biodiversity offset requirement from Kathu Solar Park to compensate for the loss of protected trees and habitats destroyed during construction of Phase 1 (100 MW) of the CSP facility (DEA 12/12/20/1994/AM2). Refer to Forest Act Licence NCU 6171115. The DEA Environmental Authorisation (Ref: 12/12/20/1994) merely stated that "no development take place on the eastern side of the fence as indicated by a red line on the locality map attached as annexure 2 of this authorisation. "See condition 33 of the EA.	26/07/2024	Statement revised.
Regulator	DFFE	11/06/2024	Technical	The reference to Kathu Forest should be either the Kathu Forest Protected Woodland or the Kathu Forest Nature Reserve, for the sake of clarity, because both phrases can be referred to as Kathu Forest.	26/07/2024	Reference adjusted.
Regulator	DFFE	11/06/2024	Purpose	The Kathu Forest Nature Reserve must be managed exclusively for the purpose for which it was declared, namely, to conserve biodiversity, protected trees and ecosystem integrity on site. Its sole purpose is not to act as a buffer to the Kathu Forest Protected Woodland, as repeatedly stated in the draft BMP.	26/07/2024	Statement revised.
Regulator	DFFE	11/06/2024	Purpose	The draft BMP encompasses the whole lease agreement area, a total of 1928 ha consisting of the developed industrial area (778 ha), an undeveloped agricultural area (473 ha) intended for future development (apart from the 29 ha which may not be developed due to very high density protected trees) and the forest nature reserve (644 ha). The NEMPAA stated in section 41 that a management plan may contain development of economic opportunities within and adjacent to the protected area in terms of the integrated development plan framework; however, the plan should focus on the management of the forest nature reserve. The management plan may include subsidiary plans, which can cover the areas outside of KFNR or contain a separate section dealing with the management of the lease areas outside KFNR.	26/07/2024	KFNR added as focus but corridor and core areas added on western property for connectivity.
Regulator	DFFE	11/06/2024	Reserve Layout	The draft BMP failed to establish an appropriate buffer around the KFNR to ensure the integrity of the protected area as per Norms and Standards for the Management of Protected Areas in South Africa published in terms of the NEMPAA. See extract from the Gazetted Norms and Standards in figure 3 below. The measured distance between the nature reserve and cleared area adjacent to the CSP is about 175 meters (see image below). It is recommended that this 175-meter buffer be maintained naturally to safeguard the nature reserve from edge effects. (Refer to Section 9.1: Norms and Standards under NEMPAA)	26/07/2024	Included in zonation (section 4.1).

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Regulator	DFFE	11/06/2024	Reserve Layout	It is recommended that a corridor be created linking the 29-ha agricultural area with high density protected trees which must be conserved, with the nature reserve to facilitate animal migration between the two areas.	26/07/2024	Included in zonation (section 4.1).
Regulator	DFFE	11/06/2024	Reserve Layout	The draft BMP, number 4.1.2 refers to the "land management units" but does not clearly explain the rationale behind dividing the KFNR into north, central and south management units, nor how the management of the three units will differ from each other. All three units contain boreholes and windpumps. It would make more sense to use the habitat map to delineate management units.	26/07/2024	Management Units removed.
Regulator	DFFE	11/06/2024	Objectives, targets & timeframes	The draft BMP refers to vegetation types and species diversity but does not indicate what is currently on the reserve versus the desired status. Is there livestock, game or a combination of both and will this continue, or will livestock be phased out and replaced with game? The draft BMP refers to introduction of "game species(giraffe, impala, springbok, eland and blesbok) to promote habitat utilization over the next 5 years." It seems the intention is to derive maximum economic benefit from the nature reserve, but what will happen in the event of fire or severe drought, lowering carrying capacity? What management activities will be implemented once the carrying capacity is reached or exceeded? What activities must be implemented to give effect to the ecological management of the nature reserve management (wildlife management, vegetation management, specific management measures for protected and threatened species that occur within the reserve, species inventories, erosion control ,etc.). Will hunting be permitted? The plan mostly refers to prohibited activities, but is silent on activities which will be permitted in the nature reserve?	26/07/2024	An APO have been added. To be reviewed annually. Five year plan updated (section 12).

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Regulator	DFFE	11/06/2024	Purpose	Page 42, the aim and vision of the BMP refers to corporate social responsibility. The NEMPAA states that one of the objectives of the Act is to "promote sustainable utilization of protected areas for the benefit of people, in a manner that would preserve the ecological character of such areas." The National Forests Act also promotes sustainable management and development of forests (which include woodlands as per definitions in the Forest Act) for the benefit of all. Also, to promote sustainable use for environmental, economic, educational, recreational, cultural, health and spiritual purposes. Chapter 2 of the NFA refers to the underlying principles of sustainable forest management and stated that forest (in this case the forest nature reserve) must be managed to conserve biological diversity, ecosystem and habitats and promote fair distribution of their economic, social, health and environmental benefits; to promote their health and vitality; and conserve natural resources, especially soil and water. The draft BMP lacks reference to how the forest nature reserve will incorporate the fair distribution of social benefits. For example, will tourism activities (educational, recreational, cultural, spiritual activities) be allowed to benefit society or is the proponent (KSP) the sole beneficiary of the KFNR?	26/07/2024	Recommendations made (Section . The NRMP will be reviewed every three years.
Regulator	DFFE	11/06/2024	Objectives, targets & timeframes	Page 43 onwards refers to ten objectives, but the numbering system makes it hard to figure out what the ten objectives are, and it seems as if there are only nine objectives:(1) Complete the offset edict; (2) Implement concurrent and final rehabilitation; (3) Management topsoil resources; (4) Conserve biodiversity significant habitats; (5) Improve conservation area infrastructure; (6) Manage encroaching, alien and invasive species; (7) Monitor biodiversity management effectiveness; (8) Manage site access and security regularly; and (9) Ensure the BMP is updated, relevant and accurate. Kindly confirm what is the 10th objective?	26/07/2024	Objectives and targets updated (section 11).
Regulator	DFFE	11/06/2024	Objectives, targets & timeframes	Of the listed objectives, some are not applicable to the nature reserve, for example concurrent and final rehabilitation, as well as management of topsoil resources. The plan should focus on the management of the nature reserve to ensure the protection and conservation of the area and promote tree health and vitality in a manner consistent with the objectives of the NEMPAA and for the purpose for which it was declared. It should also outline actions implemented to safeguard it from impacts from the adjacent KSP industrial area.	26/07/2024	Objectives and targets updated (section 11).

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Regulator	DFFE	11/06/2024	Objectives, targets & timeframes	Number 11.3 refers to Annual Objectives. Is this the Annual Plan of Operation (APO)? To monitor biodiversity management effectiveness and prevent illegal access, wood collection, snaring and fires caused by trespassers. One would have expected pro-active management interventions, prioritized in terms of importance to deliver the desired outcomes of each objective and addressing threats to the nature reserve (i.e. dust impact from nearby gravel roads which have proven to have significant impacts on the surrounding vegetation).	-	Dust impacts are captured in the EIA process for any new developments.
Regulator	DFFE	11/06/2024	Review	It is recommended that the plan be reviewed every five years, because it must be signed off by the Minister or MEC.	26/07/2024	Annual audit. Annual revision of APO. Revise NRMP every 3 years. Audit report submitted to DAERL and Landowner annually.
Regulator	DFFE	11/06/2024	Recommendations	The draft BMP ended with recommendations on page 47. The DFFE does not understand the recommendation to "integrate all newly approved EIA, EMP conditions in the BMP." It is not clear what EIAs are anticipated in the Nature Reserve, because it is supposed to be left undisturbed, in a natural condition. Developments that may trigger NEMA listed activities should not be permitted in the nature reserve, unless it is nature based eco-tourism activities in line with the purpose for which the nature reserve was established.	26/07/2024	Removed from BMP.
Regulator	DFFE	11/06/2024	Recommendations	The DFFE does not support a tree nursery in the nature reserve. Trees should not be planted on a large-scale in the nature reserve, as it may affect natural processes and the integrity of the reserve.	26/07/2024	Removed from BMP.
Regulator	DFFE	11/06/2024	Financial provision	The plan lacks information on a breakdown of management costs per management activity. It is one of the requirements set out in Section 41(2)(d) of the NEMPAA.	26/07/2024	An APO have been added. To be reviewed annually. Five year plan updated (section 12)
Regulator	DFFE	11/06/2024	Declaration	It is proposed that KSP consult with neighbours to see where opportunities might exist to expand the nature reserve by incorporating some additional properties that can be formally declared as nature reserves to expand the reserve, to maintain and improve ecological functions.	26/07/2024	Potential expansion areas included in section 4.1.3.
Regulator	DFFE	11/06/2024	Water usage	Lowering of the groundwater table due to use of boreholes may cause stress to deep-rooted tree species such as protected Vachellia erioloba (Camel thorn). The draft BMP refers to water resources but did not indicate how it will be managed. The utilization of boreholes must be closely monitored to prevent over-utilization. Stressed plants are more susceptible to insect pests and diseases.	-	Refer to WUL.
Regulator	DFFE	11/06/2024	Wetlands	The DFFE does not support interference with natural NFEPA wetlands in the NR by inoculating the wetlands with indicator species (this can be done at the artificial wetland outside the NR).	26/07/2024	Removed from BMP.

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Regulator	DFFE	11/06/2024	Declaration	Recommended Way Forward (1) The KSP (lessee) in conjunction with SIOC (landowner) must approach the Manager: Biodiversity Stewardship in the Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform (DAERL), Ms. Malebo Manyala (mmanyala@daerl.co.za) to initiate the process to declare the 644-ha Kathu Forest Nature Reserve as a Nature Reserve under the NEMPAA, carrying all costs associated with the process. Please copy Forestry in the correspondence (Jmans@dffe.gov.za) and give quarterly updates on the progress.	03/07/2024	Intent to declare a Nature Reserve under NEMPAA initiated. Letter dated 03/07/2024.
Regulator	DFFE	11/06/2024	Management Authority	Recommended Way Forward (2) Upon declaration, KSP can apply to be officially appointed by the Minister or MEC as the Management Authority for the Kathu Forest Nature Reserve. The appointed management authority must prepare the Biodiversity Offset Management Plan for the nature reserve within 12 months of the declaration of the nature reserve.	-	Part of the NEMPAA Process after declaration.
Regulator	DFFE	11/06/2024	Management Plan	Recommended Way Forward (3) The management plan for the nature reserve must contain components specified in Chapter 7.6.1 of the National Biodiversity Offset Guideline and comply with the Norms and Standards for the Management of Protected Areas in South Africa (Government Gazette No. 39878 of 31 March 2016, Government Notice No.382) published in terms of the NEMPAA.	26/07/2024	Adhered to throughout document.
Regulator	DFFE	11/06/2024	Further development	No further EIAs should be authorised on Farm Kathu 465 until number (1) above has been achieved.	03/07/2024	Intent to declare a Nature Reserve under NEMPAA initiated. Letter dated 03/07/2024.
Landowner	SIOM	14/06/2024	Financial provision	The action plan does not show any funding detail.	26/07/2024	An APO have been added. To be reviewed annually. Five year plan updated (section 12)
Landowner	SIOM	14/06/2024	Current condition	It is concerning that nothing is managed at present.	-	Area will undergo a Biodiversity assessment as per NEMPAA process.
Landowner	SIOM	14/06/2024	Property Protection	Access control needs to be in place	26/07/2024	Items added to APO for 2024.
Landowner	SIOM	14/06/2024	Property Protection	Fire break management needs to be in place	26/07/2024	Items added to APO for 2024.
Landowner	SIOM	14/06/2024	Property Protection	The facility needs to be actively managed on a day to day basis (This will further reduce the risk of poaching etc.)	26/07/2024	Items added to APO for 2024.
Landowner	SIOM	14/06/2024	Property Protection	Regular inspections will be conducted by the landowner and will be discussed with KSP	26/07/2024	Items added to APO for 2024.
Landowner	SIOM	14/06/2024	Purpose	How do we enhance and celebrate the things we want to protect through the Management Plan?	26/07/2024	Purpose of NRMP updated.

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Landowner	SIOM	14/06/2024	Agreements	A discussion will have to take place between SIOM and KSP regarding the lease agreement revision. The revision will ensure that all expectations are made clear and the objective of the property is stated. One option is to say that the BMP is an Annexure to the lease agreement since the BMP will change over time. Since the BMP must be independently audited, that audit could also serve as SIOM's verification that the area is managed according to the BMP. It may be easier to keep this outside of the lease agreement and rather just have a clause within the Lease agreement stating that KSP must comply with the BMP and that SIOM receive copies of the audit reports.	-	The landowner will be a part of the process for declaration under NEMPAA.
Landowner	SIOM	14/06/2024	Agreements	The BMP must state that the lease agreement should be revised.	-	The lease agreement will be revised through the process of declaration under NEMPAA or at expiry.