

Circulation: Public Stakeholders

Compiled by: South African National Biodiversity Institute (SANBI)

ACRONYMS

ADU VM: Animal Demography Unit Virtual Museum	ISSV: Initial Site Sensitivity Verification
AEWA: African Eurasian Waterbird Agreement	IUCN: International Union for Conservation of Nature
BA: Basic Assessment	KBA: Key Biodiversity Area
BAR: Basic Assessment Report	LC: Least Concern (IUCN)
BGIS: SANBI's Biodiversity Geographic Information System	LDP: Low Detection Probability
BI: Biodiversity Importance	LepSoc: Lepidopterists' Society
BLSA: BirdLife South Africa	MA: Management Authority
CA: competent authority	NEMA: National Environmental Management Act
CI:	NT: Near Threatened
CSIR: Council for Scientific and Industrial Research	PAOI: Project Area of Influence
DD: Data Deficient	POSA: Plants of Southern Africa

DEFF: Department of Environment, Forestry and Fisheries	QDS: Quarter-degree Grid
EA: environmental assessment	RI:
EAP: environmental assessment practitioner	SABAA: The South African Bat Assessment Association
EAPASA: Environmental Assessment Practitioners Association of South Africa	SACNASP: South African Council for Natural Scientific Professionals
EIA: environmental impact assessment	SANBI: South African National Biodiversity Institute
GIS: Geographic Information System	SCC: Species of Conservation Concern
GPS: Global Positioning System	Screening tool – National web-based screening tool
I&AP: interested and affected party	SEA: strategic environmental assessment
IFC: International Finance Corporation	SEI: Site Ecological Importance

COMMENTS AND RESPONSE REPORT

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT				
GENERAL				
1.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 268-270: The lack of accurate info on SCC should be indicated in a report, or lack of suitable opportunity/ survey/ seasonal shortcomings. Should the report not conform it has to be returned to the specialist.		This sentence is referring to past lack of information for SCC. The development of layers of data for SCC in the EIA screening tool means this information is now available. The suggestion that lack of accurate information about SCC should be included in specialist report, is correct. Guidance for how to include this information is provided in 9.3.6 Researching and presenting data for expected SCC and 9.3.8 Description of sampling limitations. Furthermore, specific

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				guidance is provided on the seasonality of surveys in 9.2.1 Seasonality with specific reference to the EA process.
2.	Riaan Robbeson— Bathusi Environmental Consulting CC	Lines 278-279: The Plant and Animal Species Protocols aim to standardise species-level aspects of EIAs and the reporting of potential impacts from proposed developments on SCC. This is not reflected in the recommended approach to surveys, which also lack a scale-based approach.		Survey methodologies to satisfy the minimum requirements for each taxonomic group are provided and are appropriate to detect the presence of SCC for that taxon or determine the likelihood that it could occur in the development site. The screening tool provides information from a “large scale” approach and the specialist studies, along with the method to evaluate Site Ecological Importance, provides finer scale detail, therefore culminating in a multi-scale approach.
3.	Riaan Robbeson— Bathusi Environmental Consulting CC	Lines 322-324 The guideline states: It must be noted that an Avifaunal Protocol has been developed to address the assessment and reporting requirements for the impacts on avifauna by onshore wind energy generation facilities requiring EA (see #2 in Table 3-1). Is this protocol not only aimed at certain impact-prone species? How will surveys be required to address avian surveys aimed to determine diversity attributes?		The Avifauna protocol mentioned in this comment is the one published for implementation on 20 March 2020 in Government Gazette No. 4310. It is a separate protocol to the Terrestrial Animal Species Protocol published for public comment in January 2020 and for which these guidelines have been developed. This protocol was developed specifically for impact prone bird species. The Species Environmental Assessment Guideline bird section details survey methods for birds.
4.	Riaan Robbeson— Bathusi Environmental Consulting CC	Lines 334-336: 2.4 How these guidelines relate to Provincial guidelines on biodiversity assessments in EIAs. In some Provinces, CAs have developed their own minimum requirements for specialist reports in relation to identified environmental sensitivities. Which provinces would this include?		Gauteng and KZN have guidelines for biodiversity assessment in EIAs. This has been added in the update of this guideline.

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5.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 421 at Low Sensitivity Rating (Table 4-1). This indicates a lack of accurate and comprehensive knowledge in many natural (untransformed) areas across SA. The absence of SCC from an area can only be confirmed through comprehensive and seasonally repetitive surveys.		This concern is noted, however extensive work has gone into preparing models of possible suitable habitat for taxa of conservation concern. Any intersection with possible suitable habitat triggers the requirement of a specialist survey. We are therefore being very precautionary and inclusive to identify and map as much suitable habitat as possible within the medium sensitivity category. While you are correct in that absence of SCC can only be confirmed through comprehensive and seasonal surveys there is a very low probability of finding SCC taxa in the low sensitivity rating areas. Due to the high costs of EIAs it is not feasible to require surveys across all natural habitat in South Africa.
6.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 428 Has ecological types of conservation concern also been considered? For example Egoli Granite Grassland?		No, addressing threatened ecosystem types are included in the Terrestrial and Aquatic Biodiversity Protocols. SANBI is currently developing guidelines for these protocols and these will also be published for external comment.
7.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 435 I don't agree. All SCC should be included for purpose of conservation of biodiversity. No development shall take precedence over sensitive biodiversity		Your comment is noted, however producing distribution occupancy models is intensive, and requires financial and human resources. Should additional resources become available, Near-Threatened and Data-Deficient species will be added.
8.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 465, Page 23 EAPs are in most cases not qualified to evaluate the biodiversity sensitivities that are inherent to certain areas. Doing it from a desktop approach complicates the matter further! Is there a review process of this part of the Protocol? As much as existing information sources contains erroneous inclusions, EAPs will definitely not be able to provide consistently accurate assessments of		There has been a misunderstanding in the interpretation of this section, it is included to allow for identification of irreversibly modified habitats. Should the site still be in natural condition then a specialist study is required as per the Terrestrial Fauna & Terrestrial Flora Species Protocols.

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		a development footprint. This ISSV will be abused to the detriment of the environment.		
9.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 476 Does this imply herpetologist, invertebrate specialist, mammologist, or zoologist (in general)? Too many biodiversity reports are generated under the banner of 'Ecology' because of cost-cutting measures, instead of employing taxon-specific specialists.		Yes, this refers to specific taxon-specific relevant specialist. The report generated by the screening tool, once a development footprint is uploaded or identified, will specify the SCC found on site and their relevant taxas: e.g. herpetologist, ornithologist etc. The specialists required is therefore dependent on the taxonomic groups to which the SCC that occur (or potentially occur) on site belong to.
10.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 478 Again, the EAP is in most cases not qualified to assess the status of the vegetation, animals within an area to produce a consistent and accurate statement?		As per comment 8 above, this is included to allow for identification of irreversibly modified habitat. Should the ISSV reveal the area is different to the sensitivity of the screening tool, a specialist will need to be deployed. We have made this clearer in text.
11.	Riaan Robbeson— Bathusi Environmental Consulting CC	Footnote 9 (below Line 501) “pp 30-38” Comment : “re on m”	There is an error with the footnote that should be corrected	Comment unclear as no error observed.
12.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 990 And a suitable qualification and SACNASP registration in the relevant field, as noted below. Important to note the distinction between experience and qualification and registration.		We acknowledge your support of this section of the guideline where experience as well as qualification is explicitly stated as a requirement.
13.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 991 Remove the word “majority”. It is poor choice of words/ unclear.	Remove “majority”.	Noted and actioned.

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14.	Riaan Robbeson— Bathusi Environmental Consulting CC	Lines 994-996 It is acceptable for Candidate Natural Scientists (Cand.Sci.Nat.) to work under the supervision of Professional Natural Scientist (Pr.Sci.Nat) who sign off on their work... How will this be enforced or ensured?		We have stipulated that <i>Pr.Sci.Nat.</i> specialists would need to provide a signed declaration that <i>Cand.Sci.Nat.</i> were supervised appropriately, and that the former would need to be present in the field during surveys.
15.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 1016 This would be EXTREMELY difficult to practically implement. At the time of costing for a project, for example a botanical survey, there is no way to know how many, which species and how many returns to an area will be required. This inevitably results in undercosting, resulting in excessive costs for the specialist, or overcosting and not being successful on commercial basis. Similarly, it is a known fact that EAPs do not favourably consider a delay of months because of the requirement to survey for SCC species that only flower in 9 months time. Having said that, it is important that a way be found that this can be implemented, as it is a crucial requirement.		We acknowledge this aspect of specialist work as challenging but the data in the Screening Tool should greatly enhance planning as not only confirmed species known to occur at the site but multiple potential species have been modeled, meaning that a list of potential species is available upfront and is generated in screening tool report. This allows the specialist to do far more accurate budgeting in a manner that is completely transparent to the EAP and the client.
16.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 1664, 10.1.1 Species included in the Screening Tool Was ecological (VEGMAP) habitat types of conservation concern also considered? This would imply the conservation of representative portions of threatened types. It does feel that the Screening Tool is biased to the presence/ absence of SCC and does not consider sensitive features and ecological types		No, not for this dataset, but they have been used to generate the layer of threatened terrestrial biodiversity as they are the baseline input data for threatened ecosystem types. Please also see comment 6..

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17.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 1671-1672 In most cases there are no known data on habitat preferences for SCC. Precautionary Principal?		The species distribution modeling process has been extremely precautionary taking into account broad habitat requirements but not limiting models to micro habitat preferences.
18.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 1673 The absence/ presence of SCC can only be accurately considered after repetitive sampling that spans several seasons. How will this fit into submission of EA		The models trigger that the species is likely present, details on habitat preferences are available from SANBI's Plant Red List Website http://redlist.sanbi.org/ . Furthermore, specialist investigations are required to assess the habitat suitability for SCC in the absence of their detectable presence during a particular survey and apply the precautionary principle as per 9.3.2 Application of the precautionary principle and 'absence data'.
19.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 1679 Such as "but not specifically limited to.....?" NEWPOSA?		Thank you, have amended the sentence and added the recommend data source.
20.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 1719 Shouldn't this rather be 'comprehensive'? Rapid assessments will compromise on quality.	"Rapid" should be replaced by "comprehensive".	All surveys performed for EA purposes are rapid in nature compared to fully comprehensive surveys usually conducted over the long-term and spanning multiple seasons/years. The term rapid is therefore correct and the term Rapid Biological Assessment (RBA) is an accepted international term (see reference to Larsen et al 2016).
21.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 1727 Delete "usually"	Replace "usually" with "often"	Not all SCC have fragmented distributions but often do. The term is retained.
22.	Riaan Robbeson— Bathusi Environmental Consulting CC	Lines 1741-1743 Given our experience with EAPs and EA, this is rarely practically possible. How will this be enforced?		The risk to developers from performing unseasonal surveys is greater because specialists will more readily have to apply the precautionary principle and assume the SCC is indeed present during unseasonal surveys, which would not be favourable for

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				the granting of EA or would at least necessitate a follow-up survey, which is more costly. Therefore, EAPs and their clients should seek to perform surveys in a more seasonally favourable timeframe in order to present a more robust argument to the CA regarding the absence of a SCC.
23.	Riaan Robbeson— Bathusi Environmental Consulting CC	Lines 1743-1745 This is also not always practically possible, prolonged periods of drought might imply the delay of survey by a full year, or more?		Specialist investigations are required to also assess the habitat suitability for SCC in the absence of their detectable presence during a particular survey and apply the precautionary principle as per 9.3.2 Application of the precautionary principle and 'absence data'.
24.	Riaan Robbeson— Bathusi Environmental Consulting CC	Lines 1777-1779 There seems to be a particular emphasis placed on the location of SCC and not enough on the assessment of habitat diversity, species diversity, ecological status, sensitivity, etc?		The minimum requirements of the Species Protocols are reliant on SCC as defined therein and in the guidelines to these Protocols: 4.2 Defining species of conservation concern (SCC).
25.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 1827 Are permits readily available on short notice. Our experience is that obtaining these permits takes several weeks and are not given priority in the administration process by authorities		All prior permits and planning must be obtained prior or in the course of EA process in order to meet the timeframes stipulated in the regulations.
26.	Riaan Robbeson— Bathusi Environmental Consulting CC	Lines 1897-1898 A description of the vegetation communities, depending on the level of detail in the report, should be based on collation and analysis of data, example Braun-Blanquet. The above sections do not allow for the collection of data that will address this requirement.		Conducting detailed vegetation community analyses is not expected in EIA studies. However, the specialist is expected to be able to recognize different vegetation communities, at least structurally, and to map these appropriately.
	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 2374 Why only a limited selection of SCC? Should specialists use own discretion for the inclusion of other SCC in the		Screening tool will be updated as different datasets from the relevant custodians become available. Data on additional SCC will be incrementally added, most additional bird species of

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27.		meantime? When will the Screening Tool be amended to include all SCC?		conservation concern will be added during 2020 and 2021. Eventually all known SCC will have been added.
28.	Riaan Robbeson— Bathusi Environmental Consulting CC	Lines 2377-2383 What happens when clients demand that only the supplied list of SCC be utilised for reporting and other, important SCC are excluded. This could lead to severe impacts on other SCC		Firstly, it is the responsibility of the EAP and specialists to report on all SCC that will be affected by the proposed development, irrespective of the clients' demands. Secondly, the Species Protocols have now been amended to include a clause stating that specialists are required by law to disseminate all observations of SCC to reputable online and publicly accessible databases, prior to any reporting. Please refer to 5.3 Step-by-step guidance for Protocols 3c and 3d.
29.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 2402 As per Par 10.3.1 this list is incomplete?		As noted in the response to comment 27, this is being addressed as a matter of priority and the list will soon include all bird SCC. Currently the list includes 42 species.
30.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 2662 Is there a list of approved specialists that can be utilised?		No, not at this stage. Specialists with the appropriate field of expertise may be selected from the SACNASP website.
31.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 2662 Table 10-9: Mammal Species of Conservation Concern (SCC) included in the Screening Tool. Sampling and identification of bats is a specialist field and should be conducted by a qualified and accredited specialist. The general category of Zoological specialist (SACNASP) is not adequate to categorise this requirement. As it stands, and my understanding of NEMA is that the specialist only need to be registered?		Thank you, we have specified that ideally trained bat specialists should perform such surveys and have provided a resource where such specialists may be contacted.
	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 2662 (at common name: Short-eared Trident Bat) Table 10-9: Mammal Species of Conservation Concern (SCC) included in the Screening Tool		Your comment is noted.

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32.		The appointment and need for a separate bat specialist will have a financial implication on projects.		
33.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 2774 How should sampling be adapted to cater for these project deficiencies?		This comment is unclear and cannot be addressed.
34.	Riaan Robbeson— Bathusi Environmental Consulting CC	Line 2931 10.5 Butterflies Why only butterflies? This is inadequate! The SANBI requirement should be amended to include other important groups such as dungbeetles, etc.		SANBI has addressed this comprehensively. Please refer to the response to comment 216.
35.	Andre van der Spuy / AVDS Environmental Consultants	The Guidelines are clearly well-intended and appear although they are rather hefty and unfortunately add to the burden of an already complicated EIA hierarchical requirements (i.e. NEMA, EIA Regs Appendix 6, Screening toolkit and protocol, these Draft Guidelines). It would be better they were incorporated into the Appendix 6 or similar. Or at least abbreviated somewhat.		This comment has been noted however the guidelines cannot be incorporated into appendix 6 which details contents of specialist reports. They are meant to guide specialists, CAs and EAPs on the implementation of the Species Protocols which replace Appendix 6 of the EIA regulations. The guidelines have been streamlined to the bare essentials; this is the minimum level of detail required by the Species Protocols.
36.	Andre van der Spuy / AVDS Environmental Consultants	The main problem with EIAs these days is the level of development-friendly bias incorporated into ALL of the reports. This bias extends from the EAP, to the specialists (there are a very few exceptions), the Competent Authority, and Minister Creecy. This bias centers on political motives, business motives (fees & return work on account of finding favor with the		Your concerns are noted. This guideline and data for species in the screening tool is attempting to facilitate this process and improve transparency and accountability. The screening report will clearly identify which SCC are present and which specialists need to be appointed. This in itself is a huge step forward in supporting EIAs and the decision-making process.

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		particular developer). The whole environmental industry is corrupted through poor ethics on the part of those involved and a genuine lack of appreciation of the environment before all else. While this may sound like a dramatic view the evidence of rapid rates of decline in once common species and in the unsustainable development that is happening despite laws to prevent suggest that it is perhaps an understated view. The Guidelines will not fix the unethical practices so common today but should at least make an effort to build in proper controls. Unfortunately, I doubt that this is possible given the failure of the law (NEMA & EIA Regs) to even be respected. I have noted reference to the SAXX & EAPSA. I think this is a vain effort as my experience has revealed these organizations to be merely protectors of their members who are the problem. These bodies are therefore actually part of the problem. Some of them, through low standards and criteria, legitimize poorly qualified/ under-qualified persons who should properly not be permitted to have any influence on important environmental matters. Environmental law (NEMA etc.) since 1994 has progressively undergone a dismantling of proper environmental controls in favour of leniency towards development (which translates to legitimised environmental destruction). Perhaps the worst has been the introduction into the EIA Regs of "Need and desirability" of a particular activity. This is wholly open to interpretation by Heaps and specialists who inevitably adopt a view of such taken from the		It is an attempt to address the deep-rooted concerns that you raise, unfortunately no amount of regulation can change ethics of individuals.

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		perspective of the developer (and Competent Authority) – local community views (expressed through public participation process) are usually dismissed unless they align accordingly.		
37.	Andre van der Spuy / AVDS Environmental Consultants	Specialist must strictly stick to their disciplines. Many times EIA specialist borrow arguments and mitigation from the studies of other specialist from other disciplines. For instance, in the renewable energy sector, the personal views of the specialist as regards transition to green energy in relation to climate change, Renewable Energy Development Zones (REDZs) etc. has no place to play in the specialist study. I have frequently seen specialists dismiss significant negative impacts based on their perceived urgency for green energy or approve of the project based upon it being within a REDZ.		Your comment is noted, one of the main purposes of the guideline is to ensure that specialist only collect the necessary data to provide the evidence required for CAs to make transparent decisions regarding suitability of the site for development.
38.	Andre van der Spuy / AVDS Environmental Consultants	Under NEMA the “No go” option is a real option and must be equally assessed with the preferred development option and other alternatives. It is not merely a baseline scenario or hypothetical one. The “No go” option is the ultimate mitigation measure.		This option is one that describes the baseline conditions of an environment and highlights the status quo should the development not occur. The no-go alternative is assessed by the EAP and included in the EIA/BA report. The species data included in the screening tool has four levels of sensitivity. The highest level: very high sensitivity indicated that there are no other sites where that species can be found and provides the information to support a decision.
39.	Andre van der Spuy / AVDS Environmental Consultants	Budget for a proper specialist study must be irrelevant. If the developer (i.e. financier) cannot afford the level of specialist work properly demanded from a purely environmental perspective then that developer should withdraw its proposal as it is under-resourced.		The reason to provide data upfront is to ensure that it is clear to the developer how many specialists will be needed and the clear step-by-step guidance ensures that the specialist can provide accurate upfront budgets and be able to defend these should EAPs or developers try to force them to reduce their budgets.

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		Compromise of the specialist work for budgetary reasons of the proponent is unethical and illegal.		
40.	Andre van der Spuy / AVDS Environmental Consultants	As with the budget issue, time required to undertake a required level of specialist work must not be compromised by the time wishes of the proponent or others.		Agreed and this is specified in section 9.2.1. of the guideline. The guidelines provides specialists with information to justify the time and budget requirements for their work.

41.	Andre van der Spuy / AVDS Environmental Consultants	The precautionary principle (“risk averse and cautious approach”) must be respected, and applied, at all times. Where insufficient data exists then the worst case scenario must be used – even if this amounts to a “fatal flaw” finding. Below is a case where it has NOT been applied as was required of the bat specialist: It is pleasing to see (to best of my knowledge) the first effort towards a definition of “fatal flaw” in the South African EIA directives (under line 113 of the Guideline). This has been a highly abused term by EAPs and specialist who have routinely given it their convenient subjective interpretation (much like the term “sustainable”). I however fear that definition is still to vague and is left to the convenient threshold determination of the specialist – this relies upon an ethical and objective specialist (but which is rare in my experience). A fatal flaw is an unacceptable impact from an environmental perspective, and it must be absolute. Line 1542: I do not agree that a “fatal flaw” could justify consideration of an offset. A fatal flaw should dictate that the “No go” option becomes mandatory without exception. The practice of offsetting itself is questionable as objective and ethical assessment should dictate that the natural asset secured (at the cost of the sacrificed one) demanded protection according to its own merits anyway. It is critical that the criteria for a “fatal flaw” be explicitly set down. I would suggest that any potential negative impact that is of “HIGH” significance, post mitigation attempt must be a fatal flaw in terms of NEMA Section 24. NEMA states that negative impacts must be anticipated and prevented, and where they cannot be altogether prevented , are minimised and remedied – in		We note your comment. The Guidelines strongly promotes application of the precautionary approach and provide guidance on when it must be applied (9.3.2 Application of the precautionary principle and ‘absence data’).
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		other words there is no accommodation for so-called “residual impacts” and proclaimed “need an desire “ for the development cannot justify the allowance for residual impacts (otherwise what level of “residual impact” is then permitted?). Thus, the methodology and categorization of potential impacts by the specialist must include the (post-mitigation) impact threshold for a “fatal flaw” to be registered.		
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42.	Andre van der Spuy / AVDS Environmental Consultants	Mitigation hierarchy: This is another abused description. The “no Go’ option must be recognised as the ultimate mitigation option relevant to whatever activity is being proposed. Mitigation must be specific to the particular specialist discipline under question and it must be evidence based. If there is no evidence of a particular mitigation measure’s effectiveness then such must be stated and the pre-mitigation impact significance level must be the same as the post-mitigation impact significance level. General (non-specific) mitigation measures, and those borrowed from other specialist disciplines, must be rejected. E.g. if a wind farm is predicted to have an unacceptable impact on vultures then that impact is not mitigated by a specialist’s approval of that same wind farm on the basis of the wind farm contributing to the fight against climate change and thus the preservation of birds species in general.		We note your comment. This comment is outside of the scope of this guideline as it is in an EIA process comment. The Species Guideline states: Numerous methodologies exist for calculating the significance/importance of impacts based on the above-mentioned descriptor variables, each with its pros and cons. For stand-alone reports, specialists are encouraged to use the most appropriate methodology applicable to their taxon (that can be referenced) and to provide justifications (where necessary) for the evaluation of the descriptor variables. Your comment is noted.
43. 	Andre van der Spuy / AVDS Environmental Consultants	Specialist opinion must be backed by facts which are specific to the subject project. Many times specialist opinion alone is given as reason for important findings.		These guidelines are very specific about what must be included in specialist reports, to ensure that -EAPs and -CAs receive the information required. We recognize that in the past there was too much inclusion and emphasis on opinions, which is the reason for providing this new standard.
44.	Andre van der Spuy / AVDS Environmental Consultants	Need and desirability of the particular project should have no part (and, by definition, can have no part) in a proper objective specialist study.		Your comment is noted.
45.	Andre van der Spuy / AVDS Environmental Consultants	Specialist qualifications are critically important. I note that they Guidelines offer some leeway on this issue in that an apprentice is permitted to work under the watch		Your concern on qualification is noted. SACNASP and other registration bodies have clear criteria on requirements for registration of professional. Amending the registration

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		of a suitably supervisor. It is common practice in multi-disciplinary firms (such as CES) to groom un/ under-qualified employees into a specialist role under guidance of another senior partner but who is also not properly qualified. Unfortunately, the qualifications for an “EAP” are so wide-ranging and low that virtually any person with any qualification can become an “EAP” and thereafter direct their “specialist” intentions into a range of disciplines. I do not agree that a “diploma” is sufficient qualification for a specialist, per: “Nationally recognised tertiary degree/ diploma in relevant field” A diploma is a very general and all-encompassing term and is easily abused (which it will be). It is common practice for EAPs and specialist to these days substitute certificates, diplomas and registrations for proper high level academic (i.e. university) qualifications.		requirements of professional bodies is outside the scope of this guideline.
46.	Christian Deschodt: Invertebrate Biosystematics and Conservation Group/ Department of Zoology & Entomology: University of Pretoria	In order for economic advancement at an acceptable environmental cost, guidelines and protocols for environmental auditing and reporting are being drafted. The following important organismal groups have been identified to be used during the auditing process: Flora, Herpetofauna, Avifauna, Mammals and Butterflies. Although it is virtually impossible to sample for every invertebrate group, I find it amazing that only one group from the vast assemblage of invertebrates was selected in the environmental auditing process. I can find no concrete reasoning in the draft why only Butterflies was		SANBI has addressed this comprehensively. Please refer to the response to comment 216.

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		selected. Certainly, various other groups are taxonomically, spatially and in terms of richness equally well known. Ants, Antlions, Baboon spiders, Dragonflies and Damselflies, Dung beetles and Scorpions, are just a few other groups that immediately come to mind. All these groups are in some way good surrogates or indicators of environmental health. As each project is unique, the invertebrate target groups to be used for that specific project should be identified during the screening or scoping process. In addition to specific groups, it is also critically important to sample general invertebrates from all other groups. Even though they may not be well known, they are still part of the system. These general invertebrates must be identified by the specialist to the best taxonomic level. Specific standard protocols should be implemented and used for each of the selected groups. This will even allow for statistical analyses between projects. All sampled material should be deposited in a proper entomological collection to be curated and to be available if any queries from a specific project arise. Furthermore, it is recommended that rigorous statistical methods be used in the analyses of the data. This is the best way the specialist would be able to provide scientific sound and unbiased results and recommendations. Statistically appropriate methods for collecting almost all groups should be available in the literature.		

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47.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— Department of Economic Development, Environment, Conservation & Tourism (DEDECT), North West Provincial Government	I was a reviewer on the said document attached, but have since checked up again, not sure whether it was expected, but anyway, it was done. The first part - simple technical changes to suggest, some of which may have slipped from notice previously. Second part - more major changes relate to content, and suggestions to change course etc. Ideas having come up afterwards. I looked at all the general sections, and specifically mammals and birds (as I know these the best). I perused only briefly through herps and butterflies - the Tables they have are very good in them, perhaps mammal one can have similar? I think this company has done a good job mindful that this is also a busy fieldwork season for them.		The stakeholder is thanked for the thorough review.
48.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 3 – Project leaders – Jonathan Booth?	Correct Spelling	The document has been updated to include the correct spelling.
49.	John Power: Terrestrial Ecologist, Subdirectorate:	Page 19 – Line 352 DEFF? [acronymed]		Edited for grammar, second minister removed.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT				
	Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government			
50.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 24 onwards, sections 2.1 etc. etc. Subheadings to be bolded to match that of the Minimum requirements and detailed guidelines 'grey boxes', which is vivid and stand out. Not major issue, just looks like a mismatch in importance with subheadings appearing less pronounced.		We have maintained the font size and look and feel of the subheadings as they are appropriate for the document.
51.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 32, Green box, after 3.3. "Guidance for the consideration of seasonal limitations and surveys for SCC with particular reference to the 300 day duration of the Environmental Authorisation process is provided in 9.2.1 Seasonality with specific reference to the EA process"	• Correct grammar/word fill • Provide Detailed guidance/ add information • Add bolded text	The grammar has been corrected in the document.
52.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity	Page 36, Table 6-1. Example procedure to determine the taxon-specific (flora) project area of influence, Line 621 "Project activities confined within the project footprint (6 m wide road) may impact on the surrounding area for	Add bolded text	Text has been edited to improve grammar and the table reference.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT				
	Management— DEDECT, North West Provincial Government	up to 700 m, when considering the nearby aquatic habitats due to accidental hydrocarbon spills and improper storm water management leading to erosion and siltation. Increased levels of dust production along the roads during construction is expected to result in compromised capacity of plants to photosynthesise which may cause die-off, resulting in potential colonization by alien and invasive species. Increased traffic on the upgraded road is expected to negatively impact on the flora communities for at least 50 m surrounding the road, due to aided dispersal of wind-dispersed alien and invasive plants, which may easily colonize patches of dead or compromised natural vegetation. The combined primary, secondary and tertiary project areas of influence is therefore much larger than the project footprint (Figure 6-2). Description and justification for the PAOI areas, as well as the area calculations for each are provided in” [Spelling/grammar]		
53.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 41, lines 727-730 – acronyms –i.e PAOI/ EA – used before somewhere?		The document has been updated to remove the full term for PAOI and EA, as they have been defined earlier in the document, so there is no need to repeat.
54.	John Power: Terrestrial Ecologist, Subdirectorate:	Page 42, Footnote 19 Willful	Correct spelling	The document has been updated to include the correct spelling.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
	COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT			
	Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government			
55.	John Power: Terrestrial Ecologist, Subdirector: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 44, lines 798-801 Acronyms here – RI/SEI etc.		The text in the document has been updated to refer to the acronyms.
56.	John Power: Terrestrial Ecologist, Subdirector: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 49, line 878. “Sandy Fynbos – the proximity of transformed or degraded habitat along the border of Sandy Fynbos in the PAOI has resulted in some degradation in habitat quality through edge effects; a buffer of 15 m is considered necessary to ensure that these edge effects are not exacerbated if development takes place right at the boundary of Sandy Fynbos”	Correct spelling and grammar.	Spelling and grammar corrected in the document.
57.	John Power: Terrestrial Ecologist, Subdirector: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT,	Page 50-51, Table 8-5. Worked example of how to determine Site Ecological Importance for flora within the PAOI. Step 2- Herpetofauna mentioned in next worked example. Check procedure and example. Remember this is about the flora this example.	Delete Herpetofauna	The text has been removed from the document.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT				
	North West Provincial Government			
58.	John Power: Terrestrial Ecologist, Subdirector: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 53, Fig 8-5 – SEI – Acronymed.		The text has not been amended, as we prefer to have the SEI written out in full at the beginning of a figure caption.
59.	John Power: Terrestrial Ecologist, Subdirector: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 53, 8.4.2 Herps.. “Wetlands with SSC – The recommended minimum buffer for high density urban, resort and hotel developments for river, wetlands and estuary habitats is 15 m (Macfarlane & Bredin, 2017) and is considered sufficient and 28 for amphibian SCC breeding in these wetlands;”	• Check grammar sentence flow • Footnote to come to end, as it disrupts sentence flow.	The grammar and error has been corrected in the document.
60.	John Power: Terrestrial Ecologist, Subdirector: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 55, table 8.7, Step 3, example – acronym – SEI.		The text in the document has been updated to refer to the acronyms.
61.	John Power: Terrestrial Ecologist, Subdirector: Biodiversity Scientific	Page 56, footnote 33 “Each habitat type is evaluated separately for area”	Rephrase	The footnote has been rephrased.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
	COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT			
	Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government			
62.	John Power: Terrestrial Ecologist, Subdirector: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 59, line 996. “however acceptable for Candidate Natural Scientists (Cand.Sci.Nat.) to work under the supervision of a Professional Natural Scientist (Pr.Sci.Nat) who sign off on their work “	Correct spelling and sentence structure.	Text in the document has been amended accordingly.
63.	John Power: Terrestrial Ecologist, Subdirector: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	page 65, Line 1235. “One acceptable surrogate method is to take the listed.”	Correct spelling	Text in the document has been amended accordingly.
64.	John Power: Terrestrial Ecologist, Subdirector: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 68, line 1358 – “...if species is not classified as a sensitive species..”	Correct sentence structure.	Text in the document has been amended accordingly.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
	COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT			
65.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 106, Avifauna, line 2382 ISSV – used before? Acronym? Not in list of acronyms so to place this in full.		ISSV, the initial site sensitivity verification has been added to the abbreviations list at the start of the document, is used as of section 5 of the document. Section 5.1 also describes what the ISSV step is and what its acronym is.
66.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 112, line 2628 “timing and intensity of the..” [sentence etc]		Text in the document has been amended accordingly.
67.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 121, line 2754 handling not handing (Mammals)	Correct spelling	Text in the document has been amended accordingly.
68.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT,	Page 123, line 2801 – landowners vs land owners? [spelling = consistency?]	Correct spelling	Text in the document has been amended accordingly; “landowner” is used.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT				
	North West Provincial Government			
69.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 125, line 2846-2847, and or & between referenced authors? Not sure style.		Have replaced all instances of “&” with “and”.
70.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 21, Section 4.2 – defining SCC. For most part this is acceptable, one should just be aware that there are national and global lists, and perhaps the both of them to be considered. Then issue of TOPS – though many are included already, should this also be accommodated in some way? Scientifically IUCN red listings are better to use, but it can’t harm to add them? Some provincially protected species is fine, and be there on merit, and some lists are quite extensive and thus a national level capping may be required, as it can sometimes be exhaustive as numerous species are under protection. Free range populations of reintroduced, mostly protected large mammals are of importance, and not sure how to accommodate and they would be seen as SCC. For example red hartebeest in a part of NW have always lived there, and they are not protected beyond a		The guideline is clear in its definition of SCC, which goes beyond internationally accepted standards (such as IFC and KBA criteria). Protection at the Provincial level is often in relation to trade regulation and/or disease control and therefore not relevant in relation to biodiversity conservation, which is the ambit within which these Guidelines are operating. Newly defined SCC will continuously be added to the screening tool as required. Red hartebeest are assessed by the IUCN as LC and therefore are not of conservation concern.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT				
		province's ordinance. Maybe some SCC can be decided for in consultation with a province?		
71.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 23 – Line 447 -448 The e-mail to report on screened species with unique identifier – must not just have e-mail, maybe e-mail address in brackets – but mention the designation at least of the person. It is weird having this requirement of an e-mail which presupposes the email as a juristic person? Just to improve upon this.		There is a generic email in the guideline so that queries can be managed and directed to the appropriate person who can respond within SANBI.
72.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 23 – Line 453 Not meant to be Endangered sensitive animal?		Ideally it needs to reflect the taxon group for the animals. The text has not been amended but an explanatory footnote has been provided.
73.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 26, Line 512-513 Orange box – Probability of Occurrence – ie. > 75 % (likely), possible (50-75%), etc., these should be detailed and a lot of emphasis placed on them, especially for sections on elusive hard to find taxa within constraints of time to do assessments, i.e. herps, mammals. I'm not sure where the detail has to go, but some mention of how to determine this can really be beneficial to mention. For example, a record in last decade in nearby area, could mean a high probability of occurrence, or medium? Then up to specialist to justify, i.e. based on		Probability of occurrence is deliberately not defined according to a proportion as this requires quantitative data to ascertain, which will not be available to the specialist. Therefore, the specialist is required to make a qualitative decision in this regard based on their understanding of the species and the ecological conditions of the PAOI and provide a short justification of the decision reached in this regard. The CA and I&APs can then evaluate these justifications and raise any objections if necessary. Guidance on how to assess probability of occurrence is provided in 9.3.6 Researching and presenting data for expected SCC.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT				
		current threats, habitat alteration etc. I can guess in many cases many potential SCC will not be found at all, as they are very rare, and there are time limits on being able to assess comprehensively. These issues can be taken up in taxon specific accounts, but should be enabled by higher level descriptions of the principles.		
74.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 58, Lines 968-978 Maybe to stress that this worked example was from site with very rare species, including even one suspected of being extinct in wild, and in reality many sites in SA may not have as many highly threatened species as this site near CT. [Optional to mention, but to stress this is extreme example]		The comment is noted. However, it is necessary to provide extreme examples to demonstrate the range of SEI evaluations possible and how they should be combined since utilizing a simplistic, less extreme sample will not provide sufficient demonstration thereof. Furthermore, the fact that this example is based on a real-world scenario is ideal to demonstrate a realistic situation. Accordingly, no additions have been made to the text.
75.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 61, 9.2.3 Permitting considerations Can mention in bullet – some provinces have electronic permit system (Nipas), which has expedited the process.		Text has been amended to include online permit application options.
76.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 64 – Lines 1220 onwards – as above, the Probability of occurrence stuff is here it seems – seems adequate, but may need some fleshing out, as this is crucial. Even if a species is found on the boundary over the PAOI – legally it can be argued it's not found there, so the high probability category will cover it.		The comment is noted and partly addressed in comment 73. The text is considered adequate in its current form and is not amended.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT				
77.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 106, Avifauna Change in prevalence via SABAP can be examined pre and post development, as a way of appraising development at the pentad level – this is optional to include, and it is post hoc, but up to ornithologist here to mention or not – not sure if necessary, as it is more to do with monitoring and not first detection.		The comment is noted. A pentad (5'x 5' area ≈ 9 km north-south and 7 km east-west in South Africa) is too large in relation to most developments for change detection to be assigned to a single development.
78.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 108-109 – Table 10-6 I would think that camera traps can be good for large birds, i.e. bustards, as they walk by them, like a mammal would, and can be detected, and raptors also, as they often at waterholes, and can be detected by camera traps – though not a primary method – unless this is what is meant by authors.		A good suggestion, the table has been amended accordingly.
79.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 110, line 2517 “As many roads within and adjacent to the PAOI should be surveyed as possible”.	Rephrase	Text in the document has been amended accordingly.
80.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate:	Page 111, line 2566 Secondarily obtained data from parallel mammal studies can also provide some SCC, which can augment		Text in the document has been amended.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT				
	Biodiversity Management— DEDECT, North West Provincial Government	the avifaunal study. Bustards are often located on camera traps.		
81.	John Power: Terrestrial Ecologist, Subdirector: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 117, Table 10-9 1. Spelling error. 2. Some species have asterisks. 3. Check statuses, whether to look national/global red listings, as leopard not here, and it is at least Vulnerable (SA), or NT?	1. Spelling: Neotragus sp. (Sun) Not Nes.. 2. Remove asterisks if not applicable. 3. Proof check over all the species again.	1. <i>Nesotragus</i> is the correct spelling. 2. Asterisks removed. 3. Development /land use change is not the primary threat to leopards. Their main threats are persecution and wildlife trade, land use regulation is not the appropriate tool for mitigating threats to leopards.
82.	John Power: Terrestrial Ecologist, Subdirector: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 118, lines 2670 – 2675. I would look at rephrasing a bit, but this is important to mention in introductory section. Lion is not good example as they do historically occur all over SA and are not introduced out of range, so better examples are species which are often out of range as follows: buffalo, white rhino, giraffe etc.		Text has been amended to include more appropriate examples.
83.	John Power: Terrestrial Ecologist, Subdirector: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT,	Page 118-119, Table 10-10 This makes sense as point of departure, but better clarity needed. First, the first two rows, can also include large herbivores, especially megaherbivores which get		The comment is noted. However, the stakeholder is reminded that this guidance is in relation to SCC only. The colour scheme is one used throughout the document to indicate degree of importance (red = most important) and accordingly is not altered. Acronyms have now been used where possible.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT				
	North West Provincial Government	routinely reintroduced, not just large carnivores, and they will fit the framework. Second, Colour scheme – I would swop out the colours – with red at top, and green at bottom, as this would reflect more important species to consider as SCC at the nice green end, while less NB ones at the badass red end. Third, use acronyms to make less wordy, i.e. SEI etc.		
84.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 119, line 2697 Important to mention that the best method to seek an SCC must be done in compliance with the current literature on the species which details detection methods, as it will become exhaustive to mention every method for every SCC, there are better methods for some species, and this must be mentioned somewhere, maybe here, or as point on its own? Black-footed cats are better detected on smaller trails in their habitats vs main roads, which is where camera traps are normally placed. Short-eared trident bats are not often found owing to methods of sampling/detection.		Text has been amended accordingly.
85.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT,	Page 119, Table 10-11 In Table, along row with bats, and additional consideration – it may be a laborious method, but don't think one can say 'not recommended', as there is no other method which can meaningfully detect the bats.		Text has been amended by removing "not recommended". Camera trap comment not considered relevant for this table.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
	COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT			
	North West Provincial Government	Under camera traps – one can maybe mention the option of getting secondary data from species-specific studies off site of a PAOI?		
86.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 120, line 2708 “This is not only due to seasonal ecology of the species, but because displacement of soil during their subterranean activities, resulting in visible “runs”, remains observable for extended periods in moist soil. In dry soil these “runs” collapse and are not easily detectable” [rephrase I would say?] i.e. results in.. remaining visible..		The text is considered to be appropriate in its current form and has not been amended.
87.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 120, lines 2710, “Finally, many bat 2710 species will emerge from long periods of semi dormancy within very specific months (such as moist springs) and these migratory schedules must be take into account for the specialist investigation” “[rephrase] – awkward wording – moist springs? Wtf J “ [sic]	Rephrase and change wording	The text has been amended based on inputs from a bat specialist.
88.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 121, lines 2733-2739 Regarding the Table, haven’t considered this, I guess it makes sense, and necessary where no alternative I guess.		The text has been amended.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT				
89.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 121, line 2748 “Mammal walkways/ areas of frequent use - the location the area subject to frequent use. Rephrase, of?? Awkward sentence” [sic]		Text in the document has been amended accordingly.
90.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 122, line 2765 Tinned fish (sardines or pilchards) may also be used. This can be bracketed, its already mentioned to use fish, now it says this can also be used. [sic]	The words “sardines or pilchards” should be put in parentheses.	Text in the document has been amended accordingly.
91.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 122, Fig 10-7 This is not deployed camera trap – deployed suggests in field in operational state, this is just a camera trap in a yard. Optional to change I guess.		Deployment of camera traps in urban settings is an essential component of many EIA studies. Nevertheless, 3 additional examples of <i>in situ</i> camera traps have now been provided.
92.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 122, line 2775 In spoor section, I would want to see that where there is ambiguity, i.e both jackal species in area, that one is more careful when assigning a species from an area, and these records should be provided, but with caution being erred, as similar species cannot be identified		Text in the document has been amended to include guidance on identification uncertainty.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT				
		accurately from spoor discrimination, which is where camera traps play their part.		
93.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 122, lines 2775 onwards Some other references/field guides for spoor tracking – maybe mention all, as some authors will feel idea of favouritism with some mentioned and not others. For example Rhenius Mhlongo and Alex Van den Heever produced spoor book too. These can be consulted to. One can argue why some references are mentioned in SA and others not?		Examples of important and relevant literature are provided in the text, not a comprehensive list, which is sufficient. The text has therefore not been amended.
94.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 124, line 2809 Relative abundance better vs density?		Text has been amended to replace density with “estimated population size”. Note that the Protocols do require estimation of population size and guidance on this is provided in 9.3.10 Population size estimates for expected SCC. Any additional information in this regard that can be obtained is therefore useful and applicable.
95.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 124, lines 2812 & 2817 bush meat or bushmeat?		Text in the document has been amended accordingly and standardized as “bush meat”.
96.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific	Page 125, line 2830		Text in the document has been amended accordingly.

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
COMMENTS SUBMITTED TO THE DEPARTMENT POST-GAZETTING FOR PUBLIC COMMENT				
	Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	night drives		
97.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 125, line 2837 spotlights – one word	Correct the spelling	Text in the document has been amended accordingly.
98.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 125, line 2839 Road mortalities, road kills nearby POAI suggest likelihood of occurrence, not that they do occur.		Text in the document has been amended accordingly.
99.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 125, line 2847-2849, rephrase: “These techniques may require laboratory access, with the use of slides and dissecting microscopes for the examination of hair cross section and scale patterns of scat contents” -scale patterns of hair, not scat – just to rephrase for clarity.		Text in the document has been rephrased.
100.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific	Page 127, line 2894		The term “density” has been removed. The number of individuals observed is what must be reported on in this context. However, the Protocols do require estimation of

No.	STAKEHOLDER	STATEMENT/ COMMENT	SUGGESTION	RESPONSE/ ACTION TAKEN
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	Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Maybe relative density/abundance better to say? Density is very specific?		population size and guidance on this is provided in 9.3.10 Population size estimates for expected SCC.
101.	John Power: Terrestrial Ecologist, Subdirectorate: Biodiversity Scientific Support (BSS), Directorate: Biodiversity Management— DEDECT, North West Provincial Government	Page 149, Appendix 2 – Biodiversity management plans. 13. wild dogs & cheetah are TOPS under conservation status, to correct 14. Scientific name for blue crane is here, maybe mention all cranes, and have their family name, Gruidae whatever?	13. Correct this. 14. Mention all cranes and have their family names included.	This table has now been extensively updated to take into account this comment and additional unaddressed errors.
102.	Dr John Measey: DSI-NRF Centre of Excellence for Invasion Biology	Page 87: C. rosei - why not pit fall traps for this spp? X. gilli - acoustic surveys are not appropriate - even for underwater calling. Animals don't call regularly or predictably. I would add "adult trapping". I don't think that tadpole surveys would work well for this species.		Text in the document has been amended accordingly.
103.	Dr John Measey: DSI-NRF Centre of Excellence for Invasion Biology	Page 88: A. rugosa - remove tadpole surveys. Remove diurnal & nocturnal searches A. subvoce - remove tadpole surveys. Remove diurnal & nocturnal searches I'm concerned with these recommendations that people could potentially do one of the recommended		Text in the document has been amended accordingly. An additional footnote has been provided to capture the valid concerns of the stakeholder.

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		methods (e.g. diurnal search for <i>A. rugosa</i>) and find nothing, and then claim nothing is there, even though there were plenty of calls. Similarly, with the recommended timing, it needs to be clear that this isn't exclusive. We need to remain open to the possibility of late/early rains & shifting climatic periods over much of the country.		
104.	Susie Brownlie	In general, the Guideline is comprehensive and covers all the key issues needed.		We appreciate this recognition.
105.	Susie Brownlie	It is heartening to see consideration being given to potential species impacts beyond the 'development footprint' and the specific project site, through ensuring that the Project Area of Influence is taken into account.		We appreciate this recognition.
106.	Susie Brownlie	Impact assessment, impact analysis and impact evaluation have different connotations and should be included in the 'definitions' section for clarity.		Will be addressed in the updating of the guideline.
107.	Susie Brownlie	Based on experience drawn from reviewing biodiversity specialist studies for EIAs, application of the 'extent' of impact variable can be extremely confusing and result in inappropriate messaging to decision makers (through questionable impact significance ratings). As an example, where a threatened local endemic species is impacted on a project site, many specialists rate the 'extent' of impact as 'site-specific' or 'local'. In this case, the 'extent' could better be seen as an impact with national or global implications. It would be very useful		A very important comment. The text was originally adjusted to include a call-out box specifically addressing this issue and to provide guidance on how to evaluate this aspect correctly. However, subsequently it has been discussed that the issues surrounding impact analysis require more in-depth addressing, specifically evaluation of 'extent' and impact 'significance'.

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		if the Guideline could address this dilemma, since it influences overall impact significance.		
108.	Susie Brownlie	The Guideline correctly refers to the Mitigation Hierarchy as comprising four steps. However, there is some confusion in the document around use of the term 'residual' impacts which must be addressed. The term 'residual impacts' is used internationally to refer to the impacts remaining after the first three steps in the Mitigation Hierarchy have been exhausted, and a measure of these residual impacts is then used as the basis for designing an offset – if and only if there would not be loss of irreplaceable biodiversity or irreversible negative impacts. In the Guideline, e.g. 1433 -5, it is said that the 'after mitigation' significance of impacts must be evaluated after all four steps in the hierarchy have been taken into account, describing these impacts as the 'residual impact'. Later, however (e.g. 1542), the Guideline states that '...if significant residual environmental impactsremain after minimization and restorative measures were to be taken, then biodiversity offsets may be required', introducing conflicting messages!		The text has been amended to remove this ambiguity.
109.	Susie Brownlie	Given the extremely tight timeframes in the One Environmental System's EIA process, and over and above the guidance pointing to early planning of a number of surveys and applications for permits (e.g.), it would be beneficial for the Guideline to advocate undertaking much of the Species Environmental Assessment work as part of the wider EIA before the formal application commences, given that the		We note your concern it is addressed under sections 9.2.1. The text has however been amended to recommend initiation of fieldwork prior to the application for EA. In addition, the timeframes figure has been updated to include the Basic Assessment Reporting (BAR) Process and the figure legend and footnotes have been clarified too.

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		constraints on planning impact minimization, restoration/ rehabilitation and in particular biodiversity offsets are considerable once 'the clock starts ticking'.		
110.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Lines 339-345 While it has been stated previously that the national guideline will not replace minimum requirements stipulated by the provinces, the national guideline claims precedence and only recommends that any additional provincial requirements be attended to. The recommendation should be replaced with an instruction to also address any additional provincial requirements.		The protocol prescribes the minimum assessments and reporting requirements and are legally binding. They do not necessitate the need for some requirements contained in the provincial guidelines. As this a guideline, we cannot instruct users to adhere to provincial guidelines but we can recommend adherence. The guideline can only recommend that additional provincial requirements are adhered to.
111.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Lines 353-354 The information provided under the legal framework indicates that the screening tool is operational and use thereof compulsory. Only much later in the document (line 2372) is it revealed that the species layers are incomplete. This needs to be clearly stated in the introduction.		We note this inconsistency and will address this.
112.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Lines 396-397 Given that the rigour of follow up studies differs for areas identified as low, medium, high or very high sensitivity it is critical that the sensitivity categorization is accurate. Greater emphasis needs to be placed on gathering biodiversity data needed to accurately categorise site sensitivity especially for species and areas where knowledge is poor. See further comments on modelling under Table 4-1 below.		Your concern is noted. BirdLife will look into influencing Birdlasser to collect more accurate data.

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		BirdLasser currently only makes provision for recording three location accuracy classes i.e. not specified, within 500m and exact. Few records are likely to be exact, but any record with an error of >250m is not considered accurate enough in terms of the EIA decision tool (refer to Table 4-1). I suggest that SANBI approach BirdLasser and request that an additional accuracy class of <250m be added so that bird atlas data becomes more useful.		
113.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 403 The footnote explaining the meaning of extremely rare needs to be included after the first mention i.e. on page 21.		Footnotes have been appended a suggested.
114.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Table 4-1 The high sensitivity category relies on occurrence records with a spatial confidence level of <250m and only applies to the habitat segment in which the species was recorded. Using this approach to accurately map the occurrence of birds that move amongst habitat patches within a fragmented mosaic would be challenging as a record would be needed for each patch. Including all suitable habitat patches within a given radius around an accurate locality record might partially address this, but justifying meaningful “buffers” would be challenging. Elevating high resolution models from medium sensitivity to high might be a more defensible approach.		Bird high sensitivity is created using species distribution models, we have amended the text to make this clear. Thank you for pointing out this discrepancy.
115.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Lines 435-436 Given the paucity of good biodiversity data a more precautionary approach might be warranted at least for poorly researched taxa and localities.		Should a specialist go on site to confirm 'low' sensitivity of an area as indicated by the screening tool and find a SCC, the assessment procedure that must be followed is that of very high/high sensitivity.

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116.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 468 It is essential that the EAP be required to inform DEFF/SANBI of any undocumented sensitivities prior to the applicant. Otherwise there is a risk that a diligent EAP could be replaced and details of the actual site sensitivity might be withheld.		Your suggestion is noted and will be included. The protocol currently requires a specialist to upload the data from field surveys onto iNaturalist. This includes any undocumented species of special concern.
117.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 499 Remove “a”.		Completed.
118.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 512 A definition of “migratory species” is required. Does this include all species listed under the Convention on Migratory Species and its associated agreements (some of which are not truly migratory) or alternatively all species that undergo migration even if they are common?		Defined as per NEMBA and included under the list of definitions.
119.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 525 Within the minimum requirement block (second bullet) replace “evaluation” with “evaluate”.		Completed.
120.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 555 Within the detailed guidance block add “of” before “seasonal”.		This sentence is grammatically correct and this change has not been made.
121.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Lines 682 and 686 The equations as written suggest that the outputs were calculated mathematically, but no provision is made for differential weighting that appears to have been applied to generate the matrices presented at line 778 and 783.		The equations are simplistic representations of how SEI and BI are calculated, through the combination of two other factors. It is clear to the reader, at the relevant section, that this combination occurs through interpretation of a matrix. No changes have therefore been made to the text.
122.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 698		Congregatory species are included in Table 8-1 as triggers for both the Very High and High categories. Not all migratory species are included, only those that congregate and are

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		Migratory species are listed among the SCC (line 512), but are not included amongst criteria for assessing site importance. This needs to be explained.		therefore vulnerable to site level disturbances. Not all migratory species are SCC.
123.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 700 In the minimum requirement block below line 512 reference is made to “national or regional” assessments rather than “global or national” assessments used here. A consistent approach is needed. While the proposal to use the most recent red list assessment (whether global, regional or national) makes good sense for RSA endemics and near-endemics this is not necessarily the case for more widespread species. In cases where the national assessment is not used, the latest assessment must be compared to the most recent national assessment. There may well be threats to populations of species that are not endemic that exceed local thresholds of concern and therefore merit a higher threat listing nationally than globally/regionally. Unless the global/regional assessment is more recent and indicates that the specific threat has been addressed in South Africa or that a new global threat has emerged that merits a higher listing, the national red list assessment should be used.		Text has been updated to indicate that national assessments should be used preferentially.
124.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 712 Is range restriction not already adequately addressed under the IUCN criteria?		No, the IUCN criteria only list range-restricted species that are also currently experiencing population declines, naturally rare species that are not in decline are not included under the IUCN categories of threat but are of significant national importance hence their inclusion here.

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125.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 714 What % is proposed? Table 8-1 gives 10%, but no rationale. For birds 1% of the global population or 0.5% of the national population have been used previously (possibly linked to Ramsar or CMS).		We have followed the IFC criteria for critical habitat determination in this regard (see performance standard 6 guidance note 78).
126.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 717 Presumably guidance will be provided as to what is considered significant.		Yes, the fulfilling criteria to determine this are provided in Table 8.1.
127.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 778 Inclusion of Functional Integrity in the assessment of Biodiversity Importance is a long overdue progression from the threatened species focus of recent decades. The weighting of the matrix is, however, still biased towards Conservation Importance even though this is not explicitly stated. A site with very high functional integrity should not be reduced to low biodiversity importance simply because it does not support threatened species. This undermines the value of including functional integrity as a valid consideration in and of itself. Maintaining large functioning ecosystems needs to be given greater consideration.		Your comment is noted but for the species guideline the focus necessarily needs to be on SCC. Sites of high functional integrity are addressed in the terrestrial biodiversity protocol.
128.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 796 What is the basis for the figure of 70% used in Table 8-3? A reference or rationale is needed.		This has been changed to 75% and a detailed footnote has been provided to explain the reasoning behind this restoration endpoint.
129.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 803 Since the Site Ecological Importance score appears to increase with declining Receptor Resilience the term "Ecological Vulnerability" may be more appropriate than "Ecological Importance".		Thank you for the comment. During the inception of this method numerous names were proposed and considered but ultimately, SEI was considered to represent the best description which is technically useful, avoids confusion and is easily interpretable by non-ecologist that will read these reports (e.g. members of the public). The name will therefore not be changed.

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130.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 904 The inclusion of “(herpetofauna)?” under Step 2 of Table 8-5 seems out of place given the botanical nature of the rest of the example.		This has been removed.
131.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 927 Replace “no” with “not”.		Completed.
132.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 923 While the inclusion of footnote 28 is acknowledged, wetland buffers have an unfortunate tendency to be based on misreading or misquoting of the original literature. If the 15m buffer is to be used in this example for illustrative purposes only please state this explicitly whenever it is mentioned (note just in a footnote which can easily be overlooked) that the terrestrial area required to protect biodiversity associated with a water resource is much larger than the buffer needed for water quality alone. <i>Semlitsch, R.D. & Jensen, J.B. 2001. Core habitat not buffer zone. National Wetlands Newsletter. 23(4): 5-11</i> is one many informative references.		The discussion on appropriate buffers to use has been elevated from the footnote into the main text and incorporates more descriptive discussion.
133.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 1235 Replace “acceptably” with “acceptable”.		Completed.
134.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 1290 It is unclear what value species photographs would have for reviewers who tend to be generalists and would not be able to correct misidentifications. It seems unlikely that a specialist would include species that are not present.		This is not an obligatory requirement but rather a recommendation, inclusion of photos is valuable for multiple users of the report. They should be included for building awareness and should not be included as a means to verify the presence of a species. Furthermore, many interested and affected parties are indeed specialists and may be able to comment on the validity of species identifications presented

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				in the report: an overlooked misidentified SCC can have profound consequences for the EA process.
135.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 1301 End sentence with “collage” and delete the rest to eliminate repetition.		Completed.
136.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 1370 The specialist should be required to indicate which of the impacts can be mitigated or remedied e.g. alien species and littering can be addressed through management interventions. Too often the presence of manageable impacts has been used to downplay the significance of proposed future transformation.		A very important comment, thank you. A paragraph has been added to the current impacts section to address this concern.
137.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Footnote 42 Replace “be” with “have been”.		The grammar as it stands is correct. We have not changed this.
138.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Footnote 43 Replace “limitation” with “implementation”.		Completed.
139.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 1440 Suggest putting the worked example (i.e. 9.4.3) after section 5 as Table 9-1 requires an existing knowledge of mitigation.		To address this comment, the mitigation of impacts section has been moved to come before the impact analysis section.
140.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 1460 In Table 9-1 the wording in the second last cell of the last column is awkward. Suggest full stop after “loud”. Then replace the remaining text with “Disturbance of birds is unavoidable as the factory would need to be built close to the nesting colony and a suitable buffer cannot be implemented.”		Completed.
141.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 1508 Another related application of this “Search and Rescue” approach could be to provide specimens to nurseries or		While we appreciate your good intention, including this as an option will be misinterpreted as a mitigation measure which it

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		other institutions where the intention is not to translocate, but rather to use specimens for propagation or medicinal use. This is also not a mitigation measure, but rather an opportunity to salvage a valuable biological resource from a development site before it is destroyed. Potential for abuse exists and caution is required.		is not as no plants will remain in the wild. It will therefore not be included.
142.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 1641 The potential exists for applicants to lock specialists into non-disclosure agreements preventing them from sharing sensitive information. Would it be possible to get around this by making data sharing mandatory in terms of NEMA?		The species Protocols have been amended to include mandatory dissemination of SCC by specialists (2.2.2 in the Protocol). Developers may therefore no longer bind specialists to non-disclosure agreements that would prevent them from executing this legally required action. This aspect is now addressed in more detail in the guidelines following the protocol update.
143.	Lihle Dumalisile and Craig Whittington-Jones: GDARD	Line 1644 This should be mandatory. Specialists should be required to sign the final bound report confirming that their work has not been amended.		Specialists sign a declaration of independence. The EAP signs a declaration that states they have included all information available to them and must attach the original specialist assessment with the overall EIA/BA report for submission to the CA.
HERPETOFAUNA				
144.	Craig Whittington-Jones: GDARD	Line 1931 Add ISSV to the glossary of acronyms.		This has been added.
145.	Craig Whittington-Jones: GDARD	Line 1938 Include local conservation authorities in this list.		This has been added in the relevant section for all taxa.
146.	Craig Whittington-Jones: GDARD	Table 10-3 <i>K. lobasiana</i> may be found on small, wooded koppies in grassland areas of Gauteng. Vegetation types include Carletonville Dolomite Grassland, Egoli Granite Grassland and Rand Highveld Grassland.		Thank you for this addition it has been added.

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147.	Craig Whittington-Jones: GDARD	Line 2018 Given potential for spreading pathogens all equipment should be cleaned and disinfected between sites.		Agreed. However, this is already addressed under 9.2.4 Prevention of the accidental translocation of species.
148.	Craig Whittington-Jones: GDARD	Line 2036 Awkward wording, suggest “Note it is possible for a single specialist (driver) to use this method, but safety and efficacy are likely to be compromised”		The text has been amended.
149.	Craig Whittington-Jones: GDARD	Line 2056 Replace “environmental audio” with “sounds”.		The text has been amended.
150.	Craig Whittington-Jones: GDARD	Line 2064 Replace “a time-consuming process” with “time-consuming”.		This edit has not been actioned as the wording as is is deemed clear.
151.	Craig Whittington-Jones: GDARD	Line 2083 Worth mentioning here that trapping may be subject to provincial permits.		This has already been addressed under 9.2.3 Permitting considerations.
152.	Craig Whittington-Jones: GDARD	Line 2092 Replace “appropriate habitat types should be selected as the trap site” with “trapping should be conducted in appropriate habitats”.		The text has been amended.
153.	Craig Whittington-Jones: GDARD	Line 2095 It is importance to acknowledge that factors other than the proposed development may influence amphibian numbers calling e.g. weather conditions on a given day, variation in timing and amount of rainfall amongst years, etc.		That is implicit in any comparative study, such as monitoring surveys and is not necessary to describe here.
154.	Craig Whittington-Jones: GDARD	Line 2134 Pitfall buckets should have drainage holes to reduce the risk of flooding during heavy rainfall events. In addition to providing shade, a wet sponge should be placed in each bucket to reduce the risk of dehydration.		The text has been amended to include the suggestions.

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155.	Craig Whittington-Jones: GDARD	Line 2296 Note that provincial permits may be required even if the intention is to trap and release specimens i.e. the act of erecting and operating a trap may be a restricted activity requiring authorization.		This has already been addressed under 9.2.3 Permitting considerations.
AVIFAUNA				
156.	Craig Whittington-Jones: GDARD	Line 2406 Local conservation authorities should also be consulted.		See comment 145.
157.	Craig Whittington-Jones: GDARD	Line 2569 South Africa is also a signatory of the CMS and the African Eurasian Waterbird Agreement (AEWA) and has obligations under these to conserve habitat for waterfowl.		This has been added to the text.
158.	Craig Whittington-Jones: GDARD	Line 2575 Reword sentence.		Sentence has been amended.
159.	Craig Whittington-Jones: GDARD	Line 2579 What is the rationale for requiring photos of specimens and sound recordings? These should only be necessary if the specialist is unable to confirm the identification of a species to his/her satisfaction in the field and need not be provided to reviewers.		Addressed under comment 134.
160.	Craig Whittington-Jones: GDARD	Table 10-8 Fences need to be included in the list of linear infrastructure; buffer sizes need to be referenced.		Fences have been added and reference provided in table heading.
MAMMALS				
161.	Lihle Dimalisile: Production Scientist, Mammals Directorate – Biodiversity Management,	Line 1074 I think permits may be needed for surveys within all “formally” protected areas, not only Nationally Protected Areas as stipulated here.		Text has been amended.

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	Gauteng Department of Agriculture & Rural Development			
162.	Lihle Dumalisile: Production Scientist, Mammals Directorate – Biodiversity Management, Gauteng Department of Agriculture & Rural Development	Line 1079 The contact details for GDARD have changed since the document was produced. I do not know whether this could be attended to in a separate process and update for all provinces. If not, please see below corrections for GDARD: Physical address: Umnotho House, 56 Eloff Street, Johannesburg Tel. (reception): 011 240 2500 Tel. Permits office (Patience Mthembu): 011 240 3359 Other contact instead of Nkosana Giyose: 011 240 2617		Thank you for this correction. We have requested SANBI's permitting official to update this.
163.	Lihle Dumalisile: Production Scientist, Mammals Directorate – Biodiversity Management, Gauteng Department of Agriculture & Rural Development	Line 1126 "Appendices" instead of "Appendix"		Completed.
164.	Lihle Dumalisile: Production Scientist, Mammals Directorate – Biodiversity Management,	Lines 1158-1159 Suggested that provincial MA's be contacted for information not available on SANBI BGIS.		This has been added to the text.

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	Gauteng Department of Agriculture & Rural Development			
165.	Lihle Dumalisile: Production Scientist, Mammals Directorate – Biodiversity Management, Gauteng Department of Agriculture & Rural Development	Line 1235 Replace “acceptably” with “acceptable”		Completed.
166.	Lihle Dumalisile: Production Scientist, Mammals Directorate – Biodiversity Management, Gauteng Department of Agriculture & Rural Development	Line 1251 Recommended that provincial MA’s be included as sources of additional distribution information for SCC’s. Provincial scientists conduct monitoring for their relevant provinces’ SCC’s and some of this information may not yet be incorporated into the provinces’ conservation plans, as this may be not be updated often.		The text has been amended. See also comment 145.
167.	Lihle Dumalisile: Production Scientist, Mammals Directorate – Biodiversity Management, Gauteng Department of Agriculture & Rural Development	Line 1309 Replace “individual” with “individuals”		Completed
168.	Lihle Dumalisile: Production Scientist, Mammals	Table 10-9		Asterisks removed. Correct we have not prepared data for the screening tool for Near Threatened (NT) species only for threatened and highly range-restricted species, specialist do still need to search for

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	Directorate – Biodiversity Management, Gauteng Department of Agriculture & Rural Development	Some species have asterisks (*) next to them – what do these mean? Acknowledging that a certain criteria for selecting SCC's listed on Table 10-9 was followed, I have noticed that no species listed as NT in the regional assessment are listed, even though some of them are of conservation concern as they are either listed on TOPS or CITES appendices (e.g. Cape clawless otter, Serval etc.).		NT species and report these as described now in 4.2 Defining species of conservation concern (SCC).
169.	Lihle Dimalisile: Production Scientist, Mammals Directorate – Biodiversity Management, Gauteng Department of Agriculture & Rural Development	Lines 2681-2686 Recommended that provincial MA's be included as sources of additional distribution information for SCC's. Provincial scientists conduct monitoring for their relevant provinces' SCC's and some of this information may not yet be incorporated into national databases.		The text has been amended. See also comment 145 .
170.	Lihle Dimalisile: Production Scientist, Mammals Directorate – Biodiversity Management, Gauteng Department of Agriculture & Rural Development	Lines 2739 and 2864 Observing that the requirement for permits is highlighted in a previous section, I recommend that it is re-iterated here.		No need, else it has to be reiterated at every section requiring capture and or trapping. It has been discussed adequately under 9.2.3 Permitting considerations.
171.	Dr Bryan Maritz Biodiversity and Conservation Biology –	Lines 1140-1144 and at 10.2.4.3 I was reading through the newly developed protocols for terrestrial species surveys and would like to register a comment as part of the public comment process.		Thank you for a very valuable comment. Firstly, a clarifying footnote has been added to the description of sampling duration. Secondly, another clarifying footnote has been added to the discussion concerning “appropriate” surveys for proving the absence of a species. Finally, an entire section

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	University of the Western Cape	My comment relates to the precautionary principle and the limits of how it is applied. Currently, my reading of the protocols make it clear (lines 1140-1144) that should a SCC be suspected to occur on a site, it should be treated as present (even if undetected). The document goes on to say under 10.2.4.3 (and I assume the corresponding sections for other taxonomic groups) that "Should this [suitable survey work] not be possible within the timeframe of the environmental authorisation process, then the precautionary principle must be applied and it must be assumed that the SCC is present until such time that appropriate fieldwork can be conducted to confirm its absence". Given the remarkably low detection probabilities of many herpetofauna, I would like to see some guidance regarding what might be considered "appropriate fieldwork" in this context. The document does a great job of outlining trapping protocols etc, but it also says that surveys should be at least 5 days in length. Given that some species can avoid detection, even during extensive survey work, my concern is that the current guidelines provide a loophole, in that a practitioner can state we surveyed under appropriate conditions for more than 5 days (as mentioned in the guidelines) and therefore we think that we have provided evidence of the absence of the SCC.		providing guidance for surveys for species with low detection probabilities has been provided in 9.3.7 Expected SCC with very low detection probabilities and for each taxon, species are listed as LDP species for which this guidance must apply.

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172.	Dr Charmaine Oxtoby: Biophysical Specialist – City of Cape Town’s Biodiversity Management Branch	Thank you for a fantastic addition to the EA toolbox; one which will have wider reaching positive influence and act as a handy reference for standardised sampling methods.		We appreciate your acknowledgement.
173.	Dr Charmaine Oxtoby: Biophysical Specialist – City of Cape Town’s Biodiversity Management Branch	It is encouraging to see the improvement since the Draft Protocols published for comment in 2019. Our concerns around the accountability of Environmental Assessment Practitioners’ Reports have been addressed for both the Impact Assessment and Compliance Statement criteria. While the National Screening Tool is only as good as the data inputted by SANBI to date, it does level the playing field and should be both promoted and enforced. The Species Environmental Assessment Best Practice Guideline is a welcomed and highly valuable addition to the toolbox for Terrestrial Flora (3c) and Terrestrial Fauna (3d) Species Protocols for Environmental Impact Assessments, in order to standardise the approach and requirements for specialist studies. These protocols and associated best practice guideline are a positive step forward towards honest, comparable and sensible Environmental Assessment reports, and the Department of Environmental Affairs (Department of Environment, Forestry and Fisheries) should be commended for driving this initiative, which will ultimately be for the long-term benefit of the environment.		We appreciate your acknowledgement.

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174.	Dr. Barbara Kasl (Fauna Consultant)	I think if there is a specific process that you are wanting replicated for the purposes of CA assessment – like the BI CI and FI then this must really be done step by step as in its current form this is still fairly open to interpretation. I think it is probably the most useful item in this guideline but it would be good to get people on the same page from the start. So maybe a detailed appendix on methodology and an “if this then that” scenario maybe would also be useful.		Thank you for your request, the authors of the guideline will work on an additional publication on the SEI methodology that will give further worked examples and step by step guidance. Once this is ready for publication the guidelines will be updated with a link and reference to this publication.
175.	Dr. Barbara Kasl (Fauna Consultant)	I generally feel like the document was written by and for conservation biologists and not specialists in the impact assessment sector. So I feel like I have wasted a lot of my time on something that: - I do not believe is my responsibility (i.e. gather biodiversity data for the state). I make my small contributions through citizen science sites, but I am not hired by or paid by the government to conduct biodiversity assessments. The country’s biodiversity and environmental institutes should be providing me with the biodiversity information I need. - Will probably prevent me from continuing my profession because if I apply the recommendations my quote will be high compared to other fauna consultants and they will get the jobs. - Because I find it very hard to believe that this will be properly implemented – I cannot see small project developers with limited capital		In response to your comment: - The state is providing a massive amount of data on species of conservation concern for the first time to specialist consultants. - The guideline will need to be implemented by all specialists hence pricing should be similar. CAs have been notified of the guidelines and will be looking that they are implemented as per the protocol requirement. - As per response above (b.) this will be implemented and should result in developers needing fewer specialists, not more.

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		paying for two fauna consultants to assess their 5 ha property because they happen to trigger habitat for SCC based on BGIS data with limited accuracy currently.		
176.	Dr. Barbara Kasl (Fauna Consultant)	This does not at all work as a rapid assessment method and does not at all consider project costs.		The purpose of the guideline and the protocol is to ensure accurate and thorough determining of impact of development on species of conservation concern, not to ensure costs are maintained at a specific threshold. It must also be recalled that the upfront provision of data on the presence of SCC via the screening tool allows developers to at an early stage to determine the number of specialist assessments that will be required and the likely cost Avoidance of sites with high concentrations of SCC is therefore possible and can save costs.
177.	Dr. Barbara Kasl (Fauna Consultant)	It has become very prescriptive and this is dangerous in any legal setting because it does not allow for any common sense to intervene.		The high variance in quality of specialist reports means that the standardization included in this guideline is necessary.
178.	Dr. Barbara Kasl (Fauna Consultant)	It's a great piece for conservation biologists but I think in a country where most people live below the poverty line and where job creation and employment are critical factors in preventing people from relying on the environment so much, implementing guidelines that kills development might not be the right way to proceed.		This guideline was developed to support sustainable development. The guideline aims to guide development and ensure that it is sustainable and steer it in the direction of areas with the lowest risk to the environment. We acknowledge the socio economic context of country, and it forms part of the reason protocols and guidelines are developed so that development and assessments take place in a transparent and fair manner that assesses impacts based on evidence.
179.	Dr. Barbara Kasl (Fauna Consultant)	I really hope you get this out to the real AFFECTED PARTIES for the next consultation process. I think that		This guideline was circulated by SACNASP to all members.

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		specialists in the EIA sector and EAPS must be targeted for comment as this effects them the most and not anyone with a degree in biology.		
180.	Dr. Barbara Kasl (Fauna Consultant)	I do apologise for the negative comment and response – I really think there are some good parts but don't have the time to highlight those, but then often they seem to be forgotten in latter parts of the report which is very disappointing and makes me feel like this report has not undergone the rigorous internal review that it should have.		We note your concern, however, others who have read this in detail feel the guideline is comprehensive. In order to address your concerns we require these to be specifically listed.

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181.	Dr. Barbara Kasl (Fauna Consultant)	Page 1 Cover Page Most threats to fauna are as follows - i realise this is an over-simplification, but it still stands (See IUCN categories and threats faced by SA species). It also indicates in most circumstances preserving habitat (not always necessarily threatened or protected habitat but habitat useful to fauna) will reduce threats to the species (therefore your comment on habitat preservation being limited in terms of protecting SCC is not entirely correct for the most part): 1) habitat destruction / degradation (direct development or from pollution) - species can be saved by conserving the habitat. 2) climate change on both micro- and macro-scale - ensure distinct and valid / operational corridors with w-e orientation across SA, ensure aquatic corridors are linked to terrestrial corridors, ensure gradient habitats along valleys to hill tops, along rivers to upper reaches of valley, from coast to escarpment, ensure habitat and micro-habitat diversity in an area is maximised. - again preserve core habitat components. 3) limited dispersal and populations sinks - again preserve buffers, corridors and satellite habitats for dispersing individuals. 4) Habitat restriction: ensuring adequate ranges / areas for target species, ensure ecological corridors. 5) genetic weakening due to inbreeding - also responsible for many of the diseases - safe-guard ecological corridors and connectivity between subpopulations. Prevent hybrid species into natural spaces (requires species management or legal		I interpret this comment to be addressing key threats to species of which the most dominant are habitat loss and degradation. Within this guideline the inclusion of functional integrity in the calculation of Site Ecological Importance coupled with the request that specialists consider not only the site but also the project area of influence means that loss of any species' (SCC) habitat is being minimized. No such guidance has been available in the past so this is a major step forward in promoting landscape integrity and minimizing loss of habitat. The Terrestrial and Aquatic biodiversity data and protocols deal with the ecosystem approach which relates to some of your climate change concerns.

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		intervention in terms of potential hybridising species such as is being undertaken in the AIS regulations) 6) interaction with human infrastructure / road mortalities - this requires active intervention and management and is constantly evolving. 7) Pet / muti trade / international market value - intervention through national and global legislation (CITES). 8) hunting, snaring and trapping / road mortalities- Social issue that cannot be resolved without community consultation and buy in.		
182.	Dr. Barbara Kasl (Fauna Consultant)	Relevance is that the guidelines limit fauna consultants to only do 2 taxonomic groups, but as this is not adequately defined it is nonsense.		Taxonomic group are as specified by the requirement of the Site Screening tool report, we specify that one specialist can only work on two species groups due to the poor quality of reports received in the past when specialists work on more than two groups.

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183.	Dr. Barbara Kasl (Fauna Consultant)	What constitutes a taxonomic group must be very clearly stipulated and allow for future additions. Right now the terms mammals, birds, frogs, butterflies constitute what is being used as a taxonomic group. Biologists do not consider these as taxonomic groups – specialist in botany and arthropod specialists will scoff at this terminology and how it is used. Then when you add spiders and scorpions and millipedes and snails, where will these go? SACNASP does not have a category for each of the so-called taxonomic groups. Keep in mind also, that many botanists and zoologists are registered as ecologists – this is absolutely normal for people working in the field, yet this registration is ignored by everyone.		We note this concern. A taxon (plural taxa) can be any defined taxonomical unit. In the guidelines we have clearly grouped the taxon units according to the screening tool output, which itself takes into consideration the general fields of practice. We recognize that there are sub-disciplines of the defined taxa, especially for plants and invertebrates, and the screening tool output of SCC will help define which specialist will be most suitable. For example, in cases where succulent plant SCC are present, a botanical specialist with only grassland expertise would not be suitable. It is for this reason that we have specified that the SACNASP-registered specialist should also have experience with the particular taxon of concern (see 9.1 Qualifications and limitations of specialist).
184.	Dr. Barbara Kasl (Fauna Consultant)	In the guide one refers to "previous experience required for the relevant taxon". How will that be defined? Who gets to decide that? So a person who did their studies in forests can't work in grasslands? I do not think this has been well thought out. I also know that some of your baboon spider / butterfly (very likely birds as well because a lot of these are self-interest items) specialists are self-taught and do not have the degree and hence do not have the SACNASP registration. My relevant experience comes from being a fauna consultant – but how are people to start in this field? AND apprenticing IS NOT the solution. I cannot take on apprentices if I have to now manage all the costs problems this guideline is going to bring me.		SACNASP provides clear guidance on how inexperienced persons may register under the supervision of a registered professional. Furthermore, additional experience on other taxonomic groups may be acquired by the specialist through attendance of workshops/courses etc. We have included a sentence in the text to specify how the relevant experience should be provided.

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		I honestly might very well pack it all in and you can be left with dealing with all the fauna consultants that don't do the jobs properly. I just do not understand why guidelines have to be developed because some people do their jobs poorly (making the conscientious ones suffer for it) – why are these people not just band / black-listed from their fields of expertise like other serious professions (medic, law, engineers, accountants).		
185.	Dr. Barbara Kasl (Fauna Consultant)	I think some clarity was provided in the talk, but it is not clear in the guideline: why are GN151 species not included. E.G. bullfrogs are not on the protocol list yet they are the only frog on the nationally protected list? There are a lot of invertebrates on IUCN that are not listed on any SA Red-list. What will eventually happen to those?		Bullfrogs are not globally threatened hence they do not qualify for inclusion in the screening tool. They are on the protected species list as they are heavily utilized and thus the harvesting and eating of bullfrogs is regulated via their protected listing. The screening tool layers have been updated to include invertebrates currently on the IUCN Red List. The guidelines have also been updated in this regard. Please refer to the response to comment 216.
186.	Dr. Barbara Kasl (Fauna Consultant)	Citizen Science-based data. This data has made all of our lives easier, but it is not something that can be relied on completely. Humans are firstly fickle in terms of what is deemed important in terms of biodiversity (elephants are an example of this). Secondly people are very clever utilizing such open systems to their advantage. a. Here is my problem and follows on to a question raised during the webinar. Once people (land-owners, like farmers who do not want mines		If a property genuinely has a species of conservation concern and this is identified through citizen science surveys then these must come into the decision-making process, the continual updating of the screening tool layers will allow this. Note also that specialists must perform appropriate and detailed desktop studies as part of the requirements under “9.3.6 Researching and presenting data for expected SCC” and also in the relevant taxon-specific guidelines. This includes a thorough review of available data through citizen science platforms. Spurious or faked contributions of SCC to citizen

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		developed on or near their farms) find out that these data bases are forming the basis for deciding if development can take place or not, these sites are going to have much higher reporting rates of SCC. I know there is a degree of vetting taking place, but none to the extent that may be required to curb this scenario. b. This in turn is going to result in more degree grids triggering medium-high sensitivity which requires trapping and thus INCREASING the assessment (making rapid assessment null and void which is the whole point in the EIA sector) and increasing costs. c. So how exactly is this going to be managed?		science platforms will easily be noted by either the curators of the data or by the specialists themselves. These records will be flagged, queried and if required, removed. Only cleaned, verified (by specialists) citizen science data are used for the screening tool layers.
187.	Dr. Barbara Kasl (Fauna Consultant)	It must be VERY CLEARLY stated that the EAP can do the initial verification so if the site is in fact in the state stipulated on the screening tool or not. A specialists is not required for this phase. Also, who can compile the compliance statement – can the EAP do this or must it be the specialists – MUST be clearly stated.		The fact that EAPs may submit an ISSV is currently included in the guideline.
188.	Dr. Barbara Kasl (Fauna Consultant)	Medium sensitivity is based on habitat modelling – so does one have to trap if the species is listed even if		Only suitable habitat has been included in these very fine scale models, so if the initial site sensitivity verification concludes that the habitat is natural and not transformed then

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		proper habitat is not identified? This is daft to do and wastes time. Must be clarified.		appropriate surveys are required to detect the SCC triggering the medium sensitivity. If these species require trapping for an effective survey then trapping will be required.
189.	Dr. Barbara Kasl (Fauna Consultant)	There are some items like populations sizes that cannot be reported for fauna. Non-mobile plants can be counted and estimated per area unit, but this cannot be done for fauna, and most certainly not in a rapid assessment situation. The guideline for flora cannot just be superimposed for fauna protocols.		Section 9.3.10 "Population size estimates for expected SCC" provides clear guidance on the use of surrogate measures for population size.
190.	Dr. Barbara Kasl (Fauna Consultant)	There must be clarity in the sensitivity assessment as to whether one must use desktop rating or what is actually happening on site. The latter should be the important one. My concern was that some items for fauna were omitted or not clearly included. Just as an example – the high area in the examples is an island. If the CA now says okay we have the sensitivity map you can develop everywhere except the highly sensitive area then this entire area may also be developed – you have created a disconnected island that is going to lose all its value, regardless of the fact that the specific SCC's tree or rock was protected – you have lost corridors and isolated the species, you have lost foraging area used by the species, you have lost the breeding grounds for the prey-base of that species. So I am not sure that a protocol / guideline will adequately replace good fauna-orientated management. Remember, animals move and are mobile and are able to change their location and adapt to changes. Right now, with climate change the most critical feature to provide our fauna after habitat are corridors so that they can get to the next important tree or rock.		We have included a sentence in the introductory section of the SEI methodology to unambiguously state that the data collected from specialist surveys is what must be used. Connectivity is an extremely important component of the evaluation of Functional Integrity and is discussed in detail with reference to the application of buffers in the taxon-specific sections (search for the word "connectivity"). Furthermore, the guideline specifically includes a section on Project Area of Influence to take into account the requirements of the SCC in question outside of the development footprint. The example provided is a real-world situation where the entire racecourse is an island surrounded by development.

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191.	Dr. Barbara Kasl (Fauna Consultant)	One scenario that I have already been faced with (post comments and webinar). I had to do a quote, but the only info provided was that the site had 13 sensitive species. I think your guideline should address this as this is part of the process. What is meant by sensitive species? How must I provide a quote when I do not know what species and how many taxonomic groups are present? So as a guideline it has already completely failed to guide me or the EAP past the costing phase.		The guideline is clear about where data for sensitive species can be requested (see section 4.5 of the guideline). Note that a number of consultants have successfully been requesting this data; the turn around time to receive the data is less than 48 hours.
192.	Dr. Barbara Kasl (Fauna Consultant)	Page 17 This problem goes both ways. I have spoken to specialists who have designated and properly motivated areas as sensitive in terms of botanical features and CAs have authorised the activities regardless. So who is causing the bigger impact to ecology and who is in actual need of a protocol to follow, because I really do not believe the ethically-bound scientists do. The non-ethically bound ones should just be banned from working in the field anyway and, regardless, should not be SACNASP registered individuals!		One of the main purposes of this guideline and the Screening Tool is to make sure that all the relevant information that is required is made transparent and that the minimum information required to support decision making by CAs is transparent and available. This makes it easier to assess whether good or poor ethics played a role in the decision-making process.
193.	Dr. Barbara Kasl (Fauna Consultant)	Page 20 Please can it be clarified as to how this guideline and the legislated protocol fit together? Why are we being guided by two separate documents? I assume as this document is not legal, the legal document will trump everything? And regardless of what you answer to the question above, the CAs will ONLY consider the legal documents. I think the role of the legal document and the role of this guideline must be clearly defined here		This guideline was developed to support the implementation of the gazetted species Protocols for plants and animals. These documents were gazetted for comment, and are intended to be gazetted for implementation. This guideline is explicitly referred to in the gazetted documents and provides clarification and guidance on the content of these Protocols. A description of the legal framework is provided in 3. Legal Framework.

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		and this guideline MUST be referred to in the regulation to make it legally required.		
194.	Dr. Barbara Kasl (Fauna Consultant)	Page 20 This might be true, but as per my comment above, unless they are referred to in a notice or regulation they are NOT legally binding. It will be like the biodiversity and mining guidelines - I have never in my years as an environmental scientist or fauna specialist ever had a CA come back to me and refer my ecological studies to be in line with the said guidelines.		Your comment is noted and already addressed above in comment 193.
195.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	These guidelines are a good step in the right direction, well done.		We appreciate your acknowledgement.

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196.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	The South African Bat Assessment Association (SABAA) were only asked to comment on these guidelines from the 6th March 2020 and the South African Council for Natural Scientific Professions (SACNASP) only sent notice out about this comment period on the 13th March 2020. Other key organizations and individuals may still not have received any notice about these guidelines and comment period.		We acknowledge this comment but note that this document was sent to SACNASP on February 25 th and reminders to circulate to members were sent on a daily basis. Furthermore, SACNASP was forewarned of the publication of these guidelines for comments during 2019 and in early 2020. Thus, if you are concerned that not enough time was provided please raise this with SACNASP directly.
197.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	The letter dated 24 February 2020 lists the Birds and Wind Energy Facility Guidelines but no other guidelines, such as the Bats and Wind Energy Facility Guidelines available at www.sabaa.org.za .		We note your concern, our guidelines do reference the bats and wind energy guidelines in section 10.4.2.
198.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Glossary of Terms and Acronyms: Abbreviations & Acronyms Please include SABAA - South African Bat Assessment Association		This has now been included.

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199.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Section 2.2 - How it relates to other species related Protocols, page 18, lines 312-325 As per previous comments by SABAA in late 2018 and early 2019 on the mentioned protocols, the well-established. Bats and Wind Energy Guidelines should have been included as the Avifaunal ones were – the impact on bats due to wind energy is potentially greater in many cases and bat guidelines have been in place in SA since 2011, therefore, why are they not included under this section? The CSIR, SANBI, BirdLife and DAFF are well aware of this. As a separate but related question: Does “No. 42946 GOVERNMENT GAZETTE, 10 JANUARY 2020 - PROCEDURES TO BE FOLLOWED FOR THE ASSESSMENT AND MINIMUM CRITERIA FOR REPORTING OF IDENTIFIED ENVIRONMENTAL THEMES IN TERMS OF SECTION 24(5)(a) AND (h) OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998, WHEN APPLYING FOR ENVIRONMENTAL AUTHORISATION.” Replace “No. 42451 GOVERNMENT GAZETTE, 10 MAY 2019 - - PROCEDURES TO BE FOLLOWED FOR THE ASSESSMENT AND MINIMUM CRITERIA FOR REPORTING OF IDENTIFIED ENVIRONMENTAL THEMES IN TERMS OF SECTION 24(5)(a) AND (h) OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998, WHEN APPLYING FOR ENVIRONMENTAL AUTHORISATION” or are they both valid?		This comment is not in relation to the current guidelines but in relation to the development of specific protocols, nevertheless it is addressed here. The development of protocols for impacts of wind energy facilities on bats is currently underway. This protocol was not ready for gazetting for public comment when the Bird protocol was gazetted for comment and implementation. Protocols have been developed in phases. Both are valid. The 42946 is the government gazette for comment on plant and animal species and the 4251 is the government gazette for public comment for protocols for the other themes listed in this gazette.

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200.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Section 3.2, page 19, lines 356-363 Same comments as previous bullet re Section 2.2.		See comment above.
201.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Section 4 Screening Tool, page 20, line 387 Please confirm with SABAA which Bat GIS layers were incorporated into the screening tool. How were “Rare” bats determined? What about NT species with declining populations – how are those dealt with in the Environmental Assessment process?		Bat GIS layer data was received from EWT and is the same data that was used for the 2016 Mammal Red List. It consisted of Seamark’s data the 2014 or 2015 version of the African Chiropteran Report. We also made use Monadjem et al. 2010 – Bats of Southern and Central Africa. There are no bat species that qualify for listing as Rare as there are no species that have an Extent of Occurrence under 500 km ² and are also not declining. Those that have small ranges have been listed in a threatened category and are therefore already included in the tool. No data on Near Threatened species are included in the screening tool due to data availability being patchy. Specialists are still required to search for and report on the presence of NT species during specialist studies.
202.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and	Line 405 SSC should read SCC.		Corrected.

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	Dr Caroline Lotter (Senior Zoologist at IWS)			
203.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Line 843 We would advise taking out the word “graphically”.		Completed.
204.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Footnote 28 Reference not found.		This footnote no longer exists due to addressing a preceding comment.
205.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Figure 9.1, page 60 Please can you also show the timeframes for a Basic Assessment (BA) process and how these guidelines tie in with that?		The BA process has been added to figure 9.1.
206.	Kate MacEwan (Chairperson of SABAA and Director of IWS),	Page 66, line 1265		We have removed this specific reason for the lack of adequate survey time although in reality it is often the case that budget limits this aspect, when it really should not.

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	Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Developers should plan properly and financial constraints should not be the reason for adequate surveys to be conducted to inform the EIA/ BA process.		
207.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Table 10-9 Mammal Species of Conservation Concern (SCC) included in the Screening Tool. Only 5 bats are listed. These cannot be the only bats that are considered as SCC – what about DD and Rare bats and those NT with declining populations? Please refer to the list of 21 SCC insectivorous in the Bat Fatality Threshold Guidelines (MacEwan <i>et al.</i> 2020), plus how are fruit bats dealt with in Environmental Assessments?		We had to be consistent with only including those species listed as threatened for all taxonomic groups. As mentioned above we are working to increase the number of trigger species included and NT species will be included in the future but not DD species.

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208.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Section 10.4.2 Mammal-specific guidelines for certain developments There are actually 4 bat and wind energy guidelines in use in SA brought out by the SABAA, the first three actually have revisions being released on 1 May 2020 and are currently under public review – see attached and below. Please refer to the latest edition of the guidelines. - o South African Best Practice Guidelines for Pre-construction Monitoring of Bats at Wind Energy Facilities: 5th Edition (Sowler <i>et al.</i> 2020). - o South African Good Practice Guidelines for Operational Monitoring for Bats at Wind Energy Facilities: 2nd Edition (Aronson <i>et al.</i> 2020). - o South African Bat Fatality Threshold Guidelines: 3rd Edition (MacEwan <i>et al.</i> 2020). - o Mitigation Guidance for Bats at Wind Energy Facilities in South Africa (Aronson <i>et al.</i> 2018) I am attaching the latest versions of the Bats and Wind Energy guidelines. The former three are currently out for comment until 17 April 2020 and will be released on 1 May 2020. Please make reference to these rather than just the Sowler et al. (2017) guidelines and also feel free to submit comments on the SABAA guidelines to info@sabaa.org.za and chair@sabaa.org.za.		Thank you, all four of the SABAA guidelines documents are now referenced in the text and are also included in the reference list. Please note that the 5 th edition of the pre-construction monitoring guideline is no longer Sowler et al 2020 as stipulated in this comment but rather MacEwan et al. 2020. Furthermore, at the time of writing this response edition 3 of the fatality threshold guideline was not yet available online.

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209.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Section 10.4.4 Desktop Study - Expected SCC; page 119 Important to note existing biorepositories in the country that hold important and verified occurrence data that may/may not be in the public domain. In most cases, these occurrence data are georeferenced. Institutions holding important mammal occurrence data include Amathole Museum (King Williams Town), Durban Natural Science Museum (Durban), Ditsong Museum of Natural History (Pretoria), National Museum (Bloemfontein), Iziko Museums of South Africa (Cape Town). Staff are obliged to provide species occurrence data for the purposes of informing EIAs and SEAs.		Thank you SANBI has access to all these data sets and these have been used to produce the spatial layers in the screening tool.
210.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Table 10-11, page 119; Mist-netting or harp traps: "Licence required to acquire mist nets. Laborious to set up and accompanied by many ethical and safety considerations. Not recommended." We find fault with this statement. With respects to bats SCC, some species, such as <i>Laephotis namibensis</i> and <i>L.wintoni</i> are difficult to record on acoustic surveys owing to their low intensity calls. However, they can be captured using harp traps. Similarly, non-echolocating fruit bats, unless heard or observed in their tree roosts, are not noted during acoustic surveys. That said, it is widely agreed that active sampling using harp traps (effective for the listed bat SCC in Table 10-9, page 117) and/or mist-netting, must only be conducted by trained professionals equipped to do so. If occurrence data suggest that SCC bats are present, active sampling should be carried out. That said, we would hope that the		Thank you for the suggestion, the text has been amended accordingly.

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		statement can be amended to state “Recommended only if conducted by trained professionals”.		
211.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Table 10-11, page 119 Scat and Other signs The presence of insectivorous bats can be identified by their guano in day roosts, insect remains at night roosts, smudges on buildings or rock crevices and smell. Fruit bat presence can be determined through daytime visual assessments, the presence of spit-outs below fruiting trees and night-time audible calls by male bats.		Thank you, we have amended the table and included the text you provided as a footnote.
212.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Section 10.4.5.1, Fieldwork timing and seasonality, page 120, line 2705-2712 An important example of searching in the correct would include assessing the presence of migrating caverosting bats.		This section has been updated according to another commenter and we have included the reference to the cave-roosting species.
213.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Page 121; 10.4.5.3 Mist nets and harp traps; lines 2737 – 2739 “during the EA process as it is laborious, time-consuming and has significant ethical and safety considerations while exhibiting a relatively low probability of success for trapping SCC.”		Thank you, the text has been updated accordingly and reference is provided to the SABAA page listing qualified bat specialists.

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		As mentioned above, active sampling (including hand-netting in non-maternity roost caves), can and should be carried out if there are bat SCC present. This sampling, however, should only be carried out by a specialist that has: - o Requisite inoculations; - o Received required training (courses are available in South Africa); - o Has demonstrated prior, relevant experience in mist-netting and/or harp trapping procedures The same effort and rules would apply to trapping for all small mammals.		
214.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)	Section 10.4.5.9 Small mammal trapping, page 125, lines 2866 – 2868 Dependent on habitat, transect line and/or grid array are acceptable configurations for small mammal trapping using Sherman® live traps, PVC small mammal traps, as well as Tomahawk live traps. Please include ethical considerations: provision of insulation (cotton wool balls etc.), for trapped animals.		Thank you, this has been added.
215.	Kate MacEwan (Chairperson of SABAA and Director of IWS), Dr Leigh Richards (Curator of Mammals, Durban	Section 10.4.7 Buffers for SCC, page 127, line 2907 For Bats and Wind Energy developments, buffers are provided in Sowler <i>et al.</i> (2020).		Thank you, this has been added to the text.

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	Natural Science Museum and SABAA panelist) and Dr Caroline Lotter (Senior Zoologist at IWS)			
216.	Peter Hawkes: Adjunct Professor, Department of Zoology, University of Venda, Thohoyandou – AfriBugs CC	Please find below my comments on the Protocol for the Assessment and Reporting of Environmental Impacts on Terrestrial Animal Species (hereafter "the Protocol") and the Species Environmental Assessment Guideline (hereafter "the Guideline"). While separate calls for comments on these documents were issued, the two are so tightly linked that it seems prudent to combine my comments and trust that the relevant portions will be considered as appropriate in updating each document; much is relevant to both. My comments are based on my experience as a terrestrial invertebrate specialist and, while I suspect they may also have some relevance to the Protocol and Guideline as these relate to the vertebrate fauna (and possibly also the flora protocol and guideline), they are intended to be considered mainly in relation to the appropriateness of the Protocol and the Guideline from a terrestrial invertebrate perspective. I believe that the Protocol and the Guideline must be considered against the backdrop of increasing evidence of substantial global declines in invertebrate abundance and diversity, which render it more imperative than ever that this long-neglected component of our biodiversity be given increased attention in our conservation efforts. A quote from E.O. Wilson is appended to this email to	There are at least three ways in which I think the system could be improved: 1. Use the current toolkit to screen sites for sensitivity, but when sensitivity is indicated, require a comprehensive survey for any South African SCC to be carried out. In the analogy above, this is equivalent to using the lung function test as a screening tool, but then testing all citizens with impaired lung function for a full range of diseases, not just for TB. Clearly this represents only a very slight improvement on the current situation, as	A. Terrestrial invertebrate input to the Screening Tool has been expanded to cover all national and global IUCN Red Listed SCC, the majority by direct inclusion, and a few indirectly by the inclusion of a Forest layer that includes all suitable habitat for these species. The Screening Tool and associated guideline will be updated annually and any newly listed terrestrial invertebrate SCC incorporated. B. Recommended sampling methodology for all currently listed SCC has been provided in the guideline and allowance made for additional methodology to be added if necessitated by the inclusion of additional SCC. C. Consideration of invasive species has been expanded to some extent, but a comprehensive treatment of this topic is beyond the scope of the Species Environmental Assessment Guideline and will be included in the Biodiversity Guideline. It is recognized that the current Alien and Invasive Species Lists contains some errors and omissions, the most significant of these relating to terrestrial invertebrates being the erroneous listing of the entire order Phasmatodea (which includes some 50 indigenous species of stick insects) as Category 1b invasive species, which will be rectified.

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		highlight why we should consider this important. ""So important are insects and other land-dwelling arthropods that if all were to disappear, humanity probably could not last more than a few months. Most of the amphibians, reptiles, birds, and mammals would crash to extinction about the same time. Next would go the bulk of the flowering plants and with them the physical structure of most forests and other terrestrial habitats of the world. The land surface would literally rot." E. O. Wilson, "The Diversity of Life" (1999)" It is my belief that with respect to terrestrial invertebrates the Protocol and associated Guideline are <u>fatally flawed</u>, being based in an entirely restrictive manner on a screening toolkit that in itself is fundamentally flawed in its approach and deliberately and disproportionately reduces the attention given to invertebrates. Consider the following: • While IUCN Red List assessment of terrestrial invertebrates lags far behind that of vertebrates, there are South African species classified as threatened by the IUCN Red List in eight terrestrial invertebrate orders (see summary below; Odonata may perhaps be excluded from the scope of Protocol 3(c) as falling under aquatic macroinvertebrates, leaving seven orders, but since protocols such as SASS operate at higher taxonomic levels such as family rather than at species level, this would not be appropriate when considering SCC).	the reliance on a fundamentally flawed and very restricted screening toolkit remains. This approach cannot be recommended as 1) there will still be many situations where no requirement for an assessment will be triggered even though there are non-butterfly SCC potentially present and 2) because all South African SCC will need to be assessed if a survey requirement is triggered, the process will be inefficient and unjustifiably costly. 2. Expand the screening toolkit by including data from all known SCC, as is (at this stage incorrectly) indicated as being the case in Protocol 3(c),	Points A and B have thus been fully addressed; point C has been addressed to the extent possible within the scope of the guideline.

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		- The current Environmental Screening Toolkit considers input from just <u>one</u> of these eight orders (the Lepidoptera), thereby taking into account a very restricted subset of Species of Conservation Concern (SCC) and contradicting the definition of SCC presented in Protocol 3(c), which in no way indicates that any IUCN CR, EN or VU species are excluded from consideration as SCC. The toolkit thus takes into consideration at most 63 of South Africa's current 169 terrestrial invertebrate IUCN listed SCC (some additional nationally but not IUCN listed SCC are included in the toolkit) and as a result only 14% of our EN species and 7% of our CR species provide input to the toolkit. - Assessment of site sensitivity is thus based on a limited subset of SCC, which is problematic in itself, but perhaps even more significant is that the toolkit then specifies that ONLY any butterfly SCC that had been highlighted as possibly occurring within a site require evaluation in a Terrestrial Animal Species Impact Assessment Report (TAIAR), thus eliminating 93% of CR and 86% of EN species from consideration in EIAs. Summary of IUCN Red List threatened terrestrial invertebrate taxa in South Africa	regularly updating the toolkit as new taxa are added to the IUCN Red List and/or National SCC lists and, when sensitivity is indicated, requiring surveys for all SCC indicated as potentially occurring, using taxon-appropriate methodology. In the analogy above, this is equivalent to carrying out a full medical check-up with additional tests such as heart function, blood pressure, blood sugar, cholesterol, temperature etc and then carrying out tests for a variety of diseases as suggested by the results of the check-up. This represents a substantial improvement in enabling effective	

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		(as at 2 August 2019; note that one orthopteran assessment at least has been added since these data were downloaded, so this table is not completely up to date) <table><tr><th>Class</th><th>Order</th><th>CR</th><th>EN</th><th>VU</th><th>total</th></tr><tr><td>Gastropoda</td><td>Stylommatophora</td><td>5</td><td>3</td><td>3</td><td>11</td></tr><tr><td>Insecta</td><td>Coleoptera</td><td>4</td><td>7</td><td>7</td><td>18</td></tr><tr><td>Insecta</td><td>Hymenoptera</td><td>-</td><td>-</td><td>3</td><td>3</td></tr><tr><td>Insecta</td><td>Lepidoptera</td><td>2</td><td>6</td><td>55</td><td>63</td></tr><tr><td>Insecta</td><td>Odonata</td><td>1</td><td>5</td><td>4</td><td>10</td></tr><tr><td>Insecta</td><td>Orthoptera</td><td>12</td><td>14</td><td>20</td><td>46</td></tr><tr><td>Myriapoda</td><td>Spirostreptida</td><td>1</td><td>6</td><td>7</td><td>14</td></tr><tr><td>Udeonychophora</td><td>Euonychophora</td><td>2</td><td>2</td><td>-</td><td>4</td></tr><tr><td colspan="2">Total</td><td>27</td><td>43</td><td>99</td><td>169</td></tr><tr><td colspan="2">estimated % included in toolkit</td><td>7</td><td>14</td><td>56</td><td>37</td></tr></table> As an analogy, I would like to offer the following scenario: Imagine that the Department of Health decides to implement a disease screening toolkit and protocol to enable cost-effective management of the country's health. TB is selected as a disease of significance, about which much is known and treatment is readily available. A lung function test is chosen as a simple and cheap tool to enable screening of citizens that might be infected with this disease. All people presenting at government clinics with	Class	Order	CR	EN	VU	total	Gastropoda	Stylommatophora	5	3	3	11	Insecta	Coleoptera	4	7	7	18	Insecta	Hymenoptera	-	-	3	3	Insecta	Lepidoptera	2	6	55	63	Insecta	Odonata	1	5	4	10	Insecta	Orthoptera	12	14	20	46	Myriapoda	Spirostreptida	1	6	7	14	Udeonychophora	Euonychophora	2	2	-	4	Total		27	43	99	169	estimated % included in toolkit		7	14	56	37	conservation and - by being targeted only at SCC predicted for a site - will be more cost-effective than the first option, but still does not allow for unexpected occurrences of taxa not predicted by the toolkit, nor is the possibility of newly discovered threatened taxa taken into account. 3. Expand the screening toolkit as in 2 above, but when sensitivity is indicated, require comprehensive surveys of all taxa with known SCC in a broader area around the project site. Although this would further enhance the impact of the protocol on conservation of SCC by allowing for	
Class	Order	CR	EN	VU	total																																																																	
Gastropoda	Stylommatophora	5	3	3	11																																																																	
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		symptoms of any illness are subjected to a lung function test. If the test indicates that they have impaired lung function, they are then tested for TB, but if their lung function is normal they are told that they are not ill and are sent home. Those with impaired lung function who subsequently test positive for TB are treated, while those who test negative are also told that they are not ill and are sent home. The Department of Health pats itself on the back for having implemented a rapid, efficient and cost-effective health management system, while citizens with all life-threatening illnesses other than TB are sent home to die. <u>This is exactly the same model that the current toolkit and species protocol is based on, at least in relation to terrestrial invertebrates.</u> Lines 432-436 of the Guideline indicate that the screening toolkit was explicitly developed in such a way as to minimise the amount of habitat in South Africa for which specialist surveys would be required, <u>in order to reduce the financial burden on developers.</u> Putting the interests of development ahead of that of conservation is entirely contrary to the main mandates of the organisations who developed the toolkit, in the same way as in the analogy above the Department of Health puts cost-saving ahead of the health of the citizens of the country. As an illustration of how flawed this approach is, I tested the toolkit by selecting an area of about 50,000 ha for a fictitious mining right application in the	unexpected occurrences of taxa not predicted by the toolkit, there may be a substantial increase in cost that might not be justifiable. I strongly recommend that the second approach be adopted and the toolkit and protocol adapted accordingly; the guideline would also need to be modified to include recommended survey methodology for all currently known SCC taxa and to allow for the use of appropriate methodology for other taxa whose inclusion becomes necessary at a later date upon expansion of the IUCN Red List and/or national SCC lists.	

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		Swartberg Mountains, a range within which six <i>Colophon</i> (stag beetle) species occur (five of which are IUCN Red Listed) and generating a site report . The latter indicated the need for an assessment of just one terrestrial invertebrate species, <i>Aloeides thyra orientis</i> (the Brenton Copper). This is a butterfly with an extremely limited distribution within coastal fynbos which could not possibly be expected to occur in the Swartberg. The initial site sensitivity verification would be sufficient to eliminate the possibility of the occurrence of <i>A. t. orientis</i> from the site and a project within my selected area would therefore not be required to prepare a TAIAR in respect of this species. In addition, a serious flaw is introduced (see lines 367-377 of the Guideline and further discussion below): because a theme (Animal Species, due to two bird, a mammal and a reptile in addition to the erroneously included butterfly species) had been identified by the toolkit, the requirement for an invertebrate specialist to provide input to a faunal report as contemplated in Appendix 6 of the EIA regulations would not apply, thereby obviating the requirement for any terrestrial invertebrate survey and potentially putting three CR, one EN and one VU <i>Colophon</i> species at risk. Using the toolkit is thus far worse from a conservation perspective than not using the toolkit, as in the latter case, the possibility of <i>Colophon</i> SCC in the project area would be picked up and trigger the need for an invertebrate specialist report.	<u>My recommendations are thus:</u> A. Change the toolkit and protocol from the current static and restricted model to one which is dynamic, makes use of all currently available SCC data and is regularly updated. At a minimum the toolkit should be updated annually to reflect the latest information available from the IUCN Red List. B. Provide recommended sampling methodology in the guideline for all taxa in which SCC are currently known and make allowance for additional methodology to be adopted if necessary when further taxa are assessed as being SCC.	

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		The Guideline recognises (lines 303-305) that there is no direct relationship between the presence of SCC and the presence of threatened ecosystems and it would follow that there is generally no direct link between the presence of one SCC and the presence of other SCC. The toolkit however appears to be based on the premise that one need only protect SCC within a single taxonomic group in order to provide adequate protection to SCC as a whole, which is clearly false. The current toolkit bases its decisions on the need for a terrestrial invertebrate assessment in the entire Northern Cape Province - 31% of South Africa's total area - on the presence of a single butterfly species, ignoring, <i>inter alia</i>, the occurrence of eight orthopteran species currently recognised as threatened in various parts of the province. The Guideline further states (lines 399-404) that specialists are required to "provide information on SCC" which includes <i>inter alia</i> all IUCN Red Listed CR, EN, VU & NT species & subspecies. This contradicts the definition given in the Protocol, which does not include NT species. More importantly it also contradicts paragraph 1.1 of the Protocol which indicates that only those SCC included in the screening tool are of relevance and the entire section 10.5 of the Guideline which indicates that ONLY butterfly SCC are of relevance. These contradictions need to be resolved, and I believe that the only justifiable way to do this is by ensuring that ALL SCC receive due consideration - <u>SCC cannot be defined by using - verbatim - the IUCN criteria and then ignoring the bulk of IUCN listed</u>	C. Clarify how invasive species should be dealt with in considering potential impacts on SCC. From a terrestrial invertebrate perspective I have to concede that this approach is still far from ideal, since many threatened taxa not currently recognised as such (which probably constitute the vast majority of our threatened taxa) will remain "off the radar" and not receive the protection they deserve. However, given the limitations of our knowledge, it is the best we can do at present and by making use of all available SCC data is perhaps the closest approximation of "best practice" we can achieve. In the light	

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		<u>threatened species with no justification other than cost-saving for developers.</u> <u>A species screening toolkit should be aimed at providing the most comprehensive list possible of SCC that might be expected to occur on a site</u>, so that a requirement for surveys targeted at confirming the presence/absence of <u>all likely SCC species</u>, using field methodology appropriate to each taxon, can be indicated. As currently implemented, the toolkit and protocol restrict the definition of terrestrial invertebrate SCC to butterflies only, and hence indicate that the only component of the terrestrial invertebrate fauna requiring consideration from a conservation perspective in South Africa is butterflies. 86% of EN and 93% of CR terrestrial invertebrate species in South Africa are thus excluded from consideration and, according to the current toolkit and protocol, a development even on the only known locality for one of the CR non-butterfly species would not trigger a requirement for an assessment of impacts on that species. Any protocol based on such a fundamentally and fatally flawed approach must therefore also be considered to be fatally flawed and most certainly cannot be referred to as "best practice" as in the current Protocol document. Protection of all currently recognised SCC requires that data on all currently recognised SCC be included in the site screening process. Section 10.5.4.3 (lines 3080-3103) of the Guideline indicate that the specialist "should provide a list of	of recent evidence of worldwide declines in abundance and diversity of the insect fauna I believe it is entirely unconscionable to deliberately minimise our efforts to protect invertebrates in order to remove obstacles to development, and this cannot be passed off as "best practice".	

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		terrestrial alien and invasive invertebrate species that were confirmed in the PAOI and may pose a threat to a particular butterfly SCC or its habitat" but does not give any indication of what survey methods and effort should be used to detect such species (which, in addition to the single beetle species mentioned in the guidelines, also include invasive ant species of high significance to our many ant-dependant lycaenid butterfly species, which constitute a large proportion of the threatened species included in the screening toolkit). Such methodology and minimum required effort should be indicated, or, if a separate protocol and guideline for detection of invasive species is to be prepared, reference to such a guideline should be given. It is utterly bizarre that the ONLY reason that alien invasive invertebrate species are considered to be an issue with respect to invertebrates in this guideline is if they might impact on the survival of a particular <u>butterfly</u> species, when invasive invertebrate species are known to have devastating impacts on entire ecosystems.		
217.	Peter Hawkes: Adjunct Professor, Department of Zoology, University of Venda, Thohoyandou – AfriBugs CC	Lines 286–288 and lines 291–294: the term “best practice” must be removed unless the scope of the guideline is substantially altered so as to actually reflect “best practice” rather than “minimal effort”		Completed.
218.	Peter Hawkes: Adjunct Professor, Department of Zoology, University of Venda, Thohoyandou – AfriBugs CC	Lines 341–343: It should not be left to the discretion of the specialist to provide or not to provide information required in terms of provincial requirements - either the provincial requirements have a legal standing and it must be compulsory to comply with these requirements		The protocol prescribes the minimum assessments and reporting requirements and are legally binding. They do not necessitate the need for some requirements contained in the provincial guidelines. As this a guideline, we cannot instruct users to adhere but we can recommend adherence to

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		in addition to those prescribed by the Protocol or they have no legal standing and must be scrapped and completely replaced by the new Protocol. The legal status of the provincial requirements must be clarified. Given the extremely limited scope of the Protocol with respect to terrestrial invertebrates, I strongly recommend that the provincial requirements be considered to be compulsory additional requirements, as to omit these would be to further limit the consideration given to one of the most important of our biodiversity components.		provincial guidelines. Further 2.2.7 of the protocol states: “include a review of relevant literature on the population size of the SCC, the conservation interventions as well as any national or provincial species management plans for the SCC” Therefore, a review of provincial species management will be done by the specialist.
219.	Peter Hawkes: Adjunct Professor, Department of Zoology, University of Venda, Thohoyandou – AfriBugs CC	Lines 437–439 make no sense - if the guideline indicates that specialists should be looking for SCC other than those specified by the toolkit and that data on these should be included in the site ecological sensitivity rating, then the guideline must provide for appropriate methodology for these other SCC to be part of the required surveys, rather than relying on haphazard and fortuitous data discovery. Why would a butterfly expert be expected to happen upon a species with habitat requirements or seasonal occurrence completely different from those of the butterfly targeted by the TAIA survey requested? If SCC other than butterflies are predicted for a site based on distribution data etc, then targeted surveys for these SCC should be required.		At this stage it is not possible to included data on DD and NT species, we have however added additional threatened invertebrate species as per your above request.
220.	Peter Hawkes: Adjunct Professor, Department of Zoology, University of Venda, Thohoyandou – AfriBugs CC	Lines 367-377: A serious flaw is introduced here that is perhaps best explained by the following example: A site report generated by the screening toolkit indicates that a threatened butterfly species might occur within a proposed project area. This triggers the		As per your request above additional invertebrate species of conservation concern have been added to the screening tool to minimize the chance of known SCC’s not being accounted for in the environmental assessment process.

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		need for a Terrestrial Animal Impact Assessment (TAIA) and as a result a faunal specialist report as contemplated in Appendix 6 of the EIA regulations is not required. The scope of the TAIA is however ONLY to assess potential impacts on the butterfly species predicted for the site, so only a butterfly survey needs to be carried out. Any SCC on the site other than butterflies will thus be ignored. If the toolkit had not been used, or had not triggered the need for a TAIA, a “normal” faunal assessment would have been required and a competent specialist would have identified the potential presence of non-butterfly SCC on the site and carried out appropriate surveys and assessments. As it is currently formulated, the use of the screening toolkit and Protocol will result in many essential assessments NOT being carried out, and the majority of the invertebrate SCC in South Africa not being given the protection they need. Essentially, the <u>potential</u> presence of a threatened butterfly on a proposed development site is sufficient to remove the legal protection that would otherwise be afforded to non-butterfly SCC. I trust that my comments will be taken in the spirit intended, which is to constructively assist in improvement and development of our environmental assessment tools in order to further conservation of the South African environment.		

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221.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	The development of best practice guidelines in this draft 'Species Environmental Assessment Guideline' are much needed in South Africa to improve the quality of reports being submitted for decision-making. While we are not EIA practitioners, between us we have many years of experience catching and documenting small mammals, and wish to contribute our knowledge in the interest of future conservation of small mammal species. Given data, quality in recording SCC species is vital; our comments (see below) are provided to improve the poorly developed taxon specific guidelines for small mammals.		We acknowledge and thank you for this contribution.
222.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Line 401: Should indicate that the assessment is for South Africa; if that is the case.		These are not for South Africa only, they can be restricted range species that cross our borders. Restricted range species refer to the size of the global population.
223.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Line 1639: Why 'encouraged', it should be 'required'? Otherwise, where do these specimens end up?		This is not something that can be required as not all collections facilities have the capacity to process, identify and house specimens collected during EIAs. Furthermore, specimen donations can be to other institutes/facilities (e.g. for university practicals or for display at education centers) and finally, the specialist may be a practicing researcher that requires the specimens for his/her own use.
224.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Line 1641: If this information is of any value to the conservation of these species, non-disclosure agreements should not be allowed.		The species Protocols have been amended to include mandatory dissemination of SCC by specialists (2.2.2 in the Protocol). Developers may therefore no longer bind specialists to non-disclosure agreements that would prevent them from executing this legally required action. This aspect is now addressed in more detail in the guidelines following the protocol update.

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225.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Lines 2684-2685: It should be recognized that these resources are not reliable for species identification of many of the small mammal SCC species.		A sentence has been added to remind specialist to be cautious of small mammal identifications on online database sources.
226.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	'Small mammal trapping (baited)' indicates 'ants attracted to bait...', assumes ants are the diet of the SCC listed species.		Have included "other invertebrates" also in the text.
227.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Lines 2710-2712: This sentence needs to be re-written. Something along the lines of – 'For the SCC bat species account needs to be taken of the possibility of seasonal migration, and periods of torpor in the colder, drier months'.		Edited as requested.
228.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Lines 2717-2719: Not all bat species in South Africa can be easily identified from call. Their calls are not regular, and we have not documented the full range of intra-specific variation across the different species. Of the listed SCC species, the Laephotis species are likely to be confused with other vesper species, due to overlap in frequencies. According to Monadjem et al. (2010) there isn't a known call for Laephotis wintoni. Work by Prof David Jacobs's lab has also shown variation in the call of various Rhinolophus species, including R. swinnyi, see: a. Jacobs, D.S., Catto, S., Mutumi, G.L., Finger, N. & Webala, P.W. 2017 Testing the Sensory Drive Hypothesis: Geographic variation in echolocation frequencies of Geoffroy's horseshoe bat (Rhinolophidae: Rhinolophus clivosus). PLoS ONE 12(11): e0187769.		Thank you for an important comment. This information has been captured in the text as a footnote and the references have been included in the list of references also.

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		https://doi.org/10.1371/journal.pone.0187769. b. Maluleke, T., Jacobs, D.S. & Winker, H. 2017. Environmental correlates of geographic divergence in a phenotypic trait: a case study using bat echolocation. Ecology and Evolution, 7 (18): 7347 - 7361. http://dx.doi.org/10.1002/ece3.3251. c. Fawcett, K., Jacobs, D.S., Surlykke, A. & Ratcliffe, J.M. 2015. Echolocation in the bat, <i>Rhinolophus capensis</i>: the influence of clutter, conspecifics and prey on call design and intensity. Biology Open, 4: 693–701. http://dx.doi.org/10.1242/bio.201511908. d. Mutumi, G.L., Jacobs, D.S. & Winker, H. 2016. Sensory drive mediated by climatic gradients partially explains divergence in acoustic signals in two horseshoe bat species, <i>Rhinolophus swinnyi</i> and <i>Rhinolophus simulator</i>. PLoS ONE, 11(1): e0148053. http://dx.doi.org/10.1371/journal.pone.0148053. For this reason, call information shouldn't be used to judge the presence or absence of the species, unless a call library has been developed for a particular area, which was based on verified identifications from vouchers and molecular sequence information.		
229.	Mr Ernest Seamark:	Lines 2734-2739:		This section has been comprehensively re-written to accommodate this comment and those from SABAA.

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	Chief Executive Officer - AfricanBats NPC	It is not identified what the statement ‘while exhibiting a relatively low probability of success for trapping SCC’, is based on. In our experience mist nets and harp traps are invaluable tools for trapping bats. Harp traps will catch the SCC Rhinolophus species and Cloeotis, while mist nets and harp traps catch Laephotis. However, permits and ethical permissions are required for their use, and importantly users must be trained and proficient in their use, and in handling of bats. AfricanBats NPC can provide training of this sort. Trap success depends on user experience and knowledge of the species. If it is necessary to identify the presence of these SCC bat species, it is not suitable to use call alone. The wording in lines 1817-1832 could be transcribed to this section, particularly since it is not easy to identify some of the species on external morphology if they are live trapped. However, if active collecting threatens the conservation status of the species, then only individuals that die must be collected, and they will be very valuable in collections not only for identification of the species, but also continuing to record biodiversity in space and time. If (complete) voucher specimens cannot be taken, tissue samples (hair, skin, ...) might be collected for molecular sequencing to get species verification.		
230.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Lines 2855-2856: Skinner & Chimimba (2005) and Avenant (2005) are not reference guides for identification of species based on teeth. Remove these references from this sentence, move the Avenant (2005) reference to the end of the previous sentence, and add:		The text has been amended accordingly at the lines indicated and the reference for spatial information of bats has also been included under 10.4.4 Desktop Study - Expected SCC.

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		- Monadjem, A., Taylor, P.J., Denys, C. and Cotterill, F.P., 2015. Rodents of sub-Saharan Africa: a biogeographic and taxonomic synthesis. Walter de Gruyter GmbH & Co KG. Also, add that these identifications can also be made / verified with reference to the extensive collections in the various natural history collections in South Africa. The African Chiroptera Report (https://africanbats.org/publications/african-chiroptera-report/) which includes all known keys to African bat species as well as updated and corrected spatial information.		
231.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Lines 2865-2866: Overheating isn't the only concern. If temperatures are cold traps should be covered, and, or lined. There are also a variety of traps, and indicating the Sherman tradename is probably not necessary. They could be referred to as 'live trap, box traps'. Depending on what the target species is, different types and sizes of traps can be used, i.e. small traps are available for shrews. Also keep in mind that some species such as shrews have a high metabolism and probably will not survive extended periods, and therefore the traps should be checked more frequently than 'daily'. See also Willan, K., 1986. Trap selection by some southern African small mammals. South African Journal of Wildlife Research, 16(3): 53-57.		This section has been rewritten to accommodate these comments and those from SABAA.

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232.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Lines 2865-2872: Given the number of mole species on the SCC list, what isn't covered is how to capture mole species. Or, why, they shouldn't be trapped.		Thank you for your comment. Following discussion with other specialists and in particular, Dr Bryan Maritz (see comment 171), an entire section providing guidance for surveys for species with low detection probabilities has been provided in 9.3.7 Expected SCC with very low detection probabilities and for each taxon, species are listed as LDP species for which this guidance must apply. All golden moles are now considered to be LDP species.
233.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Lines 2866-2868: The size and representative habitat should also be in relation to what is known of the species preference, i.e. Dasymys is likely to be found in wet, marshy areas, as are most of the shrews.		The text has been amended accordingly.
234.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Lines 2868-2870: It should be clarified whether the trapping is nocturnal, 24 hours, or diurnal. And then, indicate checking times in association with that. Traps left open overnight must be checked at dawn, not before 'ambient temperature...' -what is the lethal level?		The text has been amended accordingly.
235.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Lines 2870-2871: There are various baits that can be used, and some are more taxa targeted, i.e. bacon is often used for shrews. Replace the personal communication reference with a published reference, i.e. Willan, K 1968. Bait selection in laminate-toothed rats and other southern African small mammals. Acta theriologica 31.26: 359-363, and Kok, A.D., Parker, D.M. and Barker, N.P., 2013. Rules of attraction: the role		The text has been amended accordingly.

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		of bait in small mammal sampling at high altitude in South Africa. African Zoology, 48(1): 84-95.		
236.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Line 2870: While the aim of zero deaths is important, we are aware that deaths due to trapping do occur, in particular with shrews that have a high metabolic rate (see Do, R., Shonfield, J. and McAdam, A.G., 2013. Reducing accidental shrew mortality associated with small-mammal live trapping II: a field experiment with bait supplementation. Journal of Mammalogy, 94(4):754-760). Individuals that die, must be lodged with a public repository in South Africa. And, for this reason any trapping must have the required permit and ethical paperwork in place to cover such deaths. The wording in lines 1817-1832 could be transcribed to this section, particularly since it is not easy to identify some of the species on external morphology if they are live trapped. However, if active collecting threatens the conservation status of the species, then only individuals that die must be collected, and they will be very valuable in collections not only for the identification of the species, but also for continuously recording biodiversity in space and time. To reliably identify some of the species, i.e. Crocidura maquassiensis, Dasymys and Myosorex (if voucher specimens cannot be taken), molecular sequencing to get species verification might be required.		The text has been amended accordingly.
237.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Line 2920-2921: This list covers roosts for Cloeotis and Rhinolophus. However, Laephotis namibensis in the Western Cape uses narrow crevices and fissures on a vertical rock face,		The text has been amended accordingly.

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		(see Jacobs, D.S., Barclay, R.M. and Schoeman, M.C., 2005. Foraging and roosting ecology of a rare insectivorous bat species, <i>Laephotis wintoni</i> (Thomas, 1901), Vespertilionidae. <i>Acta Chiropterologica</i> , 7(1): 101-109). Less is known about the roosts of <i>L. wintoni</i> , which might also be narrow crevices and fissures on vertical rock faces (see Happold, M. and Happold, D.C. eds., 2013. <i>Mammals of Africa: Hedgehogs, Shrews and Bats</i> . Bloomsbury Pub.).		
238.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	Line 2928: This needs to be reworded, currently it suggests there might be voucher specimens, but if there aren't permits they won't be deposited in publically accessible repository. As indicated above in point 14, trapping is a very valuable way to confirm whether or not the species is present; in particular for shrews and the rodents. However, due to the risk of trap death all trapping should be undertaken with permits that allow individuals that die to be vouchered and deposited in publicly accessible repositories in South Africa.		The text has been amended accordingly.
239.	Mr Ernest Seamark: Chief Executive Officer - AfricanBats NPC	There is no reference made in this document to any health and safety aspects concerning fieldwork, especially about working with wild animals. This should also take into consideration not only people undertaking the fieldwork, but also measures to restrict contamination of wild populations and moving potential pathogens from one population to another. This could be included in an appendix. AfricanBats NPC has part of an introduction course that includes a		Firstly, this comment is not strictly correct as there is an entire section dedicated to the safety aspect for herpetofauna: 10.2.3.7 Safety considerations. Nevertheless, it is a valid concern in general and a new section has now been added under 9.2 Fieldwork to briefly address this aspect. Additional health and safety aspects have been added to the taxon-specific sections where relevant. We acknowledge that the information sent is extremely valuable and have now included

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		chapter on health and safety concerning fieldwork and working with small mammals (also directors have been involved in drafting field procedures that can be made available upon request). We hope these comments will be considered in formalizing this guideline document. Should you have any queries about our comments please contact us.		the link to the africanbats.org website so that the most up to date document is accessible to specialists.
240.	Professor Leslie R Brown, Head: Applied Behavioural Ecology & Ecosystem Research Unit, Department of Environmental Sciences, School of Ecological and Human Sustainability-UNISA	I have been on research for most of this year and only received this document yesterday. I have gone through it as fast as I could and have made comments on the document (pp 24; 28; 60; 68; 73; 74; 76; 85) on aspects that I am concerned about.		Thank you for taking the time to share your comments.
241.	Professor Leslie R Brown - UNISA	Line 476, page 24 "Taxon-specific specialist" In many cases there are no such a specialist in the country, while taxonomists will not be able to determine whether as species will survive in the wild or not. That would be vegetation scientists/ plant ecologists and zoological ecologists.	I suggest deleting the the term "taxon-specialist" and replacing it with "relevant specialist".	The term taxon-specific refers to broad categories of taxa, such as plants. A botanist cannot be required to assess birds for example.
242.	Professor Leslie R Brown - UNISA	Line 499, page 24 "taxon relevant": Please see my previous comment. It can only be done by ecologists (flora & fauna)		Noted, please see response to comment 241.

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243.	Professor Leslie R Brown - UNISA	Line 500, page 24 "taxa identified": As previously commented, I am concerned about this requirement. Plant and animal ecologists can interpret the ecosystem and its different drivers and how ecosystems will be affected which will influence a SCC. Taxonomists do not have that training e.g. "A taxonomist is a biologist that groups organisms into categories. A plant taxonomist for example, might study the origins and relationships between different types of roses while an insect taxonomist might focus on the relationships between different types of beetles". Thus they will not be able to assess an ecosystem. In some cases there will be ecosystems that are extremely sensitive, but with no SCC. That is one of the most important things that ecologists will notice and report on.		Your comment is noted, however here referring to taxa relevant specialist is not meaning we require a taxonomist but rather a species expert (usually an ecologist) that understands the taxon group in question.
244.	Professor Leslie R Brown - UNISA	Line 518, page 27: Minimum Requirements Box at bullet points 2 and 3: Although that would be ideal, it is seldom possible to determine that. There is currently no data available on how many individuals of a plant will make a population viable or not. That is where this protocol misses the point. If the ecosystem is natural and in near climax condition it is likely that a small population might survive and if the ecosystem is degraded it is highly likely that even a large population of SCC will not survive.		We do assess habitat viability via the functional integrity component of the Site Ecological Importance methodology (see section 8).
245.	Professor Leslie R Brown - UNISA	Line 526, page 28: Minimum Requirements Box Yes this I definitely think a taxon specialist can and should do.		Your endorsement is acknowledged.

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246.	Professor Leslie R Brown - UNISA	Lines 1049-1050, page 60: I would seriously contest this statement. This would in most cases lead to random sampling which WILL lead to important and maybe sensitive ecosystems being missed. That is why a stratified random sampling approach would be the best to get an even and accurate representation of the vegetation of an area. The moment one becomes rigid in an approach you start missing important ecosystems.		The lines refer to the loading of any pre-selected sample sites onto a GPS, they do not state how the sites are to be selected. Guidance in this regard is provided in the taxon-specific sections and in particular, for flora the timed meander search method is advocate in 10.1.3.3 Timed-Meander Search Method.
247.	Professor Leslie R Brown – UNISA	Line 1352, page 68 Although I have no problem with this suggestion, the question remains on how someone who has not been on the site will be able to evaluate it. Conditions in the field is totally different than on a desktop study or report reviewing excise. One will never be able to survey or visit every patch of the proposed study site and that is why "representative sampling" is an acceptable scientific method in both animal and vegetation studies. I do thus fail to see the value of this suggestion.		The comment is noted. Showing exactly where a specialist has been during the survey allows verification of specialist coverage of the PAOI and whether the representative sampling was indeed representative, at least from a spatial perspective. CAs and I&APs can easily see if the specialist visited the sensitive areas for example, a crucial aspect in evaluating if the study performed was acceptable, because it can indicate knowledge gaps that may need to be addressed. Typically, a specialist should cover and sample each of the important habitats in the PAOI in order to properly evaluate SEI.
248.	Professor Leslie R Brown - UNISA	Lines 1495-1506, page 73. Although I agree with this in principle, I do not agree that it is cast in stone as stated here. I have been involved in projects where the land has become degraded beyond its natural threshold of being able to return to its original condition.		The level of degradation of a site should not influence whether search and rescue practices should be recommended. We are clearly stating here that no matter what the situation, search and rescue cannot be considered as a mitigation measure. If SCC occur in an area from where a search and rescue operation is proposed, it cannot by definition be too degraded for that SCC if they are there.
249.	Professor Leslie R Brown - UNISA	Line 1523, page 73. "restoration" I am not aware of any attempt to restore an area to its original condition. People have rehabilitated		The comment is noted. Restoration is an important step in the mitigation hierarchy, an internationally accepted framework. Our guidelines do not make any statement overemphasizing the effectiveness or the possibility for this in a particular

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		ecosystems, but it is highly unlikely that any degraded system can or has ever been restored. Please provide scientific data to back-up such a statement like this. In both Gauteng and in the Nama-karoo I have long-term data showing that systems can be rehabilitated BUT NOT restored.		scenario, as this falls outside of the scope of this work. In fact, on numerous occasions the guidelines caution that restoration is not always feasible or possible and clearly state that it is a poorly understood option that is often misapplied.
250.	Professor Leslie R Brown - UNISA	Line 1528, page 74. “While it is possible to restore some habitats” See my earlier comment above. I seriously dispute this.		See response to comment 249
251.	Professor Leslie R Brown - UNISA	Line 1540-1541, page 74. “if restoration is a feasible mitigation option...” Although I agree with this, there is currently NO legislation that ensures such a programme, the funding of it or the monitoring of it. This is very idealistic and not practical		See response to comment 249
252.	Professor Leslie R Brown - UNISA	Line 1544, page 74. “then biodiversity offsets may be required” I would seriously caution this. Offsets seems to be this "fantastic" solution, but that is only on paper. I have never seen that such actions have been successful. Ecosystems not resembling the one that is transformed are mostly chosen and left without any management which eventually leads to degradation.		We note your concern regarding offsets and agree completely. We clearly state that “The application and effectiveness of offsets is highly contentious and developments should be avoided wherever offsets would be required to address residual impacts”. It is an absolutely last resort scenario.
253.	Professor Leslie R Brown - UNISA	Lines 1568-1571, page 74. I completely agree with this, but how will it ever be enforced. Currently conservation bodies cannot even manage their own properties properly, let alone enforce such actions as mentioned here.		Your concern is noted however capacity constraints within relevant government agencies cannot limit required Impact Management Action specifications being included in the Environmental Authorisation process.
254.	Professor Leslie R Brown - UNISA	Line 1644, page 76. Once a specialist has submitted his/her report to the EAP, they have no control over what happens to it. Thus		The species Protocols clearly state that “A signed copy of the assessment must be appended to the Basic Assessment Report or Environmental Impact Assessment Report”. This is a

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		this is not a feasible suggestion/recommendation. There is no law that allows or enforces a specialist to make such demands.		legal requirement. In addition, it has been recommended in the guidelines that specialists also register as I&APs to verify the integrity of the final report content. The EAP signs a declaration that states they have included all information available to them and must attach the original specialist assessment with the overall EIA/BA report for submission to the CA.
255.	Professor Leslie R Brown - UNISA	Lines 1647-1648, page 76. See previous comment		
256.	Professor Leslie R Brown - UNISA	Line 1906, page 85. "minimum distance of 200m" Please provide a rationale for this? I do not believe in a "one-size-fits-all" approach. In some cases the habitat of a SCC is so specific that the species (e.g. rocky crest) will not grow under any other circumstances. Thus by requiring a buffer zone of 200m which could include degraded/transformed land it will serve absolutely no purpose. I do believe that the specialist ecologist should be able to provide a motivation for a buffer or not, but to enforce a "general" zone would serve no purpose.		Buffers are not in place only to influence immediate habitat of the species but also to minimize edge effects. Furthermore, as shown and discussed in the SEI section, transformed habitats that cannot be restored are excised from the buffer, so the final buffer is not likely to be 200 m, which is only the starting point.
257.	Dr David McDonald: Botanical Specialist - Bergwind Botanical Surveys & Tours CC	I have not been able to prepare comments or queries regarding the new Species Protocols. I am sorry but trust that what is being done is in the best interested of conservation. I hope, very much that the <u>practical side</u> of botanical survey work has been given attention since multiple visits to any given site, as much as they are desirable, are not within the budgets of most applicants going into the EIA process. We as assessors have to make the best of single site visits and often those are not at optimal times season-wise and often have other		Only one site visit is required however ensuring this takes place at the optimal time is specified and explained within the guideline.

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		limitations as well. Detailed capturing of flora information is never simple.		
258.	Dr Low de Vries: Centre for Viral Zoonoses Department of Medical Virology, School of Medicine, Faculty of Health Sciences - University of Pretoria	My area of expertise is in bats, and as such my comments will be directed as such. Section 10. 4. 5. 3 Mist nets and harp traps While it is true that nets and traps are used extensively in virological research, it is employed by most other bat researchers too, and with good reason. It is the only reliable method to identify a bat species. In addition other crucial information can only be obtained by capturing bats, such as age, sex and reproductive status. The last of these, reproductive status, is vital to determine if a population of bats is breeding in an area, a factor that is of high importance to the conservation of the population. It is true there are ethical and safety considerations that should be taken into account, it is still my feeling that traps must be employed, but should only be used by people with experience. Mammals are hosts and reservoirs of numerous zoonotic diseases that could be transmitted to humans, and safety precautions should be put in place to reduce the risk of spill over. All traps should be cleaned with a 10% bleach solution after each capture sampling, and this is true for all mammalian traps. Gloves must be worn when handling animals, and, in cases where there is high risk, additional safety measures must be taken such as respirators		Your comment regarding the need for mist nets and harp traps is noted and has been addressed under the similar comments raised by SABAA. A link is provided on the health and safety requirements for working with bats as offered by Dr Ernest Seamark (see comment -239).

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		Not only is there a risk of zoonotic diseases, but only of transmission of diseases between populations of animals. This is evident with the spread of white nose syndrome in Northern America which was dispersed between populations of bats by researchers. All people working on animals have to ensure that they pose no risk to the animals, and this means taking the necessary precautions to prevent the spread of pathogens between populations.		
259.	Dr Darren Pietersen: Director of Research- Tikki Hywood Foundation / Research Associate: Mammal Research Institute Department of Zoology and Entomology- University of Pretoria	Section 8.2, lines 699-703 (and elsewhere, I think). Shouldn't the National Red List Assessment always take precedence over the Global Red List Assessment, provided that the National assessment was conducted within the past 20 years (or other appropriate timeframe)? My reasoning here is that the national and global assessments are not always aligned, and therefore you could get different Conservation Importance scores for the same site and for the same development depending on which Red List Assessment is used (and in what year the CI calculation is done). I believe that the National assessment should be the most appropriate assessment to use as it is specifically in reference to the population in South Africa, which may have a small proportion of the global population and/or face threats that are specific to South Africa. I believe that we as a country have a responsibility to protect all the native species within our country,		This comment is valid and has been addressed adequately due to a similar preceding comment 123.

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		regardless of what portion of the global population they constitute.		
260.	Dr Darren Pietersen: Director of Research - Tikki Hywood Foundation/ Research Associate: Mammal Research Institute Department of Zoology and Entomology- University of Pretoria	Section 8.2, line 713. Should this not read "10 000 m2", i.e. 10 km2?		The IFC defines restricted-range to be < 50,000 km ² while SANBI defines this as < 2,000 km ² . We have chosen 10,000 km ² as a good middle ground for the definition of range-restricted.
261.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Firstly great work! I love it and what it is trying to achieve. This is a great contribution towards supporting sustainable development. I am of course also a bit concerned that it may make Basic Assessments more expensive		We appreciate your acknowledgement, we suspect that the data in the screening tool will make full EIAs less expensive as fewer specialists will be needed. You are correct that basic assessments may increase in cost.
262.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	The application of the guidelines for a year or two will probably lead to its review and then things can be tweaked. But I do like what is presented. I also like the use of the case studies although the racetrack one makes the tool appear a bit too "strict". It was such an important site for threatened plants. Still it is a good example.		You are correct this site has more SCC than is typical on average, but it does present a useful example.
263.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	There are many acronyms in the start of the document that are not mentioned in the text. Please can these be cleaned up.		Thank you, we have addressed this.
264.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	As this approach is largely based on our current state of knowledge (the species observations sitting in our databases), are their sufficient checks in place to ensure that if an area does not come up as a priority in the		Currently, medium-sensitivity areas are those that have been modelled to potentially indicate the occurrence of a SCC and those areas do require a full botanical survey should flora SCC be triggered, so for your example this species should be

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		screening tool, will the EAP be able to flag it and still have a specialist do the necessary studies. This is the role of Initial Site Sensitivity Assessment but it is not clear that it sits outside of the guideline for the plant and animal protocols (if my understanding is correct). Can the text be strengthened to make this clearer. I know of an example right now in Limpopo where there is a large population of the Vulnerable <i>Ceropegia distincta verruculosa</i> in an area where the farmer wants to expand his citrus. The EAP provided the output from screening tool but plant sensitivity indicates sensitivity of Medium. I don't think Sanbi received the point records. It highlighted to me the need for a botanist to survey these Medium areas so I would advocate that we do need a botanist to assess Medium sensitivity areas. Perhaps tighten up the text and make it more explicit that a Initial Site Verification would be done that is independent of the screening tool output that may additionally identify required specialist studies. Failure to do so ... not sure what would be suitable punishment.		accounted for. We have also updated the Protocols to require that an ecologist be employed to do the Initial Site Sensitivity Screening to ensure that sensitive sites not flagged by the Screening Tool data do get picked up.
265.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	The provinces have their own databases which are continuously updated and regularly shared with SANBI, but occasionally we recognise forms as distinct species or our lists of rare's are different ... and we still use the Declining category. So can we still get consultants to ask us for a list of SCC that may occur in the Quarter Degree Square (QDS)? I provide that data to all consultants. It is extracted at farm level for all farms in the respective QDS. We would also want the specialists to use our lists and classification in their Conservation Importance assessment. I have more notes in the document.		The protocol prescribes the minimum assessments and reporting requirements and are legally binding. They do not necessitate the need for some requirements contained in the provincial guidelines. As this a guideline, we cannot instruct users to adhere but we can recommend adherence to provincial guidelines. Further 2.2.7 of the protocol states: "include a review of relevant literature on the population size of the SCC, the conservation interventions as well as any national or provincial species management plans for the SCC" Therefore, a review of provincial species management will be done by the specialist.

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266.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	It would be great if someone can extract a chart or graph of flowering/fruited time for the different biomes or provinces. The other protocols provide tables for best survey times. Charles Hopkins could easily do that for you. I attach a similar bar chart of specimens collected by month for Mpumalanga (based on 77 000 PRECIS 2010 specimens). I first summarised to create unique values for species and months and then created barchart. One would expect that people collect plants when they are in flower or fruit (identifiable) so this should give a guideline as to when surveys should take place in Mpumalanga. November to March are best. Our minimum requirements for plants usually require two assessments in the rainfall season. One before end of December and one after December. Perhaps this can be done at a biome level for flowering/fruited specimens?		A very helpful suggestion. The text has been updated accordingly and a graph has been added to the Guideline.
267.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Title: Guidelines for the implementation of the Terrestrial Flora (3c) & Terrestrial Fauna (3d) Species Protocols for environmental impact assessments in South Africa - DEFF gazette had Fauna as 3c and Flora as 3d. We need to be consistent.		The text has been amended accordingly.
268.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Definitions: "bioregional plan" – to add ... bioregional plans also frequently incorporate species locality information that drives the identification of priority areas.		The text has been amended accordingly.
269.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Definitions: Quarter Degree Grid Cells" – to add...roughly 24 x 27 km in size.		The text has been amended accordingly.

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270.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Definitions: “species of conservation concern (SCC)” - This definition is lacking some categories that are used in below text. Should include Data Deficient, Near Threatened and Declining taxa.		The text has been amended.
271.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Definitions: “translocation to add.. sometimes also referred to as Assisted Dispersal.		The text has been amended accordingly.
272.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 402: “Data Deficient (DD) or Near Threatened (NT)” - These are absent from the definition at start of document. What about Declining? I think SANBI may have dropped that although we do still us it. I see there is mention of its use in one of the tables below.		SCC definition has been updated as per comment 270. Declining is no longer used by SANBI as a national category for SCC all reference to this category has been removed from the Guideline.
273.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 405: typo – should read SCC and not SSC		Corrected.
274.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Table 4-1; high sensitivity – “those collected since the year 2000” - DEFF gazette notice speaks of 2002		Corrected - it is meant to be 2002.
275.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Table 4-1; medium sensitivity - probability threshold of 75% for suitable habitat has been used to convert the modelled probability surface and reduce it into a single spatial area which defines areas that fall within the medium sensitivity level. - So it sounds like you used two modelling approaches. It is not easy to extract a 75% threshold for models, particularly for models like Maxent. Perhaps don't be so specific and rather refer to a "high probability threshold"		We note your comment but prefer to keep the model methodology transparent it is further explained in Appendix 1.
276.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 435: typo – should read SCC and not SSC		Corrected.

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277.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 497 - Change in numbering from 5.3 to 2.1??		2.1 refers to the exact numbered statement in the species Protocols.
278.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Minimum requirements box under line 525, bullet 1 – Demonstration of the population sizes of each SCC....- Spatial comparison with global distribution? this seems to be a bit excessive. Some site may contain several SCC taxa. Not all global populations are known, not when they are not on the IUCN's website (or if they are tradable taxa I suspect). This should rather be a recommendation rather than a minimum requirement. Or if you want to keep it a minimum requirement then do not be so specific and rather allow for more estimation or inferring of proportion of known populations occurring within footprint.		Thank you for your comment we were unable to make this a recommended change as it was part of the Protocol requirement but we have added far more guidance and actual data to the guideline to assist specialists in calculating the populations of conservation concern.
279.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Minimum requirements box under line 549 - What about including the need for the development of a fine scale "sensitivity map" on site? As a minimum requirement? You called this a SEI below. This map would be a refinement of the broad screening tool sensitivity map.		It is clearly specified in the minimum requirements as the last option: "Propose an alternative development footprint that comprises a combined Site Ecological Importance (SEI) of only "Very Low" and / or "Low"
280.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 555 - I am not sure whether it is appropriate to include it under this screening tool guidelines, but the provinces and SANBI (POSA) do keep databases of species of conservation concern and we provide consultants with a list of species that occur in the same QDS. We would like consultants to make use of these lists to consider when thinking about which species to look for and the timing of the survey as to whether they will be visible (flowing or migration). The updating of the screening tool is not likely to have a short turn-around.		This request has already been addressed under comment 265, which references comments 145 and 164.

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		We have data that can be used/considered in desktop assessment process.		
281.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 576 – “Terrestrial Animal Impact Assessments” - and plant?		This wording is taken directly from the Animal Species Protocol, and since the plant and animal protocols virtually identical it is not necessary to duplicate them in the guidelines. However, a footnote has been added to indicate what the precise wording is for the plant Protocol where it differs from that of the animal Protocol.
282.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 592 – “Therefore, best practice is” - Do you require that the EAP or specialist then upload a new footprint area (PAOI) for the enlarged footprint into the screening tool? Best practice?		This section has been re-written to be more clear about the guidance provided.
283.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 702 – “global and national assessments” - What if provinces have their own categorisation of status? For example the MTPA have listed the Bullfrog as VU whereas for SA it is LC. We have experienced large declines and negative trends because of mining. Maybe your list should include both but take higher status based on precautionary principle? Or include as separate bullet point?		It is already challenging enough for consultants to know how to use National and Global assessments appropriately. The Protocol and its guidelines have been developed in relation to the national biodiversity targets and therefore, national assessments are more applicable. Please note however that this sentence has been updated to reflect the correct importance of the national assessments.
284.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 802 – table site ecological importance - I have run some examples through my head and this matrix should work. It tends to favour larger project areas in the sense of identifying highest priorities. But I think it is a good approach and criteria to try. I suspect this may be tweaked in a year or two.		We acknowledge your testing of the SEI thank you for doing this.
285.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 815 – Table 8-4 – Very High – “Offset mitigation not acceptable/not possible” - I don't think you should say "not" Rather use "may not". One may still find that options exist and some 'threatened' species may be locally abundant and options may still exist for exploring		We do not think it is wise to soften the wording in this section as it will provide loopholes for EAPs and applicants that will cause serious degradation of environmental assets.

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		offsets. Only if the impact will result in the change in conservation status or risk of species moving towards extinction is it a no go (according to offset policy as far as I am aware).		
286.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 825 – “post hoc combination of the maximum SEI for each receptor should be applied” - agreed		Noted.
287.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 849 - Any guidance for how the EAP must combine the output from the SEI with the wetland specialist or other reports from BA or EIA process? Suggest that they apply similar approach of categorising sensitivity into 5 classes and using the highest category in a combined map?		Thank you for this suggestion, we will add the SEI methodology into the terrestrial and aquatic ecosystem guidelines currently under development by SANBI.
288.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 900 - Figure 8-4 - Could you possibly include the individual buffers on the map as multiple outlines? It will help the reader see how the grey areas were derived.		We do not think this would be very helpful for this particular example, given that it is a relatively small area.
289.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 922: typo – should read SCC and not SSC		Corrected.
290.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 941 – Figure 8.6 - Arrow and herpetology record need to be added to map and legend. I can't easily figure out how the herptofauna record influenced this map. It needs more information (locality, buffers). If you are not able to show record (confidentiality reasons), then at least show buffers.		No point locality data are provided here. The occurrence of relevant amphibian species are known from the racecourse but the specific habitats relevant to each species are mapped and have buffers applied and discussed. Comparison with the Habitat map allows inspection of the buffers.
291.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Lines 997 – 999 - But this is possible in some cases. If the person has the the necessary SACNASP qualification then I think it may be allowed. I know of a few good consultants who can handle more than two disciplines. Four would be a limit.		We have specified that this limitation is required for EIA processes only and that BA processes are exempt from this. This provides a good middle ground between cost concerns and report quality optimization.

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		But for a basic assessment the issue is cost. I am concerned about the cost of all these individual specialists to survey an area for a billboard or cellphone tower in a "geographic area". For small areas it may be OK to use a specialist for more than two disciplines, like for a BA, but perhaps implement the restriction on EIAs if you must. I would vote for dropping this bullet or only make it applicable for EIAs and not BAs.		
292.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1016 - For plants in the summer rainfall regions, ideally one should do survey before end of December (Nov-Dec) and again in the new year (Jan-March). Many of the Apocynaceae do not flower until after December.		Text changed to make it clear that sometimes two seasons could be required, based on the preceding arguments presented.
293.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1032 - Perhaps this is a good place to include mention of extracting a list of SCC that are likely to occur in the area from QDS data from provinces or POSA.		The screening tool will provide a list of expected SCC at a much finer resolution than QDS. Nevertheless, additional guidance on expected SCC is provided in 9.3.6 Researching and presenting data for expected SCC.
294.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1072 - capture and collect - capture, collect and transport		Corrected.
295.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1112 – “Impact analysis,” – add ... and information/receptors informing the timing of the fieldwork		The text has been amended accordingly.
296.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1144 – “precautionary approach is to assume that the species does indeed 1143 occur there and mitigation and management decisions need to be made accordingly “ If it has the potential to occur there, but was not observed, then perhaps we should drop one criteria class? So from Very High to High if it was not observed (like due to timing)?		No, the probability of occurrence for a SCC in a PAOI is listed as “confirmed” if it was observed, since it’s no longer a probability but a certainty. This is discussed in “9.3.6 Researching and presenting data for expected SCC “where it is stated that “For species observed within the PAOI during fieldwork for which identification is certain, the probability of occurrence should be designated as ‘Confirmed’”.

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297.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1226 – “Likelihood of occurrence within project PAOI” - Likelihood of being observed based on flowering, migration, or ability to be identified at that stage of phonology / life cycle?		We are explicitly asking the specialist to evaluate the likelihood of OCCURRENCE, not the likelihood of detectability.
298.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1257 – Figure 9-2- Very very few studies are conducted at this scale. Best to use a study at a finer scale as an example. The remaining pink areas in image on the right is confusing? Or at least tell the reader that the remaining pink areas are areas that have been transformed.... if you continue to use this example.		It is the entire known range of a SCC and this level of analysis is relevant to be able to estimate the proportion of the remaining population of this SCC that will be affected by the proposed project, the latter is not shown. Furthermore, the figure legend has been updated to clarify the content of the figure.
299.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1456- Table 9-1: perhaps include "Avoiding harvesting during breeding season"?		The text has been amended accordingly.
300.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1667 – “Methods for the detection of expected threatened flora should be applied by the specialist for “High” and “Very What is required in the case of Medium sensitivities? This text is not clear that a specialist/botanist still needs to conduct a survey. Please reword. High” sensitivities defined by the Screening Tool” -		This section has been re-written to make clearer what is required by the specialists for the different sensitivity outputs of the screening tool.
301.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1676 – “The Screening Tool Report provides a list of all confirmed occurring and potentially occurring plant SCC within the vicinity of the proposed development footprint.” - Does the tool provide information on month of flowering?		No it does not. We have now added more information regarding seasonality of the SA biomes in 10.1.3.1 Fieldwork timing and seasonality.
302.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1678 – “online resources that are constantly updated with new observations should be checked for more current 1678 distributional data that may be relevant to the PAOI” - Surely it cant be constantly updated? An annual update?		The screening tool will be updated on an annual basis. Citizen science repositories (e.g. ADU VM) constantly receive new records on almost a daily basis.

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303.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1682 – add "Provincial conservation authorities." New bullet.		The text has been amended according to a previous comment.
304.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1688 – “provide a list of any additional potentially occurring threatened taxa within” – SCC taxa		Edited as requested.
305.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1706 – add after this line- "Contact provincial authorities to request a list of SCC occurring within QDS." To add something similar.		The text has been amended accordingly.
306.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1731 – “Plants have a wide variety of flowering periods and strategies and it is critically important to take this into 1730 account when planning a survey.” - Consider including graphs showing peak flowering/fruited times for different biomes.		This graphic has been added and is discussed.
307.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1796 – typo needs to red SCC		Corrected.
308.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1797 - new bullet on any notes as to why the SCC may not have been observed, like overgrazed or recently burnt.		The text has been amended accordingly.
309.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1798 - "after the word Screening Tool add ... Screening Tool, or during desktop work, as potentially occurring ..."		Added as requested.
310.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1803 – typo needs to red SCC		Corrected.
311.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1805 – add bullet after "Add Evidence of any flowering or fruiting plants". May assist in establishing functionality of population if polinators are present.		Added as requested.

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312.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1869 – Table 10- 2 - “declining” - Wonderful. There has been no mention thus far of Declining being a SCC. Please do add it as such. I do in all my work.		Unfortunately, we have had to remove this as it is not consistently used or available across the country.
313.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 1900 - typo needs to red SCC		Corrected.
314.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 2357 – Table 10 – row 3- “Buffer to be applied around the” - What would the buffer be from nest sites? We usually info on nesting areas but not colony boundaries? 300m and 500m? Or 400m and 600?		Not applicable to herpetofauna and comprehensively dealt with in the avifauna section 10.3.6 Buffers for SCC.
315.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	After line 2410 – add Provinces' species databases?		Added this before the bullet points as it's not an open access online resource.
316.	Dr Mervyn Lotter - Mpumalanga Tourism and Parks Agency South Africa	Line 3512 – “Provincial Conservation Plans” - Provincial Biodiversity Plans (aligned with SANBI terminology)		Corrected.
317.	Dave Edge	One problem that I see is that the Species Specialists who do the site work have to be SACNASP registered (page 24 and 59). We probably only have two lepidopterists who would even qualify to get this registration (myself and Reinier Terblanche) and we can't cover the whole country. There has to be a way in which we can mobilise the whole expertise of LepSoc to tackle this issue because it is not a trivial matter to do the site investigation and write a coherent scientifically based report.		We acknowledge your comment and appreciate your application to -SACNASP. For Lepidoptera specialist assessments we suggest that LepSoc co-ordinate this work and that while fieldwork can be conducted by different LepSoc members it must be checked and submitted by SACNASP registered members. SANBI is currently in discussion with SACNASP about the registration of species specialists and SACNASP have mentioned that they are open to the possibility for very experienced persons belonging to an organization such as LepSoc to apply for registration as professional specialists for the taxon concerned.- LepSoc should therefore consider putting forward additional members for SACNASP membership.