Comments and Responses Report

Public Participation Process of Reviewed Garden Route District Coastal Management Programme (CMP), 2025/2026 – 2030/2031

20 October 2026

Abbreviations:

CMP:	**Coastal Management Programme**
DEA&DP:	**Department of Environmental Affairs and Development Planning**
DFFE:	**Department of Forestry, Fisheries and the Environment**
GRDM:	**Garden Route District Municipality**
NEM: ICMA:	**National Environmental Management: Integrated Coastal Management Act**
POPIA:	**Protection of Personal Information Act**
SLA:	**Service Level Agreement**

Please note: As per the terms of the Protection of Personal Information Act (POPIA), no names of individuals were mentioned in this report, only organisational details were mentioned.

Count	Comment No	Name	Organization	Thematic area	Section Chapter	Comment	GRDM Response to Comment / Follow up Action
1	1	DEA&DP Representative	DEA&DP	Editorial		Editorial comments and suggestions	Corrected .
2	2			Governance	1.2 Regulatory Context of Coastal Management Programmes in Page 13	Ideally these legislations should be grouped or in a table format according to their level, from national to local.	This section was updated as per comment/s received.
3	3			Coastal Boundaries	Section 1.3 The Coastal Area Explained in Page 15	The 200 nm is not specified within NEM: ICMA however it is specified in the Maritime Zone Act. This can be referenced in the document for completeness.	This section was updated as per comment/s received.
4	4			Coastal Boundaries	Section 1.3 The Coastal Area Explained in Page 15	12 nm offshore is not specified within NEM: ICMA however It is specified in the Maritime ZoneAct. This can be referenced in the document for completeness.	This section was updated as per comment/s received.
5	5			Coastal Boundaries	1.3 The Coastal Area Explained in Page 16	Please include an additional reference for the upper limit being measured as a line 100 m above the upper extent of the River-Estuary Interface (REI).	This section was updated as per comment/s received. This has been removed because the EFZ is defined in the NBA 2018 and does not make specific reference to 100m from the REI. New sentence with reference to National Biodiversity Act (NBA) - (SANBI, 2019) added.
6	6			Coastal Access	2.4.1 Public Access (CMO 1) in page 20	The Coastal Access Bylaws should feature in section 2.4.1.	This section was updated as per comment/s received.

Count	Comment No	Name	Organization	Thematic area	Section Chapter	Comment	GRDM Response to Comment / Follow up Action
7	7			Coastal Access	2.4.1 Public Access (CMO 1) in Page 20	Knysna Municipalities was unable to pass their coastal bylaw to Council. The District Municipality needs to initiate the process of having an agreement with Local Municipalities where a need exists.	A draft agreement document, which stipulated the terms of agreement between the GRDM and Local Municipalities, has been drawn up by the GRDM.
8	8			Coastal Access	2.4.1 Public Access (CMO 1) in Page 20	Consider including Public Launch Sites in the box in this section and in the Annexure E.	The PLS list has been included (now Appendix 6)
9	9			Conservation	2.4.3 Biodiversity Protection, Conservation and Enhancement (CMO 3) in Page 21	The Provincial Coastal Management Programme recognises the importance Include the protection and management of Salt Marshes and Peatlands in CMO 3	This section was updated as per comment/s received.
10	10			Heritage	2.4.4 Heritage Resources (CMO 4) in page 20	Consider amending CMO 4 title to include heritage and cultural heritage resources.	This section was updated as per comment/s received. The section 2.4.4 heading changed to "Heritage and Cultural Resources". A heritage sub-section was also included under the Coastal Access section.
11	11			Water quality	2.4.6 Water Quality and Quantity (CMO 6) in Page 22; 2.4.10 Economic Development (Job Creation) in page 23	Consider requesting the DEA&DP Sustainable Water Resource Management Plan (SWMP) from DEA&DP Pollution and Chemical Management and try to find alignment with the SWMP	This section was updated as per comment/s received. Aligned with the Goals of the Western Cape Sustainable Water Resource Management Plan, 2018

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12	12			Gender and Human rights approach	2.4.10 Economic Development (Job Creation) in page 23	Indicate that economic development should benefit women, youth and the disabled who are the most vulnerable within society.	This section was updated as per comment/s received. The GRDM is supporting economic development opportunities that target the most vulnerable in society such as women, youth and the disabled. The prioritisation of a gender, youth and disability gap analysis was included under section 2.4.
13	13			Gender and Human rights approach	2.4.11 Tourism and Recreation (CMO 11) in page 23	Indicate that tourism and recreation opportunities should benefit women, youth and the disabled who are the most vulnerable within society.	This section was updated as per comment/s received.
14	14			Gender and Human rights approach	2.4.12 Sustainable Livelihoods (CMO 12) in page 23 2.4.13 Research (CMO 13) in Page 25	Indicate that sustainable livelihoods opportunities should benefit women, youth and the disabled who are the most vulnerable within society.	This section was updated as per comment/s received.
15	15			Research	2.4.13 Research (CMO 13) in Page 24	Indigenous knowledge is also important when conducting research. I would also encourage forming partnership with research institutions.	This section was updated as per comment/s received.
16	16			Gender and Human rights approach	3 Provincial and national implementation Alignment in Page 25	DEA&DP developed Gender and Human Rights Gap Analysis Report for the Provincial Coastal Management Programme recently and GRDM should indicate how they will advance women, youth and vulnerable groups empowerment here.	The MCC was aligned with the WC PCMP.

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17	17			Climate change	3.1 Climate Change and Coastal Management in Page 25	Include exploring the use of "active retreat mechanisms" to protect life and property against climate change impacts related to storm surges or mean sea level rise.	This section was updated as per comment/s received. Included the wording: “The Garden Route District Municipal Coastal Management Programme supports the Provincial Coastal Management by exploring the use of active retreat to protect life and property against climate change impacts relate to storm surges or mean sea level rise”.
18	18			Climate change	3.1 Climate Change and Coastal Management in Page 26	In Table 1 in terms of the Intensification of rainfall events, include a point on the increased pressure to artificially manipulate estuary mouths	This section was updated as per comment/s received. Point included under the column "Vulnerability Details”.
19	19			Climate change	3.1 Climate Change and Coastal Management in Page 27	DEA&DP are participating in Green Climate Fund Workshop/s in order to identify appropriate projects. Based on the interventions listed in Table 2, GRDM must engage with relevant institutions such as DEA&DP to develop these proposals.	This section was updated as per comment/s received. Relevant wording included in Table 2.

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20	20			Estuaries	3.1 Climate Change and Coastal Management in 27	Include “support the Responsible Management Authorities (RMA) to establish and implement appropriate Mouth Management Plans”.	This section was updated as per comment/s received. Relevant wording included under section 3.1.1.
21	21			Infrastructure	3.1.1 Implementing Actions Towards Coastal Climate Change Adaptation in Page 28 3.2.2 The Garden Route District Coastal Access Audit and Report in page 31 3.2.3 Approach of the Coastal Access Audit Page 34	Ensure that soft engineering approaches that are favoured over hard engineering solutions are aligned with the Estuarine Management Framework and Implementation Strategy (EMFIS) and Coastal Erosion Policy Document.	This section was updated as per comment/s received. Relevant wording included under section 3.1.1.
22	22			Editorial	3.3.2 Legislative Context of Coastal Access Page 41	Was finalised, no longer a draft. Final document are available on departmental website.	This section was updated as per comment/s received.
23	23			Coastal Access	3.3.4 Implementation Actions Guided by Coastal Management Lines in Page 41	Ensure that facilities for disabled persons comply with SANS 10400. The SANS 10400-S specifies everything that is required within a facility to meet the strict criteria to make it compliant in terms of the national building regulations for facilities for persons with disabilities.	This section was updated as per comment/s received. Included under 3.3.6: Recommended Coastal Access Implementation Actions.
24	24			Infrastructure	3.3.4 Implementation Actions Guided by Coastal Management Lines in Page 43	The construction of boardwalks and viewing platforms should be done in consultation with the Estuarine Management Framework and Implementation Strategy Activity Guidelines. Construction must follow the relevant permit application process to obtain appropriate approvals/ authorisations.	This section was updated as per comment/s received. Included under section 3.5.4:

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							Implementation Actions Guided by Coastal Management Lines. Additional wording also included: "to be aligned with the appropriate Disaster Risk Management plans."
25	25			Funding	3.3.4 Implementation Actions Guided by Coastal Management Lines in Page 43	Include exploring potential funding mechanisms for boardwalks with the DEA&DP e.g. Green Climate Fund Proposals.	This section was updated as per comment/s received. Included under section 3.5.4: Implementation Actions Guided by Coastal Management Lines.
26	26			Estuaries	3.4.3 The Development of Estuary Management Plans in Page 44	Please elaborate what is meant by “private sector”	This section was updated as per comment/s received. Additional wording included under section 3.6.2: Objectives of the National Estuarine Management Protocol
27	27			Coastal Access	3.3.6 Recommended Coastal Access Implementation Actions Page 49	Consider including a point on engagement between banks, property developers and insurance agencies.	This section was updated as per comment/s received. Additional wording included under section 3.3.6 Recommended Coastal Access Implementation Actions

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							Under section 3.6.2 also included the wording: “that the transfer of property includes the existing coastal access in the deed of sale”.
28	28			Estuaries	3.6.3 The Development of Estuary Management Plans, Page 61	Please note that this has changed with the National Estuarine Management Protocol 2021 amendments.	This section was updated as per comment/s received. Section 3.6.3 “The Development of Estuary Management Plans”
29	29			Editorial	3.6.4 Minimum Requirements for Estuarine Management Plans, Page 63	Departments have been renamed	
30	30			Estuaries	3.6.3 The Development of Estuary Management Plans, Page 63	Proposed there could be an action item - Supporting the development of EMPs in the Garden Route.	This section was updated as per comment/s received.
31	31			Estuaries	3.6.4 Minimum Requirements for Estuarine Management Plans Page 64	NEMP is now finalised, so this should be updated	This section was updated as per comment/s received.
32	32			Editorial	Issue 1.1 Location and condition of existing legal coastal access land in Page 66	Department of Environment, Forestry and Fisheries has been renamed.	This section was updated as per comment/s received.
33	33			Coastal Access	Issue 1.2 Additional coastal access land in Page 49	Please reflect (elaborate) on how you have confirmed support for the existing Coastal	The Garden Route District Municipality conducted stakeholder

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						Management Objectives or crafted new ones and reflect on any stakeholder engagements	engagements in 2022 – 2024 and found that the coastal management objectives are still relevant for the 2022 to 2027 period.
34	34			Coastal Access	Issue 1.2 Additional coastal access land in page 49	DEA&DP conducted coastal access audit for the Garden Route Region - was this action not included during the coastal access audit process	This section was updated as per comment/s received. Wording included "Assess the need for further updates to the Coastal Access Audit".
35	35			Coastal Access	Issue 1.2 Additional coastal access land in page 49	Include in the Coastal Management Objectives Table an activity (d) that Garden Route will support local municipalities in the development of Coastal Access Bylaws.	This section was updated as per comment/s received. Sub-section, point (f) included that the Garden Route District Municipality to support local municipalities in the development of Coastal Access By-laws.
36	36			Climate change	Issue 2.4 Protect sensitive coastal habitats. Page 81	Include in the Coastal Management Objectives Table an activity (L) GRDM to consult with Western Cape DEA&DP to determine the use of active retreat for properties along CPP.	This section was updated as per comment/s received. Sub-section, point (l) included that the Garden Route District Municipality to consult with Western Cape DEA&DP to determine the use of active retreat

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							for properties along CPP.
37	37			Coastal Access	Issue 1.5 Illegal coastal access land. Page 70	Licensing of launch sites no longer applies. Public Launch Sites need to be listed/registered as per the PLS Regulations.	This section was updated as per comment/s received. Issue 1.5 was amended.
38	38			Infrastructure	Issue 2.1 Limit infrastructure development for coastal access land to designated coastal access land. Page 72	The Coastal Management Lines and Coastal Protection Zone will be considered during the maintenance and upgrade of existing infrastructure along the coastal zone.	This section was updated as per comment/s received. Wording included under point (c): "The Coastal Management Lines and Coastal Protection Zone will be considered during the maintenance and upgrade of existing infrastructure along the coastal zone".
39	39			Land use planning	Issue 2.2 Limit development in the coastal zone through land use planning and decision-making processes in Page 72.	In Issue 2.2 (a) Include and ensure that the Coastal Management Lines are reflected within reviewed / updated Municipal Spatial Development Frameworks	This section was updated as per comment/s received. Wording included under Issue 2.2, point (a): "Review Municipal Spatial Development Frameworks and ensure that Coastal Management Lines and delineation of urban edge are included".

Count	Comment No	Name	Organization	Thematic area	Section Chapter	Comment	GRDM Response to Comment / Follow up Action
40	40			Coastal Boundaries	Issue 2.2 (b) in Page 73	In Issue 2.2 (b) no 6 Include all development applications along the coastal zone must consider Coastal Management Lines and Coastal Protection Zone.	This section was updated as per comment/s received. Wording included under Issue 2.2, point (b), no 6: “All development applications along the coastal zone must consider Coastal Management Lines and Coastal Protection Zone”.
41	41			Coastal Protection	Issue 2.3. Protect property against natural disasters and climate change affects in page 55	Include the rehabilitation of seagrasses	This section was updated as per comment/s received. Wording included under Issue 2.3, point (a): “Prevention should also include the protection and rehabilitation of natural defence systems, such as primary dunes, littoral vegetation, salt marshes, wetlands, floodplains and seagrasses”.
42	42			Gender and Human rights approach	Issue 2.3. Protect property against natural disasters and climate change affects in page 55	The rehabilitation of natural defences will lead to work creation, or employment opportunities therefore consider adding performance FTE indicators such as number of women, youth, disabled that are employed and these should be reported to the Department of Environmental Affairs and Development Planning.	A gap analysis will be done by the GRDM.

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43	43			Coastal Boundaries	Issue 2.3. Protect property against natural disasters and climate change affects in page 55 Issue 2.3. Protect property against natural disasters and climate change affects in page 56	The determination of flood lines can be undertaken by private sector in the absence of this information in the public sector. Ideally, the authorities should undertake this work. In light of this comment the Garden Route District may consider engaging with DEA&DP during Green Climate Fund Proposal Workshop to feature the development of the flood line assessments.	Section was updated.
44	44			Editorial	Issue 2.3. Protect property against natural disasters and climate change affects in page 56 Issue 2.4. Protect sensitive coastal habitats in page 56	The performance indicator should be revised to remove 2014/15 financial year. Reflect the wording Coastal Management Lines.	Section was updated.
45	45			Coastal Boundaries	Issue 2.4. Protect sensitive coastal habitats in page 58 Issue 2.4. Protect sensitive coastal habitats in Page 58	Remove the establishment of the Coastal Protection Zone because it has already been determined. Required to be incorporated in the relevant SDFs.	Section was updated.
46	46			Coastal Boundaries	Issue 2.4. Protect sensitive coastal habitats in page 58 Issue 2.4. Protect sensitive coastal habitats in Page 58	Under the mandate column, remove wording and replace with suggestion	Section was updated.
47	47			Conservation	Issue 2.4. Protect sensitive coastal habitats in Page 59	Include the development of funding proposals for international donors to protect sensitive coastal environments e.g. GCF Proposal Workshop	Section was updated.

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48	48			Conservation	Issue 2.4. Protect sensitive coastal habitats in Page 59	Include the declaration of Protected Environments within sensitive coastal environments.	Section was updated.
49	49			Editorial	Issue 3.1 Estuary management in Page 64	Remove "Draft"	Removed
50	50			Estuaries	Issue 3.1 Estuary management in Page 64	Develop in collaboration with the RMA	Section was updated.
51	51			Editorial	Issue 3.1 Estuary management in Page 64	Check the reference related to appendix 4.	Reference checked and corrected.
52	52			Editorial	Issue 3.2 Alien vegetation removal in Page 65	CoastCare was replaced by Working for the Coast.	Done
53	53			Reporting+D59:Q59	Issue 3.2 Alien vegetation removal in Page 65 In issue 3.2 in point (a “Collection of gender disaggregated data for Working for Programmes implemented by the municipality. “	In cases where the municipality is the implementing agent for Working for Programmes, please record the number of vulnerable groups (women, youth, disabled etc.) that work in these programmes and submit the data to DEA&DP as part of the collection of gender disaggregated data	Section was updated.
54	54			Gender and Human rights approach	Issue 3.3 Restoration and rehabilitation of biodiversity in Page 66	Include a performance indicator on the collection of data on the number of women, youth and disabled that form part of planting projects.	Section was updated.

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55	55			Gender and Human rights approach	Issue 3.6 Pollution control and coastal clean-up strategies in Page 68	If the coastal clean-up strategy includes using EPWP or lead to job creation please ensure that GRDM records the number of women, youth and the disabled that form part of the project.	Section was updated.
56	56			Fire management	Issue 3.8 Fire management in Page 70	Please include in the narrative of the CMP the importance of fire management in terms of coastal management. Fires have the potential to increase erosion and siltation in and around estuaries, and also has the potential to destroy coastal vegetation, put people at risk and affect tourism economies.	Section was updated.
57	57			Conservation	Issue 3.10 Protection of fish species and marine habitats Page 71	Please consider noting somewhere within the narrative of the document that the management of Marine Protected Areas should be done in close consultation with small scale fishers and NGOs such as Masifundise and PLAAS.	Protected Areas Advisory Committee (PAAC) and NRUGs referenced.
58	58			Editorial	Issue 3.10 Protection of fish species and marine habitats in Page 71	Replace DEA and DAFF with the Department of Forestry, Fisheries and Environment (DFFE) In Issue 3.10 under point (a) and (b) include DFFE	Done
59	59			Air quality	Issue 3.11 Air quality management in Page 72	Consider including the importance of air quality management in terms of coastal management. Indicate that air quality management plays an important role in creating a safe coastal environment. Fish factories at harbours can cause air quality issues for coastal communities.	Section was updated.

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60	60			Editorial	Issue 4.1 Heritage resources in the Garden Route coastal zone need to be managed, protected and shared by all in Page 73	Replace EDM with GRDM	Done
61	61			Editorial	Issue 4.1 Heritage resources in the Garden Route coastal zone need to be managed, protected and shared by all in Page 73	Replace EDM with GRDM	Done
62	62			Editorial	Issue 4.1 Heritage resources in the Garden Route coastal zone need to be managed, protected and shared by all in Page 73	Replace EDM with GRDM	Section was updated.
63	63			Editorial	Issue 4.1 Heritage resources in the Garden Route coastal zone need to be managed, protected and shared by all in Page 73	Replace EDM with GRDM	Section was updated.
64	64			Editorial	Issue 4.1 Heritage resources in the Garden Route coastal zone need to be managed, protected and shared by all in Page 74	Replace EDM with GRDM	Done

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65	65			Editorial	Issue 5.2 Estuary breaching protocols must ensure human safety, protection of property and infrastructure and the maintenance of ecosystem functioning in page 76	Please check the correct terminology, rather refer to Mouth Management Plans instead of Protocol.	Done
66	66			Estuaries	Issue 5.2 Estuary breaching protocols must ensure human safety, protection of property and infrastructure and the maintenance of ecosystem functioning in Page 76	Consider including Klein Brak estuary.	Wording of 5.2 (b) edited to read "Co-ordination of relevant authorities to implement estuary mouth maintenance management plans." Mandate column updated to reflect "Municipalities, SANParks, CapeNature, DEA&DP, DWS and DFFE." Timeframe adjusted to indicate "Ongoing."
67	67			Awareness	Issue 5.4 Awareness amongst recreational users of dangers associated with the sea in page 76	Consider including the erection of signboards that prohibit individuals from trampling on salt marshes, seagrasses and seabeds and peatlands. Issue	Section was updated.
68	68			Water quality	Issue 6.1 Pollution of water sources (estuary and marine). In Page 78	Consider adding the Sustainable Water Management Plan to the narrative as an important policy informant	Section was updated.

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69	69			Water quality	Issue 6.1 Pollution of water sources (estuary and marine). In Page 78	Please be specific in terms of the departments that will allocate the budget to control wastewater discharge and stormwater run-off into estuaries, wetlands and coastal waters.	Section was updated.
70	70			Water quality	Issue 6.1 Pollution of water sources (estuary and marine) in Page 79	Indicate that GRDM will monitor water quality in terms of recreational use	Section was updated, and indicated “according to financial resources”: and “the collaboration of DWS and SANParks”.
71	71			Water quality	Issue 6.1 Pollution of water sources (estuary and marine). In Page 79	The municipality can still contribute towards the improvement of water quality resources by elevating water quality concerns from local Water Users Association and local communities to Department of Water and Sanitation (DWS) and encourage DWS to report on monitoring actions within the Garden Route District Municipal Coastal Committee.	Section was updated.
72	72			Editorial	Issue 6.3 Estuaries being deprived of freshwater due to abstraction of groundwater from fountains/springs (Stil Bay) or boreholes, abstraction of water directly from rivers and construction of dams that reduce base flows in Page 80	Replace Stil Bay with Stilbaai.	Section was updated.

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73	73			Editorial	Issue 7.1 Implementation of the CMP in Page 81	The committee has been established already consider rewording the action	Section was updated.
74	74			Governance	Issue 7.1 Implementation of the CMP in Page 81	Include an action on participating within the Western Cape Provincial Coastal Committee	Section was updated.
75	75			Editorial	Issue 7.1 Implementation of the CMP in Page 81	Should be changed to Nina Viljoen or GRDM official.	Section was updated.
76	76			Governance	Issue 7.2 Interaction between organs of state (cooperative governance) in Page 81	Consider including coastal access as an example	Section was updated.
77	77			Compliance & Enforcement	Table CMO 8 - in Page 86	Include adding Issue 8.7 that focus on Capacity Building in terms of Enforcement. GRDM can encourage GRDM environmental management officials to attend the Environmental Management Inspector Training and to be designated in terms of NEM: ICMA. GRDM officials can also participate within District Level EMI Workshops or EMI Lekogtla's where they can get additional capacity.	Section was updated.
78	78			Gender and Human rights approach	Issue 9.1 Create awareness of coastal management issues and solutions in Page 87	Include a performance indicator on conducting a post-education event survey to record the number of women, youth and disabled that participate within these coastal education and awareness projects) including their satisfaction and review of the impact of the event.	Section was updated.

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79	79			Awareness	Issue 9.1 Create awareness of coastal management issues and solutions in Page 87	Please update	Done - GRDM to promote awareness initiatives, and support the LM's, with additional support from DFFE: LGS.
80	80			Awareness	Issue 9.1 Create awareness of coastal management issues and solutions. In Page 88	DEA&DP implements coastal clean-up days in September and October every year. Please consider including DEA&DP as a partner here.	Section was updated.
81	81			Editorial	Issue 9.1 Create awareness of coastal management issues and solutions. In Page 88	Address the typographical error within action point (e)	Corrected
82	82			Awareness	Issue 9.2 Education of public prior to issuing of recreational fishing licenses. In Page 89	Consider rewording and state what action GRDM will undertake, for example: GRDM could elevate the request of recreational fishers to receive training on the MLRA to National DFFE via the MCC.	Section was updated.
83	83			Gender and Human rights approach	Issue 10.1 Promote private sector investment in Page 90	The investment strategy must have a commitment to empower women, youth and disabled.	The GRDM will investigate the undertaking of a gender, youth and disability gap analysis
84	84			Editorial	Issue 10.1 Promote private sector investment in Page 90	Replace EDM with GRDM	Done
85	85			Editorial	Issue 10.2 Mariculture opportunities and development of Stilbaai harbor in	Replace EDM with GRDM and replace DEA with DFFE	Done

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					Page 90		
86	86			Coastal Access	Issue 11.1 Additional and maintained coastal access to stimulate tourism in Page 92	Consider including a point that speaks to the draft coastal access bylaws that have been developed by DEA&DP and that can be used by municipalities to enable coastal access. Also consider including an action wrt setting up agreements between DM and LM ito coastal access function.	Agreed. GRDM working on draft agreement that will be used to enable agreements between GRDM and LMs.
87	87			Coastal Access	Issue 11.1 Additional and maintained coastal access to stimulate tourism in page 93	Please note updated legislation and replace boat launching sites with public launch Sites. Further reference the operational plans for all listed sites, as per the Public Launch Site Regulations.	Section was updated.
88	88			Coastal Access	Issue 11.1 Additional and maintained coastal access to stimulate tourism in Page 92	Please update your legislation column- Application process no longer applies; all Public Launch Sites need to be listed/registered.	Section was updated.
89	89			Gender and Human rights approach	Issue 11.2 Provide recreational activities within the coastal zone in Page 94	Ensure that Local Economic Development Projects prioritise women, youth and the disabled.	Section was updated.
90	90			Blue flag beaches	Issue 11.4 Blue flag beach and marina programme in Page 95	Note the following Blue Flag status. https://wessa.org.za/wpcontent/uploads/2021/10/WESSABlue-Flag-sites_2021_22.pdf	Agreed/Done. GRDM to support only - LM's to implement
91	91			Gender and Human rights approach	Issue 11.5 Safety and security in Page 96	Monitor and report the number of women and youth that are lifeguards and are deployed by the Garden Route DM. Requested to share the data with the Department of Environmental Affairs and Development Planning.	Agree / Done. LM's to report to the GRDM the number of women and youth that are lifeguards in the

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							district, which in turn will report to DEA&DP.
92	92			Coastal Access	Issue 11.8 Access to harbours in Page 97	Consider engagement with Department of Public Works and Infrastructure and Ports Authority to consider feasibility of providing access at specified harbours	Section was updated. GRDM in collaboration with the LMs and the communities that are requesting that specific access.
93	93			Coastal Access	Issue 11.11 Allocation of launching rites for fishing jet-skis in Page 99	Perhaps specify "beach launch sites" since personal watercraft (jet ski) are not allowed within estuarine waters without a permit in accordance with the Provincial Ordinance.	Section was updated.
94	94			Editorial	Issue 12.1 Existing activities need to be controlled and additional opportunities explored in Page 100	DAFF is now DFFE.	Done
95	95			Coastal Access	Issue 12.2 Access to launch sites for commercial fishermen (Mossel Bay).in Page 100	Please refer to the Public Launch site Regulations for the definition of the private launch site. If this site is used by the public, then it is advised that the Mossel Bay Municipality should consider requesting for the launch site to be listed as PLS. In terms of ICMA, no launch fees may be charged to access the coast, only the National Minister may charge fees.	Section was updated. (If this site is used by the public, then it is advised that the Mossel Bay Municipality should consider requesting for the launch site to be listed as PLS. In terms of ICMA, no launch fees may be charged to access the coast, only the National Minister may charge fees).

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96	96			Editorial	Issue 12.2 Access to launch sites for commercial fishermen (Mossel Bay). On page 100.	Note that Warren Manuel is no longer in the Environmental section. Resist specifying people, rather use appropriate organisation or unit or designation	Section was updated.
97	97			Gender and Human rights approach	Issue 13.2 Nonconsumptive use within the coastal zone in Page 101	Motivate for this assessment to determine the number of women, youth and disabled participation within the marine and tourism sector.	Section was updated.
98	98			Reporting	4.1 The Monitoring of Implementation Actions in Page 102	With regards to monitoring the implementation of the District CMP it would be advisable if some reporting structure could be included in terms of the District CMP implementation, possibly similar to what the DEA&DP produces to report on the provincial CMP.	Section was updated. MCC, PCC and NCC will be the vehicles for reporting on the implementation of the MCMP.
99	99			Editorial	4.1.3 Garden Route District Municipal Coastal Committee in page 103 to 104	Please update, in some of the institutions there has been name changes.	Section was updated.
100	100			Editorial		Editorial comments and suggestions	All editorial suggestions / changes done as per comment/s received
101	101			Conservation	General	There needs to be more direct engagement from the various municipalities involved in the process to enable conservation entities to interact with the municipality with regards to implementing MPA's and other conservation initiatives that are of value to the area and that are in line with the Garden Route District Coastal Management Programme's vision and objectives as outlined in the documents (i.e. research, climate change mitigation, protection of natural resources, biodiversity protection and	Section was updated. The GREF, PAACs IDP engagements, Biosphere Reserve platform and MCCs are established forums are in place and includes conservation discussion. A specific point on the Agenda can be included going forward. Conservancies

Count	Comment No	Name	Organization	Thematic area	Section Chapter	Comment	GRDM Response to Comment / Follow up Action
						enhancement and protection of natural heritage features).	could organize themselves, or on the own, engage through these forums mentioned above. District and LM to finalise the Bylaw and institutional arrangements to facilitate the designation of coastal access (S18 of ICMA). DFFE has established a Coastal Access Task Team for the region. GRDM to engage with the DFFE task team dealing with the facilitation of coastal access matters in the region. DEA&DP, GRDM and LM to participate n the task team. Relevant parties will be included in the discussions of the task team. This will asssist with the way forward for the issues described here (e.g. Pacaltsdorp

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102	1	Conservancy Representative	Kai Tikquoa Conservancy	Conservation	General General	When a coastal property is mandated against development (i.e. when the official paperwork, ROD, zoning and business practices that are implemented on the property is set up in such a way that the property cannot be developed and will always be earmarked for conservation) then the Garden Route District Coastal Management Programme needs to take this into account.	GREF, PAACs IDP engagements, Biosphere Reserve platform and MCCs are established forums in place and includes conservation discussion. A section on the differentiation between conservation areas was also inserted in the CMP.
103	2			Conservation		The same principles that will be applied to coastal developments and other open coastal spaces cannot be applied to properties that are specifically mandated for conservation.	Agreed, for formally protected areas Landowners are encouraged to ensure some form of formal conservation protected status on their properties. Different levels of conservations status afford different levels of protection.
104	3			Coastal Access		Where private conservation properties are surrounded by government, provincial or state-owned land with the same characteristics, the Garden Route District Coastal Management Programme and any coastal access being implemented should first be focussed and facilitated on the land surrounding the conservation areas, especially in cases where no one is being disadvantaged or discriminated against by doing so.	District and LM to finalise the Bylaw and institutional arrangements to facilitate the designation of coastal access (S18 of ICMA). DFFE has established a Coastal Access Task Team for the region. GRDM to engage with the DFFE task team dealing with the

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							facilitation of coastal access matters in the region. DEA&DP, GRDM and LM to participate In the task team. Relevant parties will be included in the discussions of the task team. This will assist with the way forward for the issues described here (e.g. Pacaltsdorp matter).
105	4			Conservation		The government and municipalities need to take into account the length of time that valid conservation efforts have been implemented on a coastal private property when implementing the Garden Route District Coastal Management Programme. If a property has been implementing self-funded conservation initiatives for 20 - 30 years; if these self-funded conservation initiatives do not disadvantage anyone; if these conservation areas fall within Critical Biodiversity Areas; and if these conservation areas play a vital role with regards to biodiversity and coastal heritage protection within the broader area, then these conservation areas should be empowered to continue to implement these vitally important conservation activities. The implementation of the Garden Route District Coastal Management Programme cannot hinder or prevent these longstanding self-funded conservation efforts from continuing.	Agreed.

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106	5			Coastal Access		Coastal access should not be enforced in areas where it is not practical or in areas where it will cause damage to natural heritage, endangered vegetation types and sensitive geology. In Such cases, the municipality should promote and empower these conservation areas to continue to conserve and protect the environment for future generations.	Section was updated. CMO1 includes high value conservation areas.
107	6			Conservation		It is important that the government and state entities acknowledge the true importance and value of the private conservation initiatives that are located within each town. If a coastal Conservation property owner is assisting the municipality (i.e. by removing invasive plants and replanting indigenous vegetation at their own cost outside their boundaries on government-owned CBA's, assisting with cleaning vital river systems, and refuse removal along coastal stretches and greenspaces) then this needs to be valued and taken into account. Certain privately-owned coastal properties actually play a vital role in assisting the municipality with biodiversity and coastal protection and this needs to be acknowledged.	Agreed, Private conservation efforts are valued. These arrangements should be captured in agreements with the relevant municipalities. These efforts should be highlighted through the above-mentioned platforms.

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108	7			Conservation		Private conservation bodies have a legal constitutional right to protect the environment and there are a myriad of laws, acts and policies that protect these private properties and landowners. The government and municipalities, under the NEMA Act, have an obligation to implement policies that do not go against or hinder these conservation entities and areas from fulfilling their mandate. This should be acknowledged when implementing the Garden Route District Coastal Management Programme throughout the Western Cape.	GRDM is aware of the contributions to conservation by private efforts/conservancies and these are valued. GRDM CMP includes conservation initiatives by private individuals/conservancies. CMP is in alignment with all relevant legislation and principles.
109	8			Conservation		In cases where privately-owned coastal properties have the appropriate documentation in place to prove the conservation value of the property, such as: specialist environmental reports done over 20 - 30 years; scientific reports done by reputable international and national scientists; and research reports done by accredited institutions, entities and individuals, then the implementation of the Garden Route District Coastal Management Programme is subject to this documentation and cannot override or be regarded as superior to the existing conservation value and status of the private property.	The CMP guides integrated coastal management. It encourages positive conservation action. Private individuals to consider securing formal conservation status to the level of protection they desire. .
110	9			Coastal Access		It must be noted that over the past two years senior municipal officials representing the George Municipality who are appointed in key environmental positions have misused their authority to illegally demand public access over the Kai Tikquoa Conservation private property to coastal areas where no public access can be granted. These actions were politically motivated and there was a blatant refusal from the officials to engage	Noted. A formal process will be followed in order to engage with the landowner and the public seeking access to the coast, in terms of the ICMA and relevant coastal access bylaws.

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						with the owners of the property during the process. These illegal actions had an immense negative impact on the long standing self-funded conservation initiatives which have been implemented on the property over the past 34 years.	
111	10			Conservation		Kai Tikquoa Conservancy has appointed a team of specialist environmental lawyers with international merit to ensure that all actions undertaken on the property, including the actions of the George Municipality and government entities during the implementation of the new Garden Route District Coastal Management Programme, are done within the legal framework of South Africa. The protection and preservation of Kai Tikquoa Conservancy and its coastline is of utmost importance, and we are positive that the government entities responsible for the implementation of the Garden Route District Coastal Management Programme will be open to positive engagement going forward to the benefit of the environment.	Noted. CMP seeks to ensure cooperative and integrated management of the coastal zone for the benefit of all of society.
112	11			Dune management		My main comment is that I would like to see more specific mention of dune management plans, particularly for urban areas where coastal dunes have often been degraded, are under threat by developments, or pose a threat to existing developments. In a formal dune maintenance and management plan a number of listed activities are authorised for the duration of the approved plan; management actions include measures to address the effects of climate change, as well as dealing with access to the coast. These plans have proved to be an effective management mechanism for several dune systems in Hessequa Local Municipality, e.g.	Reference to maintenance management plans was included in the Section 3.3.1 dealing with Climate change

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						at Witsand and in Stilbaai; additional dune management plans for Stilbaai and Gouritsriviermond, as well as updating existing plans in Stilbaai and Witsand, were recently submitted to DEA&DP for authorisation.	
113	1	Environmental Specialist	Environmental Specialist, Stilbaai	Dune management	Chapter 4	I acknowledge that in Chapter 4: Garden Route Coastal Management Action Plan under several of the issues discussed, the development of a dune management plan is implied. However, just as there is emphasis on the development of Estuary Management Plans, I suggest that more specific mention of dune management plans could be included in several of the issues listed in this chapter, in particular those dealing with Climate Change, Access to the Coast, Recreation areas, Critical Biodiversity Areas, and Spatial Planning and Development Processes.	Reference to maintenance management plans was included in the Section 3.3.1 dealing with Climate change
114	2			Editorial		Editorial comments and suggestions	All editorial suggestions / changes done as per comment/s received
115	3			Monitoring	COMMENT 1: USE OF THE TERM 'ADAPTIVE' COASTAL MANAGEMENT	The use of the word adaptive in 'Adaptive coastal management for a future of sustainability, prosperity, awareness, responsibility, equality, natural beauty and abundance' is important. Notwithstanding the various definitions of coastal adaptation and or adaptation in general, in the literature, adaptation in the realm of coastal management, to be successful, needs to act off of something, and also, it needs to act to a certain extent. This something and the extents need to be known.	Section was updated. Thank you for the guidance.

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						No mention is made of monitoring programs directed at understanding the changes in the physical aspects of beaches. This information will provide support to the extremely important and publicly sensitive debate around impact of climate change and global mean sea level rise, on the region's local beaches, at a relatively low cost. Monitoring programs can provide extensive information to understand both what is changing, and the extent to which it is changing. To this end, monitoring programs should form an integral part of the GRDM coastal management plan, in so far as the information gathered can be used to understand what is changing, and the extent of the changes, so that the GRDM can in fact adapt to it. In this way the municipality can not only adapt to the changes in the beaches, but also adapt before it is too late.	
116	1	Private resident		Climate change	COMMENT 2: IPCC REPORT AND OTHER CLIMATE INDUCED COASTAL IMPACT STUDIES (Chapter 4, AR6)	Quite surprisingly in the GRDM CMP 2022 Draft, there is no mention of the IPCC (International Panel of Climate Change) reports, nor their findings. Engineering professionals adopt these findings in the design of most (if not all) coastal related infrastructure (ports, beaches, coastal structures etc), they are therefore extremely relevant to the coastal adaptation field. Some of the extensive findings of the IPCC reports (Chapter 4, AR6), or those finding quite by others, are summarised here: Global mean sea level (GMSL) is rising (virtually certain) and accelerating (high confidence) Sea level rise scenarios are predicted / estimated of between 20cm to 1.0m by the year 2100. Risk related to SLR (including erosion, flooding and salinisation) is expected to significantly increase by the end of this century along all low-lying coasts	Section was updated. Thank you for the guidance.

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						in the absence of major additional adaptation efforts. Choosing and implementing responses to SLR presents society with profound governance challenges and difficult social choices, which are inherently political and value laden (high confidence). Local impacts of GMSL on local coastlines are varied and somewhat uncertain. The uncertainty mentioned in the last bullet is, rather than a cause for relief and non-action, as may be the case, is in fact a cause for concern. Municipalities are bound to know what these impacts and changes on local beaches and coastlines are so that they can adapt to them, knowledge and understanding is key. In addition to these impacts by IPCC, other impacts have been identified by other authors in other reports as: Doubling of coastal flooding under SLR changes off 'only' 10-20cm increases in GMSL. Changes in direction waves leading to increased beach erosion rates, Changes in wave heights and wave periods, resulting in more severe storm activity, and possible increased erosion of beaches. Undoubtedly, further scientific investigation and research is needed before a full understanding of the impact on beaches is understood, and indeed this research is underway. It will however take time to understand these impacts.	

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117	2			Climate change		The impact of these changes aspects identified by IPCC, and others, are not negligible, and will result in the following, with varying risk levels: · Potential rotation of beaches · Potential for horizontal relocations of high and low water marks, landwards in some instances and seawards in others (combinations of beach rotation and erosion). Movement of HWM and LWM would move more established, and perhaps more relevant to infrastructure buffers such as Coastal Protection Zones, where more extensive and diverse infrastructure types are located. · Coastal Protected areas may, or may not, lose biodiversity and / or habitat under these beach changes. · Risk on homeowners in terms of damaged personal property and infrastructure. · Potential legal aspects with regards to the potential landwards relocation of the seashore (which is, as per South Africa's Seashore Act, owned by the Governor General, or Government, or the Republic of RSA), and the impact of it overlying properties owned by individual members of the public (individual coastal property homeowners).	Section was updated. Thank you for the guidance.

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118	1	Representative: Pacaltsdorp Fishers Community Letter dated 05 August 2022	Representative of the Fishers Community (Pacaltsdorp)	Coastal Access	General	I have become aware about the restrictions that small scale / subsistence fisherfolk face in accessing fishing spots along the Pacaltsdorp coast. These restrictions are based on the development of private properties along this coast. I doubt whether property development – including coastal management authorities - considered the right of access – including traditional or common practices - to coastal / fishing areas in land and property development programmes.	Response provided via email to Mr Fredricks on 11 August 2022: Thank you so much for your Letter and bringing the coastal access challenges along the Pacaltsdorp coastline to our attention. The Garden Route District Municipality appreciates your valued inputs regarding the challenges that are being faced by the fisherfolk when it comes to coastal access. The Municipality is committed to investigate these challenges, and to find possible solutions to these issues.
119	2			Coastal Access	General section 56(1)(a)(i)	There are consistent reports of fisherfolk that are being threated and intimidated by private landowners. A case of assault had been opened against one of the landowners and is currently being investigated. A group of fishermen complained that they have to pay access fees to fishing spots.	Thank you for raising this matter. Threats of violence or acts of violence are never condoned. The correct action was taken by opening up a criminal case against the alleged aggressor. Please note that no fees should be charged for accessing coastal public property (NEM: ICMA).

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120	3			Coastal Access	General	I am sure that the George Municipality is aware about this continued deprivation and discrimination. There is a strong race element as landowners are generally white and fisherfolk - that are being affected – Coloured. [Race remains a divider in South Africa, despite a desire among many South Africans to move on from the legacy of Apartheid. High levels of inequality, especially rooted in historical injustice, are difficult for societies to bear, providing a basis for conflict (World Bank Group, 2018).] South Africa belongs to all its citizens. There are a range of legislative frameworks our democracy crafted to rid those that had been deprived from suppressive and discriminatory practices, ensuring all citizens have equal access to resources. It cannot be that the development of private property prohibits the poor from access to food sources (including recreation). I believe that your institution has a mandate and function to promote and implement transformative measures that does not deprive and discriminate against those that are powerless. You cannot look the other way.	The GRDM is committed to supporting free and equitable coastal access within the district. It is for this reason that the Garden Route District Coastal Access Task Team has been established. This is a collaborative Task Team consisting of key government authorities, stakeholders and the fishers' communities. Through this Task Team complaints about coastal access restrictions and unfair access practices can be investigated and addressed.
121	4			Coastal Access	General	Given the realities of these poor fisherfolk – lack of access to information, isolation, time constraints as they have to prioritize on getting food on the table of their families as well as a reliance of fish as a food source – I hereby request an extension / opportunity to fisherfolk to submit their concerns and proposals in relation the opportunity created by the Garden Route District Coastal Management process. I believe the George Municipality participate in this process. The fisherfolk were not aware of this process and	Response provided via email to Mr Fredricks on 11 August 2022: Please receive the revised Notice of extension of the public participation process to request comments on the Garden Route District Coastal Management

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						therefore missed the deadline for submission. This process is however essential for transformation and ensuring a viable means for securing food access to the poor and vulnerable.	Programme. The new due date for submissions of comments is the 20th of August 2022. Another commenting opportunity was provided between the 14th of March 2024 to the 14th of April 2024. The Municipality will appreciate and welcome any comments from the fisherfolk and other stakeholders. Any comments, complaints, inputs or enquiries regarding the Coastal Management Programme, and the coastal access function specifically, will be welcome. The GRDM will be looking at reassessing the Garden Route District Coastal Management Programme to include improved coastal access measures and processes.

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122	5			Coastal Access	General	Do take note of the following: “49. Contents of municipal coastal management programmes(2) A municipal coastal management programme must- (a) a vision for the management of the coastal zone within the jurisdiction of the municipality, including the sustainable use of coastal resources; (c) priorities and strategies - (iii) to address the high percentage of vacant plots and the low occupancy levels of residential dwellings; (iv) to equitably designate zones as contemplated in section 56(1)(a)(i) for the purposes of mixed cost housing and taking into account the needs of previously disadvantaged individuals; (v) to address coastal erosion and accretion; and (d) performance indicators to measure progress with the achievement of those objectives.”	The GRDM took note of your reminder of the list of contents that municipal coastal management programmes must cover, and we have already set up the draft revised document to cover these aspects.
123	1	George and Mossel Bay Fishers Community, 1st Submission Comments. Dated 8 April 2024		Coastal Access	Section 3.3	1) “In the case of coastal access routes of a historic nature and with cultural links, the provision of coastal access is especially important as these routes usually provides a means of food security for subsistence fishermen, allowing them to put food on the table for their families. These access routes must therefore be protected and maintained as high-priority areas” (p. 38). **Comment:** We note the differentiation between subsistence and recreation fishers. We however should be able to also recognise recreation fishers from the historically disadvantaged communities.	According to the NEM: ICMA, and as mentioned on page 38 of the CMP, “The Garden Route District Municipality confirms that reasonable and equitable access to the coastal public property for all must be recognized as a basic human right…” So this would therefore also include both subsistence and recreational fishers. As long as they comply

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							with the relevant fishing and bait regulations, such as catch quotas, size limits, etc.
124	2			Coastal Access	Section 3.3	3) “A core focus of the Garden Route district is therefore to ensure equitable access for all by ensuring ease of access to its coastline, whilst also ensuring that this access is regulated, organized and controlled in a manner that does not detract from; or negatively impact on; the coastal environment” (p. 39). “There is however still a wide tendency of private residents, communities, and tourism facilities such as hotels, etc., to inhibit or deny equitable access for all to some coastal areas along the coastline” (p. 38) **Comment:** There are also gated villages, golf courses, conservation areas to be considered.	Please note that a paragraph or two will be included under this section on the distinction of various types of conservation areas, (e.g., declared CapeNature areas, conservancies and private nature reserve areas) and how they relate to the designation of coastal access land.
125	3			Coastal Access		4) “A municipality may administer its Coastal Management Programme, and may make By-laws to provide for the implementation, administration and enforcement of the Coastal Management Programme” (p. 15). **Comment:** Based on the input by stakeholders at one of our events, we propose municipalities to administer coastal management and develop By-laws in this regard - given the existing gaps and limitations.	Noted and agreed, thank you. Draft generic Coastal Access By-laws has already been developed by DEA&DP, and is ready for Municipalities to adopt them and make it their own.

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126	4			Coastal Access		7) "A municipality may administer its Coastal Management Programme, and may make by-laws to provide for the implementation, administration and enforcement of the Coastal Management Programme" (p. 15) **Comment:** We note the wording "may". The need was articulated by all stakeholders for Category-B municipalities to establish By-laws in relation to coastal access.	Addressed under point 3 above.
127	5			Coastal Access		8) "Spatial Planning and Land Use Management Bill (once promulgated)" (p. 17). **Comment:** SPLUMA is currently an Act. It was enacted by The President of South Africa and signed into law on 5 August 2013. Its effective date was 1 July 2015. We are not convinced that this law had been adhered to given the legacies observed in spatial planning. We do not see any evidence.	As per the wording on page 49 of the CMP, "The updated Garden Route Coastal Access Audit reports of the Western Cape's Department of Environmental Affairs and Development Planning must be used to inform the development and/or review of Municipal Spatial Development Frameworks, to comply with Section 21(j) of the Spatial Planning and Land Use Management Act, 2013 (Act No 16 of 2013) ("SPLUMA") pertaining to coastal access strips, as well as to inform the development and/or reviews of the Municipal Integrated Development Plans ("IDPs").

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128	6			Coastal Access		9) “Heritage and cultural heritage resources refers to any place or object of cultural significance to present communities and for future generations and are considered to be a part of the National Estate (NHR Act – Chapter 1, Section 3). The diverse heritage resources of the Garden Route Municipal area therefore need to be recognized, protected and shared with all its people and visitors” (p. 25). **Comment:** Had these sites / routes / areas been documented / registered – provide references? Are these being recognized and reflected in formal documents?	For any heritage related information such as registered heritage sites, routes or areas, or any documents containing this information, the Heritage Western Cape can be approached, Tel.:021 483 9729, Web: https://www.hwc.org.za/ The GRDM will also investigate whether any of the coastal access routes within the Garden Route District has been registered with the Heritage Western Cape.
129	7			Coastal Access		10) A public awareness had been conducted during the month of December 2023, targeting local fishers. **Comment:** Despite us requesting more information, dates, venues, etc. there had not been any response and cooperation in this respect. This was an opportunity missed as our fishers, who participate in the Garden Route Coastal Management Programme, were not involved.	Another public participation period was provided to the Interested and Affected Parties between the 14th of March 2024 to the 14th of April 2024. The GRDM has received the George and Mossel Bay fishers’ communities’ 2nd submission of comments.

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130	8			Coastal Access		11) **Excerpt from CMP:** "All management interventions need to be informed through scientific research and indigenous knowledge. The Garden Route District Municipality and local Municipalities within its borders should form partnerships with relevant institutions to conduct research and monitoring that informs coastal management decisions" (p. 28). **Comment:** Linked to No. 1, 5 and 9 above.	Noted, thank you.
131	9					12) Climate change and coastal management (p. 30). **Comment:** Climate change to be considered in the light of promoting custodianship by local communities and CBNRM.	Noted, thank you. The GRDM is prioritising climate change adaptation and mitigation, and is currently in the process of reviewing its Climate Change Adaptation Plans.
132	10			Coastal Access		13) **Excerpt from CMP:** "GRDM has expressed the need to enter into the written Agreements with the Local Category-B Municipalities to take on this function, as provided for in the terms of the NEM: ICMA legislation. The Garden Route District Municipality is therefore currently being assisted by the Western Cape Provincial Department of Environmental Affairs and Development Planning (DEA&DP) Legal section, who is drawing up a draft Coastal Management Service Level Agreement which includes Coastal Access issues, and which can be entered into between the GRDM and the Category-B Municipalities in the district" (p. 40).	The GRDM has drafted a generic Service Level Agreement (SLA), which can be used to enter into agreements with regards to the coastal access function with the local Municipalities. The document has been vetted by the GRDM's Legal section, and the next step is to enter into discussions / contain expressions of interest from the local Municipalities, to enter

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						Comment: We need a copy of the Coastal Management Memorandum of Agreement	into this agreement with the GRDM. If a specific Municipality do accept, they could also change the generic document to their own requirements, so the terms in the final draft SLA might be different than the original generic document produced by the GRDM, and might also differ between the specific Municipalities. It is for this reason that we would like to wait for the process / negotiations with the Municipalities to be finalised, and for the final drafts of the accepting Municipalities to be released before circulating to the stakeholders.
133	11			Coastal Access		14) **Excerpt from CMP:** "The Department of Environmental Affairs and Development Planning (DEA&DP) has provided the Garden Route District Municipality and all the Category-B Local Municipalities with draft Standard Coastal Access By-laws for the facilitation of reasonable and feasible Coastal Access in terms of Section 18 of the NEM: ICMA. Once the draft Agreement between the Garden	Depending on the acceptance of the SLA, the Municipality taking on the coastal access function will probably be implementing the draft By-laws, and might therefore revise the document according to their Municipality's

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						Route District Municipality and the Local Municipalities has been finalized by DEA&DP, the institutional arrangements regarding the implementation of the Coastal Access By-law will be entered into, as per the Terms of the Agreement" (p. 40). **Comment:** We need a copy of the Standard Coastal Access By-law	requirements and specific conditions. It is for this reason that the original draft By-laws is not yet circulated for public scrutiny, as it might be different than the final draft By-laws. The specific Municipalities will probably release the final draft By-law for public comments as part of its public participation process.
134	12					17) **Excerpt from CMP:** "Ensure inclusion of provision of public coastal access in all gated communities uniformly" (p. 49). **Comment:** Not clear what this means?	The GRDM remains committed to equal treatment of all Parties. This clause was added to promote public access to the coast which should not be restricted by gated communities. No specific gated community/ies will be treated differently, or provided with exception from providing coastal access without good reasons. Restrictions to coastal access should be investigated on a case-by-case basis.

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135	13			Coastal Access		18) **Excerpt from CMP:** "Investigate reported unsafe public access and formalise to ensure public safety, for example, Fisherman's path in Wilderness East which is reportedly dangerous due to its steepness and height above sea level" (p. 49). Comment: What does this mean / imply?	This statement refers to coastal access areas which is a danger for the access users, such as steep cliffs and known areas where previous serious injury or death has occurred due to the terrain / access conditions. So, in these areas, no formal access should be allowed – there should be no formal provisions for direct coastal access. The identification of these areas must be assessed on a case-by-case basis, with coastal access user inputs, and recorded historic injury or death statistics.
136	14					19) **Excerpt from CMP:** "Conduct Estate Agent training to put the mechanisms in place to communicate coastal access rights to any new landowners upon the sale of a property where this is applicable" (p. 49). **Comment:** Shouldn't this rather reflect in By-laws and spatial development guidelines by authorities?	Your question is noted. Yes, the process you suggested should be used as a means to enforce compliance. Other means of awareness could also be considered, such as Media Releases or social media communication. The different options can be investigated.

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137	15			Coastal Access		20) **Excerpt from CMP:** "Where appropriate and within its available resources, provide facilities that promote access to coastal public property, including parking areas, ablutions, boardwalks and other amenities, taking into account the needs of physically disabled persons" (p. 50) **Comment:** Consistency in line with the requirements for equity.	Noted, thank you.
138	16			Coastal Access	Section 3.3.6	21) **Excerpt from CMP:** "Provision should be made to allow access by subsistence fishermen using agreed access routes (and not informal routes) however agreements need to be entered into with such fishermen in respect to their actions in respect to private property which should be enforceable" (p. 49) **Comment:** Coastal access sites / routes to be formalized and registered. Not sure what this means – does access to fishers differ from public access and in what way (rights)?	Reference is made to the Integrated Coastal Management Act (ICMA), which speaks about reasonable access. Reasonable is applied on a case-by-case basis. ICMA also states that every citizen has a right to use and enjoy CPP subject to certain limitations. Public is all encompassing.
139	17			Coastal Access		Recommendations: Concerns / Gaps / Constraints	All recommendations as listed in Table on page 23 of submission is appreciated and noted for consideration.
140	1	Fishers Communities of George and Mossel Bay (2nd[t] Submission of		Coastal Access	Sections 2.4.1 & 3.3.3	**RECOMMENDATION 1:** Definitions of concepts to be clearly defined and articulated to promote engagement, understanding, clarity and fairness.	This section was updated as per comment/s received. Additional wording included:

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		Comments. Dated: 27 June 2024					Equitable: The term equitable can be defined as fair and reasonable in a way that gives equal treatment to everyone. (p. 22) Heritage resources: The term “heritage resources” can be defined as a legacy from the past, including that which defines cultural identity, which we need to value and protect today in order to conserve it for future generations. A cultural heritage is unique, valuable and non-renewable, and can be any place, space or object that has cultural significance or special value to present communities, and should be protected for the benefit of future generations. (p. 45)
141	2			Coastal Access	Section 3.3.2	**RECOMMENDATION 2:** The final plan to comply to requirements for transformation as stipulated by a spectrum of legal instruments.	This section was updated as per comment/s received. New wording inserted under section 3.3.2: “Transformation should therefore involve a shift towards a more collaborative and

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							deliberate approach to policymaking, involving government, civil society, and other stakeholders". (p.40) New insertion under the SPLUMA: "Provides a uniform, effective and comprehensive system for spatial planning and land use management, which, among others, promotes social and economic inclusion and aims to redress the imbalances of the past"; (p.43).
142	3			Coastal Access	General	**RECOMMENDATION 3:** Decision makers to be cognisant of the negative effects and impact of the power of wealth - particularly intergenerational accumulated apartheid wealth - in decision-making that relates to resources utilization and access given the existing context of inequalities.	Recommendation noted, thank you.
143	4			Coastal Access	General	**RECOMMENDATION 4:** The Garden Route District Coastal Management Plan is transparent and reflects the district context to enable readers to understand the challenges it wishes to address (problem statement) and subsequent intervention.	Recommendation noted, thank you.

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144	5			Coastal Access / Socio-Economic Profile	Appendix 1, Point 1.3	**RECOMMENDATION 5:** The Garden Route Coastal Management Plan is transparent and has a section reflecting the relevant socio-economic profiles of its population. Apart from being a management instrument, the also functions as a development mechanism.	The Garden Route Coastal Management Plan does have a section under Appendix 1, point 1.3 Socio-Economic Profile (p.146). This section was however updated with the latest stats and information. (p. 146).
145	6			Coastal Access / Socio-Economic Profile	Appendix 1, Point 1.3	**RECOMMENDATION 6:** The document to reflect on the diversity of its population.	This section was updated as per comment/s received. Additional wording was inserted under Appendix 1, point 1.3 Socio-Economic Profile (p.146): "The Garden Route District Municipality faces significant socio-economic challenges, including high poverty rates, unemployment, and inequality, even within the same communities, where residents can have varying needs and priorities".
146	7			Coastal Access	Section 3.3.6	7.7.1 "The potential to enter into agreements with landowners to share responsibility for the management and maintenance of such land" (p. 50).	This is a challenge which will be highlighted at the Coastal Access Task Team for discussion

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						RECOMMENDATION 7.1: This mechanism does not resolve the conflict as ownership might change.	and possible solutions to the problem.
147	8			Coastal Access	Section 3.3.6	7.7.2 "Provision should be made to allow access by subsistence fishermen using agreed access routes (and not informal routes) however agreements need to be entered into with such fishermen in respect to their actions in respect to private property which should be enforceable" (p. 50). **RECOMMENDATION 7.2:** There is no need to differentiate between subsistence and recreational fishers as both groups are part of the deprived fishers.	Your comment is noted, thank you. (This will be corrected in the CMP)
148	9			Coastal Access	Chapter 4, Table CMO 1, Issue 1.2	7.7.3 "Ensure inclusion of provision of public coastal access in all gated communities uniformly" (p. 49). **RECOMMENDATION 7.3:** This activity is mentioned in the review report but not listed in the operational plan	Chapter 4 was updated as per comment/s received. The activity was included under Table CMO 1, Issue 1.2 Additional coastal access land.
149	10			Coastal Access	Section 3.3.6	7.7.4 "Investigate reported unsafe public access and formalise to ensure public safety, for example, Fisherman's path in Wilderness East which is reportedly dangerous due to its steepness and height above sea level" (p. 50). **RECOMMENDATION 7.4:** Curious to know what the outcome might be in relation to access.	This topic will be discussed at the Coastal Access Task Team as to the outcomes and way forward relating to coastal access sites that are considered as unsafe for public use.

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150	11			Coastal Access		7.7.5 “Conduct Estate Agent training to put the mechanisms in place to communicate coastal access rights to any new landowners upon the sale of a property where this is applicable” (p. 49). **RECOMMENDATION 7.5:** Should rather form part of broader awareness campaign / education and not preferential treatment.	Your recommendation is noted for consideration.
151	12			Coastal Access		7.7.6 “Assess the need for further updates to the Coastal Access Audit” (p. 79). **RECOMMENDATION 7.6:** This activity to be confirmed and information and be disseminated to fishers / coastal users as this information is in the public interest.	The below response from the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP) refers: The update to the audit is dependent on information provided by the municipalities. DEA&DP is not intending to republish a revised/updated audit, but rather to add to existing data as updates are provided from the Municipalities.
152	13			Coastal Access	Chapter 4, Table CMO 1, Issue 1.2	7.7.7 “GRDM to support local municipalities in the development of Coastal Access Bylaws” (p. 69). Engaging local municipalities had been futile in the past. Participating stakeholders / authorities (SAPS and NSRI) have indicated the need to	Depending on the acceptance of the Service Level Agreement between the GRDM and local Municipalities, the Municipality taking on the coastal access function will probably

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						establish clear by-laws that will assist them in their operations **RECOMMENDATION 7.7:** Based on existing challenges with Category-B municipalities (resistance, capacity, commitment), the Minister be requested to intervene / support to convince local municipalities to develop policies and coastal by-laws that also reflect on coastal access.	be implementing the draft By-laws. These generic By-laws were developed by the Western Cape Department of Environmental Affairs and Development Planning for the use of the Municipalities. The generic versions might however be changed / revised by the Municipality's taking on this function, according to their own requirements and specific challenges. It is for this reason that the original draft generic By-laws are not yet circulated for public scrutiny, as it might be different than the final draft By-law. The Municipality will probably release the final draft By-laws for public comments as part of its public participation process.
153	14			Coastal Access		Fishers note the absence and lack of integration / participation of relevant Category B Municipalities in the programme, i.e. Bitou, Knysna, Mossel Bay and Hessequa ,unicipalities. **RECOMMENDATION 7.8:**	Your recommendation is noted, thank you. The hope is that the Service Level Agreement (SLA) process, or the review

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						Citizens should be able to know which local municipality is responsible for which coastal management area. These municipalities to provide a transparent and professional service to fishers. There should be clear internal lines of accountability.	of the NEM: ICMA by DEA&DP, will resolve the confusion regarding local and district municipal functions. The National Department of Forestry, Fisheries and the Environment (DFFE) is also currently revising its Coastal Legislation: NEM: ICMA, and the GRDM also provided its comment for them to make the coastal access function, and responsible management authority, clear / define it better, in the Legislation, then a SLA process might perhaps not even be needed.
154	15			Coastal Access		"Reasonable and equitable access to coastal public property for all must be recognized as a basic human right and must be achieved" (p. 24 and 39). "Equitable and fair access to the coastal public property and heritage resources is an inalienable right for all, and this CMP aims to address a situation that is becoming all too common, namely exclusion of the many for the select enjoyment of the few" (p. 25). "it is vital that coastal access is sufficient and easily available to all who wish to enjoy this natural public resource" (p. 39) "There is however still a wide tendency of private residents, communities, and tourism facilities such as hotels, etc., to inhibit or	Your recommendation is noted for consideration, thank you.

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						deny equitable access for all to some coastal areas along the coastline." (p. 39) **RECOMMENDATION 8**: Engaging / integrate legal support / experts to clarify and resolve the conceptual challenge of "equitable coastal access"; what does it mean, what does it imply; developing feasible strategies plans and outcomes and a monitoring mechanism.	
155	16			Coastal Access		"All effort should be made to resolve disputes related to historical access" (p. 49) **RECOMMENDATION 9:** To address these issues, it is crucial to implement objective oversight to counteract the biases and selective practices evident in the review document. Objective oversight is necessary to ensure that the review process is fair and transparent. Additionally, there is a critical need to address the lack of transformation and the entrenched attitudes of planners and decision makers. These officials must be held accountable for their resistance to change and their role in perpetuating inequities. Finally, it is imperative to ensure strict compliance with SPLUMA legislation and other laws that promote equity in spatial planning frameworks. This includes actively working to dismantle apartheid-era planning principles and practices that continue to impact coastal access.	Your recommendation is noted for consideration, thank you. (Inclusion of all relevant stakeholders in Coastal Access Task Teams and decision-making Committees, to provide oversight)
156	17			Coastal Access		"Biodiversity must, as a minimum, be protected and conserved through Innovative spatial planning strategies, a network of protected and conservation areas	Your recommendation is noted for consideration, thank you.

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						(including conservancies), proactive management, the prevention of over exploitation and pollution" (p. 25). "The designation of new coastal access land to exclude areas that include sensitive coastal habitats (e.g., primary dunes, coastal forest, intertidal saltmarsh and wetlands), bird breeding sites, priority conservation areas (e.g., area between Gericke's Point, Kleinkrantz and Swartvlei) and areas prone to erosion or accretion; no commercial-based activities should be considered for these areas." **RECOMMENDATION 10:** Verify the ecological justification for establishing and maintaining conservation areas as these are frequently used for investment and speculation at the cost of the landless local people and to keep them out.	Please note that CapeNature was requested to differentiate between, and to provide clarify on, the definition of "nature conservancies / high conservation areas, etc" and to explain how it relates to coastal access. This will be included in the final CMP.
157	18			Coastal Access		7.11 Fishers acknowledge the recognition of vulnerable groups in the review plan. However, it is misleading to suggest that these groups are mainly women and youth. A fundamental flaw in the report is its denial of the vulnerability of deprived communities, affecting a significant portion of the district's population, rooted in institutional deprivation caused by past injustices. **RECOMMENDATION 11:** Consider a reorientation in public participation processes to consider the marginalized through integrating equity, also, in consultation / public participation processes. This will promote inclusivity and credibility.	Your recommendation is noted for consideration, thank you.

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158	19			Coastal Access		7.12 “Strips of land designed to secure public access to the coastal public property, and which are subject to public access servitudes in favour of the local municipality within whose area of jurisdiction, it is situated, and in terms of which members of the public may use that land to gain access to coastal public property.” (p.20). This information is not in the public domain as supposed to be. It should be reflected in relevant by-laws of category-B municipalities, but is currently absent. This raises serious concerns and fishers perceive this absence as a conscious measure to create confusion, denying fishers of their rights to access. In the past, fishers were sent from pillar to post to clarify accountability and to lodge complaints. **RECOMMENDATION 12:** Linked to point 5.7.7 above	Your recommendation is noted for consideration, thank you.
159	20			Coastal Access		7.13 “A Municipal CMP must include coastal management objectives for the coast within the jurisdiction of the municipality” (p. 24) **RECOMMENDATION 13:** The coastal plan to integrate equity as one of its strategic objectives / coastal management objectives with a clear monitoring mechanism to gauge impact and progress.	Your recommendation is noted for consideration, thank you. (The CMP will be revise accordingly)
160	21			Coastal Access		7.14 “The Department of Environmental Affairs and Development Planning (WCG: DEA&DP) have provided the District Municipality and Local Municipalities with draft Standard Coastal Access By-laws for the facilitation of Coastal Access in terms	Your recommendation is noted, thank you. These documents will be made available once finalised (please note By-law content might

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						of Section 18 of the NEM: ICMA. A Memorandum of Agreement between the Garden Route District Municipality and all the coastal Category-B Local Municipalities will be entered into to confirm responsibilities for the provision of reasonable and feasible coastal access" (p. 24) **RECOMMENDATION 14:** Fishers request a copy of the draft Standard Coastal Access By-laws for the facilitation of coastal access.	be changed by final identified responsible Municipality/ Municipalities, and Agreements must still be discussed between the parties / final Agreed upon terms, additions and changes must still be incorporated, and the terms might also be different between Municipalities, where and if Agreements is applicable).
161	22			Coastal Access		7.15 "the GRDM has expressed the need to enter into the written Agreements with the Local Category-B Municipalities to take on this function, as provided for in the terms of the NEM: ICMA legislation." (p. 40). **RECOMMENDATION 15:** Fishers request an update on this process and a copy of the final agreement for purposes of transparency, monitoring and accountability.	Your recommendation is noted, thank you. These documents will be made available once finalised (please note By-law content might be changed by final identified responsible Municipality/ Municipalities, and Agreements must still be discussed between the parties / final Agreed upon terms, additions and changes must still be incorporated, and the terms might also be different between Municipalities, where and if Agreements is applicable).

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162	23			Coastal Access		7.16 The Coastal Management Programme must adapt and respond to the UN instruments as mentioned under point 7.16 of their submission, with a spirited dedication to fostering equitable access. **RECOMMENDATION 16:** Fishers rely on the integrity of decision-makers to consider international agreements and respect the historical rights of the fishers.	Your recommendation is noted, thank you.
163	24			Coastal Access		7.17 It is unclear of what heritage means and implies within the context of the review document and needs demystifying – mentioned earlier. A relevant question in this instance could be “whose reality counts?”. “Equitable and fair access to the coastal public property and heritage resources is an inalienable right for all, and this CMP aims to address a situation that is becoming all too common, namely exclusion of the many for the select enjoyment of the few” (p. 24). “The diverse heritage resources of the Garden Route Municipal area therefore need to be recognized, protected and shared with all its people and visitors” (p. 26). “In the case of coastal access routes of a historic nature and with cultural links, the provision of coastal access is especially important as these routes usually provides a means of food security for subsistence fishermen, allowing them to put food on the table for their families. These access routes must therefore be protected and maintained as high-priority areas” (p. 39). “… historic access now denied…” (p. 47) “All effort should be made to resolve disputes related to historical access All effort	Your recommendation is noted, thank you.

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						should be made to resolve disputes related to historical access" (p. 49). **RECOMMENDATION 17**: Research on, and the development of customary law based on the customary practices and traditions of local people / indigenous people, is essential as it appears that their reality, their contribution, their customs is being written out our conventional narratives, reports and plans. A cultural genocide is unacceptable. The information subsequently generated to be recognized and integrated into local / district development programmes.	
164	25			Coastal Access		7.18 "Education and Awareness (CMO 9)" (p. 28) "need to engage with potential partners to develop proposals that support carbon sequestration related projects such as the rehabilitation" (p. 33) **RECOMMENDATION 7.18.1:** To consider the democratization of natural resources as suggested by the White Paper on Local Government. It includes building the capacity and conducting information dissemination relevant to review of the programme. An additional benefit would be the promotion of stewardship / custodianship over natural resources. **RECOMMENDATION 7.18.2:** Instead of many people remaining workers and consumers, the dignity of deprived citizens can be significantly addressed through enterprise development relevant to coastal management. In addition to employment opportunities, prioritize entrepreneurial opportunities. This will require training and	Your recommendation is noted, thank you.

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						facilitation. In additional to the review, there are opportunities for mariculture and aquaculture, agroforestry, community-based natural resource management, to mention but a few.	
165	26			Coastal Access		7.19 “Conduct Estate Agent training to put the mechanisms in place to communicate coastal access rights to any new landowners upon the sale of a property where this is applicable” (p. 49) **RECOMMENDATION 19:** Fishers perceive this activity as preferential treatment and should rather be integrated into a larger inclusive campaign.	Your recommendation is noted, thank you. Please note that the purpose is not to undertake preferential treatment, but rather to target / concientise the audience who regularly engage potential property owners of properties on the coast (Fishers to be consulted on what they would advise such a larger inclusive campaign would entail / would look like).
166	27			Coastal Access		7.20 “Tourism and Recreation (CMO 11)” (p. 28) An essential question here is to ask: Who mainly benefits from lucrative tourism economy in the district? Who has the required infrastructure and facilities? **RECOMMENDATION 20:** The district is a famous and lucrative destination for both tourism and retirement. Transformation is slow and can be linked to a deficit in intergenerational wealth owned by local people. Steps to be made to transform this sector through opportunities creation, thereby	Your recommendation is noted, thank you.

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						promoting the heritage of locals in a credible way.	
167	28			Coastal Access		7.21 “Sustainable Livelihoods (CMO 12)” (p. 28) The topic / heading is inconsistent with its contents. The term essential refers to household sustainability (its shock, its sustainability, etc.) as well as the five capital elements reflected in the framework. **RECOMMENDATIONS 21:** Consider reflecting rather in analysis of the social profile.	Your recommendation is noted, thank you. (The CMO12 will be revised in the CMP)
168	29			Coastal Access		7.23 “Climate Change and Coastal Management” (p. 30 The literature illustrates that the poor and vulnerably will be mostly affected by climate change. The response in the review target those having assets only. The emphasis is therefore only on infrastructure and the bio-physical impact. **RECOMMENDATION 23:** Reconsider reviewing in an inclusive way.	Your recommendation is noted, thank you. (The Section 7.23 will be revised in the CMP)
169	30			Coastal Access		7.24 “In the case of coastal access routes of a historic nature and with cultural links, the provision of coastal access is especially important as these routes usually provides a means of food security for subsistence fishermen, allowing them to put food on the table for their families. These access routes must therefore be protected and maintained as high-priority areas” (p. 39).	Your recommendation is noted, thank you. (The differentiation within the CMP will be corrected to reflect a generic reference).

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						"Provision should be made to allow access by subsistence fishermen using agreed access routes (and not informal routes) however agreements need to be entered into with such fishermen in respect to their actions in respect to private property which should be enforceable" (p. 49). Fishers are not convinced that this differentiation is required as both subsistence and recreation fishers are essentially part of the historically disadvantaged / deprived community. **RECOMMENDATION 24:** Curious to know what the outcome of this classification will be.	

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170	31			Coastal Access		7.25 “The National Department of Forestry, Fisheries and the Environment (DFFE) has established a Coastal Access Task Team for the Garden Rote district. All the key stakeholders should form part of the Task Team, and will be included in the discussions of the Task Team. The Coastal Access Task Team should investigate all the aspects and challenges experienced at the hot spots where coastal access are prohibited or challenges are being experienced along the Garden Route district coastline” (p. 40). An impression is created that this structure is operational and functions effectively. This is however not the case. There is currently no intervention strategy, no function, no objectives, no deliverables, no plan, no timelines. Fishers have concerns on the purpose and performance of this structure and whether there is commitment and impact, but more importantly, what the social dynamics are with the Task Team in relation to stakeholder engagements, given existing legacies and attitude. **RECOMMENDATIONS 25:** Conduct a review on the purpose, functions, responsibility (terms) and relevance of this task team. It might create the impression that the public / fisher interest group had sufficiently participated / consulted.	Your recommendation is noted, thank you. (A Terms of Reference for the Task Team (TT) will be established which will formalise the TT as operational).
171	32			Coastal Access		7.26 “Land Use Planning Act (once promulgated)” (p. 11). Fishers are unclear about this Bill / Act. **RECOMMENDATION 26:** Fishers request clarification.	Your recommendation is noted, thank you. (The section 7.26 in the CMP will be revised accordingly).

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172	33			Coastal Access		7.27 “The Garden Route District Coastal Access Audit and Report” (p. 46) as well as “Approach of the Coastal Access Audit” (p. 47) Fishers are not convinced that these documents are relevant as these are outdated – 2017 **RECOMMENDATION 27:** Fishers however agree that the Coastal Audit be updated.	Your recommendation is noted, thank you.
173	34			Coastal Access		7.28 “The potential to enter into agreements with landowners to share responsibility for the management and maintenance of such land” (p. 49). This action is confusing and might not apply to new owners **RECOMMENDATION 28:** Landowners should comply to transparent legal instruments, e.g. By-laws	Your recommendation is noted, thank you. Response from the Department of Forestry, Fisheries and the Environment (DFFE): Indeed, legal instruments should be effected in line with the Integrated Coastal Management Act i.e. coastal management by-laws and servitudes, these will ensure consistency, sustainability and secure public coastal access in perpetuity until such time that the access strip is deemed insufficient i.e, posing an environmental threat or a threat to people's safety etc then

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							a process to cancel that access may be undertaken. The notion of agreements with landowners may offer a quick win, however, does not guarantee that the right of access may remain in effect should the property in question change in terms of use or especially ownership. In order for a municipality to effect public access legal instruments, financial and human resources need to be made available and prioritised (there needs to be an approved budget) to procure amenities such as boardwalks, signage, ablutions, parking and the land on which the access path will be laid, along with the supporting amenities. By-laws would also need to be drafted, approved by the municipal council and enforced to manage that access strip. Given the limited financial and human resources across all three spheres of

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							government to procure infrastructure and to be visible on site to manage access, it is advisable that a priority and feasible site for access be identified and that all stakeholders pull together, including landowners, fishers, the private sector and government. There needs to be an atmosphere of good behaviour, compliance, respect for the environment and all stakeholders in pursuit of equitable and reasonable access for all as enshrined in the ICM Act. The work of the Garden Route Coastal Access Task Team (GRCATT) which is comprised of the National and Provincial Departments as well as municipalities, fishers and landowners, is currently underway to, amongst other things, spatially map suitable areas to be prioritised from a selection of sites submitted by the fishers. This will need to be supported and

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							endorsed by the designated competent authority, w hich is the local municipality. The GRCATT also strives to ensure that there is continuous stakeholder engagement in line with governance imperatives for inclusive decision-making and public participation.
174	35			Coastal Access		7.29 “Empowering Vulnerable Groups” (p. 66) as well as “Socio-economic Vulnerability within the GRDM” (p. 68) The is a misconception / and projection on who vulnerable groups are / constitute. A contextual analysis and social-economic profile will clarify this dilemma (mentioned earlier). In addition, the concept of vulnerability is not unpacked. **RECOMMENDATION 29:** This section to be reviewed and clearly narrated in a just and fair matter.	Your recommendation is noted, thank you. (The Section 7.28 will be reviewed).
175	36			Coastal Access		7.30 “Human rights” (p. 70). This section is perceived as an add-on as this concept is only mentioned in the plan and not presented / unpacked in the text. Questions arise about consistency. Preventing / restricting people from getting access can be interpreted as a human rights violation. **RECOMMENDATION 30:**	Your recommendation is noted, thank you. (The Section 7.30 will be reviewed).

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						This concept to be unpacked and clarified.	
176	37			Coastal Access		7.31 “Determine location of all existing and recently closed (e.g. Gouritzmond) access points and ascertain legality, infrastructure (e.g. parking lots, foot paths, boardwalks, stairs, ramps, slipways, jetties, disabled persons access, servitudes/roads, ablution & waste facilities), level of maintenance (condition) and site-specific as well as cumulative impact” (p. 73). “Additional coastal access land to be identified (inclusive of outcomes from a and b above) and designated after consideration of site-specific and cumulative impacts, individual landowners’ rights, site-specific desirability or demand (from user groups), carrying capacity in more sensitive areas and financial implications (ability to establish and maintain). An assessment of access sites available for emergency services needs to be undertaken - these do not need to be formal access points available to the public, but need to be located so as to provide access when entry into remote areas is required” (p. 74). **RECOMMENDATION 31:** Officials / planners to build a trusting relation with fishers based on transparency, integrity and recognize the contributions made by	Your recommendation is noted, thank you.

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						fishers.	
178	1	Representative from Sea View, Mossel Bay	Sea View, Mossel Bay	Editorial		Editorial comments and suggestions	All editorial suggestions / changes done as per comment/s received
179	2			Governance	General	A breakup of coastal management functions at Provincial, District and Local Level and how it gravitates into each other/overlap is required.	Included as Appendix 8.
180	3			Conservation	General	A list of the protected areas with contact details of the responsible entities.	Included (contact details of individuals was excluded due to the Protection of Personal Information Act (POPIA)). Updated contact details can be obtained from the management authorities directly.
181	4			Compliance & Enforcement	Section 2.4.8	This is an important section, as such reference should be made to EMIs and fishery control officers. More specifically a list of fishery control offices in the district with associated contact numbers.	POPIA applicable (no names or personal contact numbers to be provided). Please contact the responsible management authorities for the latest lists of contacts (where permission was provided by individuals), as it is dynamic and changes frequently.

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182	5			Estuaries	Section 3.4.3	provides a link to EMPs. In addition to the link can a list of the EMPs with its implementing authorities and status of plans be included in this section.	Done. Included the following: "The Estuary Management Plans for the Garden Route district estuaries can be viewed and downloaded from the following DEA&DP link: https://www.westerncape.gov.za/eadp/about-us/meet-chief-directorates/environmental-sustainability/biodiversity-and-coastal-management Detailed information on the implementation activities and responsibilities can be found in the relevant EMPs."

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183	6			Heritage	2.4.4 Heritage Resources (CMO 4)	The section pertaining to Heritage Resources is very broad/general and can be applied to all other districts in South Africa. A much more in-depth synopsis specifically relating to the Garden Route is required. Reference should be made to the indigenous people and the different tribes/groups that used to live off the coastline. In addition, a list of the more important heritage resources of cultural significance should be included. If any reports are available of these heritage resources as well as of communities that used to live of these resources, then a link should be provided.	Section updated. Thank you for the guidance.
184	7			Disaster Risk Management	2.2.5 Disaster Management (CMO 5)	Disaster management – considering the various disasters that historically effected the district's coastline, linkage should be made to the district as well as local authority plans. Also how the various plans and the CMP feeds into each other. In this case the various disaster centres in the district should be listed with associated contact details.	The linkages are included in the DM Act. The contact details has been included in the section.
185	8			Governance		Institutional arrangements – required service level agreements/arrangements with local authorities and other institutions for the performance of district functions should be listed.	Issue 7.2 wording changed to include municipalities. Some municipalities are open to sign agreements, and some are not. Agreement information, if any, can be obtained from the relevant Municipalities. General information to be included not the signed agreements.

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186	9			Editorial	Reference is made to Appendix 5; Figures A3.1 to A3.6 (not found)	Reference is made to Appendix 5; Figures A3.1 to A3.6 (not found)	Corrected. Annexures have been renamed “Appendix” for ease of reference.
187	10			Blue flag beaches	General	Blue flag beaches play an important role in the tourism landscape of the district, however only reference is made to the one blue flag program of GRDM being the Knysna Marina.	Corrected. Please note: The local Municipalities is responsible for Blue Flag beach and Marina’s applications. A list of all the Blue Flag beaches and Marinas can be obtained from the WESSA website.
188	11			WftC	General	The ‘Working For’ programmes, especially the Working for the Coast Programme as initiated by DFFE plays an important role in local authorities’ ability to perform coastal management. As such more information of these types of programmes should be reflected as well as the importance thereof.	The Working for the Coast Programmes are renewed sporadically and are inactive in some areas / during some periods, due to financial, and / or Procurement and HR processes. The information is therefore dynamic, and the latest information can be obtained from the DFFE: Local Govern Support section.

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189	12			Coastal Access	General	The availability and a list of registered public launching sites (PLSs) should slot in under coastal access.	Done. Included in the Appendices.
190	13			Coastal Access	General	Also under coastal access, provide a brief overview of ORV statutes and requirements with a possible link to a permit template or the relevant national website.	Section was updated.
191	14			General	General	The action plans need to be revised as well as the associated funds. Example are made of certain projects / issues, but these actions are not specific. The same applies to the budget allocations – where the project is not specific, but an amount the linked to the generally broad action item.	Corrected.
192	15			General	General	I feel it's an excellent document to further help protect and add value to our sometimes-exploited coastal resources namely, the animals, flora, landscape, sense of place, human well-being, both in the sea, the estuaries and on the coastline.	Noted with thanks.
193	1	Landowner	Buffalo Valley, Goukamma Committee member, Western Heads-Goukamma conservancy.	Marine Living Resources	General General	A total ban on all fishing competitions, both in the Estuaries, shore and sea. (They are a colonial bloodsport tradition for male ego inflation.)	Comment is noted, thank you. The DFFE MLRA and relevant bylaws ensures that marine living resources are sustainably utilized for the benefit of people and stimulates the economy. Fishing competitions are important for tourism economy of the Garden Route region.

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194	2			Conservation		Increasing MPA's (Marine protected areas and no take zones)	Agreed. DFFE is to be engaged to enable this as the MLRA is a national mandate
195	3			Coastal Access		Very important inputs from the above landowners that were provided during earlier reviews of the CMP have still not been addressed in the latest version of the CMP.	District and LM to finalise the Bylaw and institutional arrangements to facilitate the designation of coastal access (S18 of ICMA). DFFE has established a Coastal Access Task Team for the region. GRDM to engage with the DFFE task team dealing with the facilitation of coastal access matters in the region. DEA&DP, GRDM and LM to participate n the task team. Relevant parties will be included in the discussions of the task team. The matters related to the red line diagram and issues in the Gouritsmond area should be tabled at the task team. Broad areas of concern are included in the Annexures - however, the more detailed "hotspots" areas are included in the Coastal audit information which is available at this link:

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							Garden Route Coastal Access Audits_Uploaded_2020 .zip. The concern is noted and will be dealt with through the DFFE Coastal Access Task Team.
196	1	Private resident	Rietvlei and Ystervarkfontein (between Still Bay and Gouritsmond)	Coastal Access	General	Copies of original 'moederkaarte' and title deeds of the original farms stored in the archives of the surveyor-general (SG) of the Western Cape (WC) were obtained and studied since the publication of earlier reviews of the CMP. This new information must be included and addressed in the current review of the CMP.	Your comments are noted, thank you. The GRDM and LM's to finalise the Bylaw and institutional arrangements to facilitate the designation of coastal access (S18 of ICMA). DFFE has established a Coastal Access Task Team for the region. GRDM to engage with the DFFE task team dealing with the facilitation of coastal access matters in the region. DEA&DP, GRDM and LM to participate in the task team. Relevant parties will be included in the discussions of the task team. The matters related to the red line diagram and issues in the Gouritsmond area should be tabled at the task team. Broad areas of concern are included
197	2			Coastal Access	General	The current CMP is based on copied (and manipulated) versions of farm maps from the office of the SG in the WC.	

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							in the Annexures - however, the more detailed "hotspots" areas are included in the Coastal audit information which is available at this link: Garden Route Coastal Access Audits_Uploaded_2020 .zip. The concern is noted and will be dealt with through the DFFE Coastal Access Task Team.
198	3			Coastal Access	General	The current CMP is based on inaccurate 'replacement maps' ('vervangingskaarte') of farms that do not correspond with the original maps (moederkaarte). Replacement maps that were drawn up during the last two to three decades extended original farms southwards up to the high-water mark (HWM). New owners have erected game fences and farm fences across public access roads and public property that belongs to the state. As a result, public roads of earlier days were closed and public access to the coast were terminated.	Your comments are noted, thank you. The GRDM and LM's to finalise the Bylaw and institutional arrangements to facilitate the designation of coastal access (S18 of ICMA). DFFE has established a Coastal Access Task Team for the region. GRDM to engage with the DFFE task team dealing with the facilitation of coastal access matters in the region. DEA&DP, GRDM and LM to participate in the task team. Relevant parties will be included in the
199	4			Coastal Access	General	Title deeds contradict one another in the Ystervarkfontein area.	
200	5			Coastal Access	General	The current CMP does not reflect data about admiralty reserves, public access roads and the straight-line southern boundaries of the original farms and later subdivisions thereof between Still Bay and Gouritsmond that are observed on the original maps in the archives of the SG in the WC.	

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201	6			Coastal Access	General	Conflict, and extremely expensive court cases to address the conflict has erupted during the last two to three decades. Conflict continues to escalate and legal fights continue.	discussions of the task team. The matters related to the red line diagram and issues in the Gouritsmond area should be tabled at the task team. Broad areas of concern are included in the Annexures - however, the more detailed "hotspots" areas are included in the Coastal audit information which is available at this link: Garden Route Coastal Access Audits_Uploaded_2020 .zip. The concern is noted and will be dealt with through the DFFE Coastal Access Task Team.
202	7			Coastal Access	General	Important to note is that the conflict erupted after new opportunistic property owners of coastal farms took the law into their own hands and extended the boundaries of their farm's southwards up to the HWM. In the process they took illegal ownership of land that belonged to the state, i.e., land outside of the formal beacons and co-ordinates of the farm properties that they legally own. This resulted in closure of former public access routes. Thoroughfares, waste land and sand hills, etc. have been illegally included in the replacement maps that now indicate these portions of former state land as private property. The situation has become untenable and continues to get worse.	
203	8			Coastal Access	General	As another result of the above issues, the tourist potential of the area cannot be developed.	
204	9			Coastal Access	General	Government has not taken up its responsibility and duties to manage its land and to fulfil its duties along the coast between Still Bay and Gouritsmond. Illegal closure of former public roads and access routes makes it impossible to respond to veld fires (e.g. the fire that started on Sunday 1 January 2017 that destroyed the entire wetland of the Rietvlei area).	

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205	10			Coastal Access	general	• Any version of the CMP that does not consider the above aspects, and the original farm maps and title deeds and former public access roads, thoroughfares, straight line southern boundaries, etc. will be incomplete and inadequate to address the complexity involved in coastal management. • Conflict among stakeholders with interests and rights along the coast between Still Bay and Gouritsmond is a recent phenomenon. It continues to escalate – exponentially. It did not exist 20 to 30 years back. The original order reflected harmony and respect among coastal landowners, neighbouring landowners and the public. The original order was based on the original title deeds, 'moederkaarte', public access roads, thoroughfares, admiralty reserves or 'government land' that existed until current land owners grabbed it in the absence of proper governance in the area. • All conflict that we are aware of relates back to selfish, opportunistic current private owners of coastal land that make their own rules in a context where government has abdicated their duties to the public. • Current conflict about access to the coast continues to escalate will not be resolved unless the above issues are considered and addressed properly. • A lack of proper governance of the above affairs by local government, provincial government and national government and a lack of political will to address the issues involved allow private owners of coastal farms to trespass laws, to steal land from the state, and to ruin the rights of other stakeholders.	

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206	11			Coastal Access	general	Spend half an hour on Google Maps and have a look at all the structures erected within the 100-metre distance from the HWM between Still Bay and Gouritsmond, the illegal roads in sensitive dune areas, etc.	
207	12			Coastal Access	Section 2.4.1 and in Section 4 where the action plans are discussed.	One specific leverage point to address and to resolve this entire mess is to confirm the southern beacons / boundaries of the farms involved as suggested in the latest CMP review.	
208	1	CapeNature Representative: (Conservation Intelligence)	CapeNature: Conservation Intelligence: Landscape East			1. The Western Cape Biodiversity Spatial Plan (WC BSP) has desired management objectives for the biodiversity priority categories such as the Critical Biodiversity Areas and Ecological Supports which will aid in protecting sensitive coastal habitat (Pool-Stanvliet et.al. 2017)2. The handbook has guidelines for decision making. The WC BSP should form the spatial focus for biodiversity protection along the coast.	Noted, thank you. The section was updated.
209	2					2. Section 3.3. under Coastal Management Lines should refer to the Regulatory Impact Assessment being undertaken by DEA&DP for the implementation of the CML.	Section was updated.
210	3					3. Section 3.3.3.2 under Environmental Impact Assessment - Development Set-back Line: DEA&DP Coastal Management has indicated that a clear distinction must be made between the ad hoc setback line in the NEMA listing notices and the Coastal Management Line, and this will not be the method through which the CML will be implemented.	Section was updated

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211	4					4. Section 3.4.2. The Development of Estuary Management Plans: 4.1. The first line under 3 is repeated remove "Where an estuary falls within the boundary of a local or district municipality, or" (see page 65). 4.2. Under number 5 "Where an estuary is within a protected area" it should clarify that this also includes if only part of the estuary is within a protected area e.g. Bot, Klein (in both cases a small portion).	Section was updated
212	5					5. Garden Route Coastal Management Action Plan: The WC BSP and the Estuarine Management Plans should also be used when developing the coastal planning scheme and for decision making processes (issue 2.2 page 78 and page 80).	Section was updated, thank you.
213	6					6. CapeNature supports the inclusion of coastal protection zones within the Municipal Spatial Development Framework to protect the sensitive coastal habitat.	Noted.
214	7					7. The document does not have to state Basic Assessments or EIAs it can only refer to EIA.	Noted and corrected.
215	1	Municipal Representative	Mossel Bay Municipality			1. It was confirmed and agreed by DEA&DP that due to the misleading Definition in the Act, and Letter from Minister Bredell, and in order to provide more clarity on where the function of the Designation of Coastal Access lies, the DEA&DP Coastal Management Section indicated that they would request the Minister to circulate a follow-up letter within 6 months to the Municipalities that confirms that the function lies with the Local Municipalities;	The Garden Route District Municipality have not received any feedback yet from the Department of Environmental Affairs and Development Planning (DEA&DP): Coastal Management Section regarding the request to the Minister to circulate a follow-up letter which clarifies the roles and

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							responsibilities pertaining to the coastal management function. We will follow up with DEA&DP regarding this. Page 3 of 3 It should also be noted that the GRDM recently received communication, on 13 June 2024, from the Department of Forestry, Fisheries and the Environment (DFFE) regarding an invitation for comments on the reviewed National Environmental Management: Integrated Coastal Management Act (NEM: ICMA) Act 36 of 2014, now available for comments until 31 July 2024. This will then probably (will confirm) provide an opportunity for the Municipalities to object to the unclear definition in the Act, and to call for clear specification of exact role and responsibilities within the Act. We will also circulate this communication to the

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							Mossel Bay Municipality and other Local Municipalities.
216	2					2. It was also confirmed by DEA&DP that in the interim the Agreements between the District Municipality and the Local Municipalities should go ahead. They indicated that they have instructed their Legal Department to assist the Municipalities with the drawing up of these Agreements. The Garden Route District Municipality has therefore requested that the DEA&DP Legal Section assist with the drawing up of a draft Agreement which can be used (and tweaked if necessary) between the Garden Route District Municipality and the Local Municipalities.	Once the draft Agreement has been finalised, consultation and discussions with the Local Municipalities will ensue. The draft Agreement will then also be included in the consultations, passed through the Local Municipalities' Legal sections, amended as to the requirements and Agreements with the Municipalities, amongst others. As previously mentioned, no Agreements, or parts of an Agreement, will be entered into if rejected by a specific Municipality/ies.
217	3					Lack of consultative process	The GRDM has made available numerous public participation periods for commenting on the reviewed Garden Route District CMP, and welcomes any comments on the contents of the CMP. The GRDM however also recognises that

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							there is a need for further consultation and will therefore invite all the Local Municipalities to a consultative session on the CMP as part of the public participation process, where all the concerns and enquiries will be addressed. As previously mentioned, this consultative process is separate from the Agreement on Roles and Responsibilities consultation process, which will require an in-depth process, including extensive Municipal and Legal inputs. The Garden Route District Municipality value collaborative and consultative engagement with the Mossel Bay Municipality, and will prioritise addressing the concerns of the Municipality to its satisfaction. The Garden Route District Municipality remains committed to a meaningful and

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							effective public participation process for the Garden Route District Coastal Management Programme.