

1 INTRODUCTION

The process of creating an Environmental Management Framework and the theoretical constructs employed are described elsewhere. The rationale for the Richards Bay Port Expansion Area and Industrial Development Zone EMF is also described in detail elsewhere. The purpose of this report is to supplement the other reports by providing an account of the Public Participation component.

The aim of the Report is to outline the reasons for undertaking the public participation, the factors that lead to a variation in the original plan, outcomes, and finally an assessment of the process and its effectiveness.

We plan to contribute a discussion of those actions that worked and those that didn't to the Lessons Learned Report which will be written at the end of the process.

1.1 Scope of this report

This report only covers the Public Participation processes undertaken, and not those activities categorised as Stakeholder Engagement. For the purposes of this project Stakeholders were defined as those organs of state or decision making authorities whose policies, plans or programmes might be affected by the EMF, or could influence the EMF. The Public was defined as all those organs of civil society, and individuals, whose interests would not necessarily be articulated by a stakeholder.

1.2 Outline of this report

This report is a work in progress and will only be complete once the public participation for the EMF phase is complete.

The report is divided into the following sections

1. Introduction (this section);
2. Background – providing a short socio-economic context for the public participation;
3. The role of public opinion – outlining the rationale for the public participation undertaken;
4. Methodology – outlining the methodology envisaged and the amendments that were made in the course of the study;
5. Outcomes – recording the outcomes of the public participation, or the data on which the next sections are based;
6. Method of analysis – a brief discussion of the analytical methods brought to bear on the outcomes recorded;
7. Responses received – showing the responses received from the public;
8. Analysis of the responses – giving the results of the application of the analytic tools described in the preceding sections;
9. Conclusions and recommendations – in which the results of the public participation process and the analysis undertaken is discussed and recommendations for the use of the EMF are made; and
10. Assessment of process – which gives a (self) assessment of the effectiveness of the public participation process in terms of international criteria.

The report is complemented with a series of Annexures providing detail that may be required in support of the body of the report.

2 BACKGROUND

At the outset of this project a desk top assessment was made of the broad social context of the area. It was planned that the public participation component should be wider and more in-depth than is often the case with an EMF. The reasons for this are found in the history of Richards Bay and the Port, which are outlined briefly below.

2.1 Development of the port¹

In 1996 the South African Government took the decision to build a deep-sea harbour at Richards Bay. However construction only began in 1972 and was completed four years later. The new harbour was officially opened on 1 April 1976.

Richards Bay is SA's premier bulk port and the most modern. Built for the export of coal, it has since expanded into other bulk and breakbulk cargoes. In 2008 the port handled 82.7 million tonnes of cargo. Exports amounted to 76,409,865 tonnes and imports were 6,211,792t.

A dedicated railway line connects the port with Mpumalanga Province and Gauteng and was designed specifically to handle the majority of South Africa's coal exports. Other rail links connect Richards Bay with Durban in the south and Swaziland and Mpumalanga to the north. There is an adequate road system to Gauteng, Swaziland, Mozambique and Mpumalanga, and an excellent road south to Durban.

The port occupies 2,157 ha of land area and 1,495 ha of water area at present, but has the potential of expanding when required, making Richards Bay potentially one of the largest ports worldwide. Richards Bay serves the coalfields of KwaZulu Natal and Mpumalanga Province as well as timber and granite exporters from the East Cape and Northern Cape Provinces. The port has extensive rail and conveyor belt systems servicing the berths from nearby factories and plants.

2.2 Development of the town

The residential area of Richards Bay initially developed north of the harbour with Meerensee being established in 1970, followed by Arboretum in 1975 and Veld-en-Vlei in 1980. Until 1994 these three suburbs were exclusively for Whites while Black people were confined to the township of eSikhawini, south of Richards Bay. After 1985 people Indian and Coloured people were accommodated west of Veld-en-Vlei. The entire population of Richards Bay together (excluding the black township of eSikhawini) had a population of about 20 000 in 1990. In 2009 it was estimated that the City of uMhlathuze had an estimated 81 008 households and a total population of about 345 776.

2.3 Development of the Industrial Development Zone²

The Richards Bay Industrial Development Zone (RBIDZ) is a purpose-built and secure 520 hectare industrial estate, which encourages competitiveness through tax and duty-free incentives. The industries targeted for the IDZ include:

- Export orientated industries;
- Imported raw material users;
- Heavy energy utilities – electricity, gas, coal, bio-mass;
- Large water users – pure and clarified; and
- Those aimed at downstreaming of aluminium, heavy metals, chemicals, wood, pulp, paper and various agricultural products.

2.4 Economic and employment status³

In the universe of all persons in uMhlathuze in 2001, aged 15-65 i.e. a total of 186 319 persons, 67 390 (36.17%) were employed and 46 065 (24.72%) unemployed. The balance of 72 864 (39.11%) was defined as not economically active. Therefore, the economically active population of 113 455, which is unemployment as per the official definition, stood at 40.69%. Unemployment amongst Africans was the highest at 47.41%.

¹ See <http://ports.co.za/richards-bay.php>

² See <http://www.richardsbayidz.co.za/index%20main.html>

³ See http://devplan.kzntl.gov.za/idp_reviewed_2008_9/IDPS/KZ282/Adopted/uMhlathuze%20%20Housing%20Plan.pdf

Of the approximately 67 400 persons employed in uMhlatuze in 2001, a total of 31 541 (46.8%) earned R1 600 per month or less, 45 055 (66.85%) earned R3 200 per month or less and only 3 584 (5.32%) earned R12 801 per month or more. Whereas 46,8% of total employed earned R1 600 per month or less, of the African income earners 58.95% earned R1 600 per month or less, the figure for Coloured income earners was 23.13%, Indians 16.90% and Whites 11.56%.

Since the development of the port in 1976, the main driver of economic growth has been the port itself, and the major heavy industry that it has attracted. The port handles about 87 million tonnes a year, representing 51% of South Africans seaborne trade, and transport storage and communications accounted for employment of 4 365 (6.48%) in 2001, and manufacturing employment of 10 089 (14.97%). Importantly, whilst manufacturing ranked second in terms of employment, after community, social and personal services at 13789 (20.46%), transport/storage and communications only ranked seventh.

Employment in wholesale and retail trade at 9 146 (13,57%) could well surpass manufacturing in the short-term, and financial, insurance, real estate and business services with 5 300 employees (7,86%), like wholesale and retail trade, will benefit from the planned new projects and expansion of existing plants/facilities.

Census data indicates that over 90% of the labour force (persons 15-65 years) in the tribal authority areas are unemployed and earned no income or R1 600 per month or less. The formal township figures being eSikhawini, 70,27%, Nseleni 84,62%, Zungu/Madlebe 86,99% (which includes Ngwelezane), and Vulindlela 87,74%, can be compared with Empangeni at 43,79%, and the combined Richards Bay at 52,92%.

Dube has a population of 52 238, has a labour force of 31 433, with 21 663 unemployed or reporting no income, and a total of 92,7 % reporting no income or an income of R1600 per month or less.

2.5 Summary of socio-economic context

In summary the socio-economic context for the EMF is characterised by rapid industrial development and urbanisation in circumstances of above average unemployment.

2.6 Physical characteristics

The dilemmas caused by this socio-economic context are thrown into sharp relief when viewed against the physical context in which the people in and adjacent to the study area create a livelihood.

The study area is roughly bisected by the Port and heavy industrial area; with the portion to the north comprising the former White suburbs and the portion to the south comprising largely agricultural land, the northern parts of eSikhawini and Dube tribal land. This is clearly shown in Figure 1.

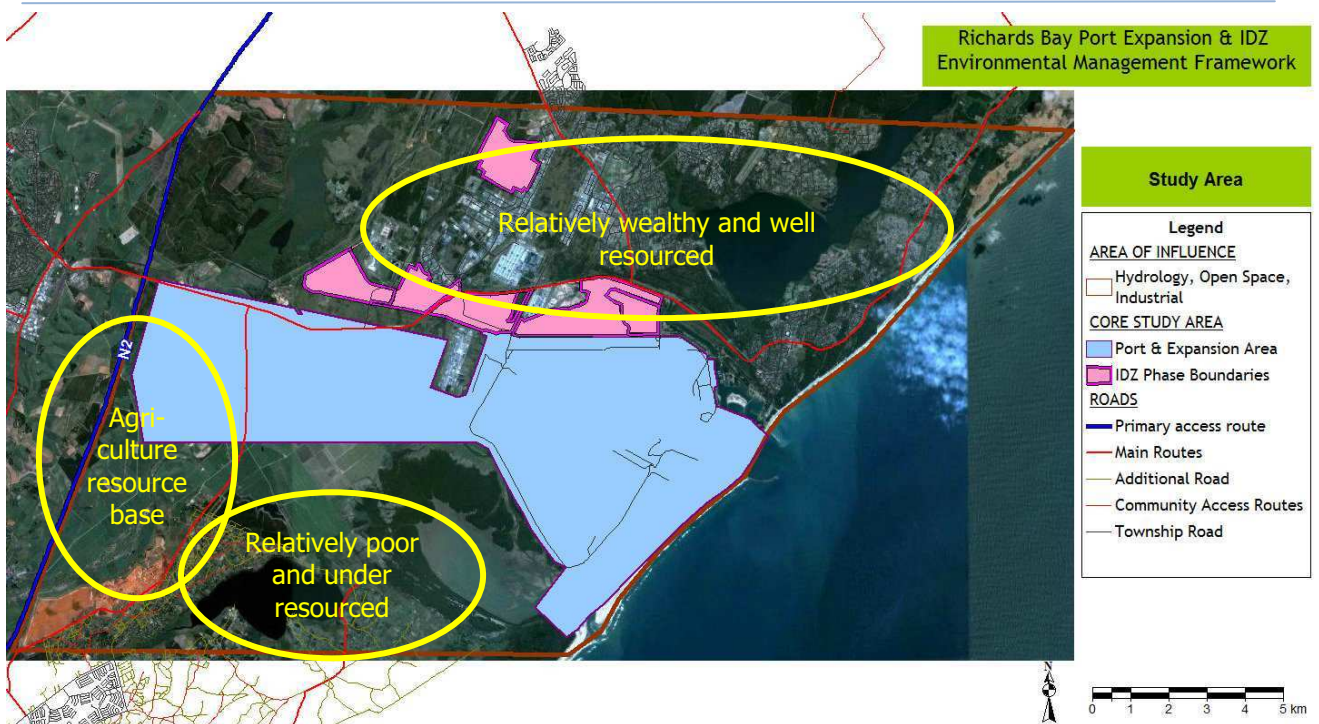


Figure 1: Study area showing how the Port, Expansion Area and IDZ emphasise social zonation

3 ROLE OF PUBLIC OPINION IN THE EMF

The process of developing any Environmental Management Framework (EMF) is largely a technical one, relying heavily on an assessment of scientific data regarding the environmental resources in and adjacent to the study area. This approach culminates in a GIS database that can be queried at different levels to assist in environmental decision making, particularly in respect of EIAs.

However this approach, while required in terms of regulations, can only be regarded as barely adequate if it is not extended to include the desires and aspirations of the public who are the primary “users” of the environment. This is particularly important in the light of the Principles for the EMF Area articulated in the Status Quo Report, viz:

- Sustainable development
- Pro-poor
- Capture value
- Support local economic development
- Focus on what is important, appropriate and possible in the area
- Internalise externalities.

In the current study, an EMF for the Richards Bay Port Expansion Area and Industrial Development Zone, it became evident that the users of the environment were not just the people who worked and, in a limited number of cases, lived within the study area, but should include all those whose lives are potentially affected by developments and activities in the study area. It was therefore deemed desirable to try and understand public perceptions of the role of environmental resources in their lives and livelihood strategies and, importantly, their views on what would constitute a desirable state of the environment for them.

4 METHODOLOGY

The initial approach proposed is shown in Annexure 1: Proposed strategy.

4.1 Appropriate methods identified

4.1.1 Public Participation Reference Group

Acknowledging the crucial role to be played by the uMhlathuze Municipality, and the request from them at an early Project Steering Committee meeting that their existing community liaison structures should be respected and utilised, a Public Participation Reference Group was proposed. The task of this group is to assist with identifying appropriate media, strategies and methods with which to engage the public, particularly those outside the mainstream, such as the poor and disadvantaged.

4.1.2 Status Quo Phase

In the Status Quo Phase the emphasis, from a public participation perspective is on obtaining information from the users of the environment regarding the environmental features which they believe play an important role in the study area currently. To this end a series of 'Focus Group' meetings were planned to which members of the public and civil society would be invited, targeting specific interest clusters. For example, recreational users of the water resources; environmental interest groups; groups concerned with air quality; and organised business and industry.

4.1.3 Desired State of the Environment Phase

In this phase the public participation emphasis is on meeting again with the identified focus groups to hear from them what their desired state of the environment would be. In addition a public meeting was to be held for the same purpose. This would be supported by press releases in the local newspapers.

4.1.4 EMF

Here the emphasis is on public understanding of the EMF, its use and limitations. As soon as the draft EMF is available for public scrutiny it was planned to run an advertisement detailing how it could be obtained and inviting comment. After some debate it was agreed that the comment period would be 30 days. During this period a public open day would be held at which the EMF could be explained and the GIS capabilities demonstrated.

4.2 Methodology employed

4.2.1 Website

All the documents released for public scrutiny were made available on the Phelamanga Projects website (http://phelamanga.co.za/proj_emf.htm). This was updated as each document became available and I&APs were directed to it in all correspondence with them and in all advertisements and notices.

4.2.2 Public Participation Reference Group

A reference group was established and met on 9 April 2009, 16 September 2009 and although a further meeting was scheduled for 8 December 2009 this did not take place as members indicated that they were not available. The minutes of the first two meetings are shown in Annexure 2: Minutes of Reference Group meetings.

4.2.3 Identification of Interested and Affected Parties (I&APs)

The boundaries of the study area delineated for the EMF are straight lines and do not conform to any social or functional logic. This means that the communities within the study area boundaries are fragmented and there is no clear basis for deciding who is "in" and who is "out". For this reason it was decided to regard the residents of the whole municipality as the primary I&AP target group.

4.2.3.1 Database of I&APs

An extensive database of potentially interested organisations was constructed from information kindly supplied by the DAEARD offices in Empangeni. These included particularly business and industry groups as

well as organs of civil society. All I&APs who were contacted directly for this project are shown in Annexure 3: ListS of I&APs.

4.2.3.2 Initial advertisement

An advertisement was placed in the Natal Mercury, the Natal Mercury and Ilanga as regional newspapers, and the Zululand Observer and Umlozi Wezindaba as local newspapers, inviting interested people to register and giving details of how the Background Information Document could be accessed. These appeared on the following dates.

- In Zulu Ilanga 23 – 25 July 2009 (Regional)
 Umlozi Wezindaba 24-30 July 2009 (Local)
- In English The Mercury 24 July 2009 (Regional)
 Zululand Observer 24 July 2009 (Local).

4.2.4 Background Information Document (BID)

A brief Background Document was produced in English and isiZulu (see Annexure 4: Background Information Document) for distribution to Interested and Affected Parties.

The BID was distributed to all those on the database with an invitation to register as an I&AP to facilitate targeted future communications, besides the 'blanket' information disseminated through the press.

4.2.5 Participatory GIS

An EMF consists of a written report and an interactive GIS tool. The GIS tool is based on a collection of data that is spatially defined. The majority of the data used to populate the GIS database is gleaned from specialist reports covering the various disciplines prominent in the attempt to achieve Integrated Environmental Management. These include Hydrology, Ecology (both marine and terrestrial), Air Quality, Land use planning, and other resources.

Many practitioners have found that while specialist information is essential it can often be enhanced, verified, or even in some cases corrected by accessing local knowledge. The unique problem lies in reflecting this local knowledge, particularly information about the relative importance of specific features, spatially in a sophisticated system like GIS. To try and overcome this, a simple participatory methodology was developed and attempted.

At each meeting at which the public was present large A0 aerial photographs of the study area was displayed. People present at the meeting were invited to identify important landscape or environmental features on the photograph and to mark the place with a numbered sticker. The same number was then recorded on a "comment sheet" on which the respondent was requested to record their views, comments or issues about that feature. A blank comment sheet is shown in Annexure 5: Participatory GIS together with an example of the aerial photo with points of concern identified on it.

4.2.6 Focus group meetings – Status Quo Phase

A series of focus group meetings at the uMhlatuze Civic Centre, and aimed at different interest groups, were planned, however response to invitations to these was disappointing. As a result the meetings plan was reconceptualized.

The following meetings were arranged. The minutes of these meetings are shown in Annexure 6: Minutes of Focus Group Meetings – Status Quo Phase.

4.2.6.1 Traditional authorities

A meeting was organised for the Traditional Authorities by Mr Maxwell Zungu of the uMhlatuze Municipality at 10:30 on 14 October. The invitations to this meeting were conveyed by Mr Zungu.

4.2.6.2 Central

Two meetings were scheduled for the 15 October 2009; one at 12:30 and one at 17:30.

These were extensively advertised in the press and by means of personally addressed emails to all I&APs on the database at that time, regardless of whether they had formally registered or not.

4.2.7 Public meetings – Status Quo Phase

A public meeting was held at the uMhlathuze Civic Centre on 16 September 2009, the minutes of which are shown in Annexure 7: Minutes of Public Meeting – Status Quo Phase.

4.2.8 Focus group meetings – Desired State of the Environment Phase

4.2.8.1 General public

Once the technical team had proceeded to the Desired State of the Environment phase of the project it became clear that if the EMF was to deliver on the principles outlined in the Status Quo Report it would be necessary to re-assess the public participation process to date.

In place of a public meeting, as planned, the tactics were changed and two focus group meetings for the general public were organised on the same day; with one aimed at civil society organisations, including recreational groups, and the other at business and industry. These meetings were held on 23 February 2010 at 10:00 (Business and Industry) and 17:30 (Civil Society and Community) at the uMhlathuze Civic Centre.

Emails were once again sent to all persons and organisations on the database informing them of these meetings, and an advertisement was placed in the Zululand Observer.

The minutes of these meetings are shown in Annexure 8: Minutes of Focus Group meetings – Desired State.

4.2.8.2 Clean Air Association

In addition to the focus group meetings described above, and at the request of Ms S Camminga, a special meeting was arranged to address the concerns and issues of the Richards Bay Clean Air Association. The notes of this meeting are shown in Annexure 8: Minutes of Focus Group meetings – Desired State.

4.2.8.3 Dube Tribal Council

It was decided to regard the Dube Tribal Council as a Focus Group, especially as the information being shared was of great significance. A specific meeting was therefore arranged with them, again through the kind offices of Mr Maxwell Zungu of the uMhlathuze Municipality. The notes of this meeting are shown in Annexure 8: Minutes of Focus Group meetings – Desired State.

4.2.9 Public Open Day – Draft EMF

To be inserted once completed.

4.2.10 Print media

During the course of the project care has been taken to work closely with the local newspaper, the Zululand Observer and its Zulu language publication, Umlozi Wezindaba, and to ensure that they were included in all information and notifications regarding the availability of reports and meetings. In the same way the Natal Mercury has been kept apprised all developments.

4.2.10.1 Advertising

All the advertisements that have been placed regarding this project are reflected in Annexure 9: Print media advertisements. These have been arranged in chronological order in order aid in following the development of the public participation in the eyes of the public.

4.2.10.2 News reports

In addition to paid advertisements the project received editorial coverage in the Zululand Observer. The reports that the newspaper published were instrumental in raising awareness in the community. While there is no objective way of measuring this, the improved attendance at meetings following the publication of these reports might be attributed to them. Copies of the news reports are shown in Annexure 10: News reports in the print media.

4.3 Limitations of methods employed

The limitations of the methods employed will be more fully discussed in the Lessons Learned Report. The progress of the public participation process was monitored throughout the project and adjustments made in the light of experiences. As with any social process it has been vitally important to amend the original plan in the light of subjective conditions in the field. One of the changes undertaken was the decision to administer a questionnaire via the press.

4.3.1 Questionnaire

A careful assessment of the public participation methods employed led to the view that the methods employed yielded useful, but fairly scant, information. The use of the questionnaire is described briefly below and the process and outcomes are described in detail in Section 5.

4.3.1.1 Standard questionnaire

For this reason it was decided to make use of a simple standard questionnaire. It was also decided that administering a questionnaire at random in shopping malls is not very satisfactory. For this reason it was decided to email a copy of the questionnaire to all those on the database and to insert it in the Zululand Observer. In addition the questionnaire was made freely available at every opportunity.

4.3.1.2 Dube area questionnaire

The questionnaire was amended slightly and translated into isiZulu for distribution, especially among the members of the Dube Tribal area.

4.3.1.3 Agriculture questionnaire

The questionnaire was also amended slightly and distributed to the farming community by email and fax, using our own database, and also through the kind offices Ms Naomi Kok of the Felixton Cane Growers' Association.

5 OUTCOMES

5.1 Status Quo

The information gathered in the Status Quo phase, i.e. from the meetings held, is summarised in the Status Quo Report. The participatory GIS approach was introduced at this meeting whereby the public were invited to locate their contributions on an aerial photograph (see Section 4.2.5 above, and Annexure 5: Participatory GIS). The outcomes included a formal appeal to expand the study area to include the whole of the municipality. Procedural questions and matters of process and application of the EMF dominated the meeting. Key issues that were raised include:

- Concern that the small study boundary is unable to respond to the nature of ecological systems, i.e. it cuts major wetland into half.
- Concern that the EMF may be biased towards certain types of development because of the study area size.

5.2 Desired State of the Environment

5.2.1 Questionnaire

Previous attempts to engage the public, either as individuals or as representative organisations during the Status Quo research phase of the project yielded less than initially hoped. This is more fully described in a previous report. A fresh approach was therefore devised, which was undertaken in the following steps, using simple questionnaires specifically designed for each target group. These are shown in Annexure 11: Questionnaires.

5.2.2 Sample selection

The sampling process was divided into three distinct exercises, one aimed at more sophisticated urban residents with a questionnaire in English a second one aimed at the per-urban / rural residents with a questionnaire in isiZulu and a third at the agricultural sector.

5.2.2.1 English questionnaire

- a) The questionnaire was mailed to every person on the I&AP database with a request for a response to be submitted by fax or email;
- b) An abbreviated questionnaire was placed in the Zululand Observer, with a similar request for a response to be mailed or faxed;
- c) Thirty-three responses have thus far been received.

5.2.2.2 isiZulu questionnaire

In a parallel exercise an isiZulu translation of the questionnaire was tabled at a meeting held on 19 January 2010 of the Dube Traditional Council which represents many of the people living in the southern portion of the study area, and

- a) At the request of the Council 2000 copies were produced and made available to them for distribution;
- b) These were circulated to respondents attending meetings of the Tribal Council wards on the weekend of 23 and 24 January 2010;
- c) 258 completed questionnaires have thus far been received.

5.2.2.3 Agricultural sector questionnaire

The questionnaire was adapted for use by farmers and others in the agricultural sector. Sugar cane is the dominant agricultural crop in the study area and surrounds so arrangements were made for the questionnaire distributed by the Felixton Cane Grower's Association as well as directly to other agriculture based I&APs in the area.

In addition to the above steps people were encouraged to distribute the questionnaire as widely as they wished.

5.2.3 Questionnaire structure

The questions posed were aimed at eliciting an understanding of the extent to which the respondents relied on natural resources for their livelihoods and well-being. It was also designed to try and establish the extent to which trade-offs between resource conservation and development were acceptable. The questionnaires used are shown in Annexure 11: Questionnaires.

5.3 Focus group meetings

Two focus group meetings were held on 23 February 2010 at the uMhlathuze Civic Centre and widely advertised. All I&APs were sent notices and invitations, and many contacted telephonically, to both focus group meetings, however certain I&APs and organisations were targeted. A list of those specifically invited is shown in *Persons specifically invited to focus group meetings*. The first meeting was held at 10 am, to which representatives of business and industry were specifically invited and the second at 5.30 pm to which

members of civil society organisations were specifically invited. The minutes of these meetings are shown in **Error! Reference source not found..**

5.4 Draft EMF

To be inserted.

6 METHOD OF ANALYSIS

A wide variety of techniques are at the disposal of anyone seeking to interpret the responses of a heterogenous group of people. Three techniques have been selected to provide the analytic framework for assessing the responses received in this study. Each of these will provide a different type of analytic outcome and a consideration of the outcomes generated by each should provide a more richly nuanced perspective and add to the depth of understanding required for environmental decision making about the study area.

6.1 'Statistical' analysis

Statistical methods could be applied meaningfully only to the questionnaires. The responses received to the questionnaires were collated and the number of similar (in some cases identical) responses to each question was noted. Each of the responses to the open-ended responses was recorded only once, even if a similar sentiment was expressed by other respondents. No more sophisticated analysis was done beyond the counts, reported in the details of the responses shown in Annexure 12: Questionnaire responses.

6.2 Discourse analysis

The second analytic lens used is that of discourse analysis with particular reference to the narrative analysis methods developed by Roe (1994)⁴.

Discourse analysis has become recognised as a useful tool in the search for an appropriate model for analysing public participation processes in environmental decision-making.

One of the most popular decision-making models in the academic literature is discursive (or deliberative) democracy (e.g. Dryzek, 1990; Benhabib, 1996; O'Mahony and Skillington, 1996), based on Habermas's critical theory; other models proposed alternative decision-making mechanisms (e.g. Young, 1990). The elements of discursive democracy have been proposed as the building blocks of public participation in environmental decision-making by several authors ..., but rarely are these translated into guiding principles at a practical level (Palerm, 2000)⁵.

This view is very similar to that proposed by Mueller⁶:

[T]he political *process* ... is one of discussion, compromise and amendment, continuing until a formulation of the issue is reached benefiting all. The key assumptions underlying this view of politics are both that the game is cooperative and positive sum, that is, that a formulation of the issue benefiting all exists, *and* that the process can be completed in a reasonable amount of time, so that the transaction costs of decision-making are not prohibitive (Mueller, 1989: 192; emphasis in the original).

This approach has been chosen because the issues that have arisen in the course of the participatory processes associated with this project have brought to the surface several apparently competing and mutually exclusive agendas or desires. Any decision on the relative merits of a proposed activity is therefore

⁴ Roe, E. 1994. *Narrative Policy Analysis: Theory and Practice*. Durham: Duke University Press.

⁵ Palerm, JR. 2000. An empirical-theoretical analysis framework for public participation in Environmental Impact Assessment. *Journal of Environmental Planning and Management*, Sep 2000, Vol 43 Issue 5, p581.

⁶ Mueller, DC. 1989. *Public Choice II*. Cambridge. Cambridge University Press.

likely to be political in nature, i.e. the decisions are likely to have as much to do with the a trade-off between possible alternatives, as perceived by the interested and affected parties, as with scientific 'facts'.

The assessment and analysis that follows is an attempt to provide a basis on which the decision-making authorities can exercise their judgement and to assist in deciding between the options that the participatory process has revealed. Furthermore the decision finally reached by the decision-maker will shape, and be shaped by, policies – that are themselves often contradictory – and the relative weight he or she assigns to each of these.

The purpose of this exercise is to understand some of the depth of feeling involved and the weight respondents attach to various issues.

6.2.1 The narrative analysis technique

Narrative analysis is a technique recommended for complex, uncertain and highly polarised issues. In his book, *Narrative Policy Analysis: Theory and Practice*, Emory Roe outlines a method of analysis that has its origins in literary analysis and critical theory (1994: 2)⁷. The method was developed by semioticians whose concern is with constructing meaning from the "signs" revealed in a narrative (Roe, 1994: 17), which can accommodate the different perspectives that different people can have of the same story.

The basic approach proposed is the consideration of the texts or narratives of the issue(s) as told by the various parties in the debate over an issue and then generating a metanarrative that accommodates the conflicting points of view. The importance of the metanarrative is that it is a 'new' story or narrative, which, while remaining true to the elements in the different accounts of the issue, provides the analyst with a story that is more amenable to other, more traditional, approaches.

6.3 Sustainable livelihoods approach (SLA)

The sustainable livelihoods approach is the product of a great deal of work, theoretical and practical, by many engaged in assessing the impact of development on the lives of primarily the poor. The relevance of this approach to the current study lies in the conviction that development does not occur in isolation and for the sole benefit of the developer, but has to be seen as making a contribution to all the elements of sustainable development and, particularly in our context, as making a contribution to poverty alleviation in the social sphere.

The approach is consistent with the view that sustainable development requires due consideration of environmental, social, and economic factors, which are in turn supported by a robust governance.

A series of Guideline Sheets have been produced by the British Department for International Development (DFID)⁸. The description of the sustainable livelihoods approach below is adapted from Section 1 of the DFID Guidance Sheets.

The livelihoods approach is a way of thinking about the objectives, scope and priorities for development. A specific livelihoods framework and objectives have been developed to assist with implementation, but the approach goes beyond these. In essence it is a way of putting people at the centre of development, thereby increasing the effectiveness of development in addressing its objectives.

The framework does not attempt to provide an exact representation of reality. It does, however, endeavour to provide a way of thinking about the livelihoods of poor people that will stimulate debate and reflection, thereby improving decision making. In its simplest form, the framework views people as operating in a context of vulnerability. Within this context, they have access to certain assets or poverty reducing factors. These gain their meaning and value through the prevailing social, institutional and organisational environment. This environment also influences the livelihood strategies – ways of combining and using assets – that are open to people in pursuit of beneficial livelihood outcomes that meet their own livelihood objectives.

⁷ *op cit*

⁸ DFID. 2001. Sustainable livelihoods guidance sheets. London. DFID

The framework for the approach is shown in Figure 2.

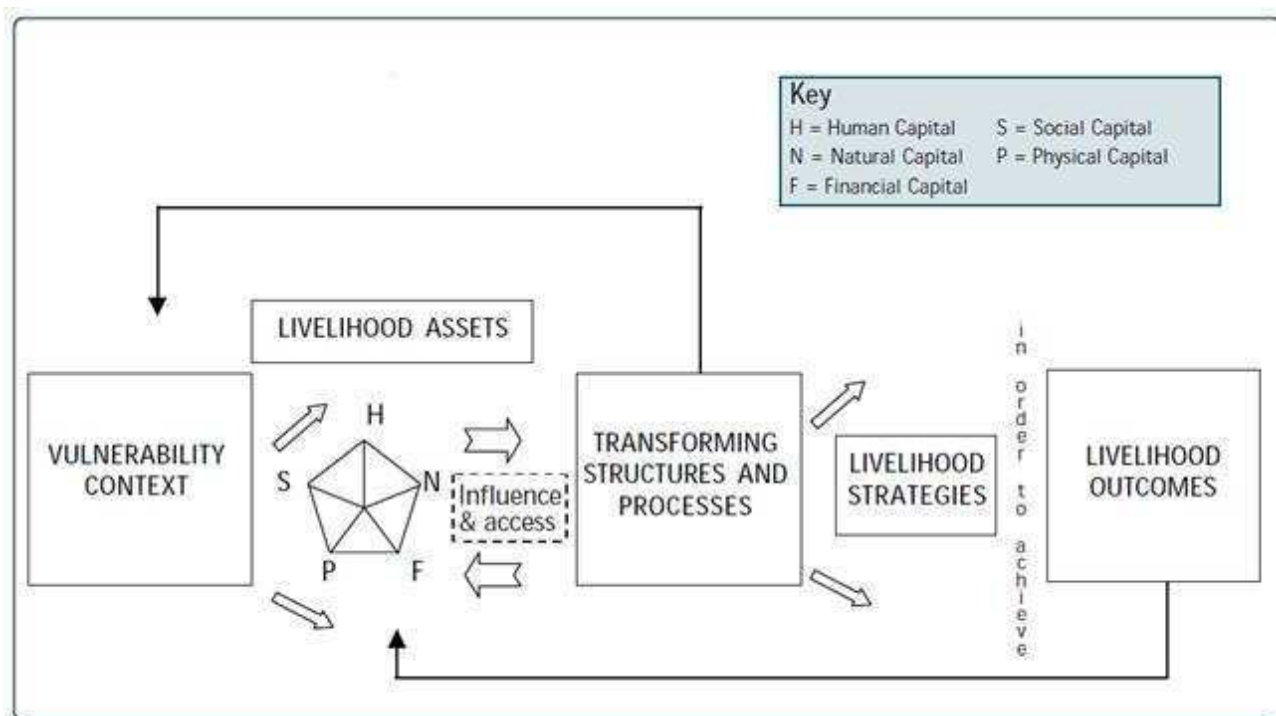


Figure 2: Sustainable Livelihoods Framework (from DFID Guidance Sheet 1)

The Sustainable development Framework on the other hand is depicted in Figure 3 adapted from that used in the National Sustainable Development Framework. In this version of the diagram, which is used in the main Desired State of the Environment Report the green disc represents the natural environment, the orange disc the socio-political and the red the economic spheres. These are supported by the blue disc representing the governance environment.

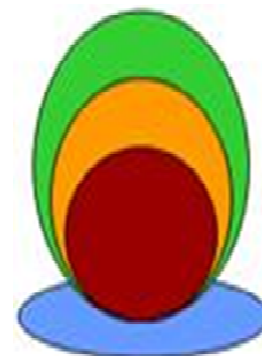


Figure 3: Sustainable Development icon

The correspondence between the two diagrams is described in Table 1.

Table 1: Table showing correspondence between elements of the SLA and SD

SLA Framework	SD diagram
Livelihood Assets	Environmental sphere (green disc)
Vulnerability Context and Livelihood Strategies	Social sphere (orange disc)
Livelihood Outcomes	Economic sphere (red disc)
Transforming Structures and Processes	Governance sphere (blue disc)

McNab⁹ has investigated the way in which the sustainable livelihoods framework can be used as a valuable tool for understanding the diverse and complex dynamics of development and natural resource management

⁹ McNab, D. 2004. Livelihood enhancement in the new South Africa: Public expectation, environmental dynamics and 'muddling through'. PhD thesis, University of Sheffield, UK.

problems (e.g. Carney, 1998¹⁰; Scoones, 1998¹¹). His research has demonstrated the power of the Sustainable Livelihoods Framework as a tool for understanding and managing this dynamic.

In the analysis of the data collected that is offered later the contribution of the Sustainable Livelihoods Approach is explored.

7 RESPONSES RECEIVED

7.1 Questionnaire

7.1.1 Responses to date – English questionnaire

Thirty-three responses have been received so far to a questionnaire distributed to the database of I&APs and published in the Zululand Observer. These responses have been collated and are summarised in *Annexure 12: Questionnaire responses*. They represent the response of those members of the public who are sufficiently concerned about environmental issues to respond to the invitation to respond. A more extensive survey might reveal other concerns and issues, but it is our opinion that the issues raised are a reliable guide to the views of the community of Richards Bay.

7.1.2 Responses to date – isiZulu questionnaire

Two hundred and fifty-eight responses were received. These questionnaires were distributed, administered and collected by members of the Dube Tribal Council. To this extent the sample represents the views of those with whom they Tribal Councillors have contact, specifically those who attend meetings of the Tribal Council wards. There is a possibility that this may skew the data and that a “group think” phenomenon may have arisen.

7.1.3 Responses to agriculture questionnaire

Awaited

7.2 Focus groups

The responses of the two focus group meetings are captured in the minutes shown in **Error! Reference source not found.**

In summary these groups adopted the positions detailed below.

7.2.1 Business and Industry

Participants expressed concern that (industrial) development applications are done in isolation, and are never constrained by the bigger picture. An individual developer has only to worry about an isolated zone, not the whole zone. The increasing pressure on the environment from both housing demand and development was also noted. The possibilities of non-industrial development were raised

The need to assess and mitigate existing impacts, for instance waste management as required by the new Waste Act, was raised as was the need for urgent technological solutions to overcome the environmental limitations. These solutions could build on research already done in the area, e.g. solar solutions, groundwater solutions, waste solutions.

¹⁰ Carney, D., 1998. Sustainable rural livelihoods. DFID: London.

¹¹ Scoones, I. 1998. Sustainable Rural Livelihoods: A framework for analysis. Working Paper 72. IDS, University of Sussex: Brighton

The issue of adequate enforcement of existing environmental protection measures was raised in order to regulate industries properly.

The group were of the opinion that development of the port should go ahead, but industrial development should be curtailed in its vicinity. A mindset that industrial development is not going to happen right here in this area must be encouraged, and even promulgated.

They also suggested better communication and cooperation between the authorities, industry and the IDZ as it appears that there is not much communication between them.

Industrial clustering should be encouraged, but will require a technical organisation or body to monitor and regulate this.

Certain areas should be no-go zones with strict controls for any areas where there is uncertainty about appropriate development. This is a form of preventative conservation, i.e. not to develop an area which could be of high value in the future, or be put to a better use.

7.2.2 Community and environmental groups

Participants noted that the Port expansion framework is in conflict with the IDZ's plan to develop. In order to facilitate a sustainable 100-year plan a service corridor will go straight through the IDZ. The question was asked as to how this kind of growth would be facilitated?

The waste of resources on inappropriate infrastructure development by the municipality was a concern, particularly in the light of the contradictions, and a lack of articulation, between plans developed by different agencies. Relocation of industries from the port closer to raw material, such as coal, was suggested.

The question of jobs and employment is also so important, many people say environment is secondary and that jobs are more important. Equally concerning is that it is not always locals who benefit from development. Industry in the area does not benefit the local community. For instance, if someone works in the Richards Bay coal terminal and their job is to sweep coal dust, they gain nothing out of the job, and their social well being and health is ruined. The magnate who exists in say, Sweden benefits from all the money.

It was also suggested that if the energy put into lobbying to allow Tata Steel to be placed in the IDZ had been put into tourism, there could really be far more sustainable types of industry, not waste-creating types of industry created.

It was suggested that what the people of Richards Bay think should be happening is not taken seriously and that they are not influential in decision making. The planning for Richards Bay started in seventies and was based on a grid pattern. This way of thinking this needs to change.

The group made the following recommendations.

- Tourism: The lakes in Richards Bay are really beautiful and crystal clear, as is the southern sanctuary. These resources could be used for non-consumptive, sustainable long-term use. Access to these natural assets is a problem.
- Open spaces, and the people who use them, must be protected.
- The harbour could provide an attraction for cruise ships and tourism linked to Northern KwaZulu-Natal.
- Coal exports. This may not be sustainable in future and so it is important to keep tracts of land and no go zones so that if things change, these areas will not be affected.
- The functionality of the dune cordon must be preserved
- The beach is totally unused and a no go area, as there is an erosion problem.
- The mudflats are a sanctuary area and very important breeding ground for the rare European Waders, with an untapped tourist potential value.
- Marine habitats are irreplaceable and it would be disastrous to lose them. Humpback dolphins can be seen at the harbour mouth and offshore, this is a very important area.

Long-term sustainable goals

1. Development of the port should go ahead, but industrial development should be curtailed in its vicinity. A mindset that industrial development is not going to happen right here in this area must be encouraged, and even promulgated.
2. Industrial clustering should be encouraged, this needs an organisation or body to monitor and regulate this. It would be good to include various stakeholders from the municipality and others.
3. Tourism/Eco tourism is a long term sustainable goal and can enrich the environment ecologically and with biodiversity as well as financially.
4. If industry is moved west of the N2, the area within Richards Bay can be rehabilitated and sustained – local mindset needs to change.
5. Work/job opportunities need to benefit locals.
6. Certain areas should be no-go zones if there is uncertainty surrounding what should be developed there. This is a form of preventative conservation, i.e. not to develop an area which could be of high value in the future, or be put to a better use.

8 ANALYSIS OF RESPONSES

8.1 ‘Statistical’ analysis

8.1.1 English questionnaire

Thirty-three completed questionnaires were received. Of these 61% maintain that they rely on natural resources “a lot”, while 85% regard the Port development and the IDZ as having “a lot” of importance as shown in Table 2 and Table 3.

Table 2: Reliance on natural resources (English respondents)

	#	%
Not at all	5	15%
Some	8	24%
A lot	20	61%

Table 3: Importance of Port and IDZ development (English respondents)

	#	%
Not at all	1	3%
Some	4	12%
A lot	28	85%

When asked about the relative importance of various consequences of the Port development and IDZ the following ranking was revealed, as shown in Table 4:

1. Access to water bodies and reduced pollution are rated as of the highest importance;
2. More jobs and more industry are important;
3. Keeping rates low is important;
4. Maintaining / creating open spaces has importance.

Table 4: Preferred trades-off between consequences of development (English respondents)

Aspect	Very important		Important		Not important	
	#	%	#	%	#	%
Low rate increases	10	30%	19	58%	3	9%
More industry	9	27%	20	61%	4	12%
More open space	7	21%	21	64%	5	15%
More jobs	22	67%	11	33%	1	3%
Access to water bodies	23	70%	8	24%	2	6%
Reduced pollution	29	88%	4	12%		0%

n= 33

8.1.2 isiZulu questionnaire

Two hundred and fifty-eight completed questionnaires were received. Of these 100% maintain that they rely on natural resources "a lot", and simultaneously regard the Port development and the IDZ as having "a lot" of importance as shown in Table 2 and Table 6.

Table 5: Reliance on natural resources (isiZulu respondents)

	#	%
Not at all		0%
Some		0%
A lot	258	100%

Table 6: Importance of Port and IDZ development (isiZulu respondents)

	#	%
Not at all		0%
Some		0%
A lot	252	100%

When asked about the relative importance of various consequences of the Port development and IDZ the ranking as shown in Table 7 was revealed.

The table indicates that "More jobs" and its corollary "More industry" are considered important by 87% and 83% respectively. However the trade-off is not as clear as 80% regard access to water bodies and 78% regard more open spaces as important, strengthening the conclusion reached in the summary of responses to Question 3. The willingness to accept higher pollution levels (20% regard "Reduced pollution" as not important) appears to indicate a "jobs at (almost) any price" attitude.

Table 7: Preferred trades-off between consequences of development (isiZulu respondents)

Aspect	Very important		Important		Not important	
	#	%	#	%	#	%
Low rate increases	135	52%	29	11%	58	22%
More industry	214	83%	46	18%	3	1%
More open space	201	78%	48	19%	12	5%
More jobs	224	87%	47	18%	6	2%
Access to water bodies	207	80%	29	11%	8	3%
Reduced pollution	138	53%	43	17%	51	20%

n= 258

8.1.3 Agriculture questionnaires

Awaited

8.1.4 Focus group attendance

It is difficult to assign any value to the attendance figures for the focus group meetings as it is impossible to assess the base value, i.e. if 10 people attend a meeting, measured against the total population of the municipality the percentage is very small.

The attendance has therefore assessed on coverage, i.e. the organisations or groups represented. Using this approach twenty-one different groups participated, in addition to those who representing the commissioning authorities (DEA, DAEARD, uMhlathuze Municipality) as detailed in Table 8.

Table 8: Organisations or groups attending Desired State of the Environment Focus Group meetings

No	Organisation
1.	RBM
2.	2CCI/MCE
3.	City of uMhlathuze: City Development
4.	City of uMhlathuze: City Engineers
5.	ETC Africa
6.	Foskor
7.	GX Marketing & Communications
8.	Island View Storage
9.	Natal Mercury
10.	Mondi Felixton
11.	Mondi Richards Bay
12.	Private
13.	Bayport cc
14.	QS2000 Plus/ USDC
15.	RBCT
16.	Sivest
17.	Transnet NPA
18.	uMhlathuze Municipality
19.	Zululand Birding Route
20.	Zululand Chamber of Commerce & Industry
21.	Zululand Observer

8.2 Narrative analysis

8.2.1 English speakers narrative

From the English responses it is clear that the majority of the people who participated in this questionnaire seem to rely significantly on natural resources for their livelihood. Some of the occupations mentioned were: agriculture, timber, mining and conservation. Another important factor is the Lake Mzingazi provides drinking water for the City of uMhlathuze and is a resource that must be protected at all costs.

People also place a high value on natural resources for their lifestyle, whether it be for recreational purposes (such as fishing, birding and dendrology), enjoyment of the wildlife and landscape, as well as direct sustenance – catching fish for food.

It is evident that people wish to preserve existing “green areas” and open spaces which act as buffer zones between residents and industrial zones. The responses also indicate how important clean air is for the health and wellbeing for the inhabitants of Richards Bay. It is also imperative that the flora, fauna and ecological heritage is preserved, as the biodiversity of the area has dwindled considerably and is under constant threat

of being eradicated. People are concerned about pollutants affecting the water and the environment as there are people who enjoy the wildlife and bird life as well as people who catch fish for consumption.

The development of the Port and IDZ is also of great importance to the people of Richards Bay. One of the most significant issues to arise from this study is that people are very eager to see an increase in jobs to sustain the community and to grow the economy. It was also noted that people feel quite strongly that the harbour/port could be established in such a way that it would raise the status of Richards Bay and make it a major role player in terms of trade and shipping. What is equally important however is that the port and IDZ is developed in a responsible manner, in other words, environmental impacts must be minimal.

The importance of possible consequences of development revealed the following ranking:

1. Access to water bodies and reduced pollution are rated as of the highest importance;
2. More jobs and more industry are important;
3. Keeping rates low is important;
4. Maintaining / creating open spaces has some importance.

8.2.2 isiZulu speakers narrative

Most respondents revealed a high dependence on natural resources for their livelihood. The majority of individuals within the community are unemployed and depend on agricultural resources. They report the importance of their access to natural resources to provide healthy food for everyone, including the sick in the area. This access is also important for income generation as some individuals may sell the food they grow while others dream of starting businesses selling agricultural produce.

The responses reveal specific issues which are of critical importance to the respondents and their desire for them to be addressed and opportunities developed. The agricultural products mentioned and the desire to cultivate these can be regarded as a wish list. However the specificity of the list seems to indicate not only a clear idea of their nutritional value but also some experience in their cultivation.

The social amenities mentioned, which at first appear to be outside the scope of an EMF, also indicate a clear conception of the integrated nature of any consideration of sustainability. For example road upgrades are not just an added convenience but also facilitate trade and access to employment.

The request for the preservation of land for agricultural purposes is in sharp contrast to the perceived job creation benefits of any industrial development in the study area. The responses appear to indicate a desperate desire for a clear path out of poverty and its consequences. There is an apparent contradiction between the desires for crop cultivation opportunities and the use of the land for development leading to formal employment.

The responses also indicate that there is some confusion over the purpose and status of the consultation. Although the role and function of the EMF was carefully explained to the leadership who were responsible for the distribution of the questionnaire it is clear that many respondents believed that future development was imminent.

In considering the outcomes reported above it become clear that the overwhelming concern expressed by residents if the area is that any future development should:

- Provide employment opportunities; but
- Not compromise access to natural resources.

8.2.3 Agricultural sector narratives

Awaiting responses

8.3 Focus group narratives

The focus groups' narratives reflect those already discerned in other groups, but are (unsurprisingly) more nuanced.

The narrative revolves around the need for better planning and coordination between authorities and potential developers as a way of limiting the impact of the highly desired and inevitable development planned for the area. The narrative goes a little further proposing that not only should there be controls and limits, but that alternate forms of development should be pursued, specifically non-consumptive developments, including tourism and eco-tourism, which is perceived to be potentially highly lucrative and will preserve/conservate the environment which is perceived to be under threat.

8.4 Dominant and counter narratives

The dominant narratives (stories) told by all respondents have a remarkable resonance. In all groups the stories are of about reliance on natural resources to provide goods and services. The extent of the reliance may vary, but these resources loom large in their lives and continued access to the both resources and to the goods and services that flow from them is very important. The preservation and conservation of these resources is considered to be critical. Access too is of great importance – critical/utmost to the Dube people (61% English questionnaire, 100% isiZulu questionnaire).

However this not an either-or scenario; an equally dominant narrative is the high importance placed on development of the port and IDZ. This latter portion of the narrative arises because development is seen as instrumental in providing jobs and livelihoods. This counts as a counter narrative and is based on the view that the Port and its expansion is critical at both a provincial and national level and that the related development of the IDZ will provide desperately need employment opportunities for the people of Richards Bay, especially the poor. The economic benefits of the planned developments are overwhelming.

8.5 Metanarrative

The apparent conflict between these two narratives can be resolved by resorting to a meta-narrative. Roe (1994)¹² suggests that policy (and the EMF will satisfy all the criteria for the definition of policy) can be analysed using a technique based on critical discourse analysis. In terms of his theory the final policy generated if it is to be successful will be the meta-narrative that emerges from a comparison of the dominant narrative and counter narratives, but transcends these, including elements of each in such a way as to enable a policy issue that was previously “dead in the water” to proceed.

In the case of this study and its attempt to generate guidelines for environmental decision making there is apparent opposition between the desire to preserve natural resources and to utilise them for industrial development. The apparent contradiction is resolved if the opportunities for cultivation are seen as bottom-line safety net type responses (“I can stave off starvation if I can cultivate a food crop”) while formal employment is seen as a longer term means of ensuring family security (“If I have steady full-time employment as a result of increased job creation my family won’t starve”). The aspect of access to natural resources is crucial as it reflects the baseline of a family unit’s sustainable livelihood strategy. Any position contribution to the family unit’s livelihood beyond this would be actively pursued. Hence the dual concern of preserving open space and access to water bodies alongside the job-seeking imperative.

The high importance attributed to development is good news for the planners, but it can only be seen as sustainable good news if the environmental costs are mitigated and an absolute minimum ‘reserve’ is enforced – rather like the ecological reserve in a river. These two equally dominant narratives can be regarded as counter narratives and a ‘way forward’ sought by reference to a meta-narrative. The meta-narrative that emerges (in my thinking) is that the ecological reserve, to use the notion introduced above, provides the base – the irreducible minimum – on which many rely for their livelihood (in the sense of maintaining life). A job and the additional resources a wage provides will enhance this livelihood, making it more ‘sustainable’.

The meta-narrative then becomes one of creating an EMF as a policy instrument that guides decision making in terms of promoting development that strives to:

1. Advantage labour intensive processes;

¹² *op cit*

2. Avoid if possible, but at least minimise, unsustainable resource consumption;
3. Creates corridors and “no-go” areas for resource rehabilitation;
4. Exploits the unique bio-diversity opportunities of the area;
5. Promotes non-consumptive resource use; and
6. Follow the most stringent Environmental Management Plans.

8.6 Sustainable Livelihoods analysis

Assuming the meta-narrative developed above has resonance the situation – and possible solution - can be viewed through an SLA lens. Following this approach the relationship between the Sustainable Livelihoods assets (human, natural, financial, social and physical capital) and the livelihood outcome is mediated by an enabling environment created by the “transforming structures and process” which are typified in the governance structures and processes. As such the EMF fits very neatly into this as it suggest an enabling mechanism by which the various zones can be managed to ensure both development and preservation of the livelihood assets as well as reducing the vulnerability context (see Figure 2 on page 12).

9 CONCLUSIONS AND RECOMMENDATIONS

In considering the responses reported above it becomes clear that the overwhelming concern expressed by residents if the area is that any future development should:

- Respect the opportunities offered, and constraints, imposed by the environment in terms of its capacity to assimilate change;
- Preserve and secure the remaining environmental assets, especially those associated with open spaces and recreational areas;
- Promote and secure a sustainable livelihoods approach to development planning, especially for – but not limited to – those sectors of the population who are most vulnerable;
- Take cognisance of the important implications for development of climate change; and
- Proactively use the planning for the IDZ to ensure environmental and ecologically efficient development that benefits all sectors of society.

In addition, management strategies for the zones proposed by the EMF emerge as fundamental to providing guidance for EIA decision making and beyond. It would therefore seem appropriate to suggest that the EMF should suggest that any environmental assessment of a proposed activity in the study area should address the following questions.

To what extent does the proposed activity:

8. Promote, or at least not reduce ecosystem functioning across the whole study area;
9. Promote labour intensive production processes, with appropriate skills development;
10. Take advantage of potential down stream beneficiation of existing products generated in the area;
11. Promote sustainable use of the natural resource base;
12. Promote, or at least not restrict, access to natural resources;
13. Promote, or at least not further militate against, social cohesion; and
14. Contribute to joint action on environmental issues by other enterprises in the area.

10 ASSESSMENT OF PROCESS

In the following sections the criteria for assessing a participatory process and the nature of the analytic technique used in this report are offered.

10.1 Criteria for assessing a process

In evaluating a participatory process a number of issues, or evaluation criteria, have been evolved. Petts (2001)¹³ has produced the following criteria for assessing a process. He suggests the questions shown in Table 9 be posed.

In assessing the outcomes of the process, as opposed to the process itself, the most useful approach is that offered by narrative analysis. The rating assigned, while a subjective self-assessment, is based on my professional opinion and my experience of this and similar processes.

Table 9: Assessment of the process

Criterion	Assessment	Rating /5
1. Ensures that the participants are representative of the full range of people potentially affected and that barriers, which may bias representation, are minimised.	Several attempts were made to ensure a fully representative participation as possible. However sections of the population resident in the northern sections of the study area did not participate.	
2. Allows participants to contribute to the agenda and influence the procedures and moderation method.	In all meetings participants were offered the opportunity to shape the agenda and to raise any pertinent issue.	
3. Enables participants to engage in dialogue, and promote mutual understanding of values and concerns.	The potential for conflict between pro- and anti-development factions was minimised and mutual understanding promoted.	
4. Ensures that dissent and differences are engaged and understood.	This occurred to a lesser extent than hoped due to the small numbers of people engaged.	
5. Ensures that 'experts' are challenged and that participants have access to the information and knowledge to enable them to do this critically.	Opportunity has been given for experts to be challenged. However very few, if any, took advantage of the opportunity.	
6. Reduces misunderstanding and ensures that the authenticity of claims is discussed and examined.	The public inputs to the knowledge base promoted this aspect.	
7. Makes a difference to participants, e.g. allows for development of ideas, learning and new ways of looking at a problem.	The development of was more obvious among the consultant team than among the participating public.	
8. Enables consensus about recommendations and/or preferred decisions to be achieved.		
9. Makes a difference to decisions and provides outcomes which are of public benefit.	While the EMF is intended to achieve this it is too early to assess.	-
10. Ensures that the process is transparent and open to those not directly involved but potentially affected.	Every attempt was made to achieve this, using email, newspaper, telephone and word-of-mouth.	
	Average	

Considering the potentially controversial nature of this project the overall average rating of xxx (or xx%) indicates that the process has been open and transparent.

¹³ Petts, J. 2001. Evaluating the effectiveness of deliberative processes: Waste management case studies. *Journal of Environmental Planning & Management*, Mar 2001, 44 (2), 207.

11 PROFESSIONAL OPINION

My professional opinion is summarised as follows:

1. The consultation, participation and engagement process has been fair, open and transparent.
2. The various stakeholders have concerns, which may not all be based on scientific evidence, but are nevertheless valid.
3. The issues that have surfaced during the process underline the importance of ensuring the greatest degree of public participation and stakeholder engagement possible in the further of the process.
4. The requirements of Section 24(7)(d) of the National Environmental Management Act No 107 of 1998, and the Regulations and Guidelines published in terms of the Act have been complied with.

RRV Bulman BCom, MSocSci

April 2010