



2 September 2011

BIRDLIFE SOUTH AFRICA's comments on the **Avifauna Study** (Appendix 11, Report No. WPB/Avi/2011-05) of the **Environmental Impact Assessment** and **Environmental Management Report** for the **Proposed Coal Mining Operation** for **WILLIAM PATRICK BOWER (PTY) LTD** on the farms **GROENVLEI 353JT** and **LAKENVLEI 355JT**

MINING RIGHT APPLICATION (MP30/5/1/2/2/505MR)

This letter is written further to objections made by BirdLife South Africa and other I&APs during the Public Participation meeting held on 29 August 2011 in Belfast, Mpumalanga.

Despite having identified 209 bird species (25% of the total 841 bird species that occur in South Africa) occurring on the WPB properties and immediate surrounding areas, and that among these are two *Critically Endangered*, eight *Vulnerable* and four *Near Threatened* bird species, no cognizance is taken of this exceptional and highly threatened avifaunal diversity.

Some of the data presented in the avifaunal study are questionable or incorrect. The study states that 32 endemic bird species occur in the proposed mining site and immediate surrounding areas (nine pentads in total). However, these data are incorrect, since only 16 of the 32 endemic species listed in Table 3-1 are in fact endemic or near-endemic (i.e. roughly 70% or more of the South African population). Species descriptions are also inaccurate in certain instances. For example, the avifaunal study states that cranes are 'only dependent on grassland', which is untrue because Grey Crowned Crane (*Vulnerable*) and Wattled Crane (*Critically Endangered*) breed in wetlands. Protecting breeding habitats is of equal or higher conservation concern and importance than protecting foraging habitats alone. With only a 100 m buffer zone around wetlands, as the wetlands report proposes, these and other wetland birds will be severely impacted upon by mining operations, yet this is not highlighted in the avifaunal



study. Water quality degradation due to mining operations could have severe negative impacts for birds through habitat degradation, yet this is also not addressed in the avifaunal study.

Furthermore, some of the mitigation recommendations made are irresponsible from an environmental and conservation perspective. The recommendation that Helmeted Guineafowl will occur and increase in numbers on rehabilitated sites in response to the availability of tree roosts is an irresponsible recommendation considering other negative impacts on avifauna. This area falls within the Grassland Biome, which is naturally absent of trees, and therefore, the further planting of invasive alien trees such as wattle (*Acacia* spp.) and pine (*Pinus* spp.) should not be promoted. Guineafowl are the most widespread gamebird in South Africa and therefore of little conservation value or concern. Guineafowl are neither suitable as an indicator bird species for grassland or wetland habitat health and condition, nor as a surrogate species indicating bird diversity in general. A better choice of indicator species for monitoring rehabilitation progress would be Red-winged Francolin (*Scleroptila levaillantii*). It must also be noted that the avifaunal study incorrectly names francolin as "*Francolinus* spp." – there is no such genus. Francolins and spurfowls in South Africa belong to the genera *Scleroptila* and *Pternistis* respectively.

The vegetation classification used (Low and Rebelo, 1996) is outdated, since the Mucina and Rutherford vegetation map for South Africa, Lesotho and Swaziland has been the accepted standard reference since 2006. The Google Earth map used to identify bird transects is also inappropriate, having used imagery from 2003. Given the continued sand mining operation and other plantation and farming activities; it is highly unlikely that the land is in the same condition and state as it was eight years ago.

Collectively, these objections call into question the validity of this avifaunal study. Furthermore, a two-day site visit in winter cannot be considered acceptable or sufficient and 19 species is not a true reflection of the bird diversity in the area. These findings should be disregarded. We recommend that the avifaunal report should be amended prior to acceptance of the finalization of the EIA Report. BirdLife South Africa does not support coal mining in this area, and believes that there are no reasonable mitigation measures that would prevent unacceptable impacts.



BirdLife South Africa supports the opinions and objections raised with regard to this application by the Mpumalanga Tourism and Parks Agency (MTPA), the Endangered Wildlife Trust (EWT), the Wildlife and Environment Society of South Africa (WESSA), Mpumalanga Wetland Forum, the Federation for Sustainable Development, and the Northvaal Chapter of the Federation of Southern African Fly Fishers (FOSAF).

Yours sincerely,

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BirdLife South Africa

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