POSITION STATEMENT
Habitat Clearance

PROBLEM STATEMENT

It is widely recognised that South Africa urgently needs to accelerate economic growth in order to address the dual challenges of inequality and high unemployment. Infrastructure development is a key determinant of economic growth and, if undertaken in a sustainable way, can greatly contribute to the prosperity of a country; this is recognised by the National Development Plan.

However, habitat loss is believed to be the primary threat to South Africa's birds, other biodiversity, and functioning ecosystems. Poorly planned infrastructure development that does not properly account for environmental sensitivities can permanently erode the ecological well-being of a country, leading to a reduced ability of the environment to support our country's biodiversity and, importantly, human welfare. This is especially relevant in South Africa as it is one of 18 megadiverse countries and hosts a number of highly sensitive ecosystems, many of which have undergone significant and irreparable transformation as a result of habitat clearing due to agriculture, mining and infrastructure development.

The chief means by which development impacts on the environment is through direct habitat clearance. Therefore, BirdLife South Africa provides a clear position on the clearance of habitat for infrastructure development, agriculture, or any other such activity.

BIRDLIFE SOUTH AFRICA POSITION STATEMENT

While South Africa's network of formally Protected Areas safeguards a number of important ecosystems, habitats and species, alone it is not sufficient for safeguarding our 'ecological bottom line' – i.e. the proportion of our total natural ecosystems that need to be conserved in order to sufficiently protect biodiversity and the ecosystem services on which societies rely.

BirdLife South Africa contends that no significant habitat clearance arising from development activities should take place in the following areas:

- Protected Areas;
- Critical Biodiversity Areas (CBAs);
- Key Biodiversity Areas (KBAs)
- Areas identified as being Very High Sensitivity in the National Site Screening Tool;
- Sites of high or very high Site Ecological Importance (as defined in SANBI and BirdLife South Africa's Species Enviromental Assessment Guidelines, 2020).
- Alliance for Zero Extinction Sites;
- Ramsar wetlands; and,
- Critical habitat for threatened species (as defined by the International Finance Corporation Performance Standard 6)

Further, BirdLife South Africa will not support habitat clearance within Important Bird and Biodiversity Areas (IBAs) as it will result in the loss of important habitat for Important Bird and Biodiversity Area trigger species.

In all other areas, if the clearance of natural habitat is required for development activities, it is imperative that all legally required permits and permissions need to be obtained prior to any habitat removal and that the Mitigation Hierarchy must be strictly applied where significant impacts are firstly avoided, secondly minimised, thirdly restored, and, lastly, any residual impacts are offset.

Offsetting must be viewed as a tool of absolute last resort. Avoiding impacts is often the most cost-effective way for projects to proceed and is in keeping with the principles of sustainable economic development.

Further, it is important that Environmental Assessment Practitioners (EAPs) and developers involve appropriate specialists at an early stage of project design. EAPs should also proactively engage with surrounding land owners and communities, relevant provincial government departments, as well as local and nationally relevant conservation organisations so as to ensure that significant impacts are properly identified and their context understood.

Nationally-accepted methods for quantifying site-based ecological sensitivity and identifying significant impacts must be followed; including BirdLife South Africa/SANBI Species Enviromental Assessment Guidelines.

Proposed measures to minimise or restore significant impacts must be supported by available evidence. Many vegetation types cannot be restored post clearance, especially primary in the Grassland, Fynbos, Succulent Karoo and Nama Kkaroo biomes.

Lastly, it is critically important that the cumulative impacts of all current and planned development projects within the landscape are considered, particularly within IBAs and KBAs. Ipacts resulting from habitat clearance cannot be properly assessed in isolation of other activities in the same landscape that are likely to result in habitat clearance.

BirdLife SOUTH AFRICA
Giving Conservation Wings