

The potential contribution of environmental impact assessment (EIA) to responsible tourism: The case of the Kruger National Park

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Highlights

- EIA and responsible tourism literature is reviewed and commonalities identified.
- EIA has considerable potential to contribute to responsible tourism developments.
- EIAs of proposed tourism developments in the Kruger National Park are evaluated.
- More could be done to better align EIAs with principles of responsible tourism.

Abstract

Environmental impact assessment (EIA) and responsible tourism both aspire to contribute to sustainable development. EIA is the process of identifying, assessing and managing the potential impacts of new developments and is legally mandated in most countries of the world. Tourism developments are subject to EIA under South African legislation, which requires consideration of the full range of sustainable development objectives. This paper highlights the parallels found in the discourses of EIA and responsible tourism, identified through a focused literature review, and develops a framework comprising five characteristics that EIA should embody to maximize its contribution to responsible tourism. It tests the framework by evaluating three EIAs conducted in the Kruger National Park since 2011, when South African National Parks (SANParks) formally committed to responsible tourism. The evaluation process confirmed the utility of the framework and highlighted areas in which responsible tourism principles could be more explicitly reflected in SANParks EIAs.

Key words: Environmental impact assessment (EIA); responsible tourism; sustainable development; sustainable tourism; SANS1162; South African National Parks (SANParks); Kruger National Park (KNP)

1. Introduction

Environmental impact assessment (EIA) is arguably the primary environmental management tool at a global scale (Morgan, 2012; UNEP, 2018), and is now recognised as a global norm in international environmental law (Yang 2018). It is a process by which the potential impacts of development, both positive and negative, are identified, assessed and managed. EIA is legally mandated in almost every country of the world in some form, as process for obtaining environmental approvals for development (Morgan, 2012) and to promote sustainable development (Sheate, 2009; Yang, 2018). It is well established in South Africa under the *National Environmental Management Act* (NEMA) 1998, as a tool to give effect to the Constitutional expectations for sustainable development and the right to a clean environment (Morrison-Saunders and Retief, 2012). In this context EIA is mandated for many forms of development including tourism infrastructure and other development activities which have the potential to impact on biodiversity within protected areas. This research explores EIA in relation to responsible tourism in South Africa.

Tourism plays a vital role in South Africa's economy, and contributed R136.1bn (US\$10.2bn) to Gross Domestic Product in 2017 (WTTC, 2018). The potential for tourism to act as a development agent to lift millions of previously disadvantaged people out of poverty has been recognised since the earliest days of the new dispensation in the post-apartheid era, with the release of the white paper on the *Development and Promotion of Tourism in South Africa* (Government of South Africa 1996). The notion that tourism should contribute to sustainable development, defined as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs" (World Commission on Environment and Development, 1987) has been central to the development of the South African tourism industry post-1994. This is fitting, since sustainable tourism has been argued to be particularly important in contexts with high biodiversity values and

large numbers of people on low incomes (McCool, Butler, Buckley, Weaver, & Wheeler, 2013), conditions which characterised South Africa then and still do today. The 1996 white paper used the alternative term 'responsible tourism', defined as "tourism that promotes responsibility to the environment through its sustainable use; responsibility to involve local communities in the tourism industry; responsibility for the safety and security of visitors and responsible government, employees, employers, unions and local communities" (Government of South Africa, 1996b: vi). The concepts of sustainable tourism and responsible tourism are very closely related and we return to this point in Section 2.

The South African National Parks Agency (hereafter SANParks) is one of the largest tourism entities in South Africa. As a public entity, it operates 19 national parks on behalf of the government and people of South Africa, with the mission "To develop, expand, manage and promote a system of sustainable national parks that represents biodiversity and heritage assets, through innovation and best practice for the just and equitable benefit of current and future generations" (SANParks, 2016, p10). Over 80% of SANParks' income is derived from tourism revenue (Biggs et al., 2014), and income earned in five parks, including the flagship Kruger National Park, subsidises the operational costs of the other parks (SANParks, 2018). In October 2011, SANParks formally adopted the National Responsible Tourism Standard SANS1162:2011 (the current version of which is SANS 1162:2016), and shortly afterwards released the brochure *Responsible tourism in SANParks: The journey to 2022* (SANParks, undated). This document includes the following definition, with more specific goals in relation to social impacts and benefits than the 1996 definition (p9):

"Responsible tourism respects the natural and cultural environment and contributes to local economic development in an ethical manner. It helps conserve fragile cultures, habitats and species by maximising the benefits to local communities and minimizing negative social or environmental impacts".

SANParks is also committed to the delivery of the *National Tourism Sector Strategy 2016 - 2026* (updated November 2017 and approved by Cabinet in January 2018 (Department of Tourism (2018)) that aims to position South Africa as, "A top world responsible tourism destination" with the vision "Rapidly and inclusively growing tourism economy that leverages South Africa's competitive edge in nature, culture and heritage... and supported by innovation and service excellence" (NDT, 2017, p16). Central to the achievement of this Vision, particularly in a time of funding challenges, is the development of additional products and services (Ferreira & Harmse, 2014). The necessary new infrastructure to enable this expansion of tourism offerings is subject to EIA, and to date numerous EIAs have been conducted on camps, gates, roads and other infrastructure planned or developed within South Africa's national parks.

EIA and tourism in South Africa thus share a common goal of contributing to sustainable development. As EIA is legally mandated for new developments in most parts of the world, including South Africa, it therefore has potential as a vehicle for the promotion of sustainable and responsible tourism outcomes through the delivery of new tourism developments. While this key point has been recognised by others (Spenceley, 2005; Zubair, Bowen, & Elwin, 2011), it is less clear how exactly this should occur or what characteristics EIA should embody to fulfil this potential to facilitate responsible tourism, and this is the focus our research. This paper firstly asks:

How can environmental impact assessment contribute to responsible tourism?

We answer this question through engagement with international literature; in Section 2 we briefly explore the related concepts of sustainable and responsible tourism and position our work in the context of responsible tourism in South Africa, while in Section 3 we review the common themes that can be distinguished within the EIA and responsible tourism bodies of literature. We commence by identifying and reviewing the small body of literature that addresses the relationship between EIA and tourism, extracting the main themes and building upon them drawing on other relevant literature sources. The process of identifying relevant literature has been informed by our own experience as long-term researchers of either EIA or tourism. Based on this review, we propose a framework comprising the characteristics that EIA should embody if it is to maximize its contribution to responsible tourism. We consider this to be the main contribution of our research.

We then test utility of our framework by applying it to a small sample of EIA practice in South Africa. Given the importance of the Kruger National Park (hereafter KNP) to tourism in South Africa, and therefore its appropriateness as a case study, we then ask:

To what extent is the potential for EIA to contribute to responsible tourism being realised in the Kruger National Park?

We address this question in Section 4 of the paper. Details of the methodology we applied to answer this question are found in Section 4.2, following a brief introduction to EIA in South Africa in Section 4.1, and the results of this analysis are presented in Section 4.3. The paper's conclusions are drawn in Section 5.

2. Sustainable and responsible tourism

The concept of sustainable tourism emerged in acknowledgement of the significant impacts that the tourism sector has both on the natural environment and on local communities (Hunter, 1997, 2002; Spenceley, 2005; Welford, Ytterhus, & Eligh, 1999). In one of the earlier contributions, Inskeep (1991, cited in Mihalic, 2016) defined five main criteria for sustainable tourism, which addressed the economic, environmental and social responsibility of tourism as well as its responsibility towards tourists (visitor satisfaction) and global justice and equity. These sentiments have been largely retained; for example, the United Nations World Tourism Organization (UNWTO) defines sustainable tourism as: "*Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities*" (UNEP and UNWTO, 2005, pp11-12). In particular there is a strong argument that tourism should contribute to local economic development to raise people out of poverty, the so-called 'pro-poor tourism' (Goodwin, 2011; Spenceley & Goodwin, 2007; Spenceley & Meyer, 2012). This is particularly important in the South African context, and is reflected in the *National Tourism Sector Strategy 2016-2026*, the fifth 'pillar' of which is Broad Based Benefits, with the goal of promoting "the empowerment of previously marginalised enterprises and rural communities" (NDT, 2017, p36).

While the discourse of sustainable tourism has been described as a 'success story' (Hall, 2011) and a 'tourism mega-trend' (Weaver, 2014), it is also a contested concept with numerous detractors that has been criticized from a number of perspectives (Butler, 2015; McKercher, 1993). From a practical

perspective it has been said that tourism operators do not understand what sustainable tourism means and therefore have been slow to implement it (van der Merwe & Wocke, 2007). On a conceptual level the term has been argued to be ambiguous and therefore potentially confusing, as it is routinely applied to both mass tourism offerings and ethically-based, alternative tourism offerings, that is small scale tourism with minimal impact that offer an alternative to mass tourism (Butler, 1999; Weaver, 2014). It has also been pointed out that sustainable tourism requires voluntary actions beyond regulatory requirements, that are taken in accordance of corporate social responsibility (Frey & George, 2010) and that resulting marketing or public relations outcomes are inadequate drivers for most tourism businesses (Buckley, 2012). There is also a growing body of work that argues that typical approaches to sustainable tourism, with a focus on specific environmental, social and economic indicators reflecting a 'triple bottom line' conceptualisation of sustainability (Elkington, 1997) are short-sighted and reductionist and can result in interventions with some positive outcomes but with larger, systemic negative outcomes in the long-term (Cochrane, 2010; Farrell & Twining-Ward, 2005; Hall, 2011; McCool et al., 2013; Strickland-Munro et al, 2010). Systems-based approaches, in which the interactions of the elements of the socio-ecological system are recognised, have been suggested to be more appropriate, a point to which we return in Section 3 below.

More recently, both the concept and language have evolved such that 'responsible tourism' has emerged as a complement or alternative to 'sustainable tourism'. Responsible tourism has slowly but surely begun to appear in a number of key international publications; for example, the most recent UNWTO publications refer to 'responsible and sustainable tourism' (see for example UNWTO, 2016). Like sustainable tourism, responsible tourism may also be defined in terms of minimising negative environmental, social and economic outcomes and maximizing positive ones (Frey & George, 2010). Mihalic (2016) provides a useful summary of the emergence of the two discourses and argues that while sustainable tourism is defined purely in terms of outcome-based goals, the added value of the responsible tourism discourse is an equal focus on the behaviours and processes through which these goals are achieved: "the notion of responsibility relates to responsible behaviour and action" (Mihalic, 2016, p464). For the purposes of this paper we will prefer the term 'responsible tourism' to reflect the current South African policy discourse and to embrace this emphasis on responsible action.

As explained in Section 1, sustainability thinking underpins the responsible tourism framing in South Africa and is central to the new vision for the *National Tourism Sector Strategy 2016-2026* (NDT, 2017). South Africa has been at the forefront of responsible tourism since the Cape Town Conference of 1992. In 2002, the then national Department of Environmental Affairs and Tourism (DEAT) released the *National Responsible Tourism Development Guidelines for South Africa* (DEAT, 2002a), along with the *Responsible Tourism Manual for South Africa* (DEAT, 2002b) and the *Responsible Tourism Handbook* (DEAT, 2003). These documents were important precursors to the South African National Standard SANS 1162 *Responsible tourism – Guidelines* and to SANParks' own commitment to responsible tourism (SANParks, undated). The specific requirements of SANS 1162 are outlined in Section 4 as part of our case study analysis.

3. How can EIA contribute to responsible tourism?

While EIA and responsible tourism share the common goal of contributing to sustainable development, the two fields have evolved almost entirely in parallel and hence “knowledge sharing between these fields appears to be very limited” (Hughes and Morrison-Saunders, 2015, p38). A search on ‘tourism’ and ‘environmental impact assessment’ in the titles identified only two contributions, both of which are quite dated and merely identify the potential for EIA to contribute to sustainable or responsible tourism without specifically explaining how (Raschke, 1970; Yu, Tian, Li & Zhang, 1999). We then extended our search to impact assessment more broadly and to specifically identify sources exploring the conceptual relationship between impact assessment and responsible tourism; an explanation of the terminology of the impact assessment field is provided here for readers who may be less familiar with the field.

Environmental impact assessment (EIA) is the process of predicting the potential environmental consequences of developments prior to implementation, and managing these consequences throughout the life of the development (Morrison-Saunders, 2018). What is encompassed by the term ‘environment’ depends upon the legislative framework and also upon the individual developer’s commitment to go beyond minimum legal requirements. In South Africa, the definition of environment in NEMA 1998 encompasses a full range of socio-economic and cultural factors, whereas in some other parts of the world the regulatory focus is on biophysical impacts only. Nevertheless, the social dimension often receives less attention than the biophysical, and hence social impact assessment (SIA) has emerged as a distinct process in its own right (Vanclay, Esteves, Aucamp, & Franks, 2015). Strategic environmental assessment is another distinct form of EIA that applies at the level of policies, plans and programmes rather than projects, and which has also emerged in response to the perceived limitations of project-level EIA (Sadler & Verheem, 1996; Thérivel, Wilson, Thompson, Heany, & Pritchard, 1992), particularly with respect to managing cumulative impacts (that is, impacts arising from different activities within the same geographic area) (Gunn & Noble, 2009). In South Africa, SIA is typically conducted as a component of regulatory EIA (Aucamp & Lombard, 2018), while SEA is a non-regulatory process sometimes conducted on a discretionary basis (Retief, Jones, & Jay, 2008).

A broader literature search showed that all of these various forms of impact assessment have been identified by various authors as having the potential to contribute to sustainable tourism; for example Carvalho Lemos, Fischer, & Souza (2012) review the role of SEA in tourism planning; McCombes, Vanclay, & Evers (2015) look specifically at how SIA can contribute to responsible tourism; the works reported by Spenceley (2005) embraces EIA, SEA, ecological impact assessment and cumulative impact assessment; while Zubair et al.(2011) review EIAs in the context of sustainable tourism. Since all these forms of impact assessment are governed by the same principles (Morgan 2012), relevant insights can be drawn from all of these sub-fields. It is, however, somewhat surprising that there are apparently so few such contributions making a conceptual link between the two fields. Perhaps the most comprehensive overview to date is that of Hughes and Morrison-Saunders (2015) who note that (p38), “Like sustainable tourism, environmental impact assessment (EIA) is a field that focusses on the nexus between specific types of human activity and the socio-economic and environmental setting within a given spatial and temporal context”. They explore the evolution of the respective discourses of the EIA and tourism literature and note a number of commonalities between these parallel fields, specifically:

- An increased focus on the full suite of sustainability impacts, including positive as well as negative impacts of development;
- Realisation of the need to consider the context within which development takes place, including identification of impacts at different scales;
- The need for contextually-appropriate management and governance structures.

In the discussion that follows, we build upon the work of Hughes and Morrison-Saunders (2015) to develop an analytical framework that can be applied to evaluate the extent to which EIA is fulfilling its potential as a tool for responsible tourism. To do this, we follow a similar approach to these earlier authors by reviewing trends in the literature in order to find areas of convergence between the two bodies of work. We commence by taking each of the three points above in turn, and reviewing and contextualizing them to this research as appropriate.

The field of EIA, like tourism, has embraced the concept of sustainable development as an aspirational goal. A body of work on ‘sustainability assessment’ has emerged that has many parallels with the trajectory of the sustainable tourism discourse (Pope, Bond, Hugé, & Morrison-Saunders, 2017). Regulatory EIA in South Africa has been argued to be a form of sustainability assessment, because of the broad definition of environment in NEMA (Morrison-Saunders & Retief, 2012). In other jurisdictions where the environment is defined more narrowly, developers may voluntarily adopt a broader sustainability assessment approach to also include social impacts, to reflect corporate social responsibility commitments and the expectations of stakeholders (Morrison-Saunders & Pope, 2013). As is the case with tourism, it is the social dimension of sustainability that is typically the most challenging, due to the inherent complexity of the social environment (McCombes et al., 2015); and because positive contributions to social outcomes are often voluntary and at the discretion of the developer (Frey & George, 2010).

With respect to the second point of Hughes and Morrison-Saunders (2015) in relation to different contextual scales, it has been suggested that tourism research in general has a tendency to focus on the destination or attraction, failing to consider the broader socio-ecological system and policy context within which the destination or attraction is located (Hall, 2011). A narrow focus can result in a failure to recognize that impacts in one location and at one point in time can have knock-on effects elsewhere in the system, as noted earlier (McCool et al., 2013). This in turn has significant implications for management and governance (the third point of Hughes & Morrison-Saunders, 2015); as Calgaro, Lloyd, and Dominey-Howes (2014, p342) note, “having an incomplete understanding of the dynamic social-environmental system that supports tourism leads to the design and implementation of inappropriate solutions that fail to reduce destination vulnerability and jeopardise the sustainability of tourism-dependent livelihoods”. Numerous contributions have proposed systems-based approaches to implementing responsible tourism that consider the impacted environment as an integrated socio-ecological system, often suggesting focusing on the resilience of local communities impacted by tourism (e.g. Calgaro et al., 2014; Cochrane, 2010; Farrell & Twining-Ward, 2005; Ruiz-Ballesteros, 2011; Strickland-Munro, Allison, & Moore, 2010; Tyrrell & Johnston, 2008). These echo similar calls within the EIA literature for systems-based approaches to promote a more comprehensive and dynamic understanding of development on the receiving socio-ecological environment and the enhancement of resilience as important factors in the quest for sustainability (Audouin & de Wet, 2012; Grace & Pope, 2015; Sloomweg & Jones, 2011). Other resonating arguments include those for increased use of SEA to take a broader perspective

and enable better consideration of cumulative impacts at a regional scale (Carvalho Lemos et al., 2012; Gunn & Noble, 2009); and for comprehensive governance frameworks to ensure that interconnected issues are managed at the appropriate level (Gibson, 2011; Jenkins, Annandale, & Morrison-Saunders, 2003). Thus leading practice in both tourism and EIA seeks to place development in its local and regional context to fully understand the interactions between tourism development and sustainability.

Further parallels between the tourism and EIA literature in relation to management and governance, the third point of Hughes and Morrison-Saunders (2015) can also be discerned. For example, if we return to the argument made by Mihalic (2016) that responsible tourism must be focused on action and not merely agenda setting, we find echoes of a similar argument for action within the EIA discourse. There is long-standing concern that EIA often stops at the point at which potential impacts have been identified and assessed, and mitigation strategies proposed, but does not continue on into what is known as the follow-up phase, during which mitigation strategies are implemented, monitored and evaluated for effectiveness (Morrison-Saunders & Arts, 2004). Inadequate follow-up has been identified as an ongoing weakness in EIA practice internationally (Hollands & Palframan, 2014; Morrison-Saunders, 2018; Sadler, 1996; Wood, Dipper, & Jones, 2000). Furthermore, it has been noted that mitigation strategies proposed in EIAs are often superficial in nature and lacking in detail of exactly what is to be done and how it is to be achieved, due to the early stage of the development at which EIA is typically conducted, often when insufficient details about the proposed development are available, and a lack of resources or capacity to develop robust mitigation strategies ready for implementation at future stages of the development (Raissiyan & Pope, 2012).

The responsibility for implementing the mitigation strategies proposed during the EIA, and the associated Environmental Management Programme (EMPr) in the South African system, usually falls to the operator of the development, who ideally develop and maintain management systems for this purpose. Management systems can be defined as “a set of inter-related organizational processes, sharing resources to achieve several organizational goals” (Sampaio, Saraiva, & Domingues, 2012, p402), and as such they provide a structured way to manage risks and opportunities. However, it is recognised that in practice EIA outcomes and proposed management actions often do not feed seamlessly into operational management systems; this is the so-called ‘implementation gap’ (Perdicoulis, Durning, & Palframan, 2012; Sánchez & Hacking, 2002), which is particularly evident in developing countries such as South Africa (Hill, 2000; Wessels, 2015). Using the terminology of Mihalic (2016) it could therefore be argued that even if the ‘agenda’ component of EIA is strong, the ‘action’ component is usually weak, and that tourism shares this issue. The implementation gap was highlighted by McCombes et al. (2015) in their study of the potential contribution of SIA to responsible tourism. They emphasised the importance of going beyond proposing mitigation strategies to embedding them within the organisation’s management systems, taking into account the available capacity and resources. Interesting KNP identified this ‘implementation gap’ recently and in section 10.9.1 of the latest KNP Management Plan devised an Environmental Management Programme with the commitment “The Park will develop an Environmental Management System (EMS) to manage their operational impacts.” (KNP, 2018). According to KNP (2018), this programme links with high-level objective 8 “To strive for effective and efficient management and administrative support services through good corporate governance enabling the park to achieve its objectives”

and sub-objective 8.1 “To strive for best practice and ensure compliance with environmental legislation through improved governance and environmental risk management” (KNP, 2018).

A further commonality between the discourses of EIA and responsible tourism is the need for greater participation of stakeholders, and particularly affected communities, in decision-making. In the tourism literature this argument is particularly associated with community-centred approaches to tourism planning (García-Melón, Gómez-Navarro, & Acuña-Dutra, 2012; Tyrrell & Johnston, 2008). The public participation discourse is arguably more advanced in the EIA literature, where the need for more deliberative and meaningful forms of participation has been advocated for many years (e.g. Doelle & Sinclair, 2006; Hartz-Karp & Pope, 2011; Webler, Kastenholtz, & Renn, 1995). Meaningful participation calls for real involvement in decision-making processes, and not merely an opportunity to comment on draft documentation. The importance of broad participation in tourism-related EIA is noted by Zubair et al. (2011).

To summarise the preceding discussion, and to answer our first research question, we argue that EIA can contribute to responsible tourism if it is:

1. **Comprehensive:** it covers every relevant substantive issue identified in the responsible tourism principles, regardless of regulatory requirements, including exploring ways to deliver positive benefits, as well as minimize negative impacts;
2. **Integrated into management systems:** it feeds seamlessly into a management system that ensures that actions are: developed to manage potential impacts, allocated appropriately (taking into account resource availability and capacities), implemented to achieve intended outcomes, monitored and evaluated (to determine extent of achieving of objectives, performance, fulfilment of compliance obligations, and continual improvement).
3. **Participative:** it meaningfully involves stakeholders, especially local affected communities;
4. **System-focused:** it is conducted in the context of a holistic understanding of the receiving socio-ecological system, understanding that interventions may have unintended consequences that may play out in other parts of the system, in different time frames; and
5. **Contextualized:** it takes into consideration the broader context within which development is taking place, including consideration of cumulative impacts.

These five characteristics form the analytical framework for our analysis of EIAs undertaken in the Kruger National Park (KNP), as outlined in the following section.

4. Case study analysis: EIAs and responsible tourism in the KNP

In this section we apply the framework developed in the previous section to recent EIAs conducted in the KNP, in order to test the utility of our framework as an evaluation tool, and in doing so to answer our second research question, namely: to what extent is the potential for EIA to contribute to responsible tourism being realised in the Kruger National Park?

4.1 Context

The EIA system in South Africa is complex and it is not the purpose of the paper to explain the system in detail. The following overview provides sufficient information to aid understanding of the analysis that follows:

- The requirement for EIA in South Africa is mandated in Chapter 5 [section 24(2)] of *NEMA* and the 2017 *EIA Regulations* (which replace the earlier regulations of 2014, 2010 and 2006 and the pre-NEMA 1997 Environmental Conservation Act Regulations);
- The competent authority deciding on and approving EIA in South Africa is prescribed in law to be either national or provincial government (of which there are nine). National government is represented by the National Department of Environmental Affairs (DEA). Projects within National Parks fall under the jurisdiction of DEA;
- South Africa uses a list-based screening mechanism to determine the appropriate level of assessment. It can be either a so-called Basic Assessment (BA) (which is a shorter and less comprehensive) or a full Scoping and EIA process (scoping being the process by which the impacts to be assessed in the EIA are identified);
- A key outcome of the EIA process is a so-called Environmental Management Programme (EMPr), which prescribes impact management actions towards achieving set impact management outcomes and objectives.

Further, more detailed information about the current EIA process in South Africa is available in Kidd, Retief & Alberts (2018), Glazewski (2017) and South Africa (2017).

Table 1: Summary of EIA case studies

Proposed Development	Scope	Level of EIA	Documents Reviewed	Current Status
Malelane Safari Lodge	A 240-bed safari lodge located at the confluence of the Crocodile River and the Timfenheni Spruit in the south of the park.	Basic Assessment	Draft Basic Assessment Report (BAR) (Feb 2015); Draft EMPr (Feb 2015)	Approved in 2016. Construction not yet commenced.
Skukuza Safari Lodge	A 256-bed facility, additional staff accommodation, relocation of some offices, upgrades to some camp infrastructure and services.	Basic Assessment	Final Basic Assessment Report (BAR) (March 2015); EMPr (March 2015)	Approved in 2015. Construction currently in final stages Opening scheduled for April 2019.
Shangoni Gate Development	A new visitors' entrance to the KNP with associated reception facility; new road with three bridges; a picnic site; camping site; and tented rest camp	Basic Assessment	Draft Basic Assessment Report (BAR) (Feb 2017), including a draft EMPr.	No further progress

4.2 Methodology

In the period 1997-2017, at least a dozen formal EIAs were conducted under NEMA for proposed new developments within the KNP, including gates, camp upgrades, safari lodges and other tourism infrastructure. At least six of these EIAs have been undertaken since 2011, when SANParks signed up to SANS 1162 and issued its own responsible tourism brochure (SANParks, undated). Of these, three completed EIAs were selected as the case studies for this research based upon their significance to

the development of KNP, particularly in terms of attracting non-traditional visitors, and the availability of EIA documentation. These were: the Shangoni Gate Development and Skukuza Lodge in the KNP management area and Malelane Safari Lodge in the Concession area). Table 1 summarises the three case studies in terms of the scope of the proposals; the level of EIA to which it was subject; the documents that were available for review; and the current status of the process.

An important point to note here is that Section 3(1)(e) of the 2014 EIA Regulations that applied at the time these three EIAs were conducted require that Basic Assessments include (South Africa, 2014)¹:

“a description of the policy and legislative context within which the development is proposed, including:

- (i) An identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks, and instruments that are applicable to this activity and have been considered in the preparation of the report; and
- (ii) How the proposed activity complies with and responds to the legislation and policy context, plans, guidelines, tools, frameworks and instruments.”

This means that SANS 1162 should be identified in all Basic Assessments conducted by SANParks and its requirements incorporated into the EIA process. Many of the SANS 1162 requirements relate to the coverage of ‘every substantive sustainability issue identified in the responsible tourism principles’ and therefore reflect our first criterion. Others relate to sustainable operations and management and thus largely coincide with our second criterion of EIA being ‘integrated into management systems’; in the South African EIA process described in Section 4.1 such requirements could be appropriately included in the EMP_r stage of the EIA process, although the demarcation between a Basic Assessment Report (in these cases) and the EMP_r is flexible and open to interpretation. We have therefore applied the full suite of SANS 1162 requirements as the basis for evaluating these two characteristics in combination, and the results of the evaluation process are found in the Appendix in Table A1.

We have used the current 2016 version of the standard because it has superseded the 2011 version that was in place at the time the three EIAs were conducted and the earlier version is no longer available. The version control notes in the SANS1162:2016 document, however, indicate that no substantive changes were made between the two versions. The SANS 1162:2016 criteria fall into four categories: sustainable operations and management (5.1); social and cultural criteria (5.2); economic criteria (5.3); and environmental criteria (5.4), as indicated in Table A1.

Our other three characteristics 3, 4 and 5 (that EIA should be participative, systemic and contextualized) are not fully covered by the SANS 1162 requirements and have been considered as additional components of our analysis. The results of the evaluation against these three characteristics are presented in Table A2. This approach means that Table A1 is considerably longer and more detailed than Table A2, where the analysis is undertaken at a higher conceptual level. Our methodological approach of evaluating the extent to which EIA documentation reflects our defined

¹ This requirement is retained exactly in the 2017 EIA Regulations (South Africa, 2017).

characteristics has a long tradition in the field of EIA. A well-known and extensively applied² example is the Lee and Colley review package (Lee et al., 1999) for reviewing the quality of EIA documentation (such as the Basic Assessment Reports reviewed in this case). The approach of Fournier (1995), which calls for the establishment of 'criteria of merit' (Fournier, 1995, p16) as the basis for evaluation is relevant to such evaluation studies, including our own.

It is also worth noting here that the fundamental premise of the Lee and Colley method is that quality of the EIA documentation can be used as a reflection of the quality of the EIA process (e.g. Sadler, 1996); the corollary that poor quality reports contribute to ineffective EIA is put forward by Sandham (et al., 2013). This is relevant to our research, since we relied solely upon review of the available documentation to undertake the evaluation. This is an acknowledged limitation of our research and its implications are discussed in Section 4.3. Again similarly to the Lee and Colley method, the process of evaluating the extent to which the characteristics were demonstrated to have been reflected in the case studies process relied on subjective judgment. Subjectivity in such cases is generally addressed through duplication of evaluations using separate reviewers, and subsequent agreement of scores by consensus Peterson (2010). In this case the evaluation was conducted by the authors through a process of deliberation and discussion.

4.3 Results and discussion of case study analysis

Analysis of the available EIA documentation against the requirements of the SANS 1162 standard as shown in Table A1 in the Appendix found that many relevant aspects of responsible tourism are being incorporated into EIAs for tourism infrastructure in the KNP, but equally many are not, or at least not comprehensively or as specified in the SANS1162 standard. We note that none of the three EIAs identified the standard as a relevant aspect of the legislation and policy context with which the development should comply, and hence this outcome is unsurprising. We can hypothesise that it is due to the fact that SANParks, like many large organisations, is structured in a way such that functions (in this case tourism and environmental management) are not integrated. Ideally, the environmental management team would be aware of SANParks' commitment to responsible tourism and highlight to consultants conducting EIAs that the requirements of SANS 1162 should be incorporated.

It is important to note here too that a number of the requirements of the SANS 1162 standard would not typically be included in an EIA unless the standard were formally identified as being relevant, since they reflect general good practice principles rather than aspects specifically related to a new development (for example 5.1.7, 5.3.6, 5.3.7, 5.3.8, 5.4.8, 5.4.9), Related to this point, since many of the SANS1162 requirements do refer to ongoing management actions, in many cases they were found to be addressed in the Environmental Management Programmes (EMPrs) rather than the Basic Assessment reports (BARs) in which the potential impacts are identified and assessed.

Within the first category of *sustainable operations and management* (5.1), apart from the requirements related to building design, the most relevant requirements to EIA are those regarding the need for sustainability management systems (5.1.3) and the evaluation of the effectiveness of sustainability actions (5.1.4). These requirements were found to be partially addressed in the EMPrs, in that sustainability management actions were specified to manage potential impacts identified in

² We are aware of dozens of published studies applying this, or a similar, method.

the EIA, and some associated monitoring actions and other activities such as record keeping were also described, although this did not extend to evaluating the effectiveness of the sustainability management actions. While there was some variation in level of detail in the management and monitoring actions described in the EMPs reviewed, in general they were found to be fairly high level, particularly for the operational stage of the developments, leaving detailed implementation and management systems to be developed at a future point. While this approach is typical of EIA practice internationally, it is also problematic as already discussed and often results in implementation gaps. To contribute meaningfully to responsible tourism, EMPs can and should go further in developing mitigation and opportunity realization strategies and making very specific recommendations for their integration into management systems and existing practices, taking into consideration the available resources and capacity for implementation, as argued by McCombes et al. (2015). Ideally the EMP would provide sufficient detail to form the basis for a robust operational management system, as McCombes et al. (2015) argued in relation to SIAs conducted for tourism infrastructure. This approach would further the action component of responsible tourism, beyond just the agenda component represented by the identification of issues in the EIA (Mihalic, 2016).

With the exception of conducting the required heritage surveys and establishing processes to manage any heritage assets discovered (5.2.1), the requirements of the second category of *social and cultural criteria* (5.2) were not found to be consistently addressed in the EIAs reviewed. Only two out of three EIAs considered how the provision of water, power and other services to the developments might affect service provision to local communities (5.2.3), and the potential for the developments to incorporate local art or design (5.2.4) or to provide opportunities for visitors to purchase local art and crafts (5.2.6) received only minimal consideration. Perhaps more significantly, while passing mention was made of the need to contribute to local development initiatives, few details were provided in any of the EIAs and nothing suggested that such opportunities had been explored in consultation with local communities (5.2.5).

Several of the *economic criteria* (5.3) relate closely to the social criteria in the previous category, specifically those pertaining to the purchase of local and fair trade goods (5.3.4) and the development of local enterprises (5.3.5). Once again, these were not consistently addressed in the EIAs reviewed. Better consideration was given to recruitment issues, such as the recruitment of local people (5.3.2) and having fair and equitable recruitment processes (5.3.1). Only two of the three EIAs specifically mentioned the requirement to comply with South Africa's Black Economic Empowerment (BEE) policies. Given that the creation of local opportunities has been one of the pillars of sustainable and responsible tourism since the inception of these concepts, and that this is also a prime concern in SIA (Esteves & Barclay, 2011; McCombes et al., 2015), these findings were somewhat surprising.

Arguably, most EIAs internationally, regardless of the scope of 'the environment' defined in enabling legislation, tend to focus on biophysical environmental impacts. Therefore, it is not surprising that many of the *environmental criteria* (5.4) were well addressed in the EIAs reviewed, including those related to the protection of biodiversity (5.4.12) and ecosystems (5.4.13), and the promotion of indigenous species (5.4.10) over alien ones (5.4.11). Those relating to waste management (5.4.5) and pollution management generally (5.4.7) were also covered fairly comprehensively. Other environmental criteria, however, were not. These included: minimisation of the use of harmful substances and the substitution of such substances where possible (5.4.6) (discussed in two of the

three EIAs); minimisation of greenhouse gas emissions (5.4.4); monitoring of water consumption from all sources and the establishment of targets (5.4.3); monitoring of energy consumption from all sources and the establishment of targets (5.4.2). This finding is somewhat surprising and it is not clear why these topics should have received such limited attention in the EIAs reviewed.

With respect to our three additional characteristics of EIA contributing to responsible tourism, all EIAs were found to be participative to the extent required by the 2014 EIA Regulations. However these requirements are limited to giving Interested and Affected Parties (I&APs) the opportunity to comment on proposed developments and receive responses to their comments. Truly participative EIA, whereby I&APs were given opportunities to influence planning and decision-making processes (Hartz-Karp & Pope, 2011) would therefore represent a significant step beyond what is required by the EIA Regulations for Basic Assessments. Nevertheless, as the client, SANParks has the opportunity to require its consultants to move more towards best practice public participation. It was necessary in making our evaluation based on document review to assume that had more meaningful public participation been conducted then it would have been reflected in the Basic Assessment Reports. We believe this is a reasonable assumption but acknowledge that a more rigorous evaluation methodology would include interviews with the consultants and relevant I&APs.

Another important point to note here is that there is little evidence in the EIA documentation of engagement with visitors to the KNP as part of the EIA processes, beyond perhaps a small sub-set comprising those historically interested in visiting Kruger on a regular basis and those having vested-economic interests. International visitors and members of un-tapped tourism markets (e.g. younger millennials and previously disadvantaged South Africans) are not provided with an opportunity to participate. It is noted however that the EIA is only one mechanism through which consultation can be conducted, and that in at least one case (Shangoni gate), SANParks together with other agencies had established a stakeholder forum prior to the commencement of the EIA to gain stakeholder input to consideration of alternative locations for the proposed development. However there is clearly potential for local communities to be more actively involved in assessing the social impacts of proposals as part of EIA, and particularly how these developments can benefit local people and local enterprises, as required by SANS 1162 requirement 5.2.5.

With respect to our other two additional characteristics of EIA contributing to responsible tourism, there was no evidence that any of the EIAs was 'systems-based', taking a holistic view of the potential impacts of development, and there was very limited evidence that they were 'contextualised', located within a broader socio-ecological and governance setting. To be fair here, we do note that the literature on systems thinking and a holistic sustainability approach to both EIA and tourism internationally and within South Africa discussed previously in this paper is relative recent and is framed as a new way of approaching these processes relative to entrenched practice – meaning that this finding is perhaps to be expected. Cumulative impacts were briefly mentioned in one EIA, while another briefly mentioned the park management plans and tourism strategies with which the development is stated to be consistent, but the scope of each EIA was effectively limited to a specific piece of proposed infrastructure with little consideration of effects outside the immediate development boundary. This is unsurprising given that the challenges of meaningfully considering cumulative impacts and the broader context in the practice project-level EIA have been well-documented (Canter & Ross, 2010). To address this issue there is potential for SANParks to further utilize the tool of strategic environmental assessment (SEA), and it is noted that at least

three SEAs have already been conducted in the KNP. Each of these assessed a small cross-section of the park and its activities: tented safari camps; the Marula Region; and the Maputo Subcorridor, but there is potential to conduct an SEA for the whole KNP, taking a broad and high level perspective of the impacts of the park's infrastructure and activities upon the broader socio-ecological system within which it operates, and enabling a robust consideration of cumulative impacts, policy settings and governance structures (Hall, 2011; Hughes & Morrison-Saunders, 2015).

Overall, we found the EIA documentation for the three case studies to be quite consistent, despite the EIAs having been undertaken by different consulting firms and different EAPs. Not unreasonably, they all tended to follow the minimum requirements specified in the 2014 EIA Regulations for a Basic Assessment, but with respect to responsible tourism they represent something of a missed opportunity. It is also important to note that two of the three developments for which the EIAs were reviewed are currently stalled and may not proceed at all, in which case there will be no contribution to responsible tourism through the EIA process.

5. Conclusions and recommendations

EIA is a well-established policy tool for sustainable development that is mandated in almost every country of the world as a process for identifying, assessing and managing the potential impacts of development. As we showed in Section 3 of this paper, the respective discourses of responsible tourism and EIA are closely aligned, and therefore it can be argued that EIA of tourism infrastructure, when done well, has the potential to contribute to responsible tourism, at least in relation to the specific development subject to EIA. In answer to our first research question: ***How can environmental impact assessment contribute to responsible tourism?*** we identified five characteristics that EIA should embody to maximize such a contribution when applied to tourism developments: it should be comprehensive with respect to coverage of responsible tourism requirements; integrated into management systems; participative; systems-focused; and contextualized. While arguments have been made for each of these characteristics in the literature, not just in the context of tourism development but more generally, it has also been noted that EIA practice typically falls well behind the aspiration.

To explore the relationship between EIA and responsible tourism in practice, we considered the situation of EIAs conducted for proposed infrastructure within the iconic Kruger National Park in South Africa and asked a second research question: ***To what extent is the potential for EIA to contribute to responsible tourism being realised in the Kruger National Park?*** To answer this question we evaluated documentation for three EIAs conducted since 2011, when SANParks formally adopted the South African National Responsible Tourism Standard SANS1162 and shortly afterwards released its own responsible tourism brochure (SANParks, undated). These EIAs were related to the proposed Malelane Safari Lodge, Skukuza Safari Lodge, and Shangoni Gate.

The 'comprehensiveness' of each EIA was assessed against the requirements of the SANS 1162 standard as the framework. We found that the EIAs generally met the requirements of the 2014 EIA Regulations, but did not address all of the responsible tourism requirements in sufficient depth or in some cases at all. Weaknesses were found with respect to both environmental impacts (such as water and energy use and the minimization and replacement of hazardous substances) and socio-economic impacts (particularly the requirement to develop opportunities for local enterprises in

consultation with local communities, and associated initiatives such as local procurement and offering local products for sale to visitors).

The SANS 1162 standard also requires a long-term sustainability management system to support responsible tourism objectives, which reflects our characteristic of EIA outcomes and recommendations being 'integrated into management systems'. While the three EIAs reviewed were typical of practice, they did not provide a comprehensive and robust foundation for the long-term sustainability management systems required by SANS 1162.

With respect to our 'participative' characteristic, the public participation conducted as part of EIA also appeared to be consistent with the current EIA Regulations. There is, however, an opportunity to take this much further, particularly with respect to social impacts and benefits and to develop strategies for local economic empowerment as part of the EIA process. Finally, we found no evidence of EIAs being 'systems-based' or little evidence of it being meaningfully 'contextualised' in relation to existing plans and strategies and other developments.

Thus we conclude that while EIA can contribute to responsible tourism in theory and that this relationship is implicitly recognized in the legislative and policy frameworks within South Africa, in practice EIA is not fulfilling its potential to contribute to responsible tourism in the KNP at present. Technically speaking, EIAs conducted within KNP or any SANPark park should explicitly identify SANS 1162 as a relevant aspect of the legislation and policy context, which should lead to more consistent and thorough inclusion of responsible tourism principles within the EIAs. We recommend that SANParks highlight and insist upon the inclusion of the standard in this way as an essential first step towards ensuring that EIA contributes to the maximum extent possible to the achievement of its responsible tourism goals. If addressed thoroughly, these requirements should underpin the development of long-term sustainability management systems, as well as incorporating more public participation of local people in the assessment of social impacts and opportunities. While individual, project-level EIAs could also be required to take a systems approach to enable a more holistic understanding of the short and long-term relationship between tourism and local communities and to be better contextualized by considering higher level plans and strategies and incorporating cumulative impact assessment, there is also considerable potential for SANParks to further utilize SEA to develop this higher level perspective in relation to its operating parks.

As a final comment, we note that EIA is not the only vehicle for implementing responsible tourism in South Africa or elsewhere, and indeed cannot be. Since EIA is only applied to proposed new developments, which may be undertaken by a large organization such as SANParks with many ongoing activities and initiatives, its reach and influence is by definition limited. As our analysis in Table A1 suggests, there are many requirements of responsible tourism that do not sit comfortably within the scope and focus of an EIA and must be addressed through other processes. Furthermore, if the developments do not ultimately proceed then no benefits can be realised. Despite these limitations, our analysis of the literature in this research suggests that EIA could be achieving more for responsible tourism than it presently is, and this was confirmed by our analysis of EIAs conducted in the KNP on behalf of SANParks since 2011. We suggest that proponents such as SANParks who are committed to responsible tourism have the opportunity to demand more from EIAs conducted on its behalf. We believe that our framework could serve as guidance for this purpose, by highlighting the key characteristics that EIA should embody if it is to contribute meaningfully to responsible tourism.

As such it can be a useful tool for SANParks and other organisations committed to responsible tourism to apply when commissioning EIAs.

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Appendix

Table A1: Evaluation of EIA documentation against requirements of SANS 1162 (Characteristics 1 and 2)

Table A1 below summarises the results of the evaluation of the three case studies for Characteristics 1 and 2, as represented by the SANS 1162:2016 requirements.

SANS 1162 requirement	Addressed in Malelane Safari Lodge EIA	Addressed in Skukuza Safari Lodge EIA	Addressed in Shangoni Gate Development EIA
5.1 Sustainable operations and management			
5.1.1 The organization shall comply with all relevant national, provincial and local legislation, regulations, licences and permits, as may be required.	Partly – BAR includes list of legislation and other requirements but does not identify SANS1162.	Partly – BAR includes list of legislation and other requirements but does not identify SANS1162. Interestingly, SANS1162 is, however, mentioned in relation to sustainable building design (see 5.1.8b below)	Partly – BAR includes list of legislation and other requirements but does not identify SANS1162.
5.1.2 The organization shall establish a responsible tourism policy that is suitable to its reality and scale, and that considers environmental, socio-cultural, economical, quality, health and safety issues.	No	No	No
5.1.3 The organization shall have a long-term sustainability management system that is suitable to its reality and scale, and that considers environmental, socio-cultural, economical, quality, health, and safety issues.	Partly - EMPr includes management plans for different project stages, covering environmental, socio-cultural and some local economic impacts, as well some health and safety measures in the construction phase. However these are high level only and do not comprise a complete management system. Environmental management systems are mentioned but no details are provided.	Partly - EMPr includes management plans for different project stages, covering environmental, socio-cultural and some local economic impacts, as well some health and safety measures in the construction phase. However these are high level only and do not comprise a complete management system.	Partly – EMPr includes management plans for different project stages, covering environmental, socio-cultural and some local economic impacts, as well some health and safety measures in the construction phase. The actions listed are quite detailed and designed to form the basis of management systems. Other management system components are also reflected in the EMPr, including requirements for staff training and environmental awareness; record keeping; roles and responsibilities.

5.1.4 The organization shall establish and implement procedures for evaluating the effectiveness of its sustainability actions. Such information should be used in the critical review of the sustainability management system.	Partly - EMPr provides a high level overview of types of monitoring to be applied but provides no details or criteria against which the effectiveness of management actions can be evaluated.	Partly – EMPr requires monitoring and auditing but provides no details or criteria against which the effectiveness of management actions can be evaluated.	Partly – EMPr requires monitoring and auditing and specifies responsibilities but provides no details or criteria against which the effectiveness of management actions can be evaluated.
5.1.5 The organization shall facilitate staff awareness of and training in its responsible tourism policy.	Partly – EMPr calls for environmental training but not training in relation to responsible tourism (see 5.1.2).	Partly – EMPr calls for environmental training but not training in relation to responsible tourism (see 5.1.2).	Partly – EMPr calls for environmental training but not training in relation to responsible tourism (see 5.1.2).
5.1.6 The organization shall make publicly available the responsible tourism policy and information about its associated activities.	No (see 5.1.2)	No (see 5.1.2)	No (see 5.1.2)
5.1.7 Promotional materials shall be accurate and complete, shall not promise more than can be delivered by the organization and shall not make misleading claims regarding sustainability.	No	No	No
5.1.8 In the design and construction of buildings and infrastructure the organization shall:			
a) respect the natural or cultural heritage surroundings in the siting, design, impact assessment, and land rights and acquisition, and	Yes – considered in site selection process and design as described in BAR.	Yes – addressed in EMPr	Yes – EMPr includes action to engage an appropriate architect to ensure these principles are met.
b) use locally appropriate principles of sustainable construction.	Yes – sustainable building design considered in BAR with respect to energy efficiency and materials.	Yes – BAR notes that SANParks has engaged a green building consultant to ensure sustainable design and construction	No
5.1.9 The organization shall provide access for people with disabilities and special needs.	No	No	No

5.1.10 The organization shall invite customer feedback on responsible tourism in the organization and shall take corrective action where appropriate.	No	Partly – EMPr calls for complaints/feedback system to be in place during construction phase.	No
5.2 Social and cultural criteria			
5.2.1 The organization shall contribute to the protection of sites that are of local historical, archaeological, cultural and spiritual importance and that are located on its properties.	Yes - Heritage impact assessment included in BAR but no heritage sites identified. EMPr includes plan for protection of any cultural heritage that might be identified during construction.	Yes – BAR identifies Stevenson baobabs heritage assets to be protected, addressed in EMPr. EMPr also includes plan for protection of any cultural heritage that might be identified during construction.	Yes – Heritage impact assessment included in BAR but no significant heritage sites identified. EMPr includes plan for protection of any cultural heritage that might be identified during construction.
5.2.2 The organization shall provide, to the local communities or residents, where applicable, reasonable access to sites of historical, social, cultural or religious significance that are located on its properties.	N/A – no such sites identified (see 5.2.1)	Yes – Stevenson baobabs to be retained, and access provided to guests.	N/A – no such sites identified (one significant site identified nearby but development not expected to impact).
5.2.3 The activities of the tourism organization shall not jeopardize the provision of basic services, such as water, energy and sanitation, to neighbouring communities.	Yes – BAR notes that development will be off grid for water, sanitation and energy. Will utilise local landfill sites and implications discussed.	Yes – Addressed in BAR.	Yes – Addressed in BAR and EMPr includes requirement to not disturb existing essential services.
5.2.4 The organization shall use elements of local art, architecture, and cultural heritage in its operations, design, decor, food and shops. In so doing, the organization shall acknowledge the intellectual property rights of third parties.	No	Partly – recommendation in BAR that local décor and art should be used at the lodge, but this is not reflected in the EMPr	No
5.2.5 The organization shall support local development initiatives in consultation with the people from the local area who are affected.	Partly – EMPr requires the developer to fund initiatives to benefit the local community but does not specify that planning should be undertaken in consultation with the community	Partly – EMPr recommends enhancement of small enterprises, such as curio market, resulting from stakeholder engagement	Partly – EMPr requires that criteria for evaluating potential initiatives benefitting the local community be developed, but does not specify that planning should be undertaken in

			consultation with the community
5.2.6 The organization shall provide opportunities for visitors to purchase local products and services.	No	Partly – implicit in support of curio market (see 5.2.5)	No
5.2.7 Historical and archaeological artefacts may not be sold, traded or displayed, unless permitted by law.	No	No	Partly – BAR and EMPr specify that artefacts found during construction cannot be removed from site.
5.2.8 The organization shall provide a code of behaviour for visits to local cultural, historical and religious sites or communities. Such code shall be developed in conjunction with the affected parties.	N/A – no such sites identified	N/A – no such sites identified	Yes – EMPr notes a natural site revered by local people to which access will be maintained.
5.2.9 The organization shall provide information to staff about HIV/AIDS and general well-being.	Yes – addressed in EMPr	No	Yes – addressed in BAR
5.3 Economic criteria			
5.3.1 The organization shall use fair and equitable processes for recruitment and advancement, in relation to race, gender and disability.	Yes – addressed in EMPr (in relation to race and gender)	No	Yes - addressed in EMPr (in relation to race and gender)
5.3.2 The organization shall employ people, including in management positions, from the local area, with a particular emphasis on designated groups.	Yes – addressed in EMPr	Yes – addressed in EMPr	Yes – addressed in EMPr
5.3.3 The organization shall provide training opportunities for staff relevant to the organizational context.	Yes – EMPr addresses both environmental awareness training and training for local community to maximise number of local people employed	Yes – EMPr addresses both environmental awareness training and skill development and training for employees	Yes – EMPr addresses both environmental awareness training and training for local community to maximise number of local people employed
5.3.4 The organization shall purchase local and fair trade services and goods, where available, and set targets for improvement.	Partly – EMPr requires goods to be purchased locally where possible to promote Black Economic Empowerment (BEE).	No	Partly – EMPr requires goods to be purchased locally where possible to promote Black Economic Empowerment (BEE).

5.3.5 The organization shall demonstrate support to small enterprises.	Yes – EMPr discusses a database of local companies and support with tendering process	Partly – implicit in support of curio market (see 5.2.5)	No
5.3.6 The organization shall pay employees a wage that is equal to or above the legal minimum.	No	No	No
5.3.7 The organization shall prohibit child labour, forced labour and sexual exploitation.	No	No	No
5.3.8 The organization shall report transparently on the use of guest contributions, where relevant.	No	No	No
5.4 Environmental criteria			
5.4.1 The organization shall have a responsible purchasing policy.	Yes – addressed in EMPr	No	No
5.4.2 The organization shall measure energy consumption, indicating all energy sources as a percentage of the overall consumption, and shall adopt quantitative goals and measures to decrease overall consumption.	No	No	No
5.4.3 The organization shall measure water consumption, indicating all sources as a percentage of the overall consumption, and shall adopt quantitative goals and measures to decrease the overall consumption and improve the reuse of waste water.	Partly – EMPr requires water consumption monitoring but does not specify measuring from individual sources	No	No
5.4.4 The organization shall implement and manage actions associated with its operations to reduce greenhouse gas emissions and other contributors to climate change.	No	No	No
5.4.5 The organization shall implement a waste	Yes – addressed in EMPr	Yes – addressed in EMPr (high level only)	Yes – addressed in EMPr

management plan, addressing both solid and liquid wastes, with quantitative goals to minimize waste produced.			
5.4.6 The organization shall limit the use of harmful substances (for example pesticides, paints, swimming pool disinfectants, cleaning materials, sanitation material and guest amenities); and substitute these substances with environmentally friendly alternatives where possible.	Yes – addressed in EMPr	No – EMPr discusses management of hazardous substances but not minimisation or substitution	Yes – addressed in EMPr
5.4.7 The organization shall implement practices to reduce pollution from noise, light, runoff, erosion, ozone-depleting compounds and other pollutants, as applicable.	Yes – addressed in EMPr	Yes – addressed in EMPr	Yes – addressed in EMPr
5.4.8 The organization shall adhere to national and international requirements that govern the trade in listed, endangered or threatened (or any combination of these) species and shall alert visitors to these requirements.	No	No	No
5.4.9 The organization shall not hold captive any wildlife without the required permits and appropriate enclosures.	No	No	No
5.4.10 The organization shall use plants of indigenous species for landscaping and restoration.	Yes – addressed in EMPr	Yes – addressed in EMPr	Yes – addressed in EMPr
5.4.11 The organization shall take measures to eradicate invasive alien plant species.	Yes – addressed in EMPr	Yes – addressed in EMPr	Yes – addressed in EMPr
5.4.12 The organization shall contribute to local	Yes – addressed in EMPr	Yes – addressed in EMPr	Yes – addressed in EMPr

biodiversity conservation, including supporting natural protected areas and areas of high biodiversity value.			
5.4.13 The organization shall avoid adverse effects on ecosystems, and shall rectify any negative environmental impact resulting from its activities.	Yes – addressed in EMPr	Yes – addressed in EMPr	Yes – addressed in EMPr
5.4.14 The organization shall provide environmental information to visitors so that they can reduce their impact on nature and natural resources.	Yes – addressed in EMPr	No	Yes – addressed in EMPr

Table A2: Evaluation of EIA documentation against Characteristics 2, 3 and 4

EIA characteristics	Addressed in Malelane Lodge EIA	Addressed in Skukuza Safari Lodge EIA	Addressed in Shangoni Gate Development EIA
Characteristic 3: EIA is participative : it meaningfully involves stakeholders, especially local affected communities.	Partly - Consultation conducted as required by the 2014 EIA Regulations for Basic Assessment, i.e. advertising in newspapers and on site, developing a register of Interested and Affected Parties, providing opportunities to comment on draft documentation and responding to comments received. Public meetings also held, but not clear that stakeholders were meaningfully involved in the process.	Partly - Consultation conducted as required by the 2014 EIA Regulations for Basic Assessment, i.e. advertising in newspapers and on site, developing a register of Interested and Affected Parties, providing opportunities to comment on draft documentation and responding to comments received. Public meetings also held, but not clear that stakeholders were meaningfully involved in the decision-making process.	Partly - BAR explains that consultation included distribution of a background information document as well advertisements in newspapers and around the site, seeking registration of Interested and Affected Parties and seeking comments. The requirements of a basic assessment with respect to responses to comments received were followed. No consultation on socio-economic opportunities for local communities conducted as part of EIA. However SANParks and other agencies consulted prior to the EIA through the Shangoni Gate Development Forum. This included consultation on 'community beneficiation'.

<p>Characteristic 4: EIA is system-focused: it is conducted in the context of a holistic understanding of the receiving socio-ecological system, understanding that interventions may have unintended consequences that may play out in other parts of the system, in different time frames.</p>	<p>No</p>	<p>No</p>	<p>No</p>
<p>Characteristic 5: EIA is contextualized: it takes into consideration the broader context within which development is taking place, including consideration of cumulative impacts</p>	<p>Partly – some potential cumulative impacts are identified in the Scoping Report, but these are not discussed in detail and are not mentioned in the EMPr. The point is made in the Scoping Report that the development is consistent with the park’s zonation plan but there is not discussion of context beyond this.</p>	<p>No</p>	<p>Partly – BAR and EMPr prepared in the broad context of the Kruger National Park Management Plan and the tourism strategy for the park. However they do not consider the broader context beyond this and does not consider cumulative impacts.</p>