

Tokai and Cecilia Management Framework 2005–2025 Review

Issues, Comments and Concerns submission: Mike Golby (Friends of Tokai Park Committee Member and IAP) —Abridged

The fight for the conservation of biodiversity will not be won in the remote depths of the forests and mangroves. It will be won in the large metropolises.

Menezes P de C & Mendes LOT in McNeely JA (Ed) 2001 [Cities and Protected Areas](#) IUCN Protected Areas Programme Parks 11(3)

Stakeholders are therefore requested to consider the Tokai Cecilia Management Framework (TCMF) 2005-2025 as the context for the current review process and then make written submissions on their concerns and issues of how they were (and still are) affected by the TCMF. Together with written concerns and issues, stakeholders are requested to present their position statements and propose options for consideration going forward for the future management of the Tokai and Cecilia management areas.

TCMF stakeholder and public engagement clarity on commenting period – Email 1 June 2021

Introduction

This submission, recording issues, comments and concerns relating to the [Tokai and Cecilia Management Framework 2005-2025](#) (TCMF) review process, aligns itself with the *Friends of Tokai Park Position Statement* and should be considered ancillary.

My objective in making a personal submission is threefold; first, to clarify the context – as opposed to informants – of the [TCMF Review](#); secondly, to address erroneous public perceptions of the aims of the review process and, finally, to submit my own comments in the context of the TCMF as it stands.

I address only two issues.

Issue 1: Context of the TCMF Review

The context in which stakeholders may suggest amendments to the TCMF is set out clearly in the Process Facilitators' quotation heading this submission. It is vital that SANParks, our primary national conservation body, hew to this context and constraint.

The TCMF is a negotiated and publicly agreed-to document flowing from past processes governed by past and current documents, laws and treaties of which the public is largely unaware.

The documents are correctly identified in SANParks literature as "informants". For want of a definition, they serve to inform a context and, as such and while in use, they are active and "provide", "identify",

"determine", quantify", "set out", "address" or "define" that which forms context. They do not themselves equate to context.

These informants do not, therefore, form or delineate the context of the TCMF Review; they give rise to or support the TCMF and provide guidance on how its context may or may not be amended. But they are not up for review; the TCMF is, and this needs to be spelled out to the public.

Defining context

Informants (supporting or foundational documents, laws and treaties) are invaluable as references, guides to and framers of debate, but context relates to "the thing itself", i.e. the TCMF. The concept of context is best defined on page 30 of the [Table Mountain National Park: Park Management Plan 2015 – 2025](#) (TMNP PMP):

5.5 Park Context

The context refers to the current circumstances and the conditions that determine these circumstances. The context is therefore important as a set of agreed-upon realities that will influence the setting of management objectives. The context is summarised under sections 2.1 to 2.12.

[Table Mountain National Park: Park Management Plan 2015 – 2025 page 30](#)

I would urge all parties, before commencement of the TCMF Workshopping Process, to read **Section 2: Legal Status** (sections **2.1** to **2.12** on pages 10-21 of the TMNP PMP) because the TCMF is a subsidiary framework subject to and governed by the same "current circumstances and ... conditions of these circumstances" and "set of agreed-upon realities" (or context) pertaining to the TMNP PMP.

Separating context and informants

It is important to the TCMF Review as a whole that we distinguish informant from context as the two can be blurred, allowing parties with vested interests to muddy, obfuscate, complicate, hinder or even derail the process by continually introducing into debate documents with no bearing on the context of the TCMF.

Following the 21 June TCMF Review Process meeting on Zoom, the *People's Post* [reported](#):

Context of comment

Clarifying a question raised in the first meeting – what it is that stakeholders should be commenting on – Dr Hendricks said they were using the TCMF framework of 2005 to 2025 as the context.

“We are asking stakeholders and anyone who has shown an interest in the review process to use the current framework as the existing context and then indicate how this framework has been

affecting or is still affecting stakeholders. How has the implementation of that framework influenced and shaped the current existence and how stakeholders are being affected.”

He said, equally important was for stakeholders to indicate their position statements based on the TCMF framework and their proposals for the conveners and facilitators to consider towards the future management of the framework.

This is correct and as it should be. Depressingly though, the report continues:

However, one of the stakeholders, Manfred Küster, felt that instead of using the previous TCMF plan as the existing context, it would make more sense to consider the Heads of Agreement between the City of Cape Town and SANParks as a starting point.

“As part of this (review) process and in the interest of transparency for both the City and SANParks, (it is important) to provide insight – even though the negotiations may not have been concluded yet – to just understand where we are as to reaching an agreement as to how SANParks is mandated to use the Table Mountain areas in the interest of SANParks but also primarily in the interest of the citizens of Cape Town. This aspect has been forgotten.”

His viewpoint was supported by Nicky Schmidt, chair of Parkscape, who added that going back to the Heads, one also had to take a step back further to the Huntley Report (1995) and the Fuggle Report (or the Policy for the Multipurpose Use for the Cape Peninsula, 1994) “and to bear that in mind to understand the frustrations that many groups have”.

“So my question is, if you are looking at the Heads, are you looking back to what the Heads was based on?” Schmidt said.

This piece of reportage illustrates the power, capability and intent of populist lobbyists espousing post-truth memes driven by social media to derail the process. I do not know Manfred Küster, but he does the spadework for Nicky Schmidt, chair of [Parkscape](#), by arguing that, rather than using the TCMF as context, it would make more sense to consider an informant, i.e. the *Heads of Agreement in Respect of the Allocation of Local Authority Land in the CPPNE for the Purpose of Establishing a National Park* (29 April, 1998) as a "starting point". In other words, he asks that an informant replace the TCMF as context.

Schmidt agrees and throws in the [Huntley Committee report](#) (1995) and Professor Richard Fuggle's recommendation (Fuggle et al 1994 - [Policy for the Multi-Purpose Use of the Cape Peninsula Volume 1, 2 and 3](#)) that SANParks, rather than the Transitional Metropolitan Council recommended by Attorney-General Frank Kahn (Kahn et al 1994 – *Working group to rationalise the management and control of the Cape Peninsula Protected Natural Environment*), be appointed "the responsible management authority for the Cape Peninsula Protected Natural Area".

Schmidt explains that these documents are key to understanding "the frustrations that many groups have". Moreover, she wants the informants of the informants ("what the Heads was (sic) based on") introduced as contextually relevant to the TCMF.

As renowned TV Advocate Gerrie Nel once (or more frequently) famously said, "It cannot be!"

These documents, three of which are not in the public domain, are foundational informants used to establish Table Mountain National Park (TMNP) and formulate other guiding documents. They have nothing to add to the TCMF Review Process. Nor do they inform or form its context as defined in the TMNP PMP.

Küster and Schmidt's emphasis of the documents' implied importance to the Review Process accords with recent calls by [Parkscape](#), [The Friends of Table Mountain](#) and [Table Mountain Watch](#) for TMNP to be privatised and SANParks ousted as its management authority. As recently as 19 April 2021, Schmidt issued a media release, "*Devastation and Ruin – and they were warned*". In it, we read:

... Schmidt says it is long overdue that the failure to manage Table Mountain National Park properly is brought into sharp focus. "It's just not working and we cannot risk it continuing to not work – too much is at stake. We need to see a completely different model of managing the Park. She points to a report Parkscape wrote for the City in 2007. "We noted then that there were serious issues with the management strategies of Table Mountain National Park – the risk of those strategies now stares us in the face – and yet still we sit with the same old management. It clearly doesn't work and we need, with the City of Cape Town, to be looking at alternatives – a privatisation or Special Purpose Vehicle model."

Parkscape | Media Release – "[Devastation and Ruin – and they were warned](#)" 19 April 2021

The above gets to the heart of "the frustrations that many groups have".

Unfortunately, Küster and Schmidt were given a free pass on the night. The *People's Post* article concludes:

In response to Küster, Foden said that she had heard his request and that she thought he was right in that they needed to draw the mandate from that agreement "into what we are doing here".

Answering Schmidt's query, Foden said, being new to the process she hadn't yet looked at the Fuggle Report but that she would do so.

Facilitator Professor Wendy Foden cleverly elided Küster's contextual assertion by agreeing that the Heads of Agreement (HoA) and the Fuggle Report support SANParks' **mandate**, i.e. she nicely avoided stating that, beyond being informants supporting the TCMF, they have no contextual bearing on it.

However, this elision will be misconstrued by the public (and interpreted by lobby groups hostile to SANParks' conservation mandate and mission) as straightforward agreement with Küster and Schmidt that these documents are contextually relevant to the TCMF.

They are not and this needs to be clarified if the TCMF is to remain the context of debate.

TCMF and other informants

At **Structure of Report** on page *iv* of the TCMF, it states:

The overall vision for Tokai and Cecilia is articulated in line with the TMNP revised Park Management Plan and Conservation Development Framework (CDF) and is refined into broad biodiversity, heritage, ecotourism and recreational objectives.

At **Chapter 2: Framework Informants**, it lists its **City of Cape Town, TMNP CDF, Biodiversity, Heritage, Recreational** and **Eco-tourism** informants. It does not list or cite any enabling legislation or other informing documents because it does not need to do so.

2.2 TMNP Conservation Development Framework on page 4 states:

The TMNP CDF is a strategic spatial planning framework for the Park and its surrounds. The CDF indicates visitor use zones, areas requiring special management intervention, sites where facilities are to be provided, entry points and movement routes through the Park and the management of land use along the Park's boundaries. The Park's approved CDF (2006 – 2011) has been revised in accordance with the Strategic Environmental Assessment guidelines.

The 2006 TMNP CDF revises the 2001 TMNP CDF and is itself informed by numerous documents. At **2. CDF Informants** (pages 4 and 5 of [Conservation Development Framework – Volume II](#)), they are listed in **Tables 2** and **3**. **Table 2** lists key planning informants of the 2001 CDF that hold for the 2006 CDF (and includes Fuggle et al 1994 - *Policy for the Multi-Purpose Use of the Cape Peninsula*) and **Table 3** lists additional informants, including legislation, to the CDF update.

More recently, though, the TMNP PMP summarises (in **Annexure 3: Park zoning and CDF**, Section **1.3, CDF Informants** at pages 147-149) from sections **1.3.1-1.3.4, Park informants, National informants, Provincial informants** and **Municipal informants**.

It then tables, at **Table 21: Key planning informants to the 2015 CDF** on page 162 of the TMNP PMP, more than 50 Internal Park, National, Provincial, Local and Other informants (including, it must be said, among **Other informants**, Fuggle et al 1994 - *Policy for the Multi-Purpose Use of the Cape Peninsula*).

And the *Tokai and Cecilia Management Framework 2005-2025* comprises one of 18 internal TMNP frameworks, plans and Environmental Management Programmes (EMPs) that inform, and are informed by, the CDF.

Summary

The TCMF Review Process requires us to use the TCMF, which aligns itself with the TMNP CDF and TMNP PMP, as context (as defined above). Populist groups opposed to the TCMF and SANParks have tried to

introduce historical SANParks informants into the process by claiming they have contextual relevance. They do not have relevance to the TCMF as published. Entertaining discussion of them will only hinder or derail the Review Process.

Note: Should lobbyists attaching value to these informants wish to find them cited, they may do so under **Section 2: Legal Status** on page 10 of the TMNP PMP. At **2.3 History of establishment** (pages 10-11) all, bar the *Huntley Committee Report*, are placed in their appropriate historical context.

Issue 2: Establishing, Understanding and Accepting the Limits of Public Participation

The [People's Post article reporting on the 21 June TCMF Review Process meeting](#) highlights a fundamental failure by SANParks to articulate to the public (those to whom the process was explained) the nature, purpose, extent and limits of a consultative "public participation" process. Such public-participation processes and their legal and terminological definitions are to be found at a national, provincial and local level.

The objectives of SANParks TMNP's public-participation model or stakeholder-engagement process are listed at **Section 4: Consultation** on page 26 of the TMNP PMP. They are to:

- *Create a channel for the accurate and timely dissemination of information to interested and affected stakeholders;*
- *Create the opportunity for communication between SANParks and the public;*
- *Promote opportunities for the building of understanding between different parties;*
- *Provide the opportunity for stakeholders to give meaningful input into the decision-making processes that drive the development of the Park Management Plan.*

In outlining the need for public participation in international and regional agreements, De Villiers S 2001 - [A Review of Public Participation in the Law and Policy-Making Process in South Africa](#) states:

At the [1992 Earth Summit in Rio](#), nations from around the world adopted Principle 10 of the Rio Declaration, which emphasises the importance of public access to information, participation in decision-making processes and access to judicial procedures and remedies. In [Agenda 21](#), the plan of action that accompanied the Rio Declaration, governments pledged themselves to the pursuit of broader public participation in decision-making processes and policy formulation for sustainable development.

De Villiers is quoted in SALS 2007 – [Public Participation Framework for the South African Legislative Sector](#). If we take cognisance of Agenda 21, we read, at **Chapter 23: Strengthening the Role of Major Groups**:

23.2. *One of the fundamental prerequisites for the achievement of sustainable development is broad public participation in decision-making. Furthermore, in the more specific context of*

environment and development, the need for new forms of participation has emerged. This includes the need of individuals, groups and organizations to participate in environmental impact assessment procedures and to know about and participate in decisions, particularly those which potentially affect the communities in which they live and work. Individuals, groups and organizations should have access to information relevant to environment and development held by national authorities, including information on products and activities that have or are likely to have a significant impact on the environment, and information on environmental protection measures.

In 2007, the Department of Provincial and Local Government (DPLG), in its [National Policy Framework for Public Participation](#), defined public participation as an:

...open, accountable process through which individuals and groups within selected communities can exchange views and influence decision-making.

DPLG 2007 – National Policy Framework for Public Participation

Key legislation includes the [Constitution](#), the [Municipal Systems Act, Act 32 of 2000](#), and the [Municipal Structures Act, 117 of 1998](#). Legislation and definition ensure that the process of public participation does not become an exercise in non-participation. As far as "participation" (power) and "non-participation" (tokenism) are concerned, the *National Policy Framework for Public Participation* uses the eight-level typology of citizen power and/or tokenism detailed in *Arnstein SR 1969 - A Ladder of Citizen Participation*.

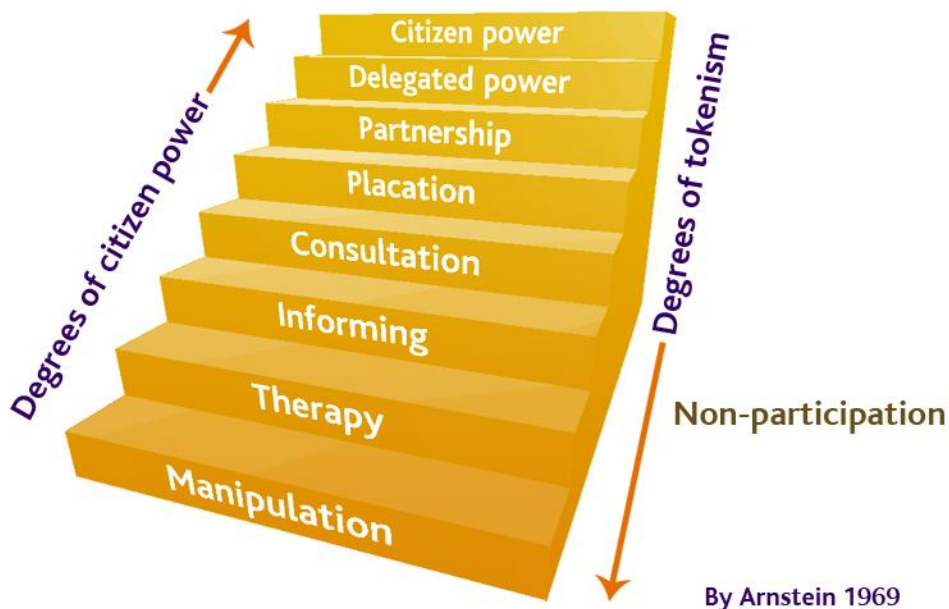


Figure 1 Arnstein 1969 – Eight-level typology of citizen power and tokenism (Click to enlarge)

Arnstein writes:

Knowing these gradations makes it possible to cut through the hyperbole to understand the increasingly strident demands for participation from the have-nots as well as the gamut of confusing responses from the powerholders. The underlying issues are essentially the same - "nobodies" in several arenas are trying to become "somebodies" with enough power to make the target institutions responsive to their views, aspirations, and needs.

She goes on to explain the limitations of such a simplistic model:

The justification for using such simplistic abstractions is that in most cases the have-nots really do perceive the powerful as a monolithic "system," and powerholders actually do view the have-nots as a sea of "those people," with little comprehension of the class and caste differences among them. It should be noted that the typology does not include an analysis of the most significant roadblocks to achieving genuine levels of participation. These roadblocks lie on both sides of the simplistic fence. On the powerholders' side, they include racism, paternalism, and resistance to power redistribution. On the have-nots' side, they include inadequacies of the poor community's political socioeconomic infrastructure and knowledgebase, plus difficulties of organizing a representative and accountable citizens' group in the face of futility, alienation, and distrust.

Arnstein writes for an American audience. South Africa's legacies of apartheid and paternalism, as well as its grossly skewed distribution of wealth, ensure that Arnstein's "significant roadblocks to achieving genuine levels of participation" are to be found, seemingly contradictorily, on unexpected sides of the power divide.

Those who *feel* disenfranchised or dispossessed (the "have-not" public who, in Cape Town, Arnstein terms the "socially elite" of the southern suburbs) hold socio-economic power and those charged with exercising power (the "haves" or SANParks) exhibit all the signs of "the poor community's political socioeconomic infrastructure and knowledgebase, plus difficulties of organizing a representative and accountable citizens' group in the face of futility, alienation, and distrust."

Nonetheless, as an organ of state, SANParks must ensure a credible, meaningful and *honest* public-participation process on the TCMF. With reference to Figure 1 above, Arnstein writes of that which the public and SANParks have in terms of the TMNP PMP (**Section 4: Consultation**) and that which they seek in relation to the TCMF:

*Rungs 3 and 4 progress to levels of "tokenism" that allow the have-nots to hear and to have a voice: (3) **Informing** and (4) **Consultation**. When they are proffered by powerholders as the total extent of participation, citizens may indeed hear and be heard. But under these conditions they lack the power to insure that their views will be heeded by the powerful. When participation is restricted to these levels, there is no follow through, no "muscle," hence no assurance of changing the status quo.*

Published more than 50 years ago (1969), Arnstein's paper nonetheless holds good and is regarded as the authority on public participation by various state entities, e.g. the DPLG and South African Legislative Sector (SALS). Arnstein says of "Consultation":

4. Consultation

Inviting citizens' opinions, like informing them, can be a legitimate step toward their full participation. But if consulting them is not combined with other modes of participation, this rung of the ladder is still a sham since it offers no assurance that citizen concerns and ideas will be taken into account. The most frequent methods used for consulting people are attitude surveys, neighborhood meetings, and public hearings. When powerholders restrict the input of citizens' ideas solely to this level, participation remains just a window-dressing ritual. People are primarily perceived as statistical abstractions, and participation is measured by how many come to meetings, take brochures home, or answer a questionnaire. What citizens achieve in all this activity is that they have "participated in participation." And what powerholders achieve is the evidence that they have gone through the required motions of involving "those people."

In terms of Arnstein's eight-level typology, lobby groups seek either *Citizen power* or *Delegated power* ("dominant decision-making authority") in Park matters, enabling them to effectively wrest control of TMNP from SANParks.

If we are to avoid tokenism or the cession of power by one authority to another, a meaningful middle path is called for. Arnstein (Figure 1 above) provides this:

*Citizens can enter into a (6) **Partnership** that enables them to negotiate and engage in trade-offs with traditional powerholders.*

Partnership is defined on page 16 of the DPLG's *National Policy Framework for Public Participation*:

Partnership – an example is joint projects – community has considerable influence on the decision making process **but the government still takes responsibility for the decision.** [My emphasis.] Participation is seen by external agencies as a means to achieve project goals, especially reduced costs. People may participate by forming groups to meet predetermined objectives related to the project. Such involvement tends to arise only after external agents have already made major decisions.

DPLG 2007 – National Policy Framework for Public Participation

Is this true partnership? Arnstein writes of this desired relationship:

6. Partnership

At this rung of the ladder, power is in fact redistributed through negotiation between citizens and powerholders. They agree to share planning and decision-making responsibilities through such structures as joint policy boards, planning committees and mechanisms for resolving

impasses. After the ground rules have been established through some form of give-and-take, they are not subject to unilateral change.

Partnership can work most effectively when there is an organized power-base in the community to which the citizen leaders are accountable; when the citizens group has the financial resources to pay its leaders reasonable honoraria for their time-consuming efforts; and when the group has the resources to hire (and fire) its own technicians, lawyers, and community organizers. With these ingredients, citizens have some genuine bargaining influence over the outcome of the plan (as long as both parties find it useful to maintain the partnership). One community leader described it "like coming to city hall with hat on head instead of in hand."

The DPLG's definition of partnership, wherein "community has considerable influence on the decision making process but the government still takes responsibility for the decision", is self-contradictory and misrepresents Arnstein's model.

It might be that, in a fledgling democracy such as ours, the state feels the public is not yet mature enough to be entrusted with partnerships according to Arnstein's definition. And it may be correct.

It is apparent, from the statements of Schmidt and Küster during the 21 June TCMF Review Process meeting, that members of the public and lobby groups such as [Parkscape](#), [Friends of Table Mountain](#) and [Table Mountain Watch](#) see the TCMF Review Process *and* public participation in SANParks' processes as means to achieve goals and objectives that are far broader than the TCMF itself.

The final sentence of the section quoted from the DPLG's *National Policy Framework for Public Participation* speaks to these organisations' primary intent, i.e. the privatisation of TMNP and the ousting of SANParks as its management authority:

Such involvement tends to arise only after external agents have already made major decisions.

"Major decisions", such as ousting SANParks as TMNP's management authority, determine whether parties to a public-participation process act in good or bad faith. The antidote to parties seeking to undermine such processes by acting in bad faith finds expression at page 28 of SALS 2007 – [Public Participation Framework for the South African Legislative Sector](#), wherein Arnstein's 1969 Ladder of Participation is used.

Figure 2: Ladder of Participation



Figure 2 Arnstein 1969 – Ladder of Participation. Click to enlarge.

Of **Level 4 Collaborate**, it says:

The fourth level is to "Collaborate". At this level, the public is provided with opportunity to partner or work jointly with decision-makers and the identification of the preferred solution. However, as with "Involve", it is still the understanding that the legislature is still the ultimate decision-maker. [My emphasis.]. In the end, all the input received will be taken into account and the legislature will make the final decision.

SALS 2013 – [Public Participation Framework for the South African Legislative Sector](#)

A "partnership" is inherently "collaborative" but, again, for the purposes of public participation in good or bad faith, it is imperative that the public bears in mind that, for the South African Legislative Sector (SALS), "it is still the understanding that the legislature [or its organ of state, i.e. SANParks] is still the ultimate decision-maker".

Thus, while the public and SANParks may work in partnership by way of organisational or individual submissions and recommendations given due deference and consideration, SANParks must interpret and implement such submissions and recommendations in terms of its Constitutional and legislative mandates outlined in **Section 2: Legal Status** (sections 2.1 to 2.12 on pages 10-21 of the [Table Mountain National Park: Park Management Plan 2015 – 2025](#)). With, again, reference to **Section 5.5 Park Context** on page 30.

In referencing Arnstein, SALS – like the DPLG – misrepresents the concept of "partnership" at **Level 4: Collaborate (Provide Opportunity for Partnering)**. By relying on Arnstein as their reference, and by

misrepresenting her findings, the SALS and DPLG documents are guilty of using semantics to equate "partnership" with "consultation" (described by Arnstein as "*tokenism*" and potentially, a "*sham*"). She does, however, note that "Inviting citizens' opinions, like informing them, can be a legitimate step toward their full participation."

The DPLG defines Consultation at page 16 of its *National Policy Framework on Public Participation*:

Consultation – community is given information about the project or issue and asked to comment – e.g. through meetings or survey – but their view may not be reflected in the final decision, or feedback given as to why not. External agents define problems and information gathering processes, and so control analysis. Such a consultative process does not concede any share in decision-making.

SALS defines **Level 2: Consult (Provide Opportunity for Input)** and **Level 3: Involve (Provide Opportunity for Dialogue & Interaction)** at page 23 of its [Public Participation Framework for the South African Legislative Sector](#):

2. The second level is to "Consult". At this level, the public is invited to provide feedback, input or comment on analyses, alternatives and/or decisions.

3. The third level is to "Involve". At this level, the public is provided with opportunity for dialogue and interaction. This could also be described as direct public participation throughout the process to ensure that issues and concerns are consistently understood and considered. However, it is the understanding that the legislature is still the decision-maker.

SALS goes on to note, on the same page:

*A public participation process should provide for levels of participation that are commensurate with the level of public interest. **Ideally, the aspiration will be to reach level four (4) Collaborate**", however, this may not be possible yet, therefore level three (3) "Involve" would be most probable at this stage of our democratic and participatory development. Therefore, the over-arching purpose of the Public Participation Framework seeks to move the Legislature Sector to Involvement within the Levels of Participation.*

The above explains misrepresentation or contradiction of Arnstein's as adaption to South African realities. Partnership is not on offer at any level of public participation in South Africa. And, as we can see from SANParks TMNP's public-participation model or stakeholder-engagement process, as detailed at **Section 4: Consultation** on page 26 of the TMNP PMP, it does not pretend to offer more than legitimate consultation and involvement by way of public participation.

It is the public's responsibility to appreciate as much when engaging in the TCMF Review Process – but it would have been helpful for SANParks' facilitators to spell this out. A politically immature public, such as that represented by lobby groups, is always bound to conclude that public-participation equates to partnership. It does not and SANParks' blithe dismissal of proposals demanding a degree of partnership must be understood to be in keeping with the model of public participation on offer.

Consultation offers "no assurance that citizen concerns and ideas will be taken into account", but the public must trust that they will be. If they are not "taken into account", the public is free to resort to advocacy.

Only a mutual understanding of, and respect for, SANParks' recognised model of public participation will ensure the integrity of the TCMF Review public-participation process. If such understanding and respect is achieved, the success of **Phase 1: Understanding the current context, issues and concerns** and **Phase 2: Focused workshops for issues, concerns and proposals** is assured.

Summary

The TCMF Review Process requires us to seek a common goal or vision by way of a recognised consultative public-participation process overseen by SANParks. Internationally, this form of public participation is legitimate. However, abuse of the process by either party to the process might render it a sham or an exercise in tokenism (Arnstein 1969).

Mutual respect and an adherence to the context and parameters of debate around the TCMF are essential.

Adversarial populist groups opposed to the TCMF and SANParks as the TMNP management authority have articulated objectives and goals antithetical to a collaborative process leading to any meaningful partnership between the public and the management authority, i.e. SANParks. The use of a consultative model whereby the management authority acts as the final arbiter is therefore desirable.

Referencing national, provincial and local-government public-participation processes makes clear that, while SANParks may be a party to an agreement, it can be so only in so far as legislation and its mandate allow it to be. Therefore, in terms of the TCMF, SANParks must ultimately decide what is, or what is not, feasible or possible.

Mike Golby — 9 July 2021