Quarterly Newsletter

Issue 1 - October 2012

EDITORIAL

Hello and welcome to the first quarterly enewsletter from the Environmental Management Directorate (EMD). EMD has now been in operation for just over 6 months and we are introducing our quarterly newsletter to keep all of our 'friends of St Helena's environment' up to date with what we have been doing.

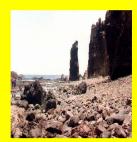
The past 6 months have been extremely busy as we have been establishing the overall remit and function of EMD and planning our activities for the coming year and beyond.

In this issue you can read about some of the highlights of the official EMD launch, development and launch of St Helena's very first National Environmental Management Plan (NEMP), exciting seabird research, progress with solid waste management and lots more.

Isabel Peters
Manager, Environmental Assessment & Advocacy



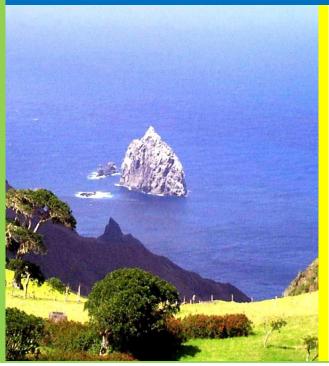








'Our Island, Our Environment, Our Responsibility'



CONTENTS

DIRECTOR'S COMMENTS - Page 2 OFFICIAL LAUNCH OF THE ENVIRONMENTAL MANAGEMENT DIRECTORATE - Page 3 WHO WE ARE - Page 4 WHAT EMD IS ALL ABOUT - Page 5 ENVIRONMENTAL ASSESSMENT - Page 6 ENVIRONMENTAL RISK MANAGEMENT DIVISION - Page 7 NATIONAL CONSERVATION AREA'S (NCA'S) ON ST HELENA - A BRIEF OVERVIEW - Page 8 NATIONAL ENVIRONMENTAL MANAGEMENT PLAN FOR ST HELENA 2012-2022 - Page 9 FUTURE LOOKING UP FOR BASTARD GUMWOOD - Page 10 SEABIRDS TO REVEAL THEIR SECRET FISHING **HOTSPOTS - Page 11-12** SOLID WASTE MANAGEMENT STRATEGY - Page 13 STAFF FOCUS - Page 14



DIRECTOR'S COMMENTS

It is an exciting time on St. Helena with the construction of the islands first airport, and the associated drive for economic development. St Helena has recognised the three pillars required for this development to be sustainable (economic, social and environment) through establishing them as National Goals in the island's Sustainable Development Plan which lays down the blueprint for this period of change. 'Effective management of the Environment' is one of the 3 National Goals and the Environmental Management Directorate has been created to coordinate the implementation of this goal

and to ensure that the environment is mainstreamed across the island. (EMD) have been up and running for 6 months and have established a great team, we are working closely with a range of national and international government and nongovernmental partners and stakeholders to enhance, create and implement systems, frameworks and mechanisms required for effective environmental management.

Tara Pelembe



- MARINE AWARENESS -

DID YOU KNOW?

RED-FOOTED BOOBY

FACT: In October 2010 a Red-footed Booby was sighted roosting amongst a colony of Masked Boobies near Castle Rock.

We have received more sightings of this bird in different areas since.

This bird looks very similar to the Masked Bobbies having a white body apart from back tips and trailing edge of the wings. However the head and neck had a brownish tint. The bird has very distinct red feet and a bright blue bill.



DID YOU KNOW?

- Fossil deposits suggest the Redfooted Booby was a regular breeder on St Helena before human colonisation.
- · Adult Red-footed Boobies can be seen elsewhere in two colors, white adults (like the bird shown in the picture above) and brown adults.
- · Red-footed boobies elsewhere usually nest in trees.

HUMPBACK WHALE

FACT: One of the most energetic of the large whales well known for spectacular breaching, lobtailing and flipperslapping. At close range its knobbly head and long flippers are unmistakable.

Adult length: 11.5—15 meters

Adult Weight: 25—30 tonnes



DID YOU KNOW?

- Humpback whales come to St Helena from June to December every year to give birth to their calves. They feed them milk that is 45-60% fat until the calf is strong enough to move to their summer feeding ground.
- No two humpback whales are alike, each whale has distinctive black and white markings on the undersides of their flukes.



OFFICIAL LAUNCH OF THE ENVIRONMENTAL MANAGEMENT DIRECTORATE

Monday the 16th April 2012 saw the official launch of St Helena's very first Environmental Management Directorate.

The Directorate, headed by Tara Pelembe, and with the purpose of coordinating environmental policy on St Helena, was launched in the presence of His Excellency, Governor Capes, Councillors, senior government officials and members of the National Trust, who were all joined, via a live video link from the UK, with Environment Minister Richard Benyon of DEFRA.

In his opening words to the people of St Helena Minister Benyon remarked on how rewarding it was to join with the Overseas Territories in recognising the importance of effective environmental management. He stressed the importance to the UK of the Overseas Territories' unique ecosystems and endemic flora and fauna, referring specifically to the St Helena Wirebird and the Bastard Gumwood, just two of the species found only on the Island.

Minister Benyon also recognised the environmental challenges that the Overseas Territories face with increasing world population and climate change, but also commented on the opportunities these challenges bring to increase the commitment by UK Government towards biodiversity in the Territories.

He said:

"The launch of St Helena Government's Environmental Management Directorate is particularly timely; DEFRA's Departmental paper 'the Environment in the United Kingdom's Overseas Territories: UK Government and Civil Society Support' was published in January and it emphasises the importance of sustainable environmental management in the overseas territories on the environment."

He ended by highlighting that to protect biodiversity in the Overseas Territories the UK Government and the territories must work together in partnership.

Governor Capes commented:

"There will be new economic and social opportunities as we develop our tourism infrastructure, but it is essential that we take great care to manage our precious environment on this jewel of an island in the South Atlantic."



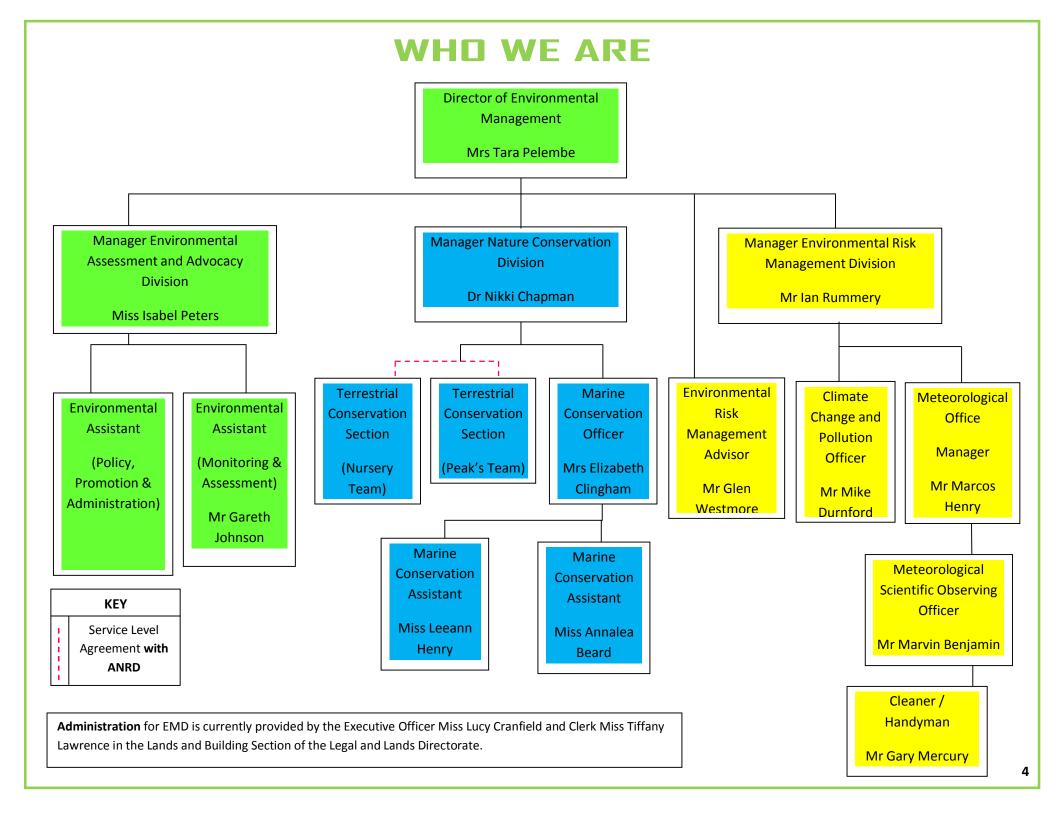
Tara Pelembe highlighted the importance of the environment to St Helena:

"The environment underpins everything, and impacts all of us...it is the air that we breathe, the water that we drink, the food that we eat, the energy we use in our houses, the landscape we enjoy, the sea where we fish and also importantly, our culture and our inspiration, our history and our business."

Councillor Raymond Williams, Chair of the Natural Resources, Development and Environment Committee remarked:

"As the airport project progresses and the Island develops its economy, we will need to ensure that the environment, one of St Helena's key tourism products, is effectively managed...I am very keen that we are successful in taking forward environmental protection, which is now one of our three National Goals under St Helena's new Sustainable Development Plan."

The day continued with an open afternoon at the EMD offices in Essex House where Isabel Peters, a well known figure in striving forward with the Island's environment issues and the new Manager of Environmental Assessment and Advocacy, 'popped the cork' to declare EMD officially open. All present were then able to share in a slice of the specially made cake for the occasion and view displays on the importance of the environment on St Helena and how to live in 'green' ways.





WHAT EMD IS ALL ABOUT

The **Environmental Management Directorate's (EMD)** mission is to be the focus of environmental management for the St. Helena Government through the creation and implementation of policy and legislation, and the provision of advice underpinned by a clear, transparent evidence-base; supported by systematic monitoring, evaluation, enforcement and a comprehensive communications strategy.

The **Environmental Management Directorate** consists of three divisions, Nature Conservation Division, Environmental Risk Management Division and Environmental Assessment and Advocacy Division.

The Nature Conservation Division's overall remit involves the conservation and sustainable management of St. Helena's terrestrial, freshwater and marine resources.

The key areas of work for the **Nature Conservation Division** are:

- Conserve endangered species and habitats through the development and strategic direction of conservation works, studies, education, participation and policy including the creation and establishment of a series of terrestrial and marine National Conservation Areas.
- Establish and implement an evidence management system to undertake and or/commission research to fill priority evidence gaps and ensure evidence is incorporated into decision making.
- Ensure that marine and terrestrial biological resources are sustainably managed through works, studies, assessment, monitoring, policies and programmes.

Read more about some of the activities that the **Nature Conservation Division** are involved in on pages 8 - 12.

The Environmental Risk Management Division's overall remit is to minimise the impacts of, and risk to, the environment through the identification of best practice and/or mitigation measures, and then enforcement and compliance to these.

The key areas of work for the **Environmental Risk Management Division** are:

- Pollution (including air, and noise)
- Solid Waste Management (currently focusing on the strategic direction for this work area)
- Climate Change (Adaptation and mitigation).

A further introduction to the work of the **Environmental Risk Management** Division can be found on page 7 and an article on solid waste management can be found on page 13

The **Environmental Assessment and Advocacy Division's** overall remit is to promote the adoption and use of sustainable environmental management and the development of policies, regulations and practices through education, participation and planning.

The key areas of work for the **Environmental Assessment and Advocacy Division** are to:

- Ensure environmental concerns are incorporated in the decision making process.
- Establish and implement a framework for the environmental assessment and subsequent monitoring of projects, policies and programmes.
- Ensure the Airport Project is implemented with due regard to the highest standard of environmental management in line with all contractual documents.

Read more about **Environmental Assessment** on page 6.



ENVIRONMENTAL ASSESSMENT

Environmental Assessment is the process by which an activity, be it a project, programme, policy or piece of legislation is looked at in terms of the impacts, both positive and negative that it will have on the environment.

The environment being defined as "everything around us" means that we look at the impacts on...everything, so this includes as appropriate: Land and Land use, what is the land being used for now and how will this be impacted; Biodiversity, our endemic and native plants and animals both on land and in the sea, and also impacts on invasive species, whether it be getting rid of them (a positive impact) or helping to spread them a (negative impact); Water, including potential for contamination, loss of natural water courses and impacts relating to how the water will be supplied; **Air** quality, relating to odours, dust generation, gas emissions, which could also contribute to climate change; **Landscape and Visual** Amenity, will it have an impact on views, open spaces; Built and archaeological heritage, will it disturb or destroy sites or buildings of historic significance; And the environment does include us so we also consider the impacts on **people**.

Impacts are assessed for **significance** and **mitigation measures** are then designed to avoid or lessen negative impacts or to enhance positive impacts.

In the Environmental Assessment and Advocacy (EAA) Division we currently manage and or undertake both formal and informal types of environmental assessment. Formal types of assessment include **Environmental Impact Assessment (EIA)** which is aligned to the planning process and follows a set process; We have also started to do **Strategic Environmental Assessment (SEA)** which is usually used to assess plans and or programmes, a Strategic Environmental and Social Assessment (SESA) - an SEA with a Social Assessment, was done of the current Land Development Control Plan.

For projects funded by overseas donors, including DFID and the EU, a form of environmental assessment is usually required, for DFID funded projects an **Environmental Screening Note** is included in the project documents. An environmental assessment of all existing policies has also recently been done. And there are a number of ways in which we do **informal environmental assessments** that are used to make "day to day" decisions on whether a particular activity has an environmental impact.

To ensure consistency and transparency we are now working on developing an **Environmental Assessment and Monitoring Framework** to include all of the existing types of environmental assessment but to establish beyond this **what** will need to be assessed, **how** it will be assessed and the **criteria** for each type of assessment.

Isabel Peters Manager, Environmental Assessment & Advocacy





THE ENVIRONMENTAL RISK MANAGEMENT DIVISION

It is one thing to say that St Helena needs to develop a 'green' economy and quite another to achieve economic development that is sustainable for the environment. We often think of the environment as the natural environment and while areas such as Diana's Peak are extremely important the environment is also where we live.

Quite rightly measures have been put in place to conserve the natural environment but in addition to this other aspects of the environment require protection. This is the remit of the Environmental Risk Management Division. We are involved in areas such as managing solid waste, pollution control and safeguarding water sources to ensure that we are using environmental resources sustainably.

The word sustainable is heard frequently these days, quite simply it means:

"Meeting the needs of the present without compromising the ability of future generations to meet their needs"

One way of ensuring that our activities are sustainable is by assessing the risk of damage to the environment from these activities. This is what we will be doing by developing regulations and legislation to protect the environment. With this framework in place we will then be able to monitor the effects on the environment and implement measures for protection.

Environmental risk management does not only cover the risks that we pose to the environment. It also includes the risk that the environment poses to the people living on St Helena. The effects of climate change, extreme weather and other natural hazards all have the potential to cause harm. These risks also need to be assessed and measures put in place to protect our community.

We have a lot of work ahead of us but it is vital that as our island undergoes dramatic change so we do not destroy our environment in the process.

Ian Rummery
Environmental Risk Management Division
Manager

- WASTE ON ST HELENA -

DID YOU KNOW?

Horse Point Landfill Site will be full in just



if we keep filling it at the current rate!

40%

of the waste we send to Horse
Point Landfill could be made into
compost and used by households
and for growing food







NATIONAL CONSERVATION AREA'S (NCA'S) ON ST HELENA - A BRIEF OVERVIEW

What does the term National Conservation Area mean?

It is an 'umbrella term' adopted by St. Helena to describe a range of sites that represent the very best of St. Helena's landscapes, plants, animals, landforms and heritage. They have previously been referred to as National Protected Areas.

What is the purpose of NCA's?

- Conserve nationally important assets
- Conserve what is important to people and help create and sustain livelihoods
- Allows discrete management appropriate for that
- To conserve the environment for future generations
- To conserve ecosystem goods and services (water catchments, recreational areas, etc).

So how does NCA's differ from current conservation efforts?

Currently there are lots of good examples of conservation efforts including:

Millennium Forest - community participation in the recreation of the former Great Wood lowland gumwood forest. Implementation of a restoration management plan.

Diana's Peak National Park - enhancing and restoring the largest area of native cloud forest - post box walk and path maintenance.

The NCA's will bring together existing conservation areas under the same umbrella as well as incorporating new ones for example 'Islands' which are important seabird breeding sites.

How many NCA's?

There are 23 proposed NCA's, which are split into 4 types:

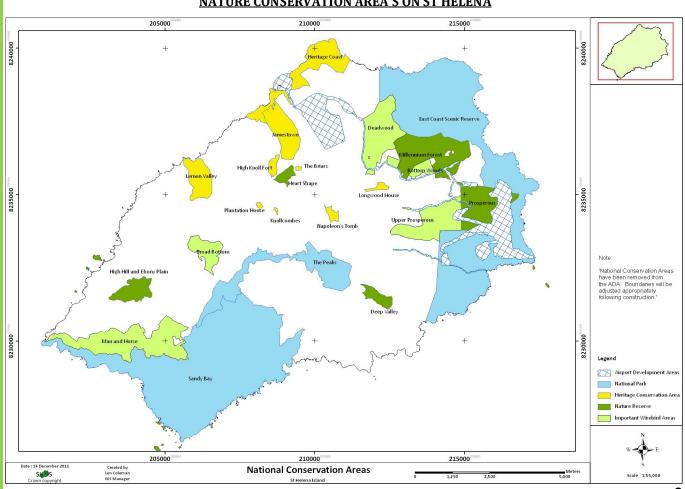
- National Park mixture of features and can have a recreational element
- Nature Reserve specific species or features
- **Important Wirebird Areas** Wirebird populations of national and international importance
- Historic Conservation Areas built heritage and archaeological sites

Where can I get more information?

Email: Dr. Nikki Chapman

m.nconservation@environmentalmanagement.gov.sh

NATURE CONSERVATION AREA'S ON ST HELENA





NATIONAL ENVIRONMENTAL MANAGEMENT PLAN FOR ST HELENA 2012-2022

Following public consultation in July 2012, a National Environmental Management Plan (NEMP) has been developed to implement St. Helena's 3rd National Goal 'Effective Management of the Environment'.

Approved by Exco on the 4th September 2012, the NEMP provides the framework for environmental management on St Helena for the next 10 years. It includes a series of time bound targets that are outlined in an action plan in the annex to the NEMP.

Councillor Raymond Williams, Chairman of the Natural Resources, Environment and Development Committee says in his foreword to the plan:

"I am extremely pleased that St Helena has developed its first National Environmental Management Plan.

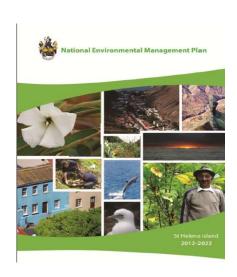
As the airport project progresses and the Island develops its economy, we will need to ensure that the environment, one of St Helena's key tourism products, is effectively managed.

The environment impacts us all, and this plan is not, and cannot be, just a St Helena Government Plan, it is a plan for the whole Island. Having branded our Island as 'green', we all need to take environmental management seriously. This is something that we all need to do in partnership and collaboration – between government, businesses, youth, civil society, residents and visitors."

The National Environmental Management Plan (NEMP) was officially launched at the Consulate Ballroom on Tuesday 9th October 2012. The purpose of the official launch of the NEMP was to raise the profile and awareness of this important national planning document and to showcase the work done by the Environmental Management Directorate (EMD) and other stakeholders to implement the plan.

The National Environmental Management Plan (NEMP) can be found on the St Helena Government website at the following link –

http://www.sainthelena.gov.sh/resources.php/813/st-helena-national-environmental-management-plan-2012-2022











FUTURE LOOKING UP FOR BASTARD GUMWOOD (Commidendrum rot undifolium)

In late 2009 conservation staff on the island were alarmed when the world's last known pure bastard gumwood at Pouncey's was struck by gales. Props were placed under the tree to support it and with help from DEFRA an intensive programme was initiated to try and save the species from extinction.

Measures included: the construction of a mesh cage to ensure only pure seed was produced – bastard gumwood hybridises with its sister species false gumwood; daily visits to hand pollinate flowers within the cage; these became daily visits to collect seed as they developed. With poor seed viability, only 1 or 2 seeds per 1000 germinating, the propagation of seedlings was the next challenge. Continued efforts, funded in part by DFID and FCO through the OTEP programme, led to the establishment of a recovery site at Drummond's Point, near the Heart-Shaped Waterfall in May 2010.

In August 2012 the first of the newly planted trees flowered. As these trees are growing well away from other gumwoods the flowers are unlikely to be pollinated from false gumwoods, meaning insects can carry out the work in place of laborious daily visits by conservation staff and volunteers.

Little is known about bastard gumwood and its ecology, the tree has been extremely rare or critically endangered for over 200 years, so the production of flowers at such an early stage is brilliant news.

Seed from the new flowers will be collected and its viability assessed. We hope that this seed will allow us to grow further seedlings.

Everyone who has contributed in any way to this project is thanked for helping to put this endangered endemic tree one step further away from extinction.

Contributed by:

Vanessa Thomas (Nurseries Officer, DANR) & Andrew Darlow (Bastard Gumwood Recovery Officer)



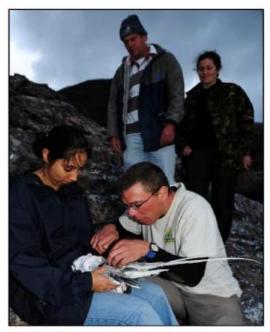




SEABIRDS TO REVEAL THEIR SECRET FISHING HOTSPOTS

To conserve marine biodiversity for future generations tourists the Environmental Management Directorate (EMD) is interested to find out which marine areas have the highest biodiversity value. One approach for such an investigation is to use seabirds as indicators. Most seabirds on St Helena (Masked Boobies, Brown Boobies, Red-billed Tropicbirds, Fairy Terns, Brown and Black Noddies) catch fish to feed themselves and their offspring, and the seabirds know exactly where to find highly productive waters that harbour the fish they like. Because seabirds are at the top of the marine food chain, areas that are consistently used by seabirds would indicate a rich biodiversity below the water surface. There is just one problem: seabirds can fly quite far, and it is often impossible to figure out from land or even from a boat where they catch most of their fish.

Scientists around the world have recently attached small GPS loggers to birds, which can reveal amazing journeys of many thousand kilometres. In July 2012, EMD staff in collaboration with Steffen Oppel, an RSPB scientist currently visiting St Helena, conducted a small pilot project to assess whether it would be feasible to track seabirds from St Helena to identify their offshore foraging areas. The team visited Egg Island to attach small GPS loggers to Red-billed Tropicbirds, and climbed up to Lot's Wife ridges to tag Masked Boobies.



Attaching a GPS logger to a tropicbird (Photo © Ed Thorpe)



Masked Booby with GPS logger (Photo © Annalea Beard)

The GPS loggers are sealed in waterproof plastic and are attached to the feathers on the back of the birds using special tape. The 15g extra weight on the back does not affect the seabirds very much, and the GPS logger gets an exact location fix every 2 minutes. The data is stored in the device, which means the team had to re-visit the seabird colonies to recapture the birds and remove the loggers.

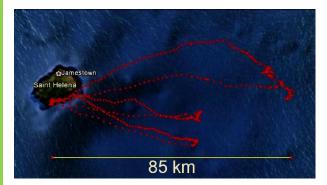
The team attached small GPS loggers on to Red-billed Tropicbirds and Masked Boobies to assess whether it would be feasible to track seabirds from St Helena to identify their offshore foraging areas. It is hoped that this work can be developed to identify biodiversity hotspots by using seabirds as indicators.

The logger data indicated that the nest-minding parent never left the nest for the 4 days the logger was attached, while its partner was out at sea foraging. It is currently unknown where the tropicbirds go, but they could fly > 500 km during their week long journey at sea. The Masked Boobies are more social parents that return to their colony every night and go foraging only for several hours during the day. Nonetheless, the birds fly farther than most local fishermen venture out to sea.

(Continues on page 12)



One male Masked Booby went fishing east of St Helena, and his preferred foraging areas were 50 - 85 km offshore. The bird completed a 210 km round-trip in 8.5 hrs to bring back food and feed his chick!



Much more work is required to track many more individuals and identify the most important foraging areas for St Helena's seabirds. Dr Nikki Chapman, Head of the Nature Conservation Division was enthusiastic that the method can yield astonishing results with relatively little effort. "It is important results from scientific projects can be communicated to all. The methodologies used here allow the time taken from collecting field data to displaying results to be very fast. In addition the clear visual outputs make it appealing to scientists and public alike". The RSPB and EMD will now consider future possibilities for extending these works.

Not only are the marine foraging areas of most seabirds unknown. For some seabird species it is even unknown whether or where they still breed on mainland St Helena. Petrels, in particular, are extremely difficult to monitor, because they nest in burrows and fly over land mostly at night. Hence, they are as good as invisible to humans. Most petrels are however very vocal when they fly around colonies at night. Another area of seabird work that has been trialled with help from Steffen Oppel, a visiting RSPB scientist, is the use of automated sound recorders to detect species in areas where nobody knows that they exist. A recorder was placed on top of the towering cliffs of Man and Horse for two weeks, recording every night for 2 hours.

Detecting petrel calls on a sound recorder is however just the first step. How many birds may breed in an area where they can be heard is far more difficult to assess. One way to estimate the numbers of birds that are difficult to count visually is by marking them individually.



Steffen Oppel ringing a Maderian Storm Petrel (Photo © Ed Thorpe)

The trips to Egg Island provided useful training for EMD and St Helena National Trust staff to capture and mark Madeiran Storm Petrels with numbered metal rings.

Several repeat visits are required to be able to estimate the number of birds that use Egg Island, because on every visit a few already marked individuals are recaptured. Last Sunday a bird was recaptured that had been ringed 3 years ago!

Despite being only 40g and flying thousands of miles across the ocean every year, storm petrels can live up to 20 years. During their long lives they build up an impressive knowledge of productive foraging areas - and if we can tap into the knowledge by tracking seabirds then we can learn much more about the marine environment.



The EMD and SHNT team on Egg Island (Photo © Ed Thorpe)



SOLID WASTE MANAGEMENT STRATEGY

The Environmental Management Directorate has developed a Solid Waste Management Strategy for St Helena. Technical input into the strategy was provided by Grant Pearson from SLR Consulting.

The strategy is committed to managing solid waste in a more sustainable manner in future years while recognising the practical limitations that exist on a remote Island such as St Helena. It explains the plans to reduce and manage waste in a manner that is more efficient and sustainable and that will ultimately bring benefit to the communities and the environment of St Helena.

The principles of the strategy are based on the 3 Rs 'Reduce, Reuse, Recycle' and everyone can apply these principles to their everyday decisions.

As part of the public consultation on the strategy, a display on Solid Waste Management was held in the Foyer of Essex House on the 8th September. The display featured information on the Solid Waste Management Strategy and the public had an opportunity to discuss this with staff from the Environmental Management Directorate. The public were also invited to complete a short questionnaire about solid waste management.

Overall, responses from the public were very positive. The Solid Waste Management Strategy is going to Executive Council this month.

The Strategy contains a series of goals, which are summarised in the following table:

Goal No.	Description
1	To move the management of solid waste up the waste hierarchy in a manner which is practical and proportionate to the needs of the Island
	Most favoured option
	Prevention Re-use Recycling
	Energy recovery
	Least favoured option
2	To ensure that the management of solid waste contributes to the delivery of National Goals and targets as defined by key relevant policy and planning documents
3	To ensure that solid waste management services are delivered in an environmentally sustainable and cost effective manner for all sections of the Island population
4	To implement data capture and management systems which facilitate analysis of trends in waste arising's and operational practices
5	To embed consideration of waste prevention and minimisation in all aspects of decision making throughout the Island population, including the activities of SHG through established/emerging processes such as the environmental assessment, monitoring and review framework
6	To promote the activities of existing waste reuse schemes and encourage the development of new initiatives across the Island
7	To support the development of existing recycling initiatives and facilitate access to information on further recycling opportunities to the Island population
8	To develop treatment facilities for the sustainable production of compost materials from suitable waste streams and identify viable on-island outlets and markets for use of such products
9	To periodically review options for the sustainable treatment of residual waste in the St. Helena context
10	To minimise landfilling of solid waste where practicable
11	To ensure that unavoidable landfilling is carried out in a manner which does not significantly impact on public health or the natural environment
12	To proactively engage with all relevant stakeholders including other SHG departments, individual householders, businesses, schools and community groups to ensure that improvement in waste management practices is embedded in all activities on the Island
13	To produce and implement an effective Communications Plan which is periodically reviewed for effectiveness and updated accordingly
614	Develop and evaluate a range of potential charging models to assist in the identification of a charging

structure which provides an equitable and appropriate level of funding for the service in future years

STAFF FOCUS

STAFF ACHIEVEMENTS

In September 2012, the following staff undertook Emergency First Response (EFR) training:

Ian Rummery
Mike Durnford
Glen Westmore
Elizabeth Clingham
Gareth Johnson
Leeann Henry
Lourens Malan
Jeremy Henry
Darrel Leo



Dive Training





NEW STAFF

September 2012 saw the arrival of Glen Westmore on the island to work within EMD for a year. Principally, Glen will be working within the Environmental Risk Management Division; helping to create environmental protection policy and legislation, and also providing technical advice and training to staff.

New staff at the Terrestrial Conservation Section

Robert Mittens - An experienced fieldworker having done regular contracts for ANRD including arboriculture and manual invasive plant control on the Peaks.

Ross Henry - Has worked at ANRD as a youth trainee. He wanted to become part of the conservation team since then, however the lack of vacancies at the time forced him to gain experience in the building industry and elsewhere. He has also been involved in undertaking contract work on the Peaks from time to time. He is very happy with this opportunity to take a place on the prestigious Peaks Team.

Dane Wade - Recently back from Ascension Island where he spent the last 9 years, he worked there with Stedson Stroud's conservation team and has been trained in the use of small machinery, rat control, and plant conservation.

Unfortunately our most senior staff member on the Peaks had to go to Cape Town on medical referral. Leslie Benjamin is a major part of the peaks team with an enormous amount of experience. We would like to wish him the best of luck and a speedy recovery.

At the end of last month, we bid a fond farewell to Mrs Jenny Williams, who officially retired on the 5th October. Jenny had been with EMD as the Senior Clerk in the Environmental Assessment and Advocacy Division, having joined the then EPD Section in April 2011.

All staff in EMD would like to thank Jenny for her hard work, input and support to the Directorate and would like to wish her a happy retirement and the best of luck with her future endeavors.

Congratulations to Marvin & Michelle Benjamin on the birth of their baby from all the staff at EMD.











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