

COMMENT BY THE ELANDS RIVER CONSERVANCY (ERC) ON THE REVISED DRAFT ENVIRONMENTAL IMPACT REPORT (RDEIR) FOR THE PROPOSED TRANSMISSION LINES FROM THUYPUNT TO GRASSRIDGE POWER STATION DEAT REF: 12/12/20/1212 AND 12/12/20/1213, AS PREPARED BY SIVEST AND PUBLISHED ON THE 21<sup>ST</sup> OF SEPTEMBER 2012.

The ERC is strongly opposed to the erection of any transmission power lines from Thuypunt to the existing substations at Dedisa and Grassridge. These power lines will inevitably have a negative and irreversible impact, visually as well as environmentally, on some of the most beautiful parts of the Eastern Cape.

#### MITIGATION PROGRAMMES

Of utmost importance to the ERC is the environmental conservation of the Elands River Valley. It is alarming to see that environmental specialists see mitigation programmes as a solution to possible problems. The ERC would much rather prefer the prevention of the problem, thereby doing away with the necessity of any mitigation programmes.

No 'walk through' can determine the impact of the proposed transmission lines. The *Landbouweekblad* of 1 June 2012, p11 features an article on ten new animal species (some are critically endangered) which have recently been discovered in the Western Cape. The scientists involved state that knowledge about South Africa's biodiversity is far from complete.

The ERC is committed to conservation of the biodiversity of the Elands River Valley. The existence of any mitigation programme (to bring the impact down to 'acceptable levels') is in itself an admission that there will be a negative impact on the environment. By then it is too late since the damage will already be done. This is totally unacceptable to the ERC.

#### UNADDRESSED ISSUES

##### 1: APICULTURE

Although the ERC has raised concerns about the effect of electro magnetic fields on apiculture on several occasions, to date our questions remain unanswered. No feedback has been received from specialists working on so-called 'desk top studies' or 'field studies'. This is a very serious omission as tons of honey is produced by several bee farmers in the ERC. In some instances the income from apiculture is the primary source of income of these farmers.

The price of honey has escalated due to various factors including the occurrence of a virus attack on bees during 2008/2009. The Elands River Valley was one of the few areas that was largely unaffected by the virus. There are a number of fruit farmers in the Elands river Valley and the role played by bees in the pollination of fruit trees is immense. Any negative impact on bee colonies in the valley would be disastrous.

## **2: COMMUNICATION**

Due to the geographical structure of the area and the absence of landlines, many residents and businesses are dependent on radio waves for communication and safety as well as internet access.

Wave interference from the transmission lines will generate copious amounts of noise (QRM) on the radios and have a negative effect on the residents safety, communication and businesses.

## **3: FIRE HAZZARD**

In 2005 the Elands River Valley had devastating fires that caused millions of rand's damage to farms and to Cape Pine plantations. As recently as 4 April 2009 lightning caused a fire in the valley (included in the report of the Elands River Fire Protection Association). Erecting high pylons and transmission lines in the area will inevitably attract lightning which will consequently increase the occurrence of veld fires.

## **THE THREE 400Kv TRANSMISSION LINES**

The proposed pylons are the Guyed Suspension type tower (double circuit), which requires 95m registered servitude per tower, thus totaling a registered servitude of 285m for 180km.

In order to be able to carry the 400kV transmission lines, the pylons will have to be an average of 33m tall with a minimum conductor clearance of 8,5m. Should these lines be erected on the northern fire break of Cape Pine it would cause an absolute, non-acceptable visual impact for the ERC. It would furthermore lead to the devaluation of privately owned land, as can be seen in related scoping reports where specialists use the term 'degraded environments'.

During a public meeting at Ankervas Primary School on the 3<sup>rd</sup> of February 2009 and a public meeting at van Stadens Farmer's Association on the 14<sup>th</sup> May 2009, it was confirmed by Eskom delegates that such areas will be targeted should the need arise for further energy-related infrastructure placements.

## **VISUAL, TOURISM AND ECONOMICAL IMPACT**

It was with great interest that we read the Visual Impact Assessment addendum (appendix 8) and the Tourism Impact Assessment (appendix 9) and the Economic Impact Assessment addendum (appendix 11).

These three entities cannot be separated as is proved by letters from Inge Konik, an ERC members' daughter in regards with their vision for their farm, Cypherfontein, a letter from Roger Cooney, owner of an operating tourism farm and a letter from BirdLife Eastern Cape, regular visitors to the valley. Please see Addendum A for the mentioned documents.

**\*The psychological effect** of industrialization must also be taken in consideration. The residents currently living in the area have chosen the Elands River Valley as an escape from urban life styles. The beauty of the area generates energy for these residents of which many, have found physical healing, are practicing sustainable farming or invested in tourism operations.

**\*Since the ERC's involvement in the EIA the tourism operations in the Elands River Valley, as was listed in our report of 2008, have grown from 10 to 14 operations.**

**\*The Slipper Way**, the brain child of Gary Gradwell and Selva Pillay, has also seen the light. The Slipper Way is an initiative to drive upliftment and promote our area by establishing a collection of arranged routes that offer visitors a variety of accommodation, local events, restaurants, outdoor activities, arts and crafts, wildlife conservation and much more. The vision is to establish a permanent tourist route or meander. For a copy of the Slipper Way please see Addendum B.

## **CLOSURE**

All of our previous comments made on the scoping report still hold true. We believe that in most instances no in depth studies were conducted and that at best it was a 'drive through' study. Very little time, if any was spent in the veld; looking under rocks, climbing our hills or crawling around the valleys. Many of our concerns and questions have not adequately been addressed. We enclose a copy for easy reference under Addendum C.

Inge Konik mentions in her letter (Addendum A) that there are numerous ways to cater for the energy needs of the South African population. First it would be necessary for government to start questioning their continued provision of the world's cheapest electricity to some of the world's most ecological damaging companies. According to Die Burger, Wednesday, 12 September 2012, BHP Billiton is using 7,5% of South Africa's generated power at a current purchasing rate of between 8,8c and 10c. These rates must be lower

than Eskom's generation costs! Eskom furthermore sells electricity to neighbouring countries for less than what South Africans must pay.

We believe that the only solution for South Africa and the world is to invest in alternative energy solutions. The sooner this is done, the more the environment and us as humans will benefit. Alternative energy is unlimited and constantly replenished while fossil fuels are being depleted at staggering rates. The South African climate is ideal for the utilization of alternative energy sources and we have the opportunity to become world leaders in this regard.

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Accidendum A

Llise Dodd <llisedodd68@gmail.com>

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## Proposal for nuclear build at Coega

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Inge Konik <ingekonik@gmail.com>  
To: Llise Dodd <llisedodd68@gmail.com>  
Cc: brunowoolard@gmail.com

Mon, Oct 15, 2012 at 8:34 AM

Dear Llise

Please see my letter below for the Revised Draft Impact Report.

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To whom it may concern

I write on behalf of myself and my parents, Hilton and Bruno Woolard, in protest against the proposed erection of transmission lines along the mountain in the vicinity of the Elands River Valley.

As our farm, Cypherfontein, is in an area of the Elands River Valley that has been classified as a conservancy, the only viable (and sustainable) economic activity that can be engaged in there is ecotourism. We plan on building a few holiday chalets on the property, in order for locals and international visitors to experience the beautiful surrounding nature, in its relatively unspoiled state.

If the pylons were to be erected in the area, it will be impossible to realize this plan, as the pylons would detract significantly from the beauty of the area. Also, their erection would fly in the face of the principle of leaving at least some areas of South Africa – especially richly biodiverse ones such as the Elands River Valley – untainted by the imposition of unnecessary technology.

We say unnecessary, because there are numerous other ways to cater for the energy needs of the South African population. First, it would be necessary for government to start questioning their continued provision of the world's cheapest electricity to some of the world's most ecologically damaging companies. Second, what must be recognized are the alternative energy industries already in place at the Coega IDZ – such as Innovent, as well as others in the pipeline like the proposed 13MW photovoltaic electricity generating facility, planned for zone 12 of the IDZ. In addition, as a coastal province, the Eastern Cape also harbors immense potential for the generation of wave power (see <http://www.pelamiswave.com/>) and ocean current energy (see <http://ocsenergy.anl.gov/guide/current/index.cfm>). These would put the South African Research and Development (R&D) budget, which is currently almost exclusively dedicated to nuclear energy research, to far better use. This is

because they are untapped sources of *sustainable* electricity provision, which would not only prevent the despoiling of our natural environment, but would also help to shrink South Africa's colossal carbon footprint, without having to resort to volatile and dangerous technologies such as nuclear.

Yours sincerely,

Inge Konik

**ENVIRONMENTAL IMPACT ASSESSMENT  
FOR THE PROPOSED THYSPUNT TRANSMISSION LINES INTEGRATION PROJECT (TTLIP)  
(DEA Ref No: 12/12/20/1211 - Southern Corridor)  
(DEA Ref No: 12/12/20/1212 - Northern Corridor)  
(DEA Ref No: 12/12/20/1213 - New PE Substation)**

**REVISED DRAFT ENVIRONMENTAL IMPACT REPORT  
COMMENT FORM  
September 2012**

**WE WOULD WELCOME YOUR COMMENTS ON THE REVISED DEIR**

Please complete this form and return before or on **WEDNESDAY 31 OCTOBER 2012** to:

**Nicolene Venter / Andrea Gibb**

P O Box 2921, Rivonia, 2128, Tel: (011) 798 0600; Fax: (011) 803 7272

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Website: [www.sivest.co.za](http://www.sivest.co.za)

TITLE	MR	FIRST NAME	ROGER
INITIALS	RL	SURNAME	COONEY
CAPACITY	OWNER		
ORGANISATION	LANDELA CHRISTIAN CAMP		
POSTAL ADDRESS	P.O. BOX 113, HUNTERS RETREAT, PORT ELIZABETH		
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FAX NO	( 086 ) 5871931	E-MAIL	landela@mtloaded.co.za

**COMMENTS:** Please refer to relevant section in the Report (You are welcome to use a separate sheet if required)  
**SEE ATTACHED**

This study is being conducted on behalf of ESKOM  
(sien keersy vir Afrikaans)

16/10/2012  
Date

# LANDELA CAMPSITE TRUST

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## Comments on :

ENVIRONMENTAL IMPACT ASSESSMENT  
FOR THE PROPOSED THYSPUNT TRANSMISSION LINES INTEGRATION PROJECT (TTLIP)  
(DEA Ref No: 12/12/20/1211 - Southern Corridor)  
(DEA Ref No: 12/12/20/1212 - Northern Corridor)  
(DEA Ref No: 12/12/20/1213 - New PE Substation)  
REVISED DRAFT ENVIRONMENTAL IMPACT REPORT  
COMMENT FORM  
September 2012

Landela Christian Camp is opposed to this proposal. The pylons will have a negative impact on our campsite as the area will be degraded due to the "Industrial feeling" of the 33m high pylons and transmission lines. This will negatively influence the aesthetic effect of our immediate vicinity and surrounding region. Many of our groups like to come here due to the peace and tranquillity, surrounded by nature with abundant birdlife, where they can escape the "urban feel".

We as part of the Elands River Conservancy and are also presently involved in promoting our area by the arranging of a collection of arranged routes that will be offering our visitors hospitality in our "current" beautiful surroundings, i.e. restaurants, outdoor activities, conference and wedding facilities, accommodation, etc.

Our Business plan, which includes the development on the lower part of our property, will be detrimentally affected; as the Pylons will be highly visible to our guests. Therefore this will have an immense impact on our future facility expansion as our guests utilize our campsite due to the surroundings and aesthetic properties of our area, as previously stated. This will have a negative economic impact on our area as it will also result in job losses due to reduced tourism initiatives.

The University of Cape Town (Dieter Oschadleus) Ornithological department of the Animal Demography Unit has been here, on numerous occasions, to conduct bird ringing projects. SAFRING National Bird ringing course was held here 11 – 17 November 2005. Web page of their visit can be found at <http://weavers.adu.org.za/trip2005ec.php> . A Narina Trogon pair was sighted here, which is highly unusual as it is not known to frequent this area.

We have an overlap of numerous bio diverse eco systems intersecting and concentrated in one area, with the result that we have a high diversity of birdlife with species not normally found in this area.

Being a small business, catering mainly to underprivileged and disadvantaged low income clients, we can little afford the detrimental impact and influence of the proposed transmission line route. We are in full support and agreement, with the stance, counter-proposals & solidarity against this proposal, by the Elands River Conservancy and affected parties in our region.





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29 September 2012

To whom it may concern

It is with great concern that BirdLife Eastern Cape heard about the proposed construction of transmission lines by ESKOM in the Elands River Valley area.

Bird Life Eastern Cape has been actively involved in helping the Elands River Conservancy (ERC) compile its bird list and some members of the club have as recently as July 2012 visited Hillingdon, the farm of the chairman of the ERC, for a birding outing.

According to studies done by Heroldt (1998); Johnsgard (1991) and Allan (1997), the collision of large terrestrial birds with the wires of utility structures and especially power lines, has been determined to be one of the most important mortality factors for this group of birds in South Africa.

As shown in the bird list of the ERC, the Elands River Valley hosts many **species that will be endangered by transmission lines.**

- Of significance are various species of ducks, wild geese, raptors and owls. The White Stork, Stanley's Bustard, Secretary birds and the Blue Crane are some of the species that have been identified as vulnerable to collisions.
- During the construction phase and maintenance of power lines habitat destruction and alteration inevitably takes place.
- Many birds are highly susceptible to disturbance and should this disturbance take place during or just prior to the chick fledging period, it could lead to temporary or permanent abandonment of the nest by the adult birds or premature fledging with fatal results for the chick.
- Such a sequence of events can have far-reaching implications for certain large, rare species that only breed once a year or once every two to three years.

Also of concern is **the visual impact** the 33m high pylons will have on the nature loving visitors to the valley.

The areas sought after by nature loving visitors are areas that are largely undeveloped. The Elands River Valley offers the serene beauty nature lovers long for.

Sadly this serene beauty will be spoiled by the erection of transmission lines as proposed by Eskom. **It will result in nature lovers seeking alternate venues in other areas and will definitely impact their decision to visit the Elands River Valley.**

A Branch of BirdLife South Africa





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There has been talk of the Elands River Valley becoming a corridor for a planned Mega Reserve linking Addo National Park, Groendal and Baviaanskloof Wilderness Areas. Power lines would certainly have a negative impact on such a project.

We believe that present as well as future tourism ventures in the Elands River Valley will be negatively affected by the erection of transmission lines in the area. We further strongly believe that birdlife as well as nature in general will suffer devastating consequences should the project go ahead.

Yours sincerely

Corné Erasmus

**Chairperson – BirdLife Eastern Cape**

A Branch of BirdLife South Africa



# Addendum C

COMMENT BY THE ELANDS RIVER CONSERVANCY,  
ON THE DRAFT SCOPING REPORT FOR THE PROPOSED TRANSMISSION LINES  
FROM THUYSPUNT THROUGH TO GRASSRIDGE POWER SUBSTATION  
DEAT REF: 12/12/20/1211; 12/12/20/1212 AND 12/12/20/1213, AS PREPARED BY SIVEST AND  
PUBLISHED ON 4th MAY 2009 (Revision 3, Project 9520) on the website  
<http://www.sivest.co.za/Download.aspx>, AND SENT AS HARD COPY (4 VOLUMES)  
TO THE CHAIRPERSON, Elands River Conservancy, BY SIVEST.

## 1. Introduction

As stated in the report compiled by the Elands River Conservancy and handed to SiVEST on the 19 April 2009, the Elands River Conservancy strongly opposes the erection of any transmission power lines from Thuyspunt to the existing substation at Dedisa and Grassridge, because such lines will inevitably have a negative and irreversible impact, visually as well as environmentally, on some of the most beautiful parts of the Eastern Cape.

The members of the conservancy raise the following points that MUST be addressed by Sivest and Eskom in their reply to this public feedback.

## 2. Procedures in view of environmental accountability to the South African public

### a) Greenwash practices Independent assessment by Corpwatch

We observe that Eskom is using greenwash strategies like the world's elite companies, as observed by commentators at the 2002 summit "Business Action for Sustainable Development". Brian Ashe commented, "Eskom has already joined the world's elite greenwash companies with its rhetoric, presence in Business Action for Sustainable Development and its embrace of the Global Compact."  
(<http://www.corpwatch.org/article.php?id=3528> (16 August 2002)) (Accessed 26 June 2009).

The Eskom commitment to the Global Concept can be seen at  
(<http://www.eskom.co.za/annreport06/pdf/United%20Nations%20Global%20Compact.pdf>)  
(Accessed 26 June 2009).

In the above article in Corpwatch, the environmental watchdog organisation Earth Life Africa "[...] looks at the reality, and finds that the company has behaved in ways that contrast with Global Compact Principles seven (support a precautionary approach to environmental challenges) and nine (encourage the development and diffusion of environmentally friendly technologies)."  
(<http://www.corpwatch.org/article.php?id=3528> (16 August 2002)) (Accessed 26 June 2009).

### b) Our alternative proposal for investigation for a conventional nuclear power plant

We maintain our proposal, already outlined in our public letter to Sivest (dated 15 April 2009) that if nuclear power is needed, a power station be built on a substantial foundation near Grassridge will save Eskom much needed money. This method is being used successfully by Japan, which has 53 nuclear power stations (<http://www.world-nuclear.org/info/inf79.html> and <http://www.world-nuclear.org/info/inf18.html>), and is situated on an area of high seismic activity on average. Should Eskom play open cards, it would win the respect of thousands of affected parties as have been identified in the draft scoping reports for the various sites in this major lines of projects. Recent sharp criticism against Eskom from Cosatu about the substantial energy price hikes and the enormous price of nuclear energy, show that the mistrust of Eskom does not merely lie with affected residents locally, but indeed the paying population at large.

We do not accept, without any reasonable motivation, that this or any other alternative option for energy generation is simply not being taken into consideration by the leading Eskom engineers, as pointed out to us at the public meeting at Ankervas Primary School on 3 February 2009, and at the public meeting held at Van Stadens Farmers' Association Hall on 14 May 2009, by Johan Breytenbach of Eskom. We trace this reluctance to a series of events in the past.

### c) Nuclear power plants are in fact an old 1980's project with vested interests

We believe that this reluctance to assess alternative solutions exists because an identical nuclear project from the 1980's that had been shelved due to political change, is being reactivated due to massive investments in the sector even by the new dispensation state, after 1994. This has been researched in great detail by David Fig. 2005 The Uranium Road. Questioning South Africa's Nuclear Direction. Johannesburg, Jacana Press.

The continued process of investment in nuclear research is further traced by an article in the online journal "Concerned African Scholars" (<http://concernedafricascholars.org/south-africa-and-the-bomb/>) in an article entitled, "The nuclear chain of command: South Africa and the Bomb" by Khadija Sharife. (dated 7 April 2009; accessed on 26 June 2009).

The article points out the indisputable continuity from the former dispensation's nuclear programme through to the establishment of the company PBMR. It also points out the perpetual future dependence on foreign specialists, and the high risk of radioactive pollution due to nuclear waste materials after their active life ends: "Cumulatively, there are 53 highly contaminated radioactive sites in SA." (<http://concernedafricascholars.org/south-africa-and-the-bomb/>) (accessed 26 June 2009)

**The PBMR company's homepage clarifies the support of the government very clearly:**

"The South African government regard the PBMR Project as a National Strategic Project, demonstrating the importance of the PBMR development to South Africa's future. This also provides for opportunities in high technology growth in South Africa and for job creation from both domestic and international sales." (<http://www.pbmr.co.za/contenthtml/Annual2007/index.html>) (accessed 25 June 2009).

As the article by Khadija Sharife establishes, this "job creation" is rather an illusion since the running of the power station will be done largely by highly qualified staff, and often foreign specialists, in all likelihood, as has been pointed out by other authors cited above.

**It is evident that there is a close and favourable link between this company and government decision-making, which is openly paraded by the company.** The company is visible in nearly all foreign nuclear-related deals reported in the media:

"At a media briefing in Pretoria on 5 December 2008, Ms Portia Molefe, the director general of the Department of Public Enterprises (DPE), announced the Government's decision to put on hold the plan to embark on a conventional new build nuclear programme. She pointed out, however, that the decision did not pertain to the PBMR technology and indicated that the DPE was looking at ways of speeding up the PBMR process, rather than slowing it down." (<http://www.pbmr.co.za/index.asp?Content=175>) (Accessed 26 June 2009)

**This causes us to be very concerned about the clear priority of the energy provider.**

**Recent developments render any doubt on nuclear power illusive:**

"The advancement of the next generation of nuclear reactors has received a boost with the signing a Memorandum of Understanding (MOU) in Beijing on 26 March 2009 between the Chinese and the South African developers of pebble bed technology."

<http://www.pbmr.co.za/index.asp?Content=218&Article=105&Year=2009> (accessed 25 June 2009)

The CEO of PBMR, Jaco Kriek, is quoted in this article, as well.

**On the other hand, EDF in France (linked to the name AREVA, that appeared to have left the playing field according to media reports earlier this year (Engineering news))**

is continuing to be a player in South Africa in expanding their nuclear power station range, after all: "EDF South Africa MD Frederic Diore tells Engineering News that the utility, which currently operates 58 nuclear reactors in France, mostly second-generation PWRs, would be keen to take equity in the South African programme, should Eskom and government decide to pursue the nuclear option and should it select Areva's Evolutionary Power Reactor, or EPR, technology."

<http://www.engineeringnews.co.za/.../edf-ready-to-partner-sa-as-utility-pursues-international-nuclear-expansion-2009-06-26> (accessed 26 June 2009)

Alarming, the MD of EDF talks about a 100-year partnership in this article. This in fact confirms the cost and dependency risk of the need for foreign specialists expressed in the article by Khadija Sharife, cited above.

**The link between the PBMR company and other supplier companies is also documented on the PBMR website:** "Pebble Bed Modular Reactor (Pty) Ltd's current investors, the South African Government, the electricity utility Eskom, the Industrial Development Corporation (IDC) of South Africa and the US nuclear giant Westinghouse..." (<http://www.pbmr.co.za/index.asp?Content=176>) (accessed 26 June 2009).

**The two quotes above belie any earlier public statement that the former service providers (Westinghouse or Areva) were no longer interested in the provision of power stations.**

**To summarise, it is our opinion that the vested interests, outlined above from publicly accessible sources, in this planned power utility are clearly evident. Thus, they render the supposedly independent entire processes of the Scoping reports (whether by Sivest or Arcus Gibb) and the EIA's rather a smokescreen.**

**The validity of the claim that nuclear energy is "cleaner" than other energy generation, and that it has the smallest carbon footprint, is strongly disputed by the following authors:** Amory B. Lovins and Imran Sheikh. 2008. The Nuclear Illusion. Ambio Nov 08 preprint, dr 18, 27 May 2008 (DRAFT subject to

further peer review/editing). The authors, like Sharife and Fig cited above, also point out the enormous cost involved in establishing nuclear power, as well as the costs and high risks of storing nuclear waste. The article explains in great depth, and with many international examples from numerous sources, both scientific and media, the type of media converage and investor lobbying that has bolstered the nuclear option over many years.

**In a study of media coverage of the nuclear debate versus the alternative energy debate, Kelth Gottschalk observes a systematic sidelining of the alternative energy debate in the official sphere already in the mid-1990's.**

He observes that the early government-attended debates around alternative energies during the new political dispensation were powerfully sidelined to favour the nuclear options.

<http://reconstructione.wordpress.com/2009/03/30/triumph-of-a-lobby-case-study-of-the-atomic-industry-lobby-in-sa/>

It is pointed out that large newspaper adverts were posted by Eskom, which suggested that the energy provider was now operating similarly to a private company and pushing a capital-intensive option. The article also suggests that Eskom internally focuses on nuclear energy with a vastly higher priority than any form of renewable energy, without entering into conversation about its high costs, both financial and environmental.

**Lastly, it gives us some hope that a recent article, while not disqualifying the nuclear option, reports President Zuma and Kgalema Motlanthe as mentioning the need for renewable energies. "Less coal, more renewable energy - Motlanthe and Zuma"**

"President Kgalema Motlanthe and ANC president Jacob Zuma have warned that South Africa needed to reduce its dependence on coal-fired electricity and increase its use of renewables."

(African Energy News Review. An analysis of energy news for decisionmakers. Online journal.)

[http://www.iol.co.za/index.php?set\\_id=1&click\\_id=14&art\\_id=vn20090303123654474C617354](http://www.iol.co.za/index.php?set_id=1&click_id=14&art_id=vn20090303123654474C617354)

"Motlanthe said it was time for South Africa to look at methods of "green technology", adding there were opportunities for the country to establish solar panel manufacturing companies, agreeing with Zuma's call to reduce dependence on coal-fired sources of energy." (Originally published on page 5 of Cape Argus on March 03, 2009)

**It is our sincere hope that the pressure by Cosatu, representing numerous electricity users, and this attitude by two of the highest leaders in the country may stimulate a rethinking of the obsession with nuclear energy.**

**d) The Scoping report is not in fact an open process but a systematic pressure mechanism**  
The Scoping report does not ask for opinion on two alternative projects, but merely imposes a well-defined plan on an unwilling public. Public meetings are a ritual to "tick off" the need for public participation as having been done. The Sivest process is widely understood by local residents as an attempt to coerce them into yielding to power pressure, and to the supposed moral obligation of allowing the development of a functioning nuclear power infrastructure to cover Eskom's service delivery problems in the country. This pressurises residents into yielding their interests "for the greater good", which is hardly convincing to any critical citizen, considering the systematic reluctance of Eskom to engage with renewable energy options, which are not debated as any feasible alternative, despite their increasingly widespread use and efficiency in India, Europe and even the USA.

**e) Secrecy about the funding requirement**

Eskom insists through correspondence to us via SiVEST that the exact amount of funding required for the proposed project cannot be made public. (Sivest Minutes of Public Meeting at Ankervas Primary School, 3 February 2009). To an interested and affected party, such a statement is completely unacceptable as Eskom boasts a transparent approach. Seeing that the project is in national interest, South Africans across the spectrum should be informed about all the details concerning the project.

**f) Private investor challenge and risk of undemocratic procedures**

In a recent statement by President Jacob Zuma, it was indicated that the government is pressurising Eskom to find solutions to the power supply shortage, including private funding.  
<http://www.engineeringnews.co.za/article/eskom-may-need-private-partner-to-fund-expansion-2009-06-04>  
(Accessed 29 June 2009). This strongly suggests that the sense of accountability provided by the Constitution - and suggested (but not evident in) the Scoping and EIA processes - and the normal democratic government procedures may well be undermined by business partners in the race to make profits and in the obligation to fulfil set goals.

It was the initial absence of sponsors in the interim period, at the end of 2008, that prompted Eskom to broadly announce that the entire project was being shelved until funding became available. However, in actuality, Eskom through Sivest was nonetheless in full procedure with the preparations for the scoping process. We therefore foresee that the EIA will be done in such a hurry that it cannot be accurate.

It is evident that the 2008 announcement was meant to function as a deviation of public interest in the project, which was unfortunately VERY successful as many concerned parties were surprised at the residents' severe concern at the start of 2009.

The strategy seems to reappear regularly, as another announcement in March shows:

"SA keen to go green on energy supply", Agnieszka Flak, Midrand, South Africa - Mar 05 2009 10:24

<http://www.mq.co.za/article/2009-03-05-sa-keen-to-go-green-on-energy-supply> (accessed 29 June 2009)

" Eskom's climate change and sustainability manager, Mandy Rambharos, said while so far only nuclear and coal have been seen as possible baseload options, the next plant could be based on solar sources, which would take less time to build. "There's a big chance that the next baseload plant would come from solar thermal," she said on the sidelines of a climate-change summit. [...] Eskom put on hold its plan to build the next nuclear plant because of financial problems and Magubane said the postponement provided a chance to focus on renewables. Rambharos said if confirmed, the plant could be built within 18 months and would be piloted for two years after that."

**Given such a statement, we must wonder whether Eskom is playing games not only with the paying public, but with government decisionmakers as well.**

There changes in government since the elections indicate a bundling of energy decisionmaking in the Ministry of Minerals and Energy, away from Eskom as the sole decisionmaking body.

We take note of the address by Ms Dipuo Peters, Minister of Energy on the occasion of Budget Vote 28: Minerals and Energy National Assembly Extended Public Committee, Cape Town, 23 June 2009. She said:

"The responsibility for electricity security of supply previously was the domain of Eskom, which was left with the responsibility to decide on the supply options that the country would introduce in the form of power stations.

This function now rests firmly under the control of the Ministry of Energy, as provided for in the Electricity Regulation Act. Accordingly, in order to align the building of new power stations with government policy the Department will be promulgating new regulations relating to the planning framework for new power stations, procurement process as well as the roles and responsibilities of the respective players." (<http://www.dme.gov.za/pdfs/speeches/BUDGET%20SPEECH%202009%20ENERGY.pdf>) (Accessed 29 June 2009). **We hope that the official insistence on a power mix that includes renewable energies will yield a far greater sector of renewable energy sources.**

**g) The Constitution and principles of environment conscious development, and government processes**

We have faith in the South African constitution, the legislation and the government structures that regulate projects of the national energy provider, in the interest of civil society at large.

We will therefore work in close consultation and cooperation with the following public bodies and others, as becomes necessary:

NECSA, the DEAT, Nature Conservation officials, city councils and civic bodies and the various screening committees, to exercise the correct procedures in view of this project. Our criticism is levelled at any procedures that may undermine the legitimate processes of public accountability to be followed, for the sole benefit of the companies that profit from such short-cuts: It is our convinced opinion that the official representation of the project situations by Sivist and Arcus Gibb may well be slanted to reflect the interests of the investors, not the residents, nor the Eskom customers.

**3. Direct comments on the Scoping Report as published**

**a) "Degraded environments" as a situating factor**

On page 99 of the scoping report, issue date: 04 May 2009, prepared by SiVEST, it is stated that "the Grassridge and Dedisa Substations are existing substations, and thus the areas surrounding them are thus arguably already visually degraded by the substations and the associated power lines that feed into them." This comment strengthens our proposal of building the proposed nuclear power station - if this project cannot be deviated into renewable energy generation - at or near Grassridge and also confirms the fact that, once Eskom has constructed a large structure in an area, that area is seen as already 'degraded',

In further follow-up projects, as was clearly suggested in the public meeting at Ankervas Primary School on 3 February 2009, and the public meeting on 14 May 2009 Van Stadens Farmers Association Hall on 14 May 2009 by Sivist representatives, such areas will evidently be targeted for further energy-related infrastructure placements which will render the area entirely unsightly. (Examples of this are the Van der Byl Park power lines built under the previous political dispensation, and more recently, several pylons-wide transmission lines structures as built in the Free State and Limpopo areas).

**The members of the Elands River Conservancy shall definitely not allow this to become the case in the Elands River Valley.**

(Also read the Draft Scoping Report, issue date: 30 April 2009, revision no 3, section B, p.20 of 30 of the Visual Impact Assessment Report)

**b) Land use sourcing**

There are references to wikipedia for the report on land use in the area. Wikipedia, although it may provide some general and at times good guidance, is academically NOT an acceptable source since it is not peer-reviewed and anyone can place information on the public knowledge site. This lack of professional verification consequently DISQUALIFIES the source for ANY professional information sourcing. **The section that is based on such sources MUST be entirely reworked from academically respectable sources.**

**c) Elands River Conservancy entirely ignored in the Scoping report**

The Elands River Conservancy is entirely ignored in the Scoping report, with the sole exception that its comprehensive report is bound in under Documents from the public. We appreciate the fact that on page 48, issue date: 04 May 2009, it is stated that power lines should avoid conservational areas, regardless of status. We therefore demand that, in the following phase of the EIA, we are considered as such, as we notice that we are not recognized other than individual farms as potentially sensitive "visual receptors" (page 98).

**We in fact, regarding our status as a conservancy, consider the visual impact on the Elands River Conservancy area as a fatal flaw.**

**We include the letter confirming our registration as a conservancy, attached to this report.**

**d) Future planning of tourism in our area , and the creation of environmental conservation corridors**

Also, as stated to SIVEST during an informal meeting of the Elands River Conservancy with Sivist representatives, on 15 April 2009, at Hillingdon, and as reflected in the description document handed over in person to Nicolene Venter and Chris le Roux of Sivist on 15 April 2009 at Hillingdon Farm, the conservancy foresees the Elands River Valley becoming part of the greater corridor that will link the Addo National Park and the Baviaans Nature Reserve as the valley lies between these areas.

**e) Sensitivity categories ignore Elands River conservancy as a key stakeholder.**

The Elands River Conservancy is omitted in the tables starting on page 108, which discusses the sensitivity categories. This is astonishing and completely unacceptable, since the chairperson and vice-chairperson were invited to, and attended, the SIVEST meeting with the key stakeholders at Kelway Hotel in Humewood on 15 May 2009.

For more information about a few well-known tourist activities in the Elands River Conservancy please read the report submitted to SIVEST by the conservancy.

**The conservancy therefore insists that Sivist include the conservancy in the tables on visual sensitivity, and address the above concern. It also appears that we are only included in some of the maps as visual receptors.**

**This is completely unacceptable owing to our status as a conservancy.**

**f) Inaccurate assessment of affected tourist destinations due to the omission of Elands River Conservancy**

Due to the above mentioned issues, it must therefore be pointed out that the conclusion on page 111, stating that the only affected tourist destinations along the corridor are the Loerie Dam Nature Reserve and the Groendal Wilderness Area, is incorrect and without correct foundation.

**g) Apiculture**

We also notice that there are no studies done on the Apiculture aspect in the Elands River Valley. This is a serious omission on account the virus currently attacking beehives in the country. In this regard, it is notable that the Elands River Conservancy hosts several bee farmers producing tons of honey every year, whose bee stock may well be impacted by emf's created by the transmission lines.

**h) Mountain rescue practice area and free flight zone for aircraft and helicopters from local training aerodromes.**

Although it was mentioned in the Elands River Conservancy report, no mention is made of the activities of the Mountain Club of South Africa rescue team in the Scoping report. The Mountain Rescue team practises regularly in the area, together with the SAPS and SANDF helicopter teams. Due to the intense public use of the Groendal and other hiking areas in the scoping area, the rescue team



has frequent call-outs to help distressed and injured hikers, climbers and even light aircraft accident victims in the immediate area. A large transmission line would seriously hinder the low-flight activities in this area.

i) **Mitigation measures should be prevented**

We appreciate the fact that our conservancy's concerns as stated in the Elands River Conservancy report to SiVEST will be addressed in the EIA phase. We would like to, at this stage, draw your attention to the fact that in the aspects as mentioned on page 227, table 133 'mitigation measures' are not an option for the Elands River Conservancy, but that we would rather like to avoid any situations in need of mitigation measures.

j) **Short SiVEST investigation periods WILL render incomplete reports**

Many of the conservancy members have spent years to gain knowledge about the area, including its biological diversity and accompanying fragility, and we are still astounded at what we find. **We can thus not accept a rushed EIA phase.**

k) **"Knowledge under contract" (cited from Goldman 2005:61)**

We would like to raise your awareness of the inherent faults in top-down public processes, as have been observed in the international sphere by critics of imposed developments. These may lead to what we consider fatal flaws.

The World Bank, as one of the main funders of developmental projects and thus as initiator of EIA's and related processes, has been severely criticised for the following practices by Michael Goldman. 2005. "Imperial Science, Imperial Nature: Environmental Knowledge for the World (Bank)." In: Jasanov, S & Long Martello, M. (eds.) 2004. *Earthly politics: local and global in environmental governance*. Massachusetts: The MIT Press. - This is merely one of a large number of critical voices.

"As NGO's and private consultants have been incorporated into the project assessment process, the process has the appearance of being more open and less subject to conflicts of interest. Yet even for the independence of these groups and individuals, important institutional factors shape the knowledge production process. The most general are the "terms of reference" (TOR's) under which hired consultants must work. In exchange for high salaries, unique research opportunities, and unusual access to what were formerly impenetrable research sites, the Bank specifies exactly what kind of information is needed, a time frame in which the research must be completed (and by implication, how long the researcher can be in the field), and by when it will be written up. [...]"

**"By far the biggest pressure comes from the stringent times constraints placed on those carrying out research for the Bank. [...] As a result, the method of development-related social and environmental research that has come to be most widely accepted is "rapid rural appraisal," [...] "a systematic means of quickly and cost effectively gathering and analyzing information." "** (Goldman 2005:62; our emphasis).

The author also mentions that familiar engineering firms are typically rented that had often worked with the proposed contractors, to collect and analyze the data. "More often than not, the engineering firms would find that the project was feasible..." (Goldman 2005:60)

"In some parts of the World, the World Bank uses the same firms for all projects, creating an enduring and comfortable relationship between the loan managers and the project reviewers." (Goldman 2005:60)

**In our cooperation with the Sivist representatives, we have encountered several situations which may well be fraught with very similar risk problems in view of the procedures chosen, and therefore potential inaccuracies, as the above examples suggest.**

#### 4. Conclusion

Although the desktop studies in the Scoping report are very thoroughly done, and although a civil working relationship has been maintained by the SiVEST representatives in their dealings with the interested and affected parties, the general direction of the conclusions is very illusive **and the report does not accurately address all the targeted areas identified by the Sivist specialists. If the conclusions of the Scoping report are read without consulting the detailed descriptions - and they are incomplete, inaccurate and flawed in several aspects, as has been pointed out - these comfortable conclusions can be extremely misleading.**

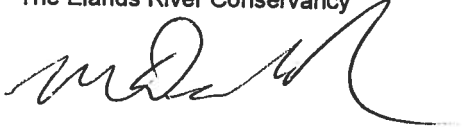
We cherish the environmental awareness that has been evident in the South African government's consolidation processes of wilderness areas in our region, in the country and in the subcontinent.



**We therefore trust that, by adhering to the critical values of the national conservation programme, there is a way to avoid undermining this remarkable achievement, currently threatened by convenience processes and profit-driven infrastructure development in the pretentious name of a national need for energy.**

Yours in conservation

The Elands River Conservancy

A handwritten signature in black ink, appearing to be 'M. de V.' or similar, written in a cursive style.

CHAIRMAN: ELANDS RIVER CONSERVANCY