PROPOSED ESKOM NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE

ENVIRONMENTAL IMPACT ASSESSMENT (EIA: 12/12/20/944)

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT

(Volume RDEIR IRR 5 – 21 May 2011)

Issues have been received from the following stakeholders:

No	Name	Organisation
1	Kayla Wolfaardt	Interested Party
2	Liziwe McDaid	Green Connection
		Southern African Faith Communities Environment Institute –
3	David Le Page	Assistant Director
		Women's Leadership and Training Programme and The Grail
4		Earth Network - Representative
5	Byron Andrews	Pam Golding Properties – Gold Club Agent
		Political Information and Monitoring Service (PIMS) and
		Economic Governance Programme (EGP) Idasa, an African
-		democracy Institute – Senior Researcher: Governance and
6	Gary Pienaar	Ethics
7	Candice Pelser	Project 90 By 2030
8	JesseBurton	Energy Research Centre – PhD Candidate, UCT
9	Julia van Biljon-Heidemann	The Mineral Corporation – Senior Adviser
10	Tristen Taylor	Earthlife Africa Jnb – Project Co-Ordinator
11	EleanorWelsh	Interested Party
12	Antony and Mary Yoell	Permanent Resident of St. Francis Bay
13	Carola Steinberg	Earth Life – Member
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No	Date	NAME &	ISSUES/COMMENTS	RESPONSE
		ORGANISATION		
1	17 May 2011 11:53 Email	Kayla Wolfaardt Interested Party	Extension of Comments Period for Revised Draft Environmental Impact Assessment Report for the Eskom Nuclear Power Station and Associated Infrastructure (Nuclear-1)	Thank you for your comment. As you are aware, an opportunity to review the Revised Draft Environmental Impact Report (EIR) Report commenced on 09 May 2011 with a closing date of 23 June 2011. Various Interested and Affected Parties, including yourselves, have requested an extension of the review period.
			In the wake of the International Nuclear disaster, are you really certain that you want this on your conscience?	After due consideration of these requests, it was decided that the comment period will be extended by an additional 45 days. The closing date for comment thus changed to 07 August 2011 (i.e. a 90 day comment period).
			This letter formally applies to you to for an extension of a further 45 days, and in reality asks you to do everything in your human power to stall this project indefinitely. At a time when Germany is closing down its nuclear plants, we should be running from projects like this as fast as we can, not charging towards them. The future can only be a place where the safety and health of the planet and its inhabitants is our primary consideration.	The precautionary approach has, since the inception of this application for environmental authorisation, been applied in terms of Nuclear-1. As such the EIA team has ensured that the assessment of impacts and the methodology applied in terms of this assessment is scientifically sound, in line with best practice principles. The assessment report has been peer reviewed, not only by members of the public, but by three independent, experienced peer reviewers, who have confirmed that the EIA process have been undertaken as per the legal requirements. Furthermore, the BBC (http://www.bbc.co.uk/news/world-europe-13592208) reports that Germany's decision to close down its nuclear power stations will most probably lead to an increase in the import of nuclear energy from France. Phasing out nuclear power will also result in increased dependence on fossil fuels, which result in proportionately larger releases of greenhouse gases into the atmosphere than nuclear power, which has a greenhouse gas footprint similar to some renewable technologies (see Section 4.2.2 of the Revised Draft EIR). There is a further risk that Germany will not manage to quickly halt its dependency on fossil fuels, especially coal-based energy, which creates unintended negative environmental impacts of its own.

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			Will you live near to such a plant, or condemn others to do so?Act wisely today, the alternative is too horrific to contemplate.	It should be noted that the EIA Regulations require the EAP to be independent of the agenda of both the applicant and the I&AP. More importantly it is the responsibility of the EAP to be objective. Therefore, to provide a personal opinion in this regard is not appropriate.
2	18 May 2011 12:18 Email	Liziwe McDaid Green Connection	During the scoping phase of the Nuclear-1 EIA, we attended a public meeting at the Vineyard hotel, on the 19 th April 2010. The meeting was well attended and a number of organisations that subsequently made submissions attended the meeting at that venue, presumably because it was convenient. However, in the details of the public meetings, no meeting is scheduled for the Vineyard Hotel in Newlands, nor is there any other venue in a nearby area. I find this astonishing and assume that there must be some error. It would certainly undermine public participation if there were to be no public meeting within an area which had showed so much interest in the project! We would therefore like to request that you confirm that there will be a public meeting in Newlands or close by and	Your comment is noted. The choice of venues for the current public meetings was based on proximity to the alternative sites and the most potentially affected parties, as well as accessibility for the Interested and Affected Parties (I&APs) from surrounding areas. The changes made to the Draft Environmental Impact Report predominantly relate to issues specific to the Thyspunt site. The Duynefontein and Bantamsklip sites are not recommended as the preferred site. It is therefore considered that the Public Open Houses and Meetings advertised were sufficient to allow Interested and Affected Parties (I&APs) reasonable opportunity to comment on the key changes to the Revised Draft EIR Version 1. This is the reason that Melkbosstrand was chosen as the public meeting venue for the area around the Duynefontein site and the area is easily accessible for residents. It must be noted that I&APs have been afforded the opportunity to comment in other ways to the GIBB Public Participation Office on the Revised Draft Environmental Impact Report, namely by means of: fax, telephone call and written letter. The public comment period was also further extended by a further 45 days and closed on 07 August 2011.

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			ask for details of the venue etc to be forwarded as soon as possible.	
3	18 May 2011 13:45 Email	David Le Page Southern African Faith Communities Environment Institute Assistant Director	Please schedule a Public Meeting on the Nuclear EIA in central Cape Town During the scoping phase of the Nuclear 1 EIA, we attended a public meeting at the Vineyard hotel, on the 19 th April 2010. The meeting was well attended and a number of organisations that subsequently made submissions attended the meeting at that venue, presumably because it was convenient.	Your comment is noted. The choice of venues for the current public meetings was based on proximity to the alternative sites and the most potentially affected parties, as well as accessibility for the Interested and Affected Parties (I&APs) from surrounding areas. The changes made to the Draft Environmental Impact Report predominantly relate to issues specific to the Thyspunt site. The Duynefontein and Bantamsklip sites are not recommended as the preferred site. It is therefore considered that the Public Open Houses and Meetings advertised were sufficient to allow Interested and Affected Parties (I&APs) reasonable opportunity to comment on the key changes to the Revised Draft EIR Version 1.
			However, in the details of the public meetings now listed for the process ahead, no meeting is scheduled for the Vineyard Hotel in Newlands, nor is there any other venue in a nearby area. This will undermine public participation if there were to be no public meeting within an area which had showed so much interest in the project! We would therefore like to request that you confirm that there will be a public meeting in Newlands or close by and ask for details of the venue etc to be forwarded as soon as possible.	This is the reason that Melkbosstrand was chosen as the public meeting venue for the area around the Duynefontein site and the area is easily accessible for residents. It must be noted that I&APs have been afforded the opportunity to comment in other ways to the GIBB Public Participation Office on the Revised Draft Environmental Impact Report, namely by means of: fax, telephone call and written letter. The public comment period was also further extended by a further 45 days and closed on 07 August 2011.

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4	18 May 2011 08:54 Email	Marilyn Aitken Women's Leadership and Training Programme and The Grail Earth Network Representative	We request an extension of the time for comment from 45 to 90 days.	Thank you for your comment. As you are aware, an opportunity to review the Revised Draft Environmental Impact Report (EIR) Report commenced on 09 May 2011 with a closing date of 23 June 2011. Various Interested and Affected Parties, including yourselves, have requested an extension of the review period. After due consideration of these requests, it was decided that the comment period will be extended by an additional 45 days. The closing date for comment thus changed to 07 August 2011 (i.e. a 90 day comment period).
5	18 May 2011 11:49 Email	Byron Andrews Pam Golding Properties Gold Club Agent	I have read your heavily biased EIA regarding the location of Nuclear 1 at Thyspunt. It is clear that the report is trying to present information in way that makes Thyspunt look like a favourable site. These lies will be exposed in time to come, and Eskom can expect a long and costly battle. At the end taxpayers and consumers, throughout the country will not allow this ridiculous project to continue. There is no financial sense in building a nuke, within 20km of a premier coastal holiday destination (whose rates and taxes account for most of the income generated by the Kouga municipality). Who will continue to pay rates when they have to evacuate the	Thank you for your comments. Please note that all sites were equally assessed within this EIA. However, we would appreciate receiving any additional information supporting your claim of bias in the Revised Draft EIR Version 1.

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			area? In the middle of the Eastern Cape's dairy producing region (benefits to agriculture include radioactive milk?)	Please refer to Appendix E10 (Air Quality Assessment), E15 (Marine Impact Assessment), E21 (Agriculture Assessment), E22 (Tourism Assessment) and E25 (Transportation Assessment) of the Revised Draft EIR Version 1.
				The Agricultural Assessment has found that there will be short- term negative impact on agriculture in terms of dust during the construction phase only. However, there is potential for a positive impact on production by increasing the size of the local market for fresh produce as a result of the influx of population (Nuclear-1 employees, their families and construction workers) to the area. The Air Quality Assessment furthermore finds that, based on the predicted impacts of both non-radioactive and radionuclide air pollution, that the air pollution impacts will be insignificant at all the three alternative sites. Please also refer to the radiological assessment (Appendix E32) for further information on the potential impacts that may be experienced on the receiving environment. From the assessment it was found that the radiation levels that may be generated by the Nuclear-1 power station will fall well below the background radiation levels. Therefore, the potential for the power station to contaminate the surrounding resources throughout the area is considered to be highlly unlikely.
			Pumping sand into the chokka spawning ground, because Thyspunt is in the middle of shifting sand dunes.	The Marine Impact Assessment (Appendix E15 of the Revised Draft EIR Version 1) concludes that the disposal of spoil at Thyspunt will have limited impact on the overall chokka squid stock, when considered within the context of the extensive area over which this species spawns. The affected area is less than one percent of the total spawning ground of chokka squid.

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			The costs of constructing power lines for over 100km spanning the Kromme river, Gamtoos and Van Stadens gorge.	The costs of construction of transmission lines are dealt with in the Environmental Impact Assessment for the transmission lines. These are separate EIAs to that of the power station. In this regard, please refer to the EIR documents to be made available by SiVest on <u>www.sivest.co.za/Download.aspx</u>
			What about rebuilding the Van Stadens, Gamtoos and Kromme bridges to carry the weight of the nuclear reactor when they deliver to site? They claim to have a road that does not go through Humansdorp, but what about St Francis and Cape St Francis who will have hundreds of trucks on their roads everyday?	The recommended routes to the Thyspunt site in the previous version of the Report were revised as a result of public input and recommendations received between 29 May 2011 and 2 June 2011. Based on the feedback received, the R330 is now proposed to be used for light vehicle traffic and abnormal load transport, and sections will require upgrading for this purpose. The Oyster Bay Road is now proposed to be used during the construction and operations phases for staff access, light vehicle traffic, and heavy vehicle traffic and as an emergency evacuation route for areas such as Oyster Bay. DR1762, which links the R330 and Oyster Bay Road, is now proposed to be surfaced to provide improved eastwest connectivity. Bypass roads to the east and west of Humansdorp are also now proposed to be constructed to reduce the traffic impact on central Humansdorp. The revised specialist assessment will be made available for public comment and review as part of the Revised Draft EIR Version 2.
				In terms of the upgrades to public transport and access during the construction phases at Thyspunt, upgrades of existing road infrastructure will be required as stated in the revised Transport Specialist Study. The report confirms that the Thyspunt site requires significant transport upgrades with regard to public transport, access and emergency evacuation, during the construction phases. The report further states that propping will be required at most under bridges to ensure stability during the

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				transportation with strengthening and bracing being required at the Van Staden's gorge arch bridge.
			No impact on tourism? Who are you kidding?	The Tourism Impact Assessment concludes that as a result of the established premium tourism product offered in the Greater St Francis area, a nuclear power station will have a significant impact on the perceived attractiveness of the area. However, it is only from Seal Point at Cape St Francis and Oyster Bay that the Thyspunt site is visible (from a distance of more than 10km). The duration of the negative impact is reduced by the fact that perception is a time-based phenomenon and, with the passing of time, tourism agents and stakeholders will adjust their businesses to maximise their exploitation of the natural tourism product as experienced at each site. This is based on the experience with the Koeberg Nuclear Power Station. The overall impact at worst would be a short-term reduction in the tourism market, most notably due to a drop in the premium product image that the area currently enjoys. However, this short-term negative impact on current sense of place (premium holiday destination) could well be neutralised by business tourism, while the long-term impact would be likely to be positive. Keeping the above in mind, specialists agree that there are no fatal flaws at the Thyspunt site in terms of upgrading of transport infrastructure, impact on agriculture, air quality and tourism as well as spoil disposal and marine ecology. However, extensive
				mitigation measures, which are discussed in Chapter 9 of the Revised Draft EIR, summarised in Chapter 10 and included in the Environmental Management Plan (Appendix F of the Revised Draft EIR Version 1), are proposed to mitigate the
				potential negative impacts.

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6	19 May 2011	Gary Pienaar	During the scoping phase of the	Your comment is noted. The choice of venues for the current
	08:45	Political	Nuclear- 1 EIA, it is our understanding	public meetings was based on proximity to the alternative sites
		Information and	that a public meeting at the Vineyard	and the most potentially affected parties, as well as accessibility
	Email	Monitoring	Hotel on 19 April 2010 was well	for the Interested and Affected Parties (I&APs) from surrounding
		Service (PIMS)	attended and a number of	areas. The changes made to the Draft Environmental Impact
		and Economic	organisations that subsequently made	Report predominantly relate to issues specific to the Thyspunt
		Governance	submissions attended the meeting at	site. The Duynefontein and Bantamsklip sites are not
		Programme	that venue, presumably because it was	recommended as the preferred site. It is therefore considered
		(EGP) Idasa, an	convenient.	that the Public Open Houses and Meetings advertised are
		African		sufficient to allow Interested and Affected Parties (I&APs)
		democracy	However, there appear to be no plans	reasonable opportunity to comment on the key changes to the
		Institute Senior	for a follow-up public meeting during	Revised Draft EIR Version 1 in this type of forum.
		Researcher:	the EIA phase at this venue, or at any	
		Governance and	other venue nearby.	This is the reason that Melkbosstrand was chosen as the public
		Ethics		meeting venue for the area around the Duynefontein site and the
			Any such final decision is likely to	area is easily accessible for residents.
			undermine the value of public	
			participation in an area that has	It must be noted that I&APs have been afforded the opportunity
			apparently shown significant interest in	to comment in other ways to the GIBB Public Participation Office
			the project. It would seem to me to be	on the Revised Draft Environmental Impact Report, namely by
			a logical instance of fair process that	means of: fax, telephone call and written letter. The public
			there should be continuity where	comment period was also further extended by a further 45 days
			significant interest is shown in a	and closed on 07 August 2011.
			particular area, provided that a further	
			and additional meeting at a venue	
			close to the mooted project location	
			would also appear to be justified.	
			It is therefore requested that you	
			confirm that there will be a public	
			meeting in Newlands or close by, and	
			that details of the venue, date and time	

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			are announced as soon as possible.	
7	19 May 2011	Candice Pelser	Last year's public participation process	Your comment is noted. The choice of venues for the current
	09:28	Project 90 By 2030	included a meeting at the Vineyard Hotel on the 19 th of April. We notice	public meetings was based on proximity to the alternative sites and the most potentially affected parties, as well as accessibility
	Email	2030	that the next round of public meetings	for the Interested and Affected Parties (I&APs) from surrounding
	Emai		do not include this venue, nor one	areas. The changes made to the Draft Environmental Impact
			nearby.	Report predominantly relate to issues specific to the Thyspunt
				site. The Duynefontein and Bantamsklip sites are not
			In the interests of continuity and a fair	recommended as the preferred site. It is therefore considered
			public participation process, we hereby	that the Public Open Houses and Meetings advertised are
			request that a public meeting for this area be added to the programme.	sufficient to allow Interested and Affected Parties (I&APs) reasonable opportunity to comment on the key changes to the
			alea be added to the programme.	Draft EIR in this type of forum.
				This is the reason that Melkbosstrand was chosen as the public
				meeting venue for the area around the Duynefontein site and the
				area is easily accessible for residents.
				It must be noted that I&APs have been afforded the opportunity
				to comment in other ways to the GIBB Public Participation Office
				on the Revised Draft Environmental Impact Report, namely by
				means of: fax, telephone call and written letter. The public
				comment period was also further extended by a further 45 days
				and closed on 07 August 2011.
8	19 May 2011	Jesse Burton	Last year, during the public	Your comment is noted. The choice of venues for the current
	11:37	Energy Research	consultation process for the Nuclear1	public meetings was based on proximity to the alternative sites
		Centre	EIA, a public meeting was held at the	and the most potentially affected parties, as well as accessibility
	Email	PhD Candidate,	Vineyard Hotel in Newlands, Cape	for the Interested and Affected Parties (I&APs) from surrounding
		UCT	Town.	areas. The changes made to the Draft Environmental Impact

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			I believe that this year the only scheduled meeting is to be held in Melkbosstrand, despite the high levels of public interest in the Newlands area. This seems to be a serious omission on the part of the organisers, and I would like to request that a public consultation be scheduled either in the Newlands area or in an area nearby.	Report predominantly relate to issues specific to the Thyspunt site. The Duynefontein and Bantamsklip sites are not recommended as the preferred site. It is therefore considered that the Public Open Houses and Meetings advertised are sufficient to allow Interested and Affected Parties (I&APs) reasonable opportunity to comment on the key changes to the Draft EIR in this type of forum. This is the reason that Melkbosstrand was chosen as the public meeting venue for the area around the Duynefontein site and the area is easily accessible for residents.
			I would appreciate if you could forward the details of such a meeting to me as soon as possible.	It must be noted that I&APs have been afforded the opportunity to comment in other ways to the GIBB Public Participation Office on the Revised Draft Environmental Impact Report, namely by means of: fax, telephone call and written letter. The public comment period was also further extended by a further 45 days and closed on 07 August 2011.
9	19 May 2011 11:48	Julia van Biljon- Heidemann The Mineral	Thank you for the opportunity to comment.	Thank you for your comment. The risks related to the possible occurrence of Tsunamis have been assessed in the Hydrological Assessment (of the Revised Draft EIR Version 1), the report on
	Email	Corporation Senior Adviser	Please see attached e-mail sent some months back to the Environmental Officer on site (also discussed telephonically with him about a year ago). My point is simple – to urge that Tsunami risks be taken fully into account with proper scientific oversight, especially given the	the position of the 1:100 year floodline (Appendix E9 of the Revised Draft EIR Version 1) and the Oceanography Report (respectively Appendices E6, E9 and E18 of the Revised Draft EIR Version 1). It is concluded that the potential exists for water levels to exceed the proposed elevation of the nuclear power station (10m above sea level) at all three sites should a tsunami coincide with extreme meteorological conditions (a meteo- tsunami event). The maximum calculated sea level for the life of the nuclear power station (including the effects of climate change) is 14.8 m above sea level. The occurrence of a tsunami

No	Date	NAME &	ISSUES/COMMENTS	RESPONSE
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			evidence at the site of such events in	is, however, improbable given the low risk of seismic activity in
			fairly recent geological time. Recent	the surrounding ocean.
			experience at Fukushima should	
			prompt this step.	The experience of the Fukushima nuclear incident has indicated that the earthquake itself is unlikely to affect the structural
			(Email attachment pasted hereunder.)	integrity of the nuclear power station, but that the resulting tsunami may affect power supply to the nuclear power station. In
			From: Julia van Biljon - Heidemann	this respect, the height above sea level of the backup generators
			[mailto:jvb.umcebo@netactive.co.za]	for the plant is critical. If the generators are too low above sea
			Sent: Friday, March 18, 2011 11:51 AM	level, they may also be affected by a tsunami and may fail to provide power to the power station. In the case of Fukushima,
			To: Henni.dBeer@eskom.co.za	the backup generators were also flooded by the tsunami, which
			Cc: 'Hutchinson'; 'Daniel Reinecke'	prevented them from providing power to the power station to
			Subject: Tsunamis	allow for safe shutdown.
			Hi Henni	At Thyspunt, the backup OCGT (Open Cycle Gas Turbine) plant is proposed to be located for the north of the power station at a
			A am a niece of Marta Hutchinson, she	height over 50m above sea level.
			introduced us briefly a few years ago	
			when there was a talk by a retired	
			nuclear scientist about nuclear energy at The Links.	
			I spoke to you on the phone some time	
			ago about the possibility of Tsunamis	
			at Thyspunt, as a geologist I am	
			interested in these phenomena, which	
			are rare but nevertheless should be	
			properly taken into account. With the	
			recent events in Japan, I was wondering if there are specialists on	
			the Thyspunt Eskom team who are	

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		ORGANISATION		
			adequately quantifying this risk for the particular site envisaged.	
			I also just wanted to remind you about the rock the Reinecke family has known about for years (we call it the "monolith") which an experienced geologist in the family has indicated points to a Tsunami event in the recent geological past.	
			It is situated very near the Thyspunt point, I am sure members of the family could point it out to you.	
			Please do let us know should you be interested.	
10	19 May 2011	Tristan Taylor	Please see attached letter requesting	Thank you for your comment. As you are aware, an opportunity
	15:03	Earthlife Africa Jhb	an extension of an additional 45 days for comments on the nuclear-1 EIA	to review the Revised Draft Environmental Impact Report (EIR) Report commenced on 09 May 2011 with a closing date of 23
	Email	Project Co- Ordinator	from the following organisations:	June 2011. Various Interested and Affected Parties, including yourselves, have requested an extension of the review period.
			COSATU, South African Municipal Workers Union, Timberwatch, Greenpeace Africa, South Durban Community Environmental Alliance, GroundWork, Earthlife Africa Cape Town, Earthlife Africa Johannesburg, Noordhoek Environmental Action	After due consideration of these requests, it was decided that the comment period will be extended by an additional 45 days. The closing date for comment thus changed to 07 August 2011 (i.e. a 90 day comment period).
			Group, Alternative Information Development Centre, Green	

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			Connection, Southern African Faith	
			Communities Environment Institute,	
			Renewable Energy Centre, Transition	
			Centre.	
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			Thanking you in advance for a speedy	
			response.	
			(Refer to attachment pasted	
			hereunder.)	
			,	
			Extension of Comments Period for	
			Revised Draft Environmental Impact	
			Assessment Report for the Eskom	
			Nuclear Power Station and Associated	
			Infrastructure (Nuclear-1)	
			Dear Sir/Madam,	
			On the 9th of May 2011, Arcus GIBB	
			released the Revised Draft	
			Environmental Impact Assessment	
			Report for the Eskom Nuclear Power	
			Station and Associated Infrastructure	
			(Nuclear-1) and indicated a comment	
			period of 45 days until the 23rd of June	
			2011.	
			This is insufficient time to deal with the	
			mass of data in the Revised Draft	
			Environmental Impact Assessment	
			Report for the Eskom Nuclear Power	
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		ORGANISATION		
			Station and Associated Infrastructure	
			(Nuclear-1). The data available on your	
			website amounted to over 700mb, and	
			runs over two thousand printed pages.	
			Just reading the entire report will take	
			a significant amount of time, let alone	
			considered thought and then in-depth	
			comments. As many of the issues in	
			the report have highly technical	
			components, expert opinions will be	
			need to be consulted.	
	20 May 2011	Tristan Taylor	Therefore, 45 days is insufficient for	
	15:29	Earthlife Africa	meaningful and substantial comment.	
		Jhb		
	Email	Project Co-	Therefore, we the undersigned,	
		Ordinator	request a minimum extension of an	
			additional 45 days (i.e. 90 in total) in	
			order to prepare comments on this	
			important EIA.	
			Looking forward to your swift response	
			and thanking you in advance for such.	

			I have yet to hear from you, in writing,	
			regarding the below issue.	
			On Mon, 2011-05-16 at 10:59 +0200,	

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			Tristen Taylor wrote:	
			Dear Arcus GIBB and Ms. Ball,	
			Would you please respond to the below issue regarding speaking with a researcher involved in the EIA? I am seriously disappointed not to have received a response from you, in what is arguably a Freedom of Speech issue. Surely, Arcus GIBB will, at least, respond to such a request?	GIBB acknowledges your request to liaise directly with Dr. Hart in terms of the Nuclear-1 Revised Draft Environmental Impact Report (EIR). However, as the Environmental Impact Assessment Practitioner managing the Environmental Impact Assessment (EIA) process, it is our legislated responsibility (among others) to capture all comments raised on the Revised Draft EIR Version 1 and its associated specialist studies, in order to present the competent authority with all relevant information for decision making purposes.
			I have copied our legal representative (Ms. Andrews) and freedom of expression expert (Mr. Delaney) to this mail as I sign of how seriously I regard this issue and the public's right to engage substantially in a public process.	In this regard, it must be pointed out that Regulation 58 of Government Notice R 385 of 2006 (in terms of which this application was lodged, and is pending) stipulates the requirements for EIA public participation procedures, and indicates that it is the responsibility of Interested and Affected Parties to submit comments to the Environmental Assessment Practitioner (EAP).
				 Your attention is drawn in this regard, to two specific provisions in the EIA regulations: Regulation 58(4), which states that "any written comments received by the EAP from a registered interested and affected party must accompany the report when the report is submitted to the competent authority". Regulations 59, which states that "The EAP managing an application for environmental authorisation must ensure that the comments of interested and affected parties are recorded in reports submitted to the

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				competent authority in terms of these Regulations. As EAP for this EIA process, GIBB would not be able to
				discharge its legislated duties unless we are aware of and involved in any discussions between an I&AP and one of the specialists on our team.
				GIBB therefore requests that you provide us with a list of questions/ issues for Dr. Hart's response. This will ensure that GIBB can accurately capture all comments raised by yourselves and the response from the specialist on these comments and reflect these comments and responses in the submissions to the competent authority.
11	20 May 2011 16:29 Email	Eleanor Welsh Interested Party	Have you reconsidered re having meeting in Hermanus?	Your comment is noted. The choice of venues for the current public meetings was based on proximity to the alternative sites and the most potentially affected parties, as well as accessibility for the Interested and Affected Parties (I&APs) from surrounding areas. The changes made to the Draft Environmental Impact Report predominantly relate to issues specific to the Thyspunt site. The Duynefontein and Bantamsklip sites are not recommended as the preferred site. It is therefore considered that the Public Open Houses and Meetings advertised are sufficient to allow Interested and Affected Parties (I&APs) reasonable opportunity to comment on the key changes to the Draft EIR in this type of forum.
				This is the reason that Gansbaai was chosen as the public meeting venue for the area around the Bantamsklip site and the area is easily accessible for residents. Additional meetings will be considered but at this point there is no certainty that an additional meeting will take place.

No	Date	NAME & ORGANISATION	ISSUES/COMMENTS	RESPONSE
				It must be noted that I&APs have been afforded the opportunity to comment in other ways to the GIBB Public Participation Office on the Revised Draft Environmental Impact Report, namely by means of: fax, telephone call and written letter. The public comment period was also further extended by a further 45 days and closed on 07 August 2011.
12	19 May 2011	Antony and Mary	Many thanks for advising us of the	Thank you for your comments. Please refer to Appendices E10
	15:29	Yoell Permanent	availability of a revised draft EIR for the proposed Nuclear power station at	(Air Quality Assessment), E15 (Marine Impact Assessment), E21 (Agriculture Assessment), E22 (Tourism Assessment) and E25
	Email	Resident of St. Francis Bay	Thyspunt.	(Transportation Assessment) of the Revised Draft EIR Version 1.
			Whilst not objecting to nuclear power in principle, we would like to register our concern that certain issues have not been adequately addressed in the report which will have a substantial negative impact on the residential/tourist towns of St Francis Bay/Cape St Francis.	The Tourism Impact Assessment also concluded that as a result of the established premium tourism product offered in the Greater St Francis area, a nuclear power station will have a significant impact on the perceived attractiveness of the area. However, it is only from Seal Point at Cape St Francis and Oyster Bay that Thyspunt is visible (from a distance of more than 10 km). The duration of the negative impact is reduced by the fact that perception is a time-based phenomenon and, with the passing of time, tourism agents and stakeholders will adjust their businesses to maximise their exploitation of the natural tourism product as experienced at each site.
			We are most concerned about the use of the R330 between Humansdorp and Cape St Francis as the main routing for construction vehicles over 7 years. No tourist (or resident) will want to sit behind lines of construction vehicles on a winding road for 15 kilometres and similarly will certainly not enjoy the	With regard to the impact of traffic, the Transportation Specialist Assessment has been revised in order to minimise the traffic on the St Francis Bay to limited heavy loads. The majority of traffic will travel on the Humansdorp- Oyster Bay road which will be upgraded. During the peak December holiday period construction will be very limited.

No	Date	NAME &	ISSUES/COMMENTS	RESPONSE
		ORGANISATION	resultant noise and air pollution. This will result in tourists finding other more peaceful holiday destinations and many tourist based businesses will die, resulting in unemployment and an increase in crime in the area. We are also concerned about the impact on the squid industry. We cannot follow the argument that pumping 6,3 million cubic meters of sand into South Africa's prime squid breeding ground will not have a huge effect and will in all likelihood spell the end of the St Francis squid industry, also resulting in further unemployment. We are also concerned that an	The Marine Impact Assessment (Appendix E15 of the Revised Draft EIR Version 1) concludes that the disposal of spoil at Thyspunt will have limited impact on the overall chokka squid stock, when considered within the context of the extensive area over which this species spawns. The pumping of sand/spoil will be for a very short period of time 4 – 6 weeks. The modelling completed on the movement of the spoil where the chocca spawn has indicated an additional layer of less than 1 cm of sand. Your comment is noted. The recommended position of the
			We are also concerned that an important Khoisan heritage site will be adversely affected and await the judgement of SAHRA with interest. We look forward to hearing these issues addressed at the Public Meeting on 31 May.	your comment is noted. The recommended position of the power station is such that the greatest concentration of archaeological sites on the Eskom property will not be directly affected by the power station. The largest concentration of sites is within 200 m of the coast, which will be left undeveloped, as per the revised Heritage Impact Report. The central portion of the site within the vegetated dunes has been found, through test excavations that were permitted by SAHRA, to be free of significant heritage sites. A revised Heritage Impact Assessment, which includes the findings of the test excavations, will be provided for public comment and review comments together with the Revised Draft EIR Version 2.

13	Comment	Carola Steinberg		Thank you for your comments. Please see our response below:
	Sheet	Earth Life		
	Completed	Member	P8-9	P8-9
			Maintaining that "NoGo" cannot be	The EIA process is a project specific tool and therefore
	Mail		considered an alternative because it is	considers the impacts of the proposed development, as per the
			"imperative" for South Africa to	application for environmental authorisation, on the environment.
			"develop its power generation ability" is	This EIA therefore does not comment on government policy in
			a totally facile statement in the face of	terms of future energy planning. It is however important to note
			the Chernobyl meltdown, the	that the Integrated Resource Plan 2010 which has been ratified
			Fukushima accident. There are large	by Cabinet states that:" In addition to all existing and committed
			spaces for generating wind and solar	power plants (including 10 GW committed coal), the plan
			energy in the Karoo and West Coast	includes 9,6 GW of nuclear; 6,3 GW of coal; 17,8 GW of
			and the reality that it would be cheaper	renewables; and 8,9 GW of other generation sources"
			to import power than build another	
			nuclear power station.	COMMENT FROM INDEPENDENT NUCLEAR SPECIALIST:
				In addition to what has been said, the issue of compating
				In addition to what has been said - the issue of competing
				technologies and preferred energy mix scenarios in the context of demand side and economic growth trajectories are clearly in
				the ambit of the IRP. IRP 2010 remains the formal IRP adopted
				by government. The regulatory regime is as stated and nuclear
				facilities are in general required to consider a range of "design
				basis security threats" as part of the design assessment process
				- however the exact nature of these threats and the preventative
				or mitigative provisions which may be put in place are for
				obvious reasons restricted in accordance with a "need to know"
				principle.
			P17	P17
			Claiming that Nuclear Waste holds "no	Radioactive waste management practices envisaged for the
			significant risk" if it is "contained	Nuclear-1 Power Stations are consistent with the IAEA
			according to management practices"	guidelines for a Radioactive Waste Management Programme for
			approved by the "NNRU" <u>(GIBB</u>	nuclear power stations, from generation to disposal. The

	Nuclear-1 Public Participation Office:	Nuclear-1 Power Station will further strive to minimise production
	to confirm if this is correct with Ms	of all solid, liquid and gaseous radioactive waste, both in terms
	Steinberg) is a lie in the face of the	of volume and activity content, as required for new reactor
	reality that nuclear waste remains	designs. Systems are lastly designed to store processed solid
	dangerous to human health for 20000	radioactive waste for a period of up to three years within the
	years.	facility, thereafter they are transported to Vaalputs. The storage
		containers are consistent with the requirements for the disposal
		of solid waste at the radioactive waste disposal facility at
		Vaalputs. The High-level waste unsuitable for disposal at
		Vaalputs will be stored safely on site until a suitable facility is
		available in South Africa. Responsibility for high level radioactive
		waste storage is with The National Radioactive Waste Disposal
		Institute Act (NRWDIA). With the implementation of appropriate
		mitigation measures all potential impacts are expected to be of
		low significance.
		COMMENT FROM INDEPENDENT NUCLEAR SPECIALIST:
		In addition it must be noted that the EIA process and Nuclear
		Licensing process for any off site waste storage facilities will be
		the subject of separate applications and are outside the scope of
		this submission. It must be noted that on site storage of spent
		fuel in ponds, vaults, or casks is a widely practiced and
		demonstrated technology which has been used to store fuels for
		many decades.
	P15	P15
	It is an illusion to think that Eskom and	It is one of the key recommendations of the Revised Draft EIR
	its construction contractors will follow	Version 1 that a comprehensive heritage mitigation programme
	any "lengthy and complex mitigation"	must be implemented prior to the commencement of any
	process to mitigate the environmental	construction activities. No construction may commence prior to
	and heritage impact of their work.	the completion of heritage mitigation measures. The effective
		implementation of this mitigation measure, and other mitigation
		measures, will be monitored by a team of independent

Environmental Control Officers, who will report to an
Environmental Monitoring Committee, including representatives
of local communities, SAHRA, other authorities and other
relevant specialists.
Also note that Environmental pre-mitigation measures are part of
our environmental laws' requirements and shall be conducted for
all construction sites before construction commences. Pre-
construction mitigation measures have been conducted at all
Eskom's construction site and this is taken seriously all the time.
Just to give an example, at Ingula heritage mitigations were
conducted before and during construction. An archaeologist was appointed to survey the site before construction to ensure that all
heritage structures were identified, recovered and protected,
including graves (which were removed in consultation with the
families and in accordance to the Heritage Act).
During construction work was stopped every time an artefact
was found on site. Ingula has recovered a lot of historical
artefacts and remains found on site and have been sent to a
national museum in Bloemfontein until such time when the site's
visitors' centre is operational.
Search and rescues are also conducted before construction to
ensure that all animals and protected plants are rescued from
any harm. Animals are normally sent to the nearest reserves
and plants kept in the nursery for replanting later after construction.
Construction.
Wetlands are also demarcated before construction for protection
by fencing them in or anything that would protect them from
being driven over etc