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 8 – 31 May 2011)

Issues have been received from the following stakeholders:

No	Name	Organisation	
1	Michel Hucenko	Interested and Affected Party	
2	Walter Smith	Project Gapwedge Properties 63 (Pty) LTD – Project Manager	
3	Matthys C Horak	ATNS, ATM Planning Department - ATM Specialist	
4	Rob Small	Interested and Affected Party	
5	Peter Becker	Koeberg Alert Alliance	
6	Hubert Cronje	Melkbosstrand Ratepayers Association	
7	Anthea Torr	The Ascension Time	
8	David Robert Lewis	Interested and Affected Party	
9	Samantha Jenner	Interested and Affected Party	
10	Neil Goodwin	Interested and Affected Party	
11	Alex Smuts	Interested and Affected Party	

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1	22 May 2011	Michel Hucenko	It is still my firm conviction that nuclear is	Thank you for your comments and participation in the EIA
		Interested and	the solution for our need of electricity	process. Please continue raising these comments at the
	12:36	Affected Party	supply. There will not be a Chernobyl or	Nuclear-1 public forums.
			Fukushima in our country as we are	
	Fax		neither Russian nor Japanese.	
			Furthermore, I wonder how many South	
			Africans have to die in the dark for the	
			sake of a few butterflies or for some	
			obscure political agenda. By the way I	
			am living near Koeberg for 27 years and	
			I still don't glow in the dark!	
2	23 May 2011	Walter Smith	Gapwedge Marine Aquaculture Land	Thank you for your comments. The impact of the proposed
		Project Gapwedge	Based Finfish Project, Pearly Beach	Nuclear Power Station on agricultural and marine resources
	12:48	Properties 63 (Pty)	on portion 1 of the farm no. 385,	has been assessed in both the Agriculture and Marine Biology
		LTD	Pearly Beach.	Assessment reports (Appendices E16 and E15, respectively of
	Email	Project Manager		the Revised Draft EIR Version 1).
			As an interested and affected party (I&AP), Gapwedge fish farm <u>strongly appeals</u> against the proposed nuclear development on Bantamsklip.	A agricultural survey undertaken within a 16 km radius of the Bantamsklip site found that the major impacts of a nuclear power station on agriculture (including food safety) would have a short term negative impact on agricultural production with regard to dust during the construction phase.
			The Gapwedge fish farm has been busy for several years investing into a project to secure sustainable food resource. Our project complies with all legislation required locally, national and internationally. The Gapwedge marine finfish farm will be in approximate 15km radius of the proposed Bantamsklip nuclear site.	The Marine Assessment confirms that in terms of the unintentional release of radiation emissions, technical design of the cooling system has minimised this risk, so that this impact on Marine resources is rated as having low consequence and low significance. Lastly In terms of safety there are extensive mitigation measures built into reactor design for safety and there are multiple precautionary defences against the consequences of

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				failures in materials, equipment and human error.
			Gapwedge are currently in the process to secure export markets and the proposed Bantamsklip nuclear development has a direct negative impact on these negotiations. Strategies for food safety and quality are at this stage of main concern.	For purposes of this EIA, it is further acknowledged that the NNR will issue a license for the construction of a nuclear power station at any particular site only if the design is in full compliance with the radiological dose limits and dose requirements laid down by the National Nuclear Regulator.
			Gapwedge complies with the allocation of a right/exemption to engage in marine aquaculture activities, in terms of section 18 of the marine living resources act, 1998 (act no. 18 of 1998) ("THE ACT") Gapwedge was granted Environmental Authorization by the Department of Environmental Affairs & Development Planning for the project and all relevant role players were involved in all aspects.	COMMENT FROM INDEPENDENT NUCLEAR SPECIALIST: As discussed the facility will be subject to a licence application to the NNR - as has been discussed comprehensively above this will require a safety case which will examine the radiological impact from all initiating events which have the potential for an offsite impact including via marine pathways and from any routine releases in accordance with standards and practices in line with international best practice.
			and direct impacts on our project relating to your project. The proposed nuclear development on Bantamsklip is of great concern for Gapwedge and should there be any impact due to your proposed project, Gapwedge would then hold the applicant "Bantamsklip nuclear development "wholly liable. Gapwedge appeals against the	

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			proposed nuclear development on	
			Bantamsklip!	
3	19 May 2011	Matthys C Horak	From documentation previously provided	Thank you for your comments. The information requested is as
		ATNS, ATM	and located on your web site it appears	follows and contained within the Final Scoping Report:
	14:42	Planning	that a study is currently in place	
	Email	Department ATM Specialist	regarding this nuclear facility.	"The Duynefontein site is located adjacent to the existing Koeberg NPS, which is situated approximately
		у простанов	In view of the fact that ATNS is an Interested and possibly an affected party	30 km north of Cape Town. The Duynefontein site is situated within the Western Cape Province Municipality
			you are respectfully requested to provide ATNS with as much information on this proposed facility – Exact location (and has the following co-ordinates: 33°40'36.00"S and 18°25'54.88"E.
			Geographical position Degrees, Minutes, Seconds and decimals of a second in WGS-84 format) etc.	The Bantamsklip site is located approximately 5 km east of Pearly Beach and approximately 50 km northwest of Cape Agulhas. The site is situated on the Southern Cape coast, falls within the jurisdiction of the
			The establishment of such a facility normally goes hand in hand with the establishment of a Restricted area as is	Overberg District Municipality and has the following co- ordinates: 34°42'28.95"S and 19°33'12.17"E.
			the case with the "Koeberg Nuclear Power Station" – FAR36 GND/2,000 FT AGL See SA Aeronautical Information publication (SA AIP) ENR 5-11.	The Thyspunt site is located on the Couga Coast of the Eastern Cape Province, approximately 80 km west of Port Elizabeth. The site has the following co-ordinates: 34°11'22.51"S and 24°02'54.63"E."
			publication (SA AIP) ENR 5-11.	34º11'22.51"S and 24º02'54.63"E."

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4	24 May 2011	Rob Small	I agree to nuclear provided that:	Thank you for your comments and participation in the EIA
		Interested and		process. It must be borne in mind that the Environmental
	18:06	Affected Party	1. all the decision makers (including the	Impact Assessment process is charged with assessing the
			ministers and business people) and	significance of the construction of a Nuclear Power Station on
	Email		other proponents of the 'nuclear energy	three very specific sites and to make a recommendation in
			solution' (scientists and technicians et al)	terms of the outcomes of the investigation. Therefore, although
			agree to live permanently right on, or	your comments are noted and will be included as part of the
			next door to, nuclear reactor sites, or on	information presented to the Competent Authority for decision-
			top of the places where spent fuel is	making, it is not within the scope of the EIA to address
			stored, in perpetuity.	comments of this nature.
			2. that these same decision makers and	
			proponents agree to put their full private	
			wealth (property, shares, savings,	
			everything) at the disposal of the country	
			should any problems arise with	
			contamination from their 'nuclear energy solution'	
			Solution	
			If the decision makers and proponents	
			can't do this, then I prefer to live with	
			candles.	

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5	24 May 2011	Peter Becker	Thank you for your response.	The GIBB Nuclear-1 Public Participation Office replied via email
		Koeberg Alert		on 25 May 2011 at 10:39.
	08:54	Alliance		
			Please note we find this response	It is not GIBB's intention to exclude Newlands from the public
	Email		unacceptable. If you analyse your	participation process. GIBB has reviewed the requests for
			attendance registers, you will find that	additional public meetings after the round of public participation
			excluding people from Arcus Gibb and	for the Revised Draft EIR Version 1. The programme for public
			Eskom, there were about 40 members of	participation for the Revised Draft EIR Version 2 has, however,
			the public who signed the register in	not been finalised. Any additional meetings, which require
			Newlands. For Melkbosstrand, the	advertising, will be included in a single advert that will be placed
			corresponding figure is about 9 members	in local and regional newspapers. Registered l&APs will also be
			of the public.	notified of any additional meetings via post and e-mail.
			In the light of this, it is nonsensical to	
			claim that the public participation	
			process is best served by excluding Newlands in favour of Melkbosstrand. In	
			fact, there were about twice the number of members of the public at Newlands	
			than at the other two meetings	
			combined.	
			Combined.	
			Please note that in our view this	
			exclusion violates the requirement of a	
			meaningful public participation, and that	
			Arcus Gibb are avoiding the area where	
			there is likely to be the most vigorous	
			public participation. If you fail to arrange	
			a meeting in Newlands, and provide	
			reasonable notice of this, including	
			advertising publicly, we intend to	
			challenge the EIA process via any legal	

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			means at our disposal.	
6	25 May 2011 11:05 Fax	Hubert Cronje Melkbosstrand Ratepayers Association	For a number of years Melkbosstrand residents have tried to get information from ESKOM regarding insurance coverage for neighbouring communities in case of a disaster. This information has now become urgent and critical. It is ESKOM/NNR responsibility to make it available and it is out right to have this information.	Thank you for your comment. In terms of the National Nuclear Regulatory Act, the operator of a nuclear facility is obliged to take out insurance. The amount that is stipulated by the NNR is R 3 billion (the insurance is in US\$ denomination and the Rand value therefore differs from time to time). The NNR is, however, currently reviewing the amount of insurance that the nuclear power operator has to have. The current information can be obtained in Government Gazette No. 26327, Notice No. 581 dated 2004.05.07.
7	25 May 2011 12:29 Email	Anthea Torr The Ascension Time	I would like to request that a public meeting be held in the Southern Suburbs as well as in the North, as there are MANY, MANY people very concerned about any proposed nuclear expansion of any kind and the discussion regarding Nuclear-1 EIR needs to be attended by as many concerned citizens as possible. Please advise as soon as possible the	Your comment is noted. The choice of venues for the last round of public meetings were 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 Version 1 predominantly related to issues specific to the Thyspunt site. The Duynefontein and Bantamsklip sites were not recommended as preferred sites. It was therefore considered that the public open houses and meetings advertised were sufficient to allow I&APs a reasonable opportunity to comment on the key

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			plan to host a meeting in the Southern suburbs - the Vineyard Hotel - Newlands,	changes to the Draft EIR in this type of forum.
			was a good place - why not has it there again?	However, GIBB has reviewed the requests for additional public meetings after the recent round of public participation for the Revised Draft EIR Version 1 but the programme for public participation for the Revised Draft EIR Version 2 has not been finalised. Any additional meetings, which require advertising, will be included in a single advert that will be placed in local and regional newspapers. Registered I&APs will also be notified of any additional meetings via post and e-mail.
8	25 May 2011 12:31	David Robert Lewis Interested and Affected Party	Today's public meeting in Melkbosstrand regarding the Nuclear 1 EIA refers. I understand, this meeting is for	Your comment is noted. The choice of venues for the last round of public meetings were based on proximity to the alternative sites and the most potentially affected parties, as well as accessibility for the Interested and Affected Parties
	Email	Allocted Faity	interested and affected parties in the Melkbosstrand/Blouberg/Tableview area. Please could you organise a meeting for residents of Cape Town, in particular the Southern Suburbs.	(I&APs) from surrounding areas. The changes made to the Draft Environmental Impact Report Version 1 predominantly related to issues specific to the Thyspunt site. The Duynefontein and Bantamsklip sites were not recommended as the preferred sites. It was therefore considered that the public open houses and meetings advertised were sufficient to allow I&APs reasonable opportunity to comment on the key changes
			I am a resident of Woodstock in Cape Town, I will not be able to attend tonight's meeting.	to the Draft EIR in this type of forum. However, GIBB has reviewed the requests for additional public meetings after the recent round of Public Participation for the Revised Draft EIR Version 1 but the programme for public participation for the Revised Draft EIR Version 2 has not been finalised. Any additional meetings, which require advertising, will be included in a single advert that will be placed in local and regional newspapers. Registered I&APs will also be notified of any additional meetings via post and e-mail.

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9	25 May 2011	Samantha Jenner	I am most disappointed that there is no	Thank you for your comment. We agree that I&APs are not
		Interested and	meeting arranged in a more accessible	limited to those living in the immediate vicinity of the preferred
	12:34	Affected Party	location. The previous meeting at The	(Thyspunt) site and it for this reason that meetings were held
			Vineyard Hotel was well attended and	near the Duynefontein and Bantamsklip sites in addition to
	Email		indicates an interest and demand for	those at Thyspunt. Also please note that all registered I&APs
			future meetings at central or accessible	were notified of the availability of the Revised Draft EIR Version
			locations.	1 at public venues and on the GIBB and Eskom websites and
				have been afforded the opportunity to comment in the
			The limited transport options available	documents via letter, fax and e-mail during a comment period
			for tonight's meeting excludes a large	extended until 07 August 2011 (90 days).
			portion of the community geographically. This is not acceptable.	The chaice of venues for the last round of public meetings were
			This is not acceptable.	The choice of venues for the last round of public meetings were also based on proximity to the alternative sites and the most
			You are accountable for facilitating public	potentially affected parties, as well as accessibility for the
			participation and, if anything, additional	Interested and Affected Parties (I&APs) from surrounding
			meeting times and facilities available,	areas. The changes made to the Draft Environmental Impact
			especially given the additional interest	Report Version 1 predominantly related to issues specific to the
			that nuclear plants have been given in	Thyspunt site. The Duynefontein and Bantamsklip sites were
			the last couple of months.	not recommended as the preferred sites. It was therefore
				considered that the public open houses and meetings
			I look forward to hearing your	advertised were sufficient to allow I&APs reasonable
	25 May 2011		suggestions to remedy this failure.	opportunity to comment on the key changes to the Draft EIR in
				this type of forum.
	13:41		Thank you for your letter, however it	
			does NOT an adequate reason. I&APs	However, GIBB has reviewed the requests for additional public
	Email		are not limited to those living in the	meetings after the recent round of Public Participation for the
			immediate vicinity of the proposal site!	Revised Draft EIR Version 1 but the programme for Public
				Participation for the Revised Draft EIR Version 2 has not been
			The location of the meeting may be near	finalised. Any additional meetings, which require advertising,
			the site but it is NOT easily accessible to	will be included in a single advert that will be placed in local and
			others. Also, given that the meeting at	regional newspapers. Registered I&APs will also be notified of
			the Vineyard was full and there has been	any additional meetings via post and e-mail.

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			an increase in public interest sparked by the Fukushima Daiichi incident the option of additional meetings should be provided for. For instance, the area affected in any emergency would extend far beyond the area catered for in this meeting. Please reply with a reasoned response.	
10	25 May 2011 13:00 Email	Neil Goodwin Interested and Affected Party	I understand that Eskom intends to hold a public consultation meeting about its draft Environmental Impact Report (EIR) for Nuclear-1 only in Melkbosstrand (where no doubt only a few people can attend). Why is this? Surely such an important issue, especially post Fukushima should be aired in as many locations as possible to truly gauge the public mood on nuclear power?	Your comment is noted. The choice of venues for the last round of public meetings were 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 Version 1 predominantly related to issues specific to the Thyspunt site. The Duynefontein and Bantamsklip sites were not recommended as the preferred site. It was therefore considered that the public open houses and meetings advertised were sufficient to allow I&APs reasonable opportunity to comment on the key changes to the Draft EIR in this type of forum.
			I would like you to consider holding one in Cape Town as soon as possible. Failure to consult as widely as possible on this major issue can only serve to invalidate your credibility and throw the veil of secrecy and despotism over correct legal procedure. I wait for your response.	We agree that this is a sensitive issue that should be aired in as many locations as possible and it for this reason that meetings were held near the Duynefontein and Bantamsklip sites in addition to those at Thyspunt. Also please note that all registered I&APs were notified of the availability of the Revised Draft EIR at public venues and on the GIBB and Eskom websites and have been afforded the opportunity to comment in the documents via letter, fax and e-mail during a comment period extended until 07 August 2011 (90 days).

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				However, GIBB has reviewed the requests for additional public meetings after the recent round of public participation for the Revised Draft EIR Version 1 but the programme for Public Participation for the Revised Draft EIR Version 2 has not been finalised. Any additional meetings, which require advertising, will be included in a single advert that will be placed in local and regional newspapers. Registered I&APs will also be notified of any additional meetings via post and e-mail.
11	25 May 2011 13:11 Email	Alex Smuts Interested and Affected Party	I am interested in the affects that Nuclear-1 EIR has on the environment, and I find it malicious that you should hold such important meetings in such small suburbs as Melkbosstrand. I request along with many others I'm sure that more meetings be held in more central areas such as the CBD, where there are organisations and peoples who want to voice their opinions.	Your comment is noted. The choice of venues for the last round of public meetings were 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 Version 1 predominantly related to issues specific to the Thyspunt site. The Duynefontein and Bantamsklip sites were not recommended as the preferred site. It was therefore considered that the public open houses and meetings advertised were sufficient to allow I&APs reasonable opportunity to comment on the key changes to the Draft EIR in this type of forum.
			Please make the information that you are giving out more easily accessible to the public by holding more meetings in less conspicuous places.	However, GIBB has reviewed the requests for additional public meetings after the recent round of public participation for the Revised Draft EIR Version 1 but the programme for public participation for the Revised Draft EIR Version 2 has not been finalised. Any additional meetings, which require advertising, will be included in a single advert that will be placed in local and regional newspapers. Registered I&APs will also be notified of any additional meetings via post and e-mail.