

#### Cape Town

14 Kloof Street Cape Town 8001 PO Box 3965 Cape Town 8000

Tel: +27 21 469 9100 Fax: +27 21 424 5571 Web: www.gibb.co.za

05 August 2015

Our Ref: J27035 Your Ref: Email received 04 August 2011

Email: sally@mail.ngo.za

Dear Ms Andrew and Mr Boshier

### <u>RE: ESKOM EIA CONCERNS FOR THE PROPOSED NUCLEAR POWER STATION AND</u> ASSOCIATED INFRASTRUCTURE (DEA Ref. No: 12/12/20/944)

### Comment 1:

I would like to refer to 2 issues

1. The below document (can be found at <u>http://www.savebantamsklip.org/docs/NSIP%20REPORT\_0001.pdf</u>) of 1988 and 1993.

Entitled: NG18/TAC/ea/scapREP NUCLEAR SITING INVESTIGATION PROGRAMME (NSIP) SOUTHERN CAPE SUMMARY REPORT

2. Nuclear-1\_Bantamsklip\_sensitivity map\_rec area\_31072010 COM

Response 1:

Your comments are noted.

### Comment 2:

Dealing with 1.

After eighteen years having relapsed, the recommendations stipulated in your own report (shown below) for the purchase of the Bantamsklip site have still not been fulfilled on all three counts Motivation, Warm Water Effects and Compensation. We believe the EIA procedure is Fatally Flawed on this count alone.

### Response 2:

Your comment is noted and is responded to in Response 4 below.



GIBB Holdings Reg: 2002/019792/02 Directors: R. Vries (Chairman), Y. Frizlar, B Hendricks, H.A. Kavthankar, J.M.N. Ras

Arcus GIBB (Pty) Ltd, Reg: 1992/007139/07 is a wholly owned subsidiary of GIBB Holdings. A list of divisional directors is available from the company secretary.

### Comment 3:

### Dealing with 2.

No protected areas are shown on the map Agulhas National Park, Pearly Beach Nature Reserve, Soetfontein Nature Reserve and Groot Hagelkraal itself. The locality of Buffelsjagt is also not indicated on any of your mapping for the Bantamsklip site.

### Response 3:

Your comments are noted and a map explicitly illustrating these areas will be included in the Revised EIR Version 2.

### Comment 4:

# **5 RECOMMENDATION OF SITE SPECIFIC SENSITIVITY**

(acc 1162516)

### 6.5.2 Recommendation : Bantamsklip

The Bantamsklip site should not be purchased for later development for a nuclear power station unless certain criteria are met.

# 6.5.4 Criteria for purchase of Bantamsklip or Buffelsjagt

The following three major criteria should be met before either the Bantansklip or Buffelsjagt sites and re purchased:

### Motivation

A clear and publicly motivated need is shown for the specific site compared to other national sites.

### Warm water effects

The effects of the maximum release of warm water on the local marine resources are quantified and carefully assessed.

#### Compensation

Fair compensation (as determined in negotiations) is made to the affected parties.

### Response 4:

Your comments are noted.

#### Motivation:

The motivation for the specific site selection and the site selection process is discussed in the Revised Draft EIR Version 1 and in previous versions of the EIR and Scoping Reports.

### Warm water effects

Warm water effects are discussed in detailed in Sections 3 and 5 of the Marine Ecology Impact Assessment. This report has recently been revised in response to comments received from Interested

and Affected Parties and additional Key Stakeholder consultation, and will be made available for public comment and review and as an addendum to Revised Draft EIR Version 2.

## Compensation

It is normal practise to purchase land at market related prices and to consider any relevant compensation which may be applicable.

# Comment 5:

It is our contention that the Bantamsklip site EIA (and EIR) is fatally flawed and the site should be removed from the list of proposed nuclear sites. We are prepared to elaborate on this submission when you have had time to consider the contents thereof.

### Response 5:

In terms of the EIA and specialist opinion there are no fatal flaws which exclude any of the sites from development of a nuclear power station. GIBB therefore invites the writer to elaborate further on this issue.

Yours faithfully for Arcus GIBB (Pty) Ltd

The Nuclear-1 EIA Team