

05 August 2015



Our Ref: J27035
Your Ref: Email received 05 August 2011

Email: rob.fryer@ocf.org.za

Dear Rob Fryer

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

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

OVERSTRAND CONSERVATION FOUNDATION COMMENTS ON REVISED DRAFT EIA REPORT

Comment 1:

The Overstrand Conservation Foundation (OCF), now trading as Whale Coast Conservation, wishes the following comments to be recorded and given careful consideration in the review of the EIR.

The OCF considers the Environmental Impact Report to be fatally flawed with respect to the proposed Bantamsklip site because it fails to deal adequately with three important issues:

- 1 Tourism impact
- 2 Socio-economic impact
- 3 Site access for equipment delivery
- 4 Transmission line route

1 Tourism Impact – OCF alignment with Overstrand Municipality's Local Economic Development (LED) Strategy

The OCF is rebranding itself as Whale Coast Conservation to align our activities the local Overstrand municipality's initiative to market the Cape Whale Coast as an internationally significant terrestrial and marine biodiversity hotspot with enormous eco-tourist potential. The slogan of the Cape Whale Coast is "*wonders never cease*," referring to the amazing variety of unique experiences available to eco-tourists visiting this amazing coastline. This branding of the Overstrand and marketing of the eco-tourism potential is at the heart of the Overstrand municipality's LED strategy.

This municipal LED strategy is not given any credibility in the specialist study on tourism, which dismisses the growth potential for eco-tourism as insignificant, restricts its consideration of tourism to the Bantamsklip site itself, and uses "facts" relating to commercial visitors to Medupi coalpowered station as evidence that the construction of power stations increases "tourism" and claims that the proposed power station itself will attract tourism to the area and makes statements about the increased economic activity that will occur due to additional permanent residents (ref J27035).

The specialist study and reference illustrate the specialist's superficial treatment of the Cape Whale Coast's potential for a highly rewarding eco-tourism industry, for which it substitutes a few thousand business related visits to the power station annually and an increase in restaurant trade due to increased population. This is incredible! It is a fact that the area's eco-tourism potential has not been properly studied or documented and that tourism data for the region as a whole has not been systematically captured and analysed.



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.

This lack of data and information has led the specialist to seriously underestimate the potential and value to the region's economy of exploiting the potential for extended visits by hundreds of thousands of eco-tourists annually.

The OCF is adopting the branding Whale Coast Conservation to signify that we are striving to “*ensure wonders never cease*.” We are committed to inspiring people in the Cape Whale Coast region to become a vibrant and environmentally sustainable community. We work with community, business and government and champion responsible environmental management and optimal utilisation of our ecosystem services.

The OCF is a significant player in the Cape Whale Coast, has consistently participated in the Nuclear-1 public participation meetings and is widely known as a credible organisation in the region. We have commented upon the tourism content of the Nuclear-1 EIA specialist study, but, the specialist has never made any attempt to contact our office for information or to discuss our views. Instead, dismissive comments have been made in response to our input and there is no indication that any serious attempt has been made to address the issues raised. In conclusion, the EIR treatment of the impact of the proposed Nuclear-1 power station on ecotourism in the Cape Whale Coast:

- Fails to recognise the Cape Whale Coast branding and marketing initiative and the potential for this to substantially increase eco-tourism;
- Claims increased “tourism” of a few thousand business-related visits to the proposed power station and increased restaurant trade due to an increase of 1000 permanent residents will exceed the potential for eco-tourism revenue.
- Failed to consult with the OCF (and presumably others who have made similar comment) despite our having raised serious doubt about the credibility of the specialist report and just dismissed our input.

On these grounds, the EIR treatment of the tourism impact is not credible and is fatally flawed.

Response 1:

Your view of the Tourism Impact Assessment (Appendix E22 of the Revised Draft EIR) is noted. The Tourism Impact Assessment is based on a balanced assessment of the potential loss of existing nature-based tourism and the potential increase in business tourism associated with the establishment of a power station. This is based on experience with the operation of tourism around Koeberg Nuclear Power Station and the current construction of power stations such as Medupi near Lephalale in Limpopo Province.

Research for the Tourism Impact Assessment (Appendix E11 of the Revised Draft EIR Version 2) was conducted in 2008. No Overstrand LED strategy was available at the time. The tourism specialist obtained older documents (with difficulty) from the Overberg District Municipality. These documents included a spatial development framework document from 2004 and an integrated development plan from 2002. These documents make generic and expansive mention of tourism as a holistic concept, with eco-tourism as a part of the greater definition of identified sub-sectors of tourism. No specific planning, development targets, empirical research, responsibility mandates, nor plans of action were evident. The documents were expansive with macro-economic statements with policy formulation proposals and guidelines.

The Tourism Impact Assessment report does not disregard the growth potential of eco-tourism as insignificant. However, it does acknowledge the disparate and haphazard statistical evidence thereof. There are multiple claims of eco-tourism's growth, however Stats SA, Western Cape Tourism, CTRU and all the relevant Western Cape provincial government departments are unified in their admission that tourism statistics are insufficient and quantifiable data for specific geographic areas such as those for the Nuclear-1 project are lacking. As a result of the data inequalities and the absence of localised evidence or statistics, claims of growth potential on a policy and strategy document level cannot be

leveraged as accurate and the report indicates this data situation and recognises this in the assumptions and limitations of the study.

In conclusion, the Tourism Impact Assessment does not dismiss eco-tourism, nor does it dismiss the Overstrand Municipality's LED. The respondent is directed to the evident increase in eco-tourism that was experienced around Koeberg Nuclear Power Station and the surrounding reserve areas. This represents the only contextualised eco-tourism experience and available statistics that were available at the time of the assessment.

Comment 2:

2 Socio-economic impact

At the most recent public participation meeting in Gansbaai it was admitted by the Eskom and Arcus GIBB representatives that no attention has been paid during the EIA process to the need to accommodate a peak of 7000 workers and their families during the construction phase of the project or to the need to accommodate 1 000 permanent employees during the operational phase "it being assumed that these can be absorbed into the existing residential areas near to the proposed site of the power station." It was also admitted at the meeting that this is not a reasonable assumption.

The provision of housing and infrastructure for such large temporary and permanent numbers of workers and their families is a major project on its own, one which will definitely trigger an EIA. None of this, which is a direct and inherent consequence of the proposal to build the Nuclear-1 power station, has been taken into account in the nuclear-1 EIA. This is a fatal flaw in the EIA process and the EIR should be referred back to ESKOM in order this to be addressed. It is weakly admitted in the response to the OCF's previous comments on the effects of worker inflow that "The influx of substantial number of people into the area will definitely pose challenges regarding a wide variety of aspects. The importance of the mitigation measures cannot be underestimated, especially due to the fact they draw on lessons learned from other projects such as Saldana Steel (ref J27035)." The "mitigation measures" referred to are totally inadequate under the circumstances. There needs to be a fundamental look at how an effective development programme can be rolled out prior to and throughout the construction phase of the proposed power station to absorb the influx of people into the local economy. The funding for the development and implementation of a broadly based local economic development plan to absorb the influx of workers needs to be carried by the nuclear-1 project and must be part of the implementation plan for the project and part of the EIA study for the project because it is a direct consequence of locating such a project in a rural area such as Bantamsklip and Thuyspunt.

The mitigation steps referred to in the EIR do not at all address the human crisis that is inevitably going to unfold unless there is a real LED plan and associated funding. The glib statements made in the EIR and specialist studies lack credibility and render the EIR fatally flawed.

Response 2:

Your comment is noted.

The housing of employees for Nuclear-1 during the construction and operational stages of the development of Nuclear-1 has not been ignored. It has been stated in the EIA process that the environmental impacts of housing will be assessed in detail once a decision has been made of the location of the power station (assuming that the Department of Environmental Affairs issues an authorisation for Nuclear-1). It is also Eskom's preference not to develop a dedicated "construction camp" but to integrate housing for the proposed power station with other residential areas, where possible.

Your comment regarding the assumption that residential areas "*can be absorbed into the existing residential areas near to the proposed site of the power station*" not being reasonable is noted. No such admission was made by either GIBB or Eskom. You are referred to the relevant section of the

final minutes of the Gansbaai meeting of 23 May 2011, where it is stated “...for residential use, a separate EIA process will be required. Mr Heydenrych confirmed that the impacts associated with housing are not considered in the EIA for the nuclear power station, as it considers only the impacts associated with the power station itself and its immediately associated infrastructure. A separate EIA process for housing may therefore be required in future. The social aspects associated with accommodation have been considered in this EIR.” There is no statement in this passage that the assumptions of the Nuclear-1 EIA are unreasonable.

However, it is recognised in the EIA that the environment around the Bantamsklip site would be less capable of accommodating an influx of a large number of employees than either of the other alternative sites, since the social infrastructure in the Bantamsklip area is less developed than in the alternative affected areas and the settlements around the Bantamsklip are smaller. The cumulative social impact at Bantamsklip would therefore be higher than at Thyspunt or Duynfontein. This is one of the reasons why the Revised Draft EIR Version 2 came to the conclusion that Bantamsklip would be the least preferred of the three alternative sites and as such is no longer considered feasible for Nuclear-1.

The labour policies of the Coega Development Corporation (CDC) are recognised as being effective and the Nuclear-1 project’s labour policies and procedures will be modeled on examples such as these. The CDC has indeed indicated its willingness to share its experiences in this regard so that the Nuclear-1 project can learn from these.

Comment 3:

3 Transmission Line Route to Bantamsklip

The previous comments made by the OCF elicited the response (ref J27035) that “Your comment is noted. The transmission lines are the subjects of separate EIA processes, as it would have been impractical to combine the EIA for the Nuclear Power Station and three transmission lines into a single process. Kindly submit your comments regarding the proposed Bantamsklip transmission line to through the dedicated communication channels for that particular EIA.” This is not an acceptable response!

At the last public participation meeting the EIA consultants and ESKOM attempted to move the responsibility for identifying a feasible transmission line route to the interested and affected parties (I&AP) invited to participate. When it was admitted that ESKOM has not itself identified a feasible route, the assembled I&APs refused to take responsibility for finding a feasible route and it was agreed that this would be done by ESKOM and that the proposed route would be presented to the I&APs at another workshop. This has not happened. At the most recent public participation meeting in Gansbaai it was again asked whether a feasible transmission line route has been identified and the answer given was that ESKOM has, months later, still not identified a route that it is happy to communicate to I&APs. It was further said that the transmission line EIA is well behind schedule.

The OCF submits that the failure to identify and communicate a feasible transmission line route to I&APs represents a fatal flaw in the EIA process for the proposed power station and that the proposed Bantamsklip site should be removed from consideration in the Nuclear-1 EIA authorisation process.

Response 3:

Your comment is noted. GIBB stands by its previous response in this regard that the EIA processes for the power station and transmission lines are separate.

At the time of writing this response, the EIA process for the Bantamsklip transmission lines has been suspended. In any EIA process, it is the responsibility of the applicant to propose technically feasible and reasonable alternatives. These alternatives need to be critically interrogated by the environmental assessment practitioner (EAP), based on known environmental sensitivities, and the potential environmental impacts of these alternatives then need to be investigated in detail. Public participation

is an essential part of the EIA process and this regards to the identification of alternatives, it is critical in identifying the best practicable environmental option.

Should no feasible transmission route be identified for the Bantamsklip sites, it would mean that Bantamsklip cannot be regarded as a feasible and reasonable alternative for Nuclear-1.

Comment 4:

4 Site access for equipment delivery

The OCF reiterates that the lack of a feasible route to deliver equipment to the Bantamsklip site, by road or by sea, renders that site unfeasible as a potential site for the construction of nuclear-1 or any future proposed nuclear power station. The proposal that Bantamsklip can be considered as an alternative site to Thuyaspunt or Duinefontein is not rational and Bantamsklip should be withdrawn as a possible site for nuclear-1 in this EIA authorisation process.

Response 4:

Your comment is noted. It is acknowledged in the Nuclear-1 Revised Draft EIR Version 1 that the transport logistics make Bantamsklip a more challenging site than either Thuyaspunt or Duinefontein, Whilst it does not imply that it is a technically impossible site it is one of the factors that results in Bantamsklip not being the preferred alternative for Nuclear 1.

Comment 5:

5 Other Comment

The OCF notes that the EMP appended to the EIR is specific to Thuyaspunt and that no work has been done to draw up an EMP for the proposed Bantamsklip site. According to our interpretation of the EIA regulations, Bantamsklip cannot be considered as an alternative site for the proposed nuclear-1 power station unless an EMP is submitted for that site. It is also noted that the use of the proposed Bantamsklip, the Groot Hagelkraal property, is a Private Nature Reserve (in terms of proclamation 983/88 of 11 November 1988), and will require deproclamation prior to it being available for the development of the proposed nuclear-1 development. Such a deproclamation will be strenuously opposed, should there be such an application, on the grounds that this site is extremely important as an example of coastal fynbos and worthy of registration as a World Heritage Site.

Response 5:

The EMP focuses on the Thuyaspunt because this site is recommended site in the Nuclear-1 Revised Draft EIR. Should the Department of Environmental Affairs authorise a different site, the EMP would be amended to the authorised site.

It is not correct to state that the Bantamsklip properties are nature reserves. The properties east and west along the coast are state-owned and are managed by CapeNature, However, they are not proclaimed or declared nature reserves.

Your comment regarding the potential status of the site as a World Heritage Site is noted. Although there are valuable examples of fynbos ecosystems on the site, particularly the patches of limestone fynbos, and there are extensive wetlands (which will not be developed) on the northern portion of the site, no finding was made in any of the terrestrial ecological assessments that the site could be regarded to be of exceptional value to all of humankind.

Comment 6:

6 Conclusions

The EIA process for the proposed Bantamsklip site for the proposed nuclear-1 power plant is fatally flawed due to inadequate attention to previously submitted comment about the issues raised above. The responses given to the OCF's submissions are dismissive and show no intention to address the important observations made and none of these are reflected in the final EIR. As a consequence, Bantamsklip should be removed from consideration as a potential site for the proposed nuclear-1 power station.

Response 6:

Your comment is noted.

Yours faithfully
for GIBB (Pty) Ltd

A handwritten signature in dark ink, appearing to be a stylized 'G' or 'S' followed by a horizontal line.

The Nuclear-1 EIA Team