

COMMENTS & RESPONSE REPORT

Comments received on the draft Basic Assessment Report - Proposed expansion of the diesel storage facilities at the Koeberg Nuclear Power Station, Farm Duynfontyn No. 1552, Melkbosstrand

Comment period: 24 February 2017 – 27 March 2017

NO	DATE	COMMENT	I&AP, Stakeholder or Authority	RESPONSE	RESPONDENT
1.	27 March 2017	1. It is noted that wetlands are located adjacent to the preferred site (Ekhaya site and PEE site); however, the distance of the wetlands in relation to the proposed site has not been specified. Please note that should the preferred site be located within 500m of the wetlands, a water use licence may be required from the Department of Water and Sanitation ("DWS"). As such, DWS must be consulted on the applicability of the National Water Act, 1998 (Act No. 36 of 1998) and their requirements must be included in the Final BAR to be submitted to the competent authority.	Melanese Schippers - Western Cape Government: Environmental Affairs and Development Planning (DEA&DP): Development Management: Region 1	DWS was consulted and they confirmed that the proposed development does not trigger any water uses as contemplated in the National Water Act, 1998 (Act No. 36 of 1998). Please refer to the letter from DWS dated 24 May 2017 included under Appendix J1.	Adél Groenewald – Doug Jeffery Environmental Consultants (DJEC)
		2. This Directorate believes that impacts associated with the proposed development have not been assessed in terms of the methodology proposed. It is noted that potential soil – and groundwater contamination and potential surface water impacts during the construction phase, have been identified of negligible significance after mitigation. Furthermore, the loss of vegetation during the construction phase for the preferred site has been identified in the Draft BAR as being of very low negative significance after mitigation. An assessment that addresses the above must be included in the Final BAR to be submitted to the competent authority.		The assessment methodology was updated to include the criteria for the 'negligible' rating. A negligible rating means that there is no measurable impact. All the impacts rated as 'very low' has been changed to 'low' to be in line with the criteria. These changes have no effect on the impacts foreseen for proposed development.	Adél Groenewald – DJEC
		3. Proof of the public participation conducted must be included in the Final BAR to be submitted to the competent authority. Please note that the proof must include, <i>inter alia</i> , the following: 3.1. Copies of the newspaper advertisements ("newspaper clippings"), indicating the name of the newspapers and date of publication; 3.2. Photographs showing the notice displayed on site and a copy of the text displayed on the notice and 3.3. With regards to the written notices provided, the following must		Proof of the public participation conducted is included under Appendix E of the final BAR.	Adél Groenewald – DJEC

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		<p>be included in the Final BAR:</p> <ul style="list-style-type: none"> (i) if registered or regular mail was sent, a list of the registered or regular mail sent, as obtained from the post office (ii) if a facsimile was sent, a copy of the facsimile report; (iii) if an electronic mail was sent, a copy of the electronic mail sent and delivery reports; and (iv) if a “mail drop” was done, a signed register of “mail drops”. 			
		<p>4. Section A7, page 12 of the Draft Bar indicates that a sensitivity map is included in Appendix A3. Please be advised that Appendix A2 of the Draft BAR depicts the sensitivity map. This error must be corrected in the Final BAR to be submitted to the competent authority.</p>		<p>The error was corrected to depict Appendix A2 as the Layout Plan and Appendix A3 as the Environmental Sensitivity Map.</p>	<p>Adél Groenewald – DJEC</p>
2.	27 March 2017	<p>1. The Environmental Management Programme (“EMPr”) dated February 2017 must be amended to include/address the following comments/recommendations:</p> <p>1.1. The applicant is reminded of the requirement to comply with the “Duty of care” as defined in section 28 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”) by ensuring that the proposed diesel storage tanks do not cause significant pollution or degradation of the environment.</p>	<p>Etienne Roux - DEA&DP: Waste Management</p>	<p>Noted, agreed and included in the EMPr.</p>	<p>Adél Groenewald - DJEC</p>
		<p>1.2. Storage tanks and pipe lines must have early leak detection systems.</p>		<p>According to SANS10131 (2004) this is not applicable to above ground storage tanks; however, leak detection will be undertaken by doing regular visual inspections every two months and during refuelling of the tanks, throughout the operational phase.</p>	<p>The Applicant – Eskom</p>
		<p>1.3. Stock reconciliation must be done regularly to identify leaks.</p>		<p>According to SANS10131 (2004) this is not applicable to above ground storage tanks.</p>	<p>The Applicant – Eskom</p>
		<p>1.4. Materials spilled during transfers from tank to storage and decanted to vehicles should be regarded as hazardous waste. Spills must be contained using commercially available</p>		<p>Noted, agreed and included in the EMPr.</p>	<p>Adél Groenewald - DJEC</p>

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		absorbent material. The fuel soaked absorbent material must be treated as hazardous waste.			
		1.5. The procedure for the control of incidents and emergency situations identified in terms of section 30 and section 30A of the NEMA, respectively, must be included in the EMPr. Any event resulting in the spillage or leakage of product into a watercourse (e.g. that of hazardous substances used during the construction and/or operational phase) must be reported within the relevant timeframes to all relevant authorities, including this Departments Directorate: Pollution and Chemicals Management. Containment, clean-up and remediation of the affected area must commence immediately and all necessary documentation must be completed and submitted to the relevant authorities within the prescribed timeframes.		Noted, agreed and included in the EMPr.	Adél Groenewald - DJEC
		1.6. Confirmation must be obtained from the Municipality/service provider that there is sufficient disposal capacity to accommodate additional waste generated by the proposed development.		Noted. A capacity confirmation letter is included under Appendix J2 of the final BAR. The proposed activity is not expected to produce any waste during the operational phase and a very small amount of general construction rubble will be produced during the construction phase which will be disposed of at a licenced waste facility.	Adél Groenewald - DJEC
		1.7. All hazardous waste must be stored in a demarcated area and disposed of using professional waste disposal contractors. All documents relating to volumes and types of waste stored must be kept on site for inspection.		Noted and agreed. All documents relating to volumes and types of waste stored will be kept in the Environmental File on site for inspection.	Adél Groenewald - DJEC
		1.8. The applicant must obtain and file disposal certificates from service providers that will dispose of the general and hazardous waste, as evidence that the waste has been disposed of at an appropriate, licenced waste disposal facility.		The applicant will obtain and file disposal certificates from service providers that will dispose of the general and hazardous waste.	Adél Groenewald - DJEC
		1.9. A complaints register must be kept on site specifying the date, time and nature of complaints and how the complaint was resolved/addressed.		Noted and agreed. A complaints register will be kept on site.	Adél Groenewald - DJEC

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3.	27 March 2017	1. All installations must be fitted with vapour recovery units. This will enable vapours and hydrocarbons emitted during loading operations to be returned to the loading tank where it will be stored.	Peter Harmse - DEA&DP: Air Quality Management	Please provide the reference for the statement “ All installations requiring vapour recovery units. ” SANS 10131(2004) does not mention to need for vapour recovery units.	The Applicant - Eskom
		2. It is recommended that a fence-line passive ambient air monitoring regime be adopted to quantify atmospheric concentrations of volatile organic compounds (“VOCs”), benzene and any other pollutants indicative of such an operation. Monitoring will provide a true picture of levels of emissions over a short period, e.g. during loading.		Recommendation noted. Economic feasibility will determine the suitability of a fence-line passive ambient air monitoring system and regime.	The Applicant - Eskom
		3. A leak detection and repair (“LDAR”) programme must be implemented. Amongst others, such LDAR programme should include the following: 3.1. A list of all equipment containing liquid and gas/vapour products that have the potential to leak VOCs and volatile hazardous air pollutants within process units; 3.2. Procedures for identifying leaking equipment units; 3.3. Procedures for repairing and monitoring of leaking equipment; and 3.4. A process for evaluating new and replacement equipment to promote the consideration of installing equipment that will minimise leaks or chronic leakers.		Leak detection/identification will be performed as part of the normal plant operator rounds under which these tanks will fall, as part of business as usual at Koeberg. Plant operators are required to complete logs of all activities performed, and any anomalies noted are addressed through raising defects on the respective equipment. These defects are assigned to suitably qualified maintenance staff to carry out any repairs, using authorised working procedures and work packages. In addition to the above, an existing inspection programme for equipment potentially susceptible to microbial induced corrosion (MIC), which covers all diesel/fuel storage tanks at Koeberg, exists. This is in line with the ISIPRM (In-Service Inspection Program Requirements Manual). The tanks will form part of the specific ISIPRM MIC Augmented Module 15, which requires a 10 yearly internal visual inspection, performed by suitably qualified staff. Any anomalies noted are addressed through raising defects on the respective equipment. These defects are assigned to suitably qualified maintenance staff to carry out any repairs, using authorised working procedures and work packages. Koeberg makes use of a centralised Condition Report system (DevonWay), under which any anomalies are logged and remedial actions assigned to respective groups as deemed necessary using a systematic approach. This includes initiating engineering investigations into items which would be reported as “chronic leakers”. Such OE (operating experience) is used to ensure the	The Applicant - Eskom

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				suitability determination for new and replacement equipment on all aspects of the power station, and that the use of equipment or manufacturers deemed unsuitable is prohibited.	
		4. Section 2.6.3 of the EMPr must be amended to indicate that noise generation must comply with the Western Cape Noise Control Regulations (Provincial Notice 200/2013) of 20 June 2013. The installation of noise attenuation technology on all equipment with the potential to produce noise, is recommended.		Noted. Section 2.6.3 of the EMPr was amended accordingly.	Adél Groenewald - DJEC
4.	27 March 2017	This Directorate's main concerns relate to the handling and storage of hazardous substances. It is noted that pollution prevention and mitigation measures have been included in the EMPr to address these concerns. As such, this Directorate has no further comments on the Draft BAR.	Monique Natus - DEA&DP: Pollution and Chemicals Management	Noted.	Adél Groenewald - DJEC
5.	27 March 2017	<p>1. <u>City of Cape Town: Planning & Building Development Management Branch</u></p> <p>The site was rezoned by Council in 2009, whilst a further rezoning to commercial and general industrial to permit offices and industrial building was approved in 2011.</p> <p>The respective zones were converted to the integrated City of Cape Town Zoning Scheme in 2013. These relate to the buildings and use of the portion of the land unit (as reflected on the sketch plan submitted) with the rezoning application (project No. 20007 510 proposed zoning plan Fig. 6 dated 26/05/2007) that is limited to a nuclear power station facility and related infrastructure that includes:</p> <p>(a) Noxious Industrial building (the existing Koeberg Nuclear power Station building footprint as a Conditional Use).</p> <p>(b) Offices (above Ground Floor) and as a Conditional Use for Administrative, Commercial and Professional Offices (on Ground Floor level) to regularise the existing ACP1 and Transportation Depot, Disaster Management Centre, Administrative Offices and Environmental Survey Laboratory, Koeberg Conference Centre and Estates Managers and</p>	City of Cape Town: E&HM: Environmental Management Department	<p>As concluded in the Screening Assessment, undertaken by ERM to determine the risks that may be imposed on the public, the proposed diesel tanks are not being considered as a Major Hazard Installation (MHI) as outlined in current legislation.</p> <p>Therefore, the EAP is of the opinion that item 124 of the City of Cape Town Development Management Scheme (i.e. the Zoning Scheme Regulations) is not applicable to this proposal.</p>	Adél Groenewald - DJEC

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		<p>Conservation Offices.</p> <p>(c) Industrial buildings (to regularise the existing Bulk Storage Building, Weather Station and Koeberg Test Station) and as a Conditional use for the following:</p> <ol style="list-style-type: none"> 1. Place of Instruction (existing Training Centre, Edusec Centre and Fire Training Centre); 2. For buildings in excess of 11m in height to regularise the existing Storage building. <p>(d) Public Utilities (as a Conditional use for the Electricity Substations for the City of Cape Town and Eskom.)</p> <p>In terms of the Site Development Plan's approved for the various precincts, Alternative 1 is zoned Risk Industry (R 1) and Alternative 2 is zoned General Business (GB 1). The Bulk Stores is zoned General industry (GI 1).</p> <p>It should be noted that notwithstanding that the storage of fuel tanks (i.e. diesel) is regarded as "<i>related infrastructure</i>", item 124 of the City of Cape Town Development Management Scheme (i.e. the Zoning Scheme Regulations) is applicable, namely:</p> <p>124 Hazardous substance</p> <p>(1) Any use or ancillary activity that involves the storage or keeping of hazardous substances that may result in an installation being declared a major hazardous installation in terms of occupational health and safety law is not permitted, unless a risk management and prevention plan has been submitted by the owner, and the City has given approval thereto.</p>			
		<p>2. <u>City of Cape Town: Fire & Safety Management Branch</u></p> <p>Further to the caution pertaining to Hazardous substances raised by the Planning & Building development Management Branch above the Fire & Safety Management Branch indicated that the two diesel tanks is not considered a major hazardous installation (MHI) in</p>		Noted.	Adél Groenewald - DJEC

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		<p>isolation. The two tanks should merely be included to the Koeberg Nuclear Power Station's existing MHI protocol.</p> <p>The preferred alternatives are therefore in order.</p>			
		<p>3. <u>City of Cape Town: Environmental Health: Air Quality Management Branch</u></p> <p>3.1. The proposed storage tanks are portable and their volume below the threshold for licencing in terms of the NEM: AQA GN. 893 and therefore an Atmospheric Emissions Licencing and monitoring is not required.</p>		Noted.	Adél Groenewald – DJEC
		<p>3.2. It is however recommended that when the placement of each of the storage units is planned, particular attention is paid to the termination point of each of the vent pipes, the prevailing wind direction and the proximity of openable windows or other working areas, to prevent an odour nuisance from being caused.</p>		Noted. This will be considered.	The Applicant - Eskom
		<p>4. <u>City of Cape Town: Environmental and Heritage Management Branch</u></p> <p>This branch has the following comment on the application:</p> <p><u>Draft BAR</u></p> <p>4.1. Section A, item 11 (page 18) states that comment from Heritage Western Cape (HWC) is pending. A copy of the NID submitted to HWC and the HWC response must be include in the final BAR. Further comment will be provided upon receipt of the said information. It is cautioned that the entire subject site is located in an area of high archaeological sensitivity according to the City of Cape Town: Environmental Management Framework as contained in the approved Blaauwberg District Plan.</p>		The final comment from HWC will be included in the final BAR.	Adél Groenewald – DJEC
		<p>4.2. Section A, item 11 (page 18): Appendix the EA, dd 26 Feb 2016 (Ref: 12/12/20/997), that is being referred to in the final</p>		Agreed.	Adél Groenewald –

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		BAR for ease of reference.			DJEC
		4.3. The appendixes numbers pertaining to the Layout Plan and the Sensitivity Maps does not correspond with the appendixes numbers stated in Section A, item 6 <i>Layout</i> and item 7 <i>Sensitivity Maps</i> respectively. Please correct.		Noted and corrected. The Layout Plan is included under Appendix A2 and the Sensitivity Map is included under Appendix A3 of the final BAR.	Adél Groenewald – DJEC
		<u>EMPr</u> 4.4. Clause 2.6.1: Working hours and days must be clearly stipulated in the EMPr. It is suggested that working hours be 07h00 to 17h00 Mondays to Saturdays. It must be stipulated that no work is to occur on Sundays and public holidays.		Noted. Clause 2.6.1. of the EMPr was amended accordingly.	Adél Groenewald – DJEC
		4.5. Clause 2.4.1: It is to be specified in the EMPr that a minimum of one toilet is to be provided on site for every 15 contract personnel in the case of chemical toilets and 1 for every 30 staff in the case of flush toilets.		Noted. Clause 2.4.1. of the EMPr was amended accordingly.	Adél Groenewald – DJEC
		4.6. Clause 2.6.5 a: It must be stated in the EMPr that stockpiles may not exceed 2m in height.		Noted. Clause 2.6.4. of the EMPr was amended accordingly.	Adél Groenewald – DJEC
		4.7. Clause 2.8: It must be noted in the EMPr that no potable water may be used as a dust mitigation measure.		Noted. Clause 2.8. of the EMPr was amended accordingly.	Adél Groenewald – DJEC
		4.8. Clause 2.14.2: it must be stated in the EMPr that contractors may be fined up to R10 000 per month for commencing construction activities without an ECO on site.		Noted. Clause 2.14.2. of the EMPr was amended accordingly.	Adél Groenewald – DJEC
		4.9. The proof of appointment of an independent Environmental Control Officer (ECO) to monitor compliance with the EMPr must be submitted to the City of Cape Town Environmental and Heritage management Branch prior to the submission of the Building Plans. This requirement must be included in the EMPr.		Noted. This requirement was included under Clause 2.2.1 of the EMPr.	Adél Groenewald – DJEC
		4.10. Clause 2.2.1: It is suggested that the ECO conduct site visits		Noted. This requirement was included under Clause 2.2.1 of the	Adél Groenewald –

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		at least twice per month.		EMPr.	DJEC
		4.11. It is requested that the EMPr include a clause indicating that the ECO audit reports be submitted to the City of Cape Town Environmental and Heritage Management Branch for consideration.		Noted. This requirement was included under the Clause 1.7.4 of the EMPr.	Adél Groenewald – DJEC
		Notwithstanding the above corrections, the EAPs recommendations, and in particular the preferred alternative 1, contained in Section E (page 45) is supported from a technical comment perspective.		Noted.	Adél Groenewald – DJEC
		5. In conclusion, it must be ensured that the above comments are adequately addressed prior to the application being submitted to the DEA&DP for environmental authorisation.		The EAP is of the opinion that all comments were adequately addressed.	Adél Groenewald – DJEC
6.	27 March 2017	i. Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description.	Constance Musemburi: Department of Environmental Affairs	The listed activities applied for is in accordance with the Amendments to the Environmental Impact Assessment Regulations, 2014 that came into effect on 07 April 2017.	Adél Groenewald – DJEC
		ii. If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted please note that the Department's application form template has been amended and can be downloaded from the following link: https://www.environment.gov.za/documents/forms		An amended application form will be submitted with the final BAR.	Adél Groenewald – DJEC
		iii. The Environmental Assessment Practitioner (EAP) must ensure that an adequate motivation on the applicability of each listed activity that triggers the proposed development is provided. The applicability of each activity against the actual threshold for the proposed development must be verified.		Noted. Refer to Section A 10 of the final BAR.	Adél Groenewald – DJEC
		iv. Please ensure that all issues raised and comments received during the circulation of the BAR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final BAR. Should you be unable to obtain comments, proof of the attempts that were made to obtain comments must be submitted to the Department. The Public		Noted. All issues raised and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in this comment and response report included under Appendix E3 of the final BAR. The PPP was conducted in terms of regulation 39, 40, 41, 42, 43 &	Adél Groenewald – DJEC

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		participation Process must be conducted in terms of regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014.		44 of the EIA Regulations 2014. Refer to Section C of the final BAR as well as Appendix E.	
		v. Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final BAR. Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof of the attempts that were made to obtain comments must be submitted to the Department.		Proof of correspondence with the various stakeholders is included under Appendix E4 of the final BAR.	Adél Groenewald – DJEC
		vi. Please provide a description of all identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 1 (2) (e) and 3 (1) (h) (i) of GN R.982 of 2014. Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.		Noted. A description of all identified alternatives for the proposed activity is described under Section A 2 of the final BAR.	Adél Groenewald – DJEC
		vii. The final BAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.		Noted. An assessment of the impacts and mitigation measures for each of the listed activities applied for is described under Section D and also included under Appendix F of the final BAR.	Adél Groenewald – DJEC
		viii. Cumulative impacts of similar type of developments in the area must form part of the studies that must be assessed as part of the final BAR process.		Noted. No cumulative impacts are expected from the proposed development.	Adél Groenewald – DJEC
		ix. The final BAR must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions.		Noted. Please refer to Appendix C: Facility illustration included under the final BAR.	Adél Groenewald – DJEC
		x. In terms of Appendix 1 of the EIA Regulations, 2014, the report must include an undertaking under oath or affirmation by the EAP in relation to: <ul style="list-style-type: none"> • The correctness of the information provided in the reports; 		Noted.	Adél Groenewald – DJEC

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		<ul style="list-style-type: none"> • The inclusion of comments and inputs from stakeholders and I&APs; • The inclusion of inputs and recommendations from the specialist report where relevant; • Any information provided by the EAP to interested and affected parties; and • Responses by the EAP to comments or inputs made by interested or affected parties. 			
		<p>xii. In terms of Appendix 1 (3) (1) (a) of the EIA regulations 2014, the details of-</p> <ul style="list-style-type: none"> • The EAP who prepared the report; and • The expertise of the EAP to carry out BAR; must be submitted. 		Noted. Please refer to Appendix H of the final BAR.	Adél Groenewald – DJEC
		<p>xiii. You are further reminded that the final BAR to be submitted to this department must comply with all the requirements in terms of the scope of assessment and content of BAR in accordance with Appendix 1 of the EIA Regulations, 2014.</p>		Noted.	Adél Groenewald – DJEC
		<p>xiii. Further note that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7). Please submit a CD together with the final BAR.</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act no 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.</p>		Noted.	Adél Groenewald – DJEC
7.	27 March 2017	<p>The application is for increased diesel storage facilities required for operations at the nuclear power station for emergency situations. Two alternative locations are provided for the one additional tank, with the other additional tank located at the portable emergency equipment site.</p> <p>The three alternative locations are located on transformed footprints</p>	Rhett Smart - CapeNature	Noted.	Adél Groenewald – DJEC

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		<p>according to the information contained within the draft basic assessment report. CapeNature is satisfied that no further specialist studies are required regarding terrestrial ecology and that the facilities will not have a significant impact in this regard.</p> <p>In terms of surface water features, the Ekhaya site alternative is located to the south of stormwater attenuation ponds, with a natural wetland located a bit further to the east. The transport garage site alternative is not located adjacent to any freshwater features. There is a wetland located to the south east of the portable emergency equipment site. Ideally the buffer between the wetlands and the proposed facilities should be indicated</p> <p>CapeNature agrees that none of the proposed site alternative locations will impact on surface or groundwater features provided the design and implementation of the facility adheres to international best practice. It is noted that information has been provided regarding the proposed technology and a specialist risk assessment which should be assessed by those with the relevant expertise.</p> <p>The property is classified as Protected Area according to the Biodiversity Network (BioNet) for the City of Cape Town and the Western Cape Biodiversity Spatial Plan. It should be noted that the entire property (Cape Farm 34) forms part of the Koeberg Nature Reserve.</p> <p>With regards to the Koeberg Nature Reserve, it should be noted that the private nature reserve proclaimed under the Western Cape Nature and Environmental Conservation Ordinance, 1974 (Ordinance 19 of 1974), has been made compliant with the provisions of the National Environmental Management: Protected Areas Act (NEM:PAA – Act 57 of 2003). A stewardship agreement was signed between Eskom and CapeNature in March 2015 and a protected area management plan (PAMP) has been compiled in terms of NEM:PAA (termed the Management Plan for the Koeberg Nature Reserve). This PAMP has approved by the MEC for Local Government, Environmental Affairs and Development Planning.</p> <p>All development or changes from a natural condition within a protected</p>			

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		<p>area should be controlled by the approved PAMP in terms of NEM:PAA. None of the proposed alternative locations are within the Conservation Zone of the nature reserve. The Ekhaya site is within the Developed Zone – Noxious Industrial and the transport garage site and portable emergency equipment sites are both within the Developed Zone – Facilities. Therefore, all of the alternative sites are compliant with the PAMP. Any alternative locations within the Conservation Zone would be non-compliant. Any development that does not comply with the approved PAMP would be in contravention of NEM:PAA.</p> <p>In conclusion, CapeNature does not object to the proposed developed provided the Environmental Management Plan and industry best practice is implemented.</p>			
8.	24 May 2017	<p>The Department has perused the information submitted for the proposed development of the above ground diesel storage tanks at the Koeberg Nuclear Power Station and can confirm that the proposed development will not trigger any water uses as contemplated in the National Water Act, 1998 (Act No. 36 of 1998) and will not require any permission from the Department provided the following conditions are adhered to:</p> <ol style="list-style-type: none"> 1. No abstraction of surface water or groundwater may take place without prior authorisation from this Department, unless it is a Schedule 1 Use or an Existing Lawful Use as described in the National Water Act, 1998 (Act No. 36 of 1998). 	Warren Dreyer – Department of Water and Sanitation: Berg-Olifants Water Management Area	Noted. No water will be abstracted from surface water or groundwater sources.	Adél Groenewald - DJEC
		<ol style="list-style-type: none"> 2. No surface, ground or stormwater may be polluted as a result of any activities on site. In the event that pollution does occur, this Department must be informed immediately. 		Mitigation and management measures have been recommended and described in the EMP to prevent water pollution and control stormwater.	
		<ol style="list-style-type: none"> 3. Solid waste must be properly managed and disposed of at an authorised solid waste site facility and must comply with relevant legislation. 		Solid waste will be disposed of at a licenced landfill site.	
		<ol style="list-style-type: none"> 4. All applicable sections of the National Water Act, 1998 (Act No. 36 of 1998) must be adhered to at all times. 		Noted and agreed.	

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9.	24 May 2017	The RoD has yet to be signed but the outcome was that no further studies are required for the above-mentioned development.	Andrew September – Heritage Western Cape	Note.	Adél Groenewald - DJEC