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05 August 2015

Our Ref: J27035
Your Ref: Email received 07 August 2011

Email: patmiller@telkomsa.net

Dear Dr Pat Miller

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

COMMENT BY HERMANUS BOTANICAL SOCIETY ON THE REVISED DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE ESKOM NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE (NUCLEAR-1) dated MARCH 2011 : Department of Environmental Affairs (DEA) Reference No.: 12/12/20/944

Comment 1:

The Hermanus Botanical Society (Botsoc) is registered as an Interested and Affected Party (I&AP) for this process. Botsoc expresses on record its grave concern regarding aspects of the above document, and wishes full consideration to be given to the following points:

1. Bantamsklip EMP:

It appears that there is no Environmental Management Plan (EMP) for the Bantamsklip site, as the EMP attached to the report refers to the Thuyspunt (sic) site. We assume therefore (no doubt with unwarranted optimism) that Bantamsklip will no longer be considered as an alternative site. If so, this would be good news indeed.

The Bantamsklip site is botanically rich and home to many endemic species, within an ecosystem that is peculiar to the site. It is a commonly held fallacy that one fynbos site is as good as another and that species are interchangeable in their situation. In fact, species are often specific and unique to a very small area and once destroyed in that area can never be replaced. It is also fallacious to think that restoration of fynbos after development is a feasible option. Very few fynbos species can be restored once their home ground has been disturbed. The intricate underground web of symbiotic relationships that take place in the soil is very poorly understood. What is clearly realised however is that once the soil has been disturbed, biodiversity in fynbos is impacted extremely severely.

Response 1:

Site specific Environmental Management Plans (Appendix F of the EIR) for Thyspunt and Duynefontein have been included in the EIR. Please note that in Chapter 5 of the RDEIR Version 2, it is indicated that Bantamsklip is no longer considered a feasible site for Nuclear-1. However, as mentioned in the various public forums, Bantamsklip will be considered as an alternative site for future nuclear power projects as part of the cabinet approved Integrated Resource Plan (IRP) 2010.

Comment 2:

The Groot Hagelkraal property is registered as a Private Nature Reserve (proclamation 983 /88) and would need to be deproclaimed should it still be under consideration. If this is ever proposed, there will be very vocal opposition to it. Undisturbed pristine sites such as this one, representing highly endangered coastal fynbos, are sadly becoming ever fewer. It should in fact be given far greater protection than it has at present. We owe it to our country's heritage to preserve all that remains of our Cape Floral Kingdom – it is unique and irreplaceable.

Response 2:

Your comment is noted. As per Chapter 5 of the RDEIR Version 2, it is indicated that Bantamsklip is no longer considered a feasible site for Nuclear-1. However, Bantamsklip will be considered as an alternative site for future nuclear power projects as part of the cabinet approved Integrated Resource Plan (IRP) 2010. Should development be authorised at Bantamsklip in the future, it is assumed that it would be located on the botanically least sensitive portion of the site, away from the botanically sensitive Limestone Fynbos.

Comment 3:

2. Tourism impact:

The superficial treatment given to the lifeblood of the Overberg – tourism focused around its natural beauty and unique ecology – would be laughable were it not so patently directed to “spinning” Eskom's aims. This area is economically dependent on tourism, and tourists visit it to experience its unspoilt scenic splendour, unique ecology and local character. We even have a small number of botanical tourists who come from all over the world to study (sometimes very specific) aspects of the fynbos. To suggest that this tourist profile could be replaced or supplemented by people drawn to the area because of the presence of the proposed power station/s reads like a Monty Python script.

Response 3:

Your perception of the Tourism Impact Assessment (Appendix E22 of the 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.

Comment 4:

Please note that the Overstrand Municipality acknowledges its role as a custodian of this area of internationally significant biodiversity (both land and sea-based) and focuses on the potential for eco-tourism as one of the key aspects of its Local Economic Development (LED) Strategy. One would expect your investigators to give credence to the assumption that local government is well placed to determine what is key in its area. However, the LED strategy is summarily dismissed in the report, which discards the growth potential of eco-tourism as insignificant.

Response 4:

Research for the Tourism Impact Assessment (Appendix E22 of the Revised Draft EIR) 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. It cannot acknowledge a document or strategy that did not formally exist at the time and it certainly does acknowledge eco-tourism. Indeed, it goes to some lengths to quantify it within the context of the study. 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 5:

It is possible that data on tourism in this area was either lacking or insufficient for your needs in assessing the extent of the impact of the proposed power station/s on tourism. However, because data is lacking on an issue does not mean that the issue itself does not exist. Botsoc is unaware of any serious attempt by you to investigate this issue with the professionalism it deserves. This is an extremely serious flaw in the report.

Response 5:

The data and occupancy rates were obtained from available tourism data, the relevant tourism bureaux and a public stakeholder meeting, and verified in tourism service provider and operator sampling. It is an international standard practice in tourism research to refer to and utilize the data gathered by tourism bureaux and offices. These data are unanimously recognised and employed by tourism industry authorities, academic and research institutions and government, and form a quantitative pillar of the Tourism Impact Assessment.

Comment 6:

3. Local socio-economic implications of the construction phase:

The Overstrand area has many socio-economic problems, many centred around housing and infrastructure. Scant attention, if any, has been given to the increased socio-economic impact of the presence of some 7000 construction workers and their families. It appears that the assumption is that they can be absorbed into the local residential areas and that local infrastructure will be able to accommodate their needs.

The presence of such large numbers of people in what is essentially a rural and small town environment will have a profound impact on many levels – social, economic and - not the least - environmental. Absorbing this influx into the local population will undoubtedly require an economic

development plan on its own if it is to run at all smoothly. Such a plan – with its associated funding implications - should have been part of the EIA. Its omission is a very serious flaw.

Associated with this is the issue of access to the Bantamsklip site itself during the period of construction. Vast quantities of equipment, some of which will be very heavy, will need to be delivered. This will necessitate the construction of adequate routes to do so, either by land or sea, which will obviously need to be done before construction can commence. An EIA would be required for this, which should logically form part of this process. Again, its omission constitutes a very serious flaw.

Response 6:

Your comment is noted. It is mentioned in Section 9 of the Revised Draft EIR that there would be a requirement for barging of material to Bantamsklip and that details of the landing site and facilities for barge operation were not available and therefore assessed in the Nuclear-1 EIA process. Should barging be seriously considered, the landing facilities would be required to undergo an EIA process in its own right. This is one of the significant factors that weigh against Bantamsklip being considered as a potential site for Nuclear-1.

Comment 7:

4. Transmission lines to Bantamsklip:

It would appear that Eskom has still as yet not identified a feasible transmission route from Bantamsklip to the feed-in point/s, and that the separate transmission line EIA process is well behind schedule. Until such time as this element shows progress, it is pointless to go much further in considering aspects of the power station EIA. The power station issues are of academic interest only until such time as a feasible transmission line route has been agreed. The lack of such a route is a serious flaw in the entire process.

Response 7:

Your comment is noted. As stated in Chapter 5 of the RDEIR Version 2, due to the fact that the EIA for the transmission lines for the Bantamsklip site was put on hold, the same level of assessment and comparison conducted for the Thyspunt and Duynefontein sites could not be done for Bantamsklip. As such (amongst other reasons) Bantamsklip is no longer considered feasible for Nuclear-1.

Comment 8:

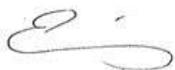
It should be noted that Botsoc's concerns noted above are also applicable to the transmission lines.

Careful consideration of the document leads to the conclusion that it contains a number of fatal flaws. This leads Botsoc to reiterate its position that the Bantamsklip site should be excluded from further consideration as a possible site for the proposed nuclear power station.

Response 8:

Your comment is noted.

Yours faithfully
for GIBB (Pty) Ltd



The Nuclear-1 EIA Team