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05 August 2015

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

Email: [hendry.eugene@gmail.com](mailto:hendry.eugene@gmail.com)

Dear Mr Eugene and Ms Louise Hendry

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

We attended your Gansbaai Public Participation meeting and submit the following comments.

**Comment 1:**

The faulty sound system you used meant that a lot that was said was not heard clearly causing confusion and frustration to some of the audience.

**Response 1:**

Your comments are noted and GIBB apologises for any confusion or frustration caused. All attendees of the meeting who signed the register and provided contact details were provided with a copy of the minutes for their comment. Draft and Final copies of the minutes of the meetings are also available on the GIBB and Eskom websites at <http://projects.gibb.co.za/> and [http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Nuclear\\_1\\_EIA\\_Documentation.aspx](http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/Pages/Nuclear_1_EIA_Documentation.aspx) respectively.

**Comment 2:**

We are concerned that the community at Buffeljags, who are your neighbours at Bantamsklip have apparently little or no knowledge of your processes.

**Response 2:**

As stated at the meeting GIBB is aware of the Buffelsjag community and has met with members of this community during the Bantamsklip Transmission Lines EIA public meetings. The community is considered within the Nuclear-1 EIA and as further stated at the meeting no recommendations to move any of the communities situated within the vicinity of any of the three sites.

Also, as part of the comprehensive Public Participation process undertaken in terms of the EIA process, the progress on the project, the availability of reports for public comment and review as well as the dates of public meetings have been advertised not only in local papers in the vicinity of the community but also regional and national newspapers. As such please see Appendix D1 of the Revised Draft EIR Version 1 for proof of advertisements sent during the last round of public participation and Chapter 7 of the same report for a full description of the public participation process throughout the history of the project. Bantamsklip is not the preferred site for the first nuclear power station. If under any circumstance it becomes the preferred site the local authorities and communities

would be further engaged during the planning phase of the project to ensure that any outstanding concerns are addressed. The community did attend this meeting and have an opportunity to raise any of the concerns they may have.

**Comment 3:**

The presentation on the latest Nuclear Power disaster was enlightening but a pity so few people stayed on afterwards to see it. The presenters spin on underplaying the severity of the disaster had it occurred here with different technology etc. was not convincing.

**Response 3:**

Your comments are noted. However it should be noted that the presentation was not to convince anyone but to put facts forward about what happened at Fukushima.

**Comment 4:**

The Fukushima nuclear disaster in Japan has left 20000 dead - 80000 people have been evacuated from a 20km exclusion zone. This exclusion zone has been extended in certain areas because of heightened radiation levels. Many livestock and pets were abandoned and have died from hunger. There is a no fishing ban within 30km of the affected area. The disaster is ongoing and the area will probably be lost to generations of Japanese people. Twenty five (25) years ago the Chernobyl Nuclear Power accident created a sterile 4500sq km exclusion zone. Is it not the Department of Environmental Affairs of our Government and the National Nuclear Regulator's duty to protect the Environment and the citizens of South Africa and their future generations, against the myriad of impacts and possible disasters created by granting Eskom a license for Nuclear 1?

**Response 4:**

Whilst the Fukushima Daiichi incident is without a doubt a highly undesirable event, as it could have led to loss of life, some perspective is also required on this event. The tsunami was responsible for the loss of approximately 20,000 lives, the evacuation of approximately 450,000 people and the complete destruction of several coastal towns. On the other hand, not a single death or serious injury due to the radiation release from the power station has been recorded to date. You are correct, it is the duty of the Department of Environmental Affairs, as a government department and Competent Authority in terms of the EIA, to evaluate and disseminate all information placed before it in terms of the provisions of the National Environmental Act and the principles of Integrated Environmental Assessment and Sustainable Development within the South African context. The National Nuclear Regulator on the other hand is the Competent Authority for ensuring that individuals, society and the environment are adequately protected against radiological hazards associated with the use of nuclear technology in South Africa.

**Comment 5:**

The Environmental impact studies have highlighted a host of impacts a Nuclear Power Station built on the coast will have on people and the environment, and the process you have adopted of mitigating factors which lessens the impact due to costs, less populated, convenient location, or weather factors etc. does not in fact lessen the impact that has been identified by your experts. The impact is real and the dangers therein will remain for generations to come e.g. storing used nuclear fuel rods on site.

The judges of the constitutional court must make this call for the benefit of our children.

We applaud Eskom for its Integrated Resource Plan, in including Renewables opportunities in South Africa and sourcing from outside our borders and viewing an African solution to the demand challenge, but leave Nuclear Power generation out of the equation! With proper negotiation and leadership and a

more flexible vision from Eskom this can be achieved. Carbon emissions can be capped at a cost less than the cost of a Nuclear Power Station.

We say that the DEA should not authorize the Thyspunt site for the Eskom Nuclear 1 Power Station and should rather consider the bigger picture of an African solution for the power generation for sub Saharan Africa.

**Response 5:**

Your comments are noted. The Environmental Impact Assessment process has never denied the existence or "realness" of impacts or their significance as the author implies. As such please refer to Chapter 9 of the Revised EIR Version 1 for a comprehensive list of impacts identified by the Nuclear-1 specialist team.

Mitigation measures included in the Draft EIR, Revised Draft EIR Version 1 and Draft Environmental Management Plan have been proposed by the Nuclear-1 specialist team, who based their recommendations upon their professional experience and scientific investigation of the proposed Thyspunt, Bantamsklip and Duynefontein sites.

Lastly please note that the Integrated Resource Plan is not an Eskom initiative. The recommendations made in the Integrated Resource Plan 2010 are strategic government decisions outside the ambit of the Nuclear-1 EIA process. Neither the Nuclear-1 EIA process nor any other EIA for a power generation project has any mandate to revisit the recommendations of the IRP 2010, whose recommendations have been adopted as government policy through acceptance by cabinet. Government thus has, through a consultative process, already taken a decision on the mix of generation technologies required to supply South Africa's future electricity needs for the next two decades. The conclusion of the IRP 2010 process is that 9,600 MW of nuclear generation must form a part of the mix of generation technologies. In terms of carbon emissions, please provide GIBB with a reference to your statement.

Yours faithfully  
for GIBB (Pty) Ltd

A handwritten signature in black ink, appearing to be a stylized 'S' or similar character.

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The Nuclear-1 EIA Team