

05 August 2015

Our Ref: J31314

Your Ref: Email received 19 August 2011

Cape West Coast Biosphere  
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Dear Ms Smart

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PO Box 3965  
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Web: [www.gibb.co.za](http://www.gibb.co.za)**RE: ESKOM EIA CONCERNS FOR THE PROPOSED NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE (DEA Ref. No: 12/12/20/944)****Comment 1:**

Thank you for providing us with the opportunity to comment on the revised EIA for the above proposed development.

The Cape West Coast Biosphere Reserve (CWCBR) extends from the Diep River in the south to the Berg River in the north and inland to Malmesbury and therefore the proposed development is located within the CWCBR. One of the primary aims of the CWCBR is to implement sustainable development principles along the West Coast, in addition to integrating rapid growth with biodiversity and heritage conservation. In this regard, the CWCBR would like to comment as follows:

The revised EIA indicates that the preferred location of the three alternative sites for the proposed nuclear power station is Thyspunt and that only one new power station will be built. The only location alternative located within or near to the CWCBR is the Duynfontein alternative; therefore this is the only site to which these comments refer. Should the proposal change to include the Duynfontein site, the CWCBR reserves the right to submit a revised comment.

**Response 1:**

Your comment is noted.

**Comment 2:**

The CWCBR acknowledges that the EIA is related to the development proposal; however the CWCBR has several issues with the current operations at Koeberg Power Station, particularly with regard to nuclear waste storage and disposal. The CWCBR requests that a meeting is set up with Eskom to discuss these current issues.

**Response 2:**

Thank you. Your comments are noted. It is acknowledged that the issues of radioactive waste management are important and integral to debate surrounding nuclear energy. The current global practice is long-term storage of the spent fuel at the nuclear power station. However please note that

a Radioactive Waste Management Institute has been legislated by the DoE and one of the functions of this institute will be to identify a repository for high level waste in South Africa.

In terms of your request for a meeting with Eskom to discuss current operations on site, you are invited to attend the Koeberg Public Safety Forums. These meetings normally take place four times per year. The Koeberg visitors centre is also open Mon-Thus from 07:30.- 16:30 and Fri : 07:30 – 13:00. The contact number is (021) 550-4667 during office hours....

**Comment 3:**

The Koeberg property is currently declared as a private nature reserve. There were proposals to deproclaim the private nature reserve (related to development proposals) which is not supported by the CWCBR. The CWCBR also proposes that the current status of private nature reserve be upgraded to contract nature reserve in accordance with the updated legislation (Protected Areas Act 57 of 2003). The site is located adjacent to the designated southern core of the CWCBR and forms part of one of the highest priority conservation corridors in the Western Cape. The Koeberg Nature Reserve is also a popular and important ecotourism and recreational facility for residents from the surrounding area. The CWCBR proposes that a contract nature reserve also be established at the site for the preferred location.

**Response 3:**

Your comments are noted. The Koeberg Power Station Nature Reserve was established and is managed in a responsible manner as a result of Eskom's due diligence and commitment to responsible environmental management and will be continued to be run in this manner in the future. However please keep in mind that when the site was originally purchased it took into consideration the possibility that additional units may be constructed and operated. The conservation activity on site would continue albeit less than 10% of the current area would be impacted. Your proposal in terms of upgrading the current nature reserve to a contract nature reserve is also noted and will be forwarded to Eskom for their consideration.

**Comment 4:**

The Cape West Coast Biosphere Reserve reserves the right to submit further comments

**Response 4:**

Your comment is noted.

Yours faithfully

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

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For GIBB (Pty) Ltd  
The Nuclear-1 EIA Team