

**PROPOSED ESKOM NUCLEAR POWER STATION
AND ASSOCIATED INFRASTRUCTURE**

ENVIRONMENTAL IMPACT ASSESSMENT (EIA: 12/12/20/944)

**COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT**

(Volume 18 RDEIR IRR 07 July 2011 – Humansdorp Minutes)

Issues have been received from the following stakeholders:

No	Name	Organisation
1	Sam van der Merwe	Interested and Affected Party
2	Clifton Booysen	Interested and Affected Party
3	Juline Prinsloo	Kouga Tourism Board
4	Chris Barrett	Thyspunt Alliance and St Francis Kromme Trust
5	Dr Yvette Abrahams	Commissioner for Gender Equality
6	Renan Stuurman	Humansdorp Community Leader
7	Dries du Preez	Interested and Affected Party
8	Frank Tamboer	Interested and Affected Party
9	Bruce Oliphants	Interested and Affected Party
10	Dries du Preez	Interested and Affected Party
11	Godfrey Africa	Interested and Affected Party
12	Eugene Goliath	Kouga Municipality
13	Unidentified I&AP	Interested and Affected Party
14	Chris Barrett	Thyspunt Alliance and St Francis Kromme Trust
15	Vernon Adams	Humansdorp Community Representative
16	Godfrey Africa	Interested and Affected Party
17	Chris Barrett	Thyspunt Alliance and St Francis Kromme Trust

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1		Sam van der Merwe Interested and Affected Party	<p>I am concerned that this study is bound to the properties already owned by Eskom. What about alternatives? We know that the present power demand is as a result of Coega. Is there no way we could look at suitable alternative sites comparable to Thyspunt, but closer to Coega? If you look at the area east of Coega, there is a large unutilised area. Very little would be affected if that site was used. Why can't that be used?</p> <p>You place emphasis on ecological effects on the limestone fynbos area. What about the coastal fynbos; it is also endangered? Don't underplay the importance of the word</p>	<p>The alternative sites were identified in the 1980-90s, through the Nuclear Site Investigation Programme (NSIP). Nuclear safety is of paramount importance, and there are not many coastal sites in South Africa that would be suitable for a nuclear power station. Five sites were identified by independent consultants from the University of Cape Town as being the most suitable sites investigated by the study and these formed the starting point of this EIA with respect to alternative sites. Regarding the Coega Industrial Development Zone (IDZ) as a candidate site, one of the challenges is that limited seismic monitoring has been done there. At the other candidate sites a detailed seismic monitoring has been carried out over several years. It would take at least five years to bring the Coega IDZ site up to the same level of detail as the three preferred sites are today. Other challenges include the fact that it is in an area of very deep sands. There is also a Coega fault, which has not been studied in-depth. Hence the recommendation has been made that for Nuclear-1, the Coega IDZ cannot be considered as an alternative site. It may well however be considered by Eskom in the future as a nuclear site.</p> <p>Also, this nuclear power station is not driven by the Coega IDZ, but rather because the lifespans of the existing coal-fired power stations in South Africa are coming to an end and also because of the increasing electricity demand (3% increase per annum) in the country.</p> <p>There is coastal fynbos at Thyspunt, and the botanical specialist did look at this. It is however not as localised as the limestone fynbos. The specialist has stated that the coastal fynbos occurs in many areas outside the site and</p>

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			<p>“could” when it says “it could be reduced” through the development.</p> <p>Regarding seismic activity, I understand that the presence of a geological contact zone caused you to plan your site in a specific area. Isn't that a warning that there is a seismic risk in the area?</p> <p>Regarding the marine ecology, many people depend on the sea as a food source. More studies may be needed to determine the exact effects on the sea currents.</p>	<p>hence the impacts on coastal fynbos would not be that significant. The Botanical Study forms Appendix E11 of the Revised Draft EIR revision 1.</p> <p>Contact zones are lines where two different rock types come together; it is not a fault. From a seismic point of view, they are not features that cause earthquakes, but from an engineering point of view, critical buildings like the reactors should not be placed across these contact zones. From an earthquake risk point of view Thyspunt is actually the best alternative site.</p> <p>Extensive modelling of the marine environmental has been done in the oceanographic study, which was based on number of years of monitoring. The impacts of ocean conditions have been modelled. This information has been included as Appendix E15 in the Revised Draft EIR revision 1. A further revised Marine Ecology Report is included in the Revised DEIR revision 2 and it also concludes that there will be minimal impact on the chokka squid industry.</p>
2		Clifton Booyesen Interested and Affected Party	I want to make a statement, not ask a question. I have visited the Koeberg Nuclear Powers Station. For me the issue is about development and sustainable job creation. The station should not go anywhere else; it must be here. We need the jobs.	Thank you, your comment is noted. However please keep in mind that the final decision regarding the Authorisation and the preferred site for the Nuclear-1 Power Station is the responsibility of the Competent Authority - the Department of Environmental Affairs
3		Juline Prinsloo Kouga Tourism Board	It was stated that it will take 9 years to build, and will create 7 700 jobs. Are these jobs going to be local jobs, and do the 7 700 jobs include technical jobs?	The 9000 jobs will be created at the peak of construction (i.e. year 6). This includes all jobs, including manual labour and technical jobs. GIBB's recommendation is that at least 25% of these jobs must be for locals. Eskom will have to do training for the local people like has been done at Medupi

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			<p>Can the existing infrastructure accommodate the expected influx of people?</p> <p>The expected 960 new vehicle trips through Humansdorp will require proper planning, and a proper route would have to be found to the R330. The four-way stop and the taxi rank will pose problems.</p> <p>Regards the Chokka industry and the heating the sea water, you have proposed</p>	<p>Power Station.</p> <p>The issue of the existing infrastructure is an important issue because there are already backlogs in infrastructure delivery. A key recommendation of the Environmental Impact Report (EIR) is that Eskom should agree with municipalities as to who will provide this infrastructure before construction starts.</p> <p>Your comments are noted. Similar concerns from the public around Humansdorp area have been raised and acknowledged regarding vehicles driving through and around Humansdorp. As such the Transport Specialist study was revised to consider other alternative routes. The revised report recommends that the main street through Humansdorp and Saffrey Street be bypassed. New transport roads for abnormal load vehicles were therefore considered and three alternate bypasses were investigated. The preferred alternative directly links between Voortrekker Road (MR389) and Park Street (MR381) and is 850m in length. The beginning of Alternative A crosses the Boskloof Valley and the rest of the route will be constructed on Municipality land.</p> <p>The alternative is considered as the most viable option as it is the shortest and most economical route to construct, and it has a good alignment for the transportation of abnormal loads. Once the route is constructed, it will also alleviate the traffic congestion in Humansdorp.</p> <p>Discharge of water into sea is a standard, common technology used all over the world. If one mixes the water</p>

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			<p>multiple release points but has the success of this been proven elsewhere?</p> <p>You want to build cut-off walls to protect the wetlands. You didn't elaborate on the type of materials that will be used, or how you would look at the environmental aspects of the site etc.</p> <p>Not much has been said about tourism impacts. We would like to have inputs in this.</p> <p>Regarding the heritage impacts, there wasn't much said about storage of the radioactive waste, how do you store it etc.</p>	<p>quickly, the temperature comes down quickly. Within a few hundred metres of the release point the water has returned to its original temperature.</p> <p>The cut-off wall would be a barrier 20 m deep to the bedrock. It would stop water from seeping into the site. The wall is normally made of clay slurry. It has been used before and the same technology was used at the Koeberg Nuclear Power Station in the 1970s.</p> <p>Mr David Scott the tourism specialist contacted Ms Juline Prinsloo on 15 June 2011 via phone. Concerns raised by Ms. Prinsloo is also addressed in IRR 15 will form part of the Revised Draft EIR Version 2. The document will be made available for public comment and review.</p> <p>Radioactive waste management practices envisaged for the Nuclear-1 Power Stations are consistent with the IAEA guidelines for a Radioactive Waste Management Programme for nuclear power stations, from generation to disposal. The High-level waste (spent fuel) unsuitable for disposal at Vaalputs will be stored safely on site until a suitable facility is available in South Africa. It firstly goes into wet storage within the plant for 20 - 30 years, and thereafter goes into dry containers, encased in concrete and stays on site.</p> <p>With the implementation of appropriate mitigation measures all potential impacts are expected to be of low significance.</p>

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4		Chris Barrett Thyspunt Alliance and St Francis Kromme Trust	<p>We have raised the issue of transport before. What you are envisaging at the moment, is one heavy-duty truck going down Saffrey street every 24 seconds, and also going down the R330 where there are kids crossing the road to school. This is excluding any existing traffic.</p> <p>This traffic issue must be looked at, because it affects the social and economic studies, and hence they must all be reviewed. I have heard it said that that no expenditure on the road between Humansdorp and St Francis would be required. This is nonsense.</p>	<p>Your comments are noted. Similar concerns from the public have been raised and acknowledged regarding vehicles driving through and around Humansdorp and Cape St. Francis. As such the Transport Specialist study was revised to consider other alternative routes. The revised report recommends that the main street through Humansdorp and Saffrey Street be bypassed. New transport roads for abnormal load vehicles were therefore considered and three alternate bypasses were investigated. The preferred alternative directly links between Voortrekker Road (MR389) and Park Street (MR381) and is 850m in length. The beginning of this alternative crosses the Boskloof Valley and the rest of the route will be constructed on Municipality land.</p> <p>The alternative is considered as the most viable option as it is the shortest and most economical route to construct, and it has a good alignment for the transportation of abnormal loads. Once the route is constructed, it will also alleviate the traffic congestion in Humansdorp.</p> <p>The revised Transport specialist study further acknowledges that the Thyspunt site requires significant transport infrastructure upgrades. The R330 is now proposed to be used for light vehicle traffic and abnormal load transport, and sections will require upgrading for this purpose. The Oyster Bay Road is now proposed to be upgraded to a surfaced road to be used during the construction and operations phases for staff access, light vehicle traffic, heavy vehicle traffic and as an emergency evacuation route for areas such as Oyster Bay. DR1762, which links the R330 and Oyster Bay Road is now proposed to be surfaced to provide improved east-west connectivity.</p>

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				<p>There will lastly also be an additional assessment done on the feasibility of an access route on the western side of the Thyspunt site. This assessment will include an integrated assessment on wetlands, invertebrates, ecology, and fauna.</p> <p>This information together with the revised Traffic and Transportation Report will appear in the Revised Draft EIR v2.</p>
5		Dr Yvette Abrahams Commissioner for Gender Equality	In Hankey we have had a similar issue regarding underpasses for pedestrians. Every underpass costs R70 million. If you redo the transportation report, every time that you add an underpass can you please add R70 million to the project cost, and explain who will pay for it? With regards to bulk services, who pays for those; the national tax payer, the municipal taxpayer or Eskom?	<p>Thank you, your comment is noted.</p> <p>Nuclear-1 site EIA has not been decided on yet. Such discussions with municipalities can only start after environmental approval</p>
6		Renan Stuurman Humansdorp Community Leader	Concerned that we are talking as a non-global player. We are talking as if there is no electricity crisis. We need to pre-empt the crisis. People's objections stem from a small town mentality. People are saying the power plant can be built anywhere but not here. People want to use their democratic rights to disadvantage others through their decisions. How many times will you come here before we build this plant? Energy is not a luxury; it is a need and will become even more so in future. Time is running out. What is the next step? We can't waste	<p>Thank you, your comment is noted.</p>

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			<p>anymore time. There are needy people here. We cannot tolerate objections as if we don't have a past. This is our chance for us to live close to Thyspunt, close to resources. Let the power plant come.</p>	
7		Dries du Preez Interested and Affected Party	<p>The economies of Humansdorp and Jeffrey's Bay are in serious trouble, and are in desperate need for something to change. We need a driver to get business going again. We need something to happen very soon. We know about the changes that came to Ellisras (Lepalali) with the announcement of the Medupi Power Station. We need that kind of announcement in this area. How are you going to protect the jobs for locals, and ensure they are not lost to the inflow of workers from outside?</p> <p>I have heard that engineers, possibly Aurecon, were appointed to look at a coastal road alignment linking Paradise Beach, St Francis, and Jeffrey's Bay. Is it happening and is it a separate study? My concern is that this region will not benefit</p>	<p>This has been raised from page 145 of the Social Impact Assessment (Appendix E17 of the Revised Draft EIR Version 1). There are a number of mitigation measures discussed such as the use of local labour, management of expectation and careful monitoring of various housing constructs. Unfortunately people cannot be stopped from moving around or into the area, but it has been recommended that locals must get preference. Eskom has experience in engaging with local bodies to ensure locals get preference.</p> <p>On previous projects Eskom has engaged with formal community representatives to determine who is local and who is not, to ensure locals do get preference. At Medupi Power Station Eskom agreed on a 70 km radius to identify locals, and transported people within that area. Eskom also had recruitment offices at areas removed from the site. One cannot stop impacts related to migration of people completely but there are ways to minimise it and ensure local employment.</p> <p>GIBB was aware of a coastal road proposal from Jeffrey's Bay to St Francis, but it's not part of the Nuclear-1 EIA.</p> <p>There have been various discussions about transport routes, but the coastal option was not part of this EIA. Once Eskom is at a stage where they know where the access points will</p>

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			<p>from Thyspunt if this road is not built. We need to look at more than just the Thyspunt power plant on its own, but development in the whole area. Need to make sure we get that coastal road.</p>	<p>be, they will start an EIA looking at building roads. At present Eskom is concentrating on determining road access coming from N2 directly down to site.</p> <p>There will also be an additional assessment done on the feasibility of an access route on the western side of the Thyspunt site. This assessment will commence towards the end of 2012 and will include an integrated assessment on wetlands, invertebrates, ecology, and fauna.</p>
8		Frank Tamboer Interested and Affected Party	<p>It is worrying that people who are also previously disadvantaged are opposing this proposal; but some people are also concerned that this development will give "darkies" the opportunity to live in the white areas, and whites are concerned about this. I am speaking for a collective of the community, not defending my own kingdom.</p>	<p>Thank you, your comment is noted.</p>
9		Bruce Oliphants Interested and Affected Party	<p>I want to commend people from Jeffrey's Bay in sharing the same view in terms of job opportunities and economic improvement. My view is that should the project go ahead, jobs will be created and the economy of Kouga will improve. This is in line with one of the five key focus areas of the African National Congress (ANC) in its manifesto. But I am concerned with the estimated percentage of the local labour force that will be employed, only 25%. This doesn't deal with the crisis of unemployment here at the moment. Is this figure cast in stone?</p>	<p>The recommendation of 25% local labour is a minimum but hopefully more than that would be achieved.</p> <p>25% is what Eskom would specify as a minimum in contracts. Sometimes it would be 50% and other times 10%, depending on the type of contract. However, there will be many other opportunities outside of the 7 700 created e.g. support services, food, and laundry etc.</p>

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			<p>Migration of people from other areas to Kouga is natural and we can't change it. The present population is about 100 000 and 7 700 jobs are to be created. In Cape Town, most people residing there are those who have moved there from the Eastern Cape looking for greener pastures. The same in Gauteng and many have gone there from the Eastern Cape. I recommend that Eskom urgently start compiling a database of local people here but should not cut off those who are migrating in.</p> <p>In past presentations it was shown that a high volume of vehicles will be using our roads. We agree that the present infrastructure is not sufficient and it is out of the question for vehicles to use the main road of Humansdorp or Saffrey Street. We are happy to hear that alternatives will be considered. Why don't you consider developing a road from the N2, an alternative road, which then joins into the road to Oyster Bay? Through this Eskom could create jobs through the construction of roads.</p> <p>I don't want to use this as a political platform, but earlier on a doctor made political statements which undermined a political organisation. We don't want to hear about the ANC or ANCYL which has</p>	<p>Any roads used by Eskom would have to be upgraded and Eskom would have to maintain the roads. The suggestion of a link between the N2 and the Oyster Bay road will be taken to the transportation specialist for consideration.</p>

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			nothing to do with the project. We are here to hear about Thyspunt.	
10		Dries du Preez Interested and Affected Party	The 7 700 jobs is only a small part of the improvements that would come to Thyspunt. If you consider the growth to supporting industries, it could probably create a further 10 000, 20 000 or 50 000 jobs.	Thank you, your comment is noted.
11		Godfrey Africa Interested and Affected Party	<p>What resource planning has Eskom done? It is a 9-year construction project, and we are a few years away from starting, so we should be able to identify enough young kids in grade 11 or 12 in the area that could be trained up to be engineers or artisans so that by the time the project starts, we have local technical skills available. This could increase the minimum of 25% to a better number.</p> <p>To what extent will Eskom be able to influence BBEE and local employment in the tenders? To what extent will you be able to ensure that the process doesn't end up with only friends of friends benefiting. What safety mechanisms are there to ensure this doesn't happen?</p>	<p>Not much resource planning has been done yet, but as soon as there is more certainty regarding the chosen site, Eskom will need to start doing that soon. In terms of identifying local young people for education, Jongi Dyabaza and representatives from Eskom Development Foundation, has been going to schools closest to the site. Eskom has not started considering bursaries yet but will be getting the training manager to start on this soon.</p> <p>Eskom has strong policies regarding local content. When Eskom started negotiating for nuclear units three years ago (which subsequently stopped because of the financial crisis), there were very strict clauses for local training, employment, etc. Eskom is presently driving this Thyspunt process, but it will eventually become a government lead process, and they will require local content. Dave West, who is here at this meeting, is from Eskom's Audit and Forensic Department and because of the significance of this project; the whole process is being audited by an external auditor. On every contract we require an external audit number to confirm it is</p>

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				<p>fair.</p> <p>Eskom's Chief Executive is very strict on this. He and a number of Eskom staff went on a business trip to China. When they were presented with expensive watches by their hosts as gifts, he cancelled the trip and brought everyone back.</p>
12		Eugene Goliath Kouga Municipality	<p>How is Eskom planning to develop local skills before the plant is developed? I am actually supporting the development, but will the Kouga people become the future gardeners and sweepers at the plant? What is Eskom doing to develop skills in this area's schools? Eskom is not presently developing skilled artisan here. All the people here leave to be trained in other areas. Eskom should build a training college here so that we have trained locals ready by 2013 or 2015 approximately. Of the 25% that will be local workers, at least 75-80% of those should be skilled workforce.</p> <p>When will your planning start? You said Jonghi went looking at schools this week. This won't help much. You need to look at building a school. Eskom should do an Oprah Winfrey on us in this area.</p> <p>Maybe look at building a school where extra lessons in Maths and Science can be given by those who are already doing it in this area, like Mr Sammy Jantjies.</p>	<p>Eskom is continuously investing in its people for training in all aspects of its operations. The locals are favourably considered for opportunities that Eskom presents.</p> <p>Mr. David Nicholls runs the engineering department of Eskom's nuclear group. The nuclear engineering manager at the Koeberg Nuclear Power Station is Mr Cedric Davis, a coloured man from Cape Town. The head of standards is a coloured man from Cape Town. In general, about 70% of Eskom's members of staff are PDI individuals. All of his senior managers are PDIs, one of whom was sent to the United States for three years to get a PhD. Eskom is very keen to develop people.</p> <p>Agreed. Regarding sustainability, this project will last for 80 - 90 years and it is unlikely that once established that Eskom will ever stop using it. This project will still be going when we are all gone.</p> <p>At Medupi, there was a long construction period and plenty of opportunity to train people, but what is more important is when operations start. When Eskom started construction they appointed people from the local community, all locals,</p>

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			<p>The top technicians in this area are not from this area, they came here for the jobs. We want someone from this area, working on the project. This project gets my vote. One of the municipal CFOs in the Western Cape comes from this area. You said you have some people from Cape Town, at Koeberg. Similarly we would like to have people from this area, for this project. Local sustainability and development is needed.</p>	<p>and they will be operating and maintaining the Medupi plant once operational. All are from the local community.</p>
13		Unidentified Interested and Affected Party	<p>I also support transformation and empowerment but we must remember that this is not a Kouga thing, it is a South African need. When we say local we mean local South Africa, not Zimbabwe, or Namibia etc.</p>	<p>Thank you, your comment is noted.</p>
14		Chris Barrett Thyspunt Alliance and St Francis Kromme Trust	<p>Education and the future of the country are paramount. How many hundreds of millions of Rands have you spent on land here, and how much are you planning to invest in developing people?</p> <p>I'll leave it as the question was asked and unanswered. I asked about local training figures, not national figures. I asked for the amount spent on land as well.</p>	<p>Nationally, Eskom has taken on board about 4 000 learners, and has issued many bursaries. Eskom will be putting in place enough resources in this area to support the local requirements of the power station, and they have been very committed to people development in recent years.</p> <p>Eskom owns most of the land around the site and negotiations with owners of adjacent properties are at an advanced stage for Land Acquisitions. As soon as the deals on the properties are concluded the transactions will be disclosed with the deeds offices.</p> <p>Eskom is continuously investing in its people for training in all aspects of its operations. The locals are favourably considered for opportunities that Eskom presents.</p>

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				<p>In terms of the 2010 Eskom Annual Report. In 2010, a total of 5 255 bursaries were in the Eskom pipeline, corporate social investment was R 58 million, and the amount spent on training was R758 million.</p>
15		<p>Vernon Adams Humansdorp Community Representative</p>	<p>Need to know if the same thing that happened in Japan will happen here. People are spreading rumours in the community that the same thing will happen.</p> <p>What do we want? If there is no job creation in RSA, it's a problem. The opportunities are here for jobs. Let us stop arguing, and grab the opportunity. We have done a great job, and I don't feel that we will have a Japan incident here.</p>	<p>The Japanese reactor accident happened for two reasons: the height of the plant above sea level and the height of the tsunami. The plant was basically flooded. The present plan is to build Thyspunt about 15 m or higher above sea level, which is higher than the Koeberg plant which is at 8 m. South Africa doesn't have tsunamis, but Eskom has modelled them for the power station. It should be noted that if the tsunami that hit Japan were to hit Koeberg, it would damage and maybe even destroy it, but it would not lead to a radioactive release. Koeberg was designed to a higher level of tsunami than the Japanese station. It is interesting that Japan is on the ring of fire, and still they designed to a lower standard than we did here in the 1970s. We have no fears over tsunami issues.</p>
16		<p>Godfrey Africa Interested and Affected Party</p>	<p>Has Eskom had records of accidents at the Koeberg Nuclear Power Station? Safety is vital. Is Eskom communicating these statistics to the public?</p>	<p>The Koeberg Nuclear Power Station has had no incidents that have shown any health effects on the public. Eskom does measure how much radiation is released from the station during normal operation and they publish this data in their Annual Reports. The international standard for exposure to the public is 1 000 micro Sieverts (μSv) per year. Eskom's maximum limit imposed by the NNR¹ is one quarter of that, 250 μSv. The level in Eskom's last annual report is about 5 μSv. The lowest point, at which measurable health effects can be seen is 100 000 μSv.</p>

¹ National Nuclear Regulator

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			<p>To what extent has Eskom engaged the councillors and local municipalities in terms of their Integrated Development Planning for this project? How ready is the municipality to embrace this project from that point of view? What communications have been had regarding the infrastructure needs?</p> <p>This is not a political project. It is about our country and community, and people should not come here to score political points.</p>	<p>Eskom does need to engage local authorities. This is only the first authorisation that Eskom needs, and Eskom doesn't have certainty yet that it would get the Thyspunt site. It is GIBB's recommendation that the DEA should consider authorising the Thyspunt site, but it is not certain yet. Eskom are therefore not in a position to start that communication and planning yet. They will commence once the site allocation is certain.</p> <p>Thank you, your comment is noted.</p>
17		Chris Barrett Thyspunt Alliance and St Francis Kromme Trust	We have heard that various studies will be redone including the transport study, which will probably impact on the economic and cultural studies also. I have heard there will be a period of public review, presumably 45 days after their release. Is that correct? Will this apply to at least transport, economic, cultural, heritage and marine/oceanographic reports, all of which are being looked at?	<p>The following reports have been revised and compiled and will be made available for public comment and review as part of the Revised Draft EIR Version 2:</p> <ul style="list-style-type: none"> • Marine Impact Assessment; • Transportation Specialist Report; • Heritage Impact Assessment; • Addendum to the Dune Geomorphology Report; • Emergency Response Report; • Geohydrology Report; and • Assessment of the Western Access Roads to the Thyspunt site. <p>The Economic Impacts Assessment is not being revised.</p> <p>All registered I&APs of any future developments in terms of the revision of specialist reports and associated review period.</p>

