

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

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

**COMMENTS ON  
DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT**

**(Volume 23 RDEIR IRR 12 July 2011 – St Francis Bay Minutes)**

**Issues have been received from the following stakeholders:**

<b>No</b>	<b>Name</b>	<b>Organisation</b>
1	Christopher Barratt	Thyspunt Alliance and St Francis Kromme Trust
2	Hylton Thorpe	Thyspunt Alliance and St Francis Residence Association
3	Christopher Barratt	Thyspunt Alliance and St Francis Kromme Trust
4	Christopher Barratt	Thyspunt Alliance and St Francis Kromme Trust
5	Trudi Malan	Thyspunt Alliance and Cape St Francis Civics Representative
6	Trudi Malan	Thyspunt Alliance and Cape St Francis Civics Representative
7	Greg Christy	SASMIA
8	Hylton Thorpe	Thyspunt Alliance and St Francis Residence Association
9	Mike Kantey	Coalition Against Nuclear Energy
10	Hylton Thorpe	Thyspunt Alliance and St Francis Residence Association
11	Mike Kantey	Coalition Against Nuclear Energy
12	Christopher Barratt	Thyspunt Alliance and St Francis Kromme Trust
13	Riaana Tolan	Greenpeace Africa
14	Mike Kantey	Coalition Against Nuclear Energy
15	Riaana Tolan	Greenpeace Africa
16	Andre Fouche	Interested and Affected Party
17	Randall Arnolds	Interested and Affected Party
18	Peter Bosman	Interested and Affected Party
19	Dr Yvette Abrahams	Commissioner for Gender Equality
20	Dr Yvette Abrahams	Commissioner for Gender Equality
21	Dr Yvette Abrahams	Commissioner for Gender Equality
22	Un-Identified	Interested and Affected Party
23	Mike Kantey	Coalition Against Nuclear Energy
24	Christopher Barratt	Thyspunt Alliance and St Francis Kromme Trust
25	Trudi Malan	Thyspunt Alliance and Cape St Francis Civics Representative
26	Dr Jansen	Interested and Affected Party
27	Donna	Interested and Affected Party

28	Hylton Thorpe	Thyspunt Alliance and St Francis Residence Association
29	Andrea von Holdt	Coega Development Corporation – Environmental Manager
30	Bridget Elton	Interested and Affected Party
31	Christopher Barratt	Thyspunt Alliance and St Francis Kromme Trust
32	Graham Wilman	Interested and Affected Party
33	Un-Identified	Interested and Affected Party
34	Ian McKnee	Interested and Affected Party
35	Mr Kuleku	Bet Live
36	Mike Kantey	Coalition Against Nuclear Energy
37	Lynn Andrews	Squid Industry
38	Helmie Tilders	Member of Foster and affiliated to Thyspunt Alliance
39	Bridget Elton	Interested and Affected Party
40	Hylton Thorpe	Thyspunt Alliance and St Francis Residence Association
41	Riaana Tolan	Greenpeace Africa
42	Pixie Anderson	Interested and Affected Party
43	Trudi Malan	Thyspunt Alliance and Cape St Francis Civics Representative
44	Basil Webber	Interested and Affected Party
45	Greg Christy	SASMIA
46	Dr Yvette Abrahams	Commissioner for Gender Equality
47	Christopher Barratt	Thyspunt Alliance and St Francis Kromme Trust
48	Rudolf McDonald	Interested and Affected Party
49	Trudi Malan	Thyspunt Alliance and Cape St Francis Civics Representative
50	Kobus Reichert	Heritage Representative for the Gamtkwa Khoisan Council
51	Charles Lead	Interested and Affected Party
52	John Hammond	Pub Owner
53	Hylton Thorpe	Thyspunt Alliance and St Francis Residence Association
54	Bridget Elton	Interested and Affected Party
55	Elwin Malgas	Interested and Affected Party
56	Leanne Swanepoel	Interested and Affected Party
57	Greg Christy	SASMIA
58	Mike Kantey	Coalition Against Nuclear Energy
59	Trudi Malan	Thyspunt Alliance and Cape St Francis Civics Representative
60	Rene Royal	Enviro Consultant
61	Christopher Barratt	Thyspunt Alliance and St Francis Kromme Trust
62	Hylton Thorpe	Thyspunt Alliance and St Francis Residence Association
63	Mike Kantey	Coalition Against Nuclear Energy
64	Andre Fouche	Interested and Affected Party
65	Greg Christy	SASMIA

66	Shaun Thyme	Interested and Affected Party
67	Trudi Malan	Thyspunt Alliance and Cape St Francis Civics Representative

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1		Chris Barrett Thyspunt Alliance and St. Francis Kromme Trust	I am not happy with the EIA process that has been conducted. There has been a lack of independence, which is a requirement of the NEMA (National Environmental Management Act). Items which have been put forward by I&APs have been ignored. The goal posts have changed over time. Every time we seem to have a different set of criteria that we are looking at. Items are added or subtracted. The whole process has changed. ACER Africa has been excluded. Why?	<p>Your comment is noted. GIBB believes that the EAP has been entirely independent, but due to the issues raised GIBB has written to the DEA regarding the matter. The first letter was submitted to the DEA on 20 June 2011, failing to receive a response a second letter was submitted on 29 November 2011. GIBB also met with the Chief Directorate of the DEA on 15 August 2012 to further discuss the matter.</p> <p>Please note that this EIA is the first EIA for a nuclear power station of this scale in South Africa and as such this EIA is constantly evolving to improve decision making and transparency throughout the process.</p> <p>It is assumed that when you are referring to 'a different set of criteria', that you are referring to the impact assessment methodology/ criteria followed. Subsequent to the RDEIR version 1 being available for public comment, the DEA requested the EAP to review the impact assessment methodology used in the Revised Draft Environmental Impact Report (Version 1), so as to simplify the criteria for assessment of significance and identification of a preferred site. In response, an approach has been developed that identifies and describes key decision-making issues contained in the individual specialist studies. These decision-making issues apply to both the acceptability of the proposed Nuclear Power Station as well as to the preferred site.</p> <p>One of the reasons that GIBB has taken over the public meeting phase of the public participation process is to ensure that minutes of the public meetings are completed timeously. GIBB endeavoured to get the minutes out as</p>

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			<p>We were only given two hours at the meeting in St Francis on 12 July 2011 to make comment on a document which is thousands of pages long. This equates to only about 15 seconds of comment time per person here tonight.</p> <p>We feel excluded. For example we asked for an extension in time. Why were other parties told three weeks ago that the extension has been granted, but not us? Surely all I&amp;APs should be told that right away?</p> <p>There have been errors and omissions in all the documents given us. For example, St. Francis Bay was first shown as ~30 km from</p>	<p>soon as possible after the various meetings. GIBB also used alternative minute-takers for each meeting to ensure that the minutes were compiled quickly.</p> <p>Your comment is noted.</p> <p>All I&amp;APs that had lodged comments in writing with the PPP Office requesting an extension of the Comment Period, had indeed been notified of the extension. The extension was also announced at all the public meetings up to the meeting at St Francis on 12 July 2011. The previously set comment period concluded on 23 June 2011. Before that date all registered I&amp;APs received written notification of the extension of the comment period.</p> <p>The announcement of the extension was made only one week prior at the Gansbaai Public Meeting (which was held on 04 July 2011). All registered I&amp;APs with email addresses received email notification of the extension to the Comment Period on 10 June 2011. Those with only postal addresses were sent letters notifying them of the extension, which were dispatched on 11 June and 13 June from the Central Post Office, Cape Town.</p> <p>There is one reference to Danger Point on page 83 of the Visual Impact Assessment, with reference to the impact of lighting at the power station of existing lighthouses. Seal</p>

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			<p>the site. In the second round it was shown as 16 km away instead of 10 km, which is now shown. The current report comments on the dangers of light emissions from Thyspunt on the Danger Point Lighthouse, which is approximately 700 km.</p> <p>There has been a lack of transparency. Minutes have to be queried every time. Regarding of the process by which the different sites were rated, it took a legal letter sighting PAIA (the Promotion of Access to Information Act) to get this information from the consultants. Surely this info should be in the public domain? We heard tonight that this rating was done from a qualitative point of view. We query that and believe that it is totally subjective. We have requested focus group meetings with specialists but this has been denied.</p> <p>We believe that the whole process lacks credibility, and are not the only ones who say that; Eskom asked for a peer review. A quote from this peer review document: "Despite the apparent exaggeration of the impact significance and issues described earlier with respect to baseline assessment, it seems clear that of the three sites, Thyspunt is relatively the most sensitive". Furthermore, under Recommendations it states: "Strengthen the significant rating</p>	<p>Point is incorrectly referred to as "Danger Point".</p> <p>GIBB has responded to the DEA on the issue regarding GIBB's independence. The letter of response from GIBB to the DEA is included in the Revised Draft Environmental Impact Report Version 1.</p>

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			<p>criteria and ensure it is consistent with the principles that should apply as detailed in the review.” This has not been done.</p> <p>As far back as June last year, the DEA wrote to the EAP (Environmental Assessment Practitioner) and stated “It is clear that Thyspunt is the most sensitive and therefore it does not make sense that Thyspunt is recommended as the preferred site”. Based on the above analysis we have reason to believe that your independence may have been compromised”. We believe it has been compromised throughout the process.</p>	
2		Hylton Thorpe Thyspunt Alliance and St. Francis Bay Residents Association	Regarding notification of the extended response period, why could a bulk email not have been sent to all I&APs so as to ensure they were all notified at the same time of the extension?	At the time, approximately 60% of those individuals registered on the I&AP database used post as their primary means of communication with the EIA Team. Only the remaining 40% of I&APs used emails. GIBB hope to obtained the email addresses of additional and existing registered I&APs during the course of the public meetings held in 2011 .All registered I&APs with email addresses received email notification of the extension to the Comment Period on 10 June 2011. Those with only postal addresses were sent letters notifying them of the extension, which were dispatched on 11 June and 13 June from the Central Post Office, Cape Town.
3		Chris Barrett Thyspunt Alliance and St. Francis	One of the reasons for the delay in minutes is because it goes to Eskom for comment before it is published, which is	The minutes are supposed go to all stakeholders, including Eskom for comment. As is typical of all EIAs, the Applicant does get to review all documentation before it goes out to

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		Kromme Trust	<p>unacceptable.</p> <p>The chairperson of the meeting in St Francis Bay on 12 July 2011 said that he was prepared to keep the meeting running the whole evening. We have experienced these meetings in the past being cut by the EAP and have been asked to go home, and were told that they would schedule another meeting, which never happens.</p>	<p>the public. Eskom reviews the minutes before they are sent out to I&amp;APs and then all registered attendees of the meeting have an opportunity to do so.</p> <p>Your comment is noted.</p>
4		Chris Barrett Thyspunt Alliance & St. Francis Kromme Trust	We now know why we get biased minutes.	Comment noted. Gibb denies that the minutes are biased. You are requested to point out cases where you believe there is bias. Gibb will review this against the recordings taken during the meeting.
5		Trudi Malan Thyspunt Alliance and Cape St. Francis Civics Representative	<p>Would like to have transcribed minutes of the meeting held in St Francis Bay on 12 July 2011 i.e. a verbatim record of the meeting. What happens presently is that post-meeting comments are added to the minutes and we do not get the opportunity to respond to the post meeting comments.</p> <p>Regarding the Revised Draft EIR, I was hoping the specialist studies would speak to each other, but it is still not the case. The</p>	<p>This is not true as I&amp;APs are given 14 days to comment on minutes, including the post-meeting notes. GIBB noted the request for verbatim minutes, but after much consideration decided that in the interest of readability, they would not be issued verbatim. All the points made at the various meetings have been captured in the minutes and all registered attendees of the meetings were given an opportunity to verify this. GIBB feels it is necessary to add post meeting notes because all the documentation is not necessarily available during the meetings, but I&amp;APs still had the chance to comment on those notes.</p> <p>Should any inconsistencies exist between the specialist studies, please be assured that this will be corrected..</p>

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			<p>distances still differ in all the specialist studies.</p> <p>In Chapter 6, the Project Description, and this speaks to Eskom, point 3.8.7 states; "Eskom has completed investigations into housing at all three sites. They have spoken to the various municipalities and current development around Humansdorp and Jefferies bay would accommodate all these housing needs and no further EIAs would be required." I have contacted Environmental Affairs in the Eastern Cape and they disagree. We have been given the assurance throughout this process that once they have decided where they want to build the staff village, there will be an EIA done. This will impact on us as rate payers; our municipality is overburdened from a sewerage, waste management and water perspective. Every house that gets allocated to an Eskom staff village is one house less house for a person in our community; someone who has been living here for years without housing. I've asked before at meetings for Eskom to indicate where these planned areas are that have been discussed with the local authorities. Neither Eskom nor the local authority will tell us what is going on.</p>	<p>Eskom has responded to this previously. Eskom has engaged with municipalities' at all three alternative sites to understand what the accommodation options would be. Studies on these areas have not yet been completed. In Bantamsklip area it is clear that a new area would need to be rezoned for housing. Duynefontein has residential areas available which could be used and hence we would not need to rezone or do an EIA there. At Thyspunt there is the possibility that Eskom could build on an area already zoned for residential. Eskom would want to establish the construction village in the Humansdorp area, while permanent staff may establish themselves in the Jeffrey's Bay area in existing established areas. The construction village is the most significant area, and we anticipate this will be in the Humansdorp area. If it was in an area not zoned residential, then it would need an EIA. If the site was in an area already zoned residential, it would not need an additional EIA.</p>

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			<p>In Chapter 6, the Project Description, it states that “no detailed design is yet available for the intake and outlet tunnels”. Unless a detailed design forms part of this EIR, no environmental department would be able to issue a record of decision because we don’t know where the tunnels will be or what they will look like. None of us have had opportunity to comment on the appended Eskom 2011 tunnel feasibility report. I’m concerned that the specialists would have made comments on tunnels, not knowing what they will look like.</p> <p>In the Coastal Engineering Investigation, done as part of the site safety report for the NNR, reference is made to the Agulhas slump saying “a quantitative assessment of the risks of occurrence and the geometry of future slump events along the SA coast is not available at present and should be studied”. When will this study be completed, because this is important in the case of Thyspunt? It has to do with tsunamis because Thyspunt is rated the highest of all the sites in terms of tsunami impacts. I would also like to know when all the recommendations that are made in the Coastal Engineering Investigation are going to be implemented because unless they are done, this EIA is not a complete document. Page 11 of this study says “the impact</p>	<p>There is a set of criteria in the EIR called the “consistent data set” and it can be found as Appendix C to the revised Draft EIR Version 1. It indicates the various parameters of the conceptual design e.g. the inlet and outlet pipes, number of the pipes, diameter of the pipes, depth at which they would be buried, the distance they would run out to sea, etc. GIBB’s approach has also been to allow the specialist to make recommendations as to the acceptable limits of how these infrastructure items should be designed, and which designs they would prefer. The specialists have done that in their various reports.</p> <p>All the engineering feasibility studies on which the EIR is based have been made available to I&amp;APs. The recommended mitigation measures from the specialists are captured in the EMP and will be done during the detailed design phase. . Flooding from the sea is addressed in the “1-100 years flood line” specialists report.</p> <p>The Coastal Engineering Investigations are appendices to the Oceanographic Assessment (Appendix E16 of the Revised Draft EIR Version 1).</p>

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			<p>structure details are not yet defined. No coastal structures have been superimposed and considered in the calculations. The results will be subject to review once the design of the intake and terrace has advanced and the coastal structure can be incorporated in the assessment.” Until these studies have been completed, the EIA is not a complete document and no department can issue a record of decision when we don’t even know what it looks like.</p> <p>This study is in the EIA. It is called the Coastal Engineering Investigations.</p>	
6		Trudi Malan Thyspunt Alliance and Cape St. Francis Civics Representative	<p>I want to respond to Deidre’s comment that Eskom has not yet completed the studies into the location of the housing village by quoting from the report: “Eskom has completed investigations and no EIA will be required”. Where exactly in Humansdorp is this residential zoned area that you have chatted to the municipality about? Where is the exact location of the staff village?</p> <p>I have spoken to Mr Greeff regarding this issue of the staff village and he said he knows nothing about it and doesn’t deal with it. He told me to speak to Deidre Herbst. I have asked you this questions three times and you keep referring to areas</p>	<p>The location for a construction village has not been selected as yet.</p> <p>The report you are referring to is not Eskom’s report; it is the independent social specialist’s report (Appendix E18). Eskom has had discussions with the municipalities but have not concluded that the village would be at a specific location. If one refers to the Issues and Response Report (IRR), in the response section, one will find that the same response has been given. There has been no decision taken on this but Eskom hopes to find an area already zoned as residential.</p> <p>The EIR makes the statement that Eskom has completed an “initial investigation”. The word “initial” was left out from the statement by Ms Malan regarding this issue. Towards the end of the section it says “it is highly unlikely that an EIA</p>

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			around Humansdorp. Why then in your report do you say that Eskom has completed an investigation into housing?	would be done because it is already zoned residential". So the report does not say EIAs are not necessary.
7		Greg Christy SASMIA (South African Squid Management Industrial Association)	<p>Regarding the Marine Ecology Report, I am shocked that it was not included in the list of key factors for the rating of the alternative different sites. This is despite there being approximately 6.37 million m<sup>3</sup> of sand that will be pumped out to the ocean, wherever it may be; 2km out, or 5km out to sea. That is approximately 500,000 - 750,000 trucks of sand to be dumped in the ocean. SASMIA is still of the opinion that the Marine Ecology Report is inadequate and flawed. The Economic Report, which is based on the Marine Ecology Report, is therefore also flawed. How it will affect our industry is not adequately explained. Effects on our industry have been downplayed to a mere 1%. This assumption is also flawed. GIBB has agreed to a focus meeting in Cape Town between squid experts and the marine specialist who wrote this report. The main concerns are the dumping of the spoil, the discharge of warm water and brine, and also chemicals released (cooling waters and the desalinated water are full of chemicals). Releases of chemicals have not been specified in the report.</p> <p>I am also concerned that the Marine Living</p>	<p>A joint decision taken by GIBB and all the EIA specialists (including the marine specialist) concluded that the marine impacts would not be considered as one of the key decision factors in the choice of the preferred site because the impacts could be effectively mitigated. The warm water could be released at a point where it would not have an impact on squid. If it is released above the sea floor, from multiple release points, at a high flow rate in order to quickly diffuse the heated water. With regards the spoil, the potential squid impacts form a key consideration in the marine specialist's assessment of Thyspunt, particularly the depths and distance from shore where the squid spawns. This is why a deep disposal option approx. 5km offshore has been recommended.</p> <p>The Marine Living Resources Act of 1998 is indeed listed in</p>

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			Resources Act of 1998 has not been mentioned at all. This is important legislation and is not alluded to at all.	Section 6 of the Revised Draft EIR Version 1(on page 6-46).
8		Hylton Thorpe Thyspunt Alliance and St. Francis Bay Residents Association	<p>The entire EIA is based on the premise that Eskom will be using Generation III technology, which is claimed to be state of the art technology in the nuclear industry with a number of improvements on Generation II. Eskom maintains that this justifies a reduction in the emergency planning zones, from 5 km and 16 km, the accepted international criteria, to 800 m and 3 km. This is in terms of what they call the EURs (European Utility Requirements). The EURs were drawn up by approximately 8 – 12 nuclear industry members in Europe. They are good, but that is the basis on which Eskom is planning to set up these power stations. About two years ago the South African government said that Generation III technology is not affordable. My questions from this are:</p> <p>What is the present position regarding Generation III? Is government</p>	<p>A vendor has not yet been chosen and therefore the actual design has not been chosen.</p> <p>Neither GIBB nor Eskom can speak on behalf of the Government.</p>

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			<p>reconsidering its position, and have they identified a technology and a vendor?</p> <p>What is the government's attitude to Generation III?</p> <p>What is the motivation for reducing the emergency planning zones?</p> <p>In Chapter 3, Project Description, reference is made to minimising the issue of the control of urban developments that will potentially threaten the viability of nuclear sites, and the NNR has admitted that they are considering reducing these emergency zones because it interferes with urban development. In other words, they are saying that urban development is more important than the safety of persons or property.</p> <p>If a Generation III plant is built is there any conceivable event in which there would be a</p>	<p>The obvious answer to that is to reduce the amount of emergency planning actions that might have to be taken. The EUR requirements say, for example, that you must design a plant such that you would never have to evacuate people outside of the 800 m zone. So it is intended for that purpose.</p> <p><u>ADDITIONAL COMMENTS FROM INDEPENDENT NUCLEAR SPECIALIST</u></p> <p>As stated this would then be one of the design criteria for any proposed new technology to be deployed in future</p> <p>These issues will be dealt with by the NNR, but EURs require that the design should be such that you wouldn't have any type of accident that would need you to evacuate people beyond the 3 km zone, but you might have to undertake other emergency actions. As has been communicated in all meetings and documents, the NNR will decide what emergency planning action would be required.</p> <p>The EUR requirements are recognised by Western</p>

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			<p>need to evacuate people outside the 3km zone? Is this a scientific position or a marketing position?</p> <p>Are the proposed reduced emergency planning zones for Generation III in terms of the EUR recognised by the International Atomic Energy Agency or by the United States Nuclear Regulator or by any other regulator?</p> <p>St. Francis Kromme Trust raised questions about these emergency zones, and received a written answer from Jaana Ball to the effect that “because South Africa does not have specific regulations for the selection of sites, we follow the requirements of the United States Nuclear Regulatory Commission.” Their requirements are still 10 miles and 50 miles i.e. 16 km and 80 km zones, which go beyond Jeffrey’s Bay. There are contradictions here. The EIA is based on the assumption of the EUR requirements, while we have a written statement that we are following the American requirements. American requirements do not allow for 3 km zones.</p>	<p>European Nuclear Regulators Association who themselves have issued requirements, but they don’t specify an emergency zone size, but they specify the same sort of requirements as the EUR. The IAEA won’t specify a precise size for the emergency zones, because that is up to the national authority of each country to decide. There cannot be a generic requirement; one would need to look at each site on its own merits.</p> <p>Eskom disagrees with the statement. American requirements will allow for what is appropriate for the particular design of power station, and particular position of the power station. They do not have blanket rules, but review it on a case by case basis. They license each plant individually, like is done in South Africa.</p> <p>The United States Nuclear Regulatory Commission Regulations, in accordance with which the Seismic Assessment (Appendix E4 of the Revised Draft EIR Version 1) has been conducted, requires geological and geophysical investigations of increasing resolution in concentric regulatory radii of 320 km, 40 km and 8 km around each proposed site. These distances do not refer to emergency planning zones, but to the radius of the study area for assessing seismic risks. The answer provided by GIBB, referred to by Ms Malan, referred to the radii of the seismic study area, not to the size of the emergency planning zones.</p>

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10		Hylton Thorpe Thyspunt Alliance and St. Francis Bay Residents Association	What would implications be for the EIA if Government decided to apply for a technology which did not conform to Generation III specifications?	If the power station fell outside the enveloping criteria that have been specified in this EIA, then any authorisation received would not be valid. Either a new EIA or revision to this EIA would be required.
11		Mike Kantey Coalition Against Nuclear Energy	<p>Regarding human health impacts, the EIA hasn't really assessed the impact on human beings. What is fascinating about the Fukushima incident is the level of exposure of human beings to radioactive isotopes, particularly the long lived isotopes such as Caesium 137, a particularly "nasty" isotope.</p> <p>Impacts on human health starts with airborne emissions, and liquid effluents released during normal operations. Mr Kantey indicated that he has in his possession 30 years worth of emissions data for Koeberg.</p> <p>The reason we talk about Caesium 137 and Strontium 90 is because they are the two most common by-products of the process and the most long lived (Strontium 90 half life is 28 years, and Caesium 137 has half life of 30 years). This is the problem with Chernobyl, and will be the problem at Fukushima. The problem is not from background radiation but from that which gets into the human body through inhalation and ingestion. Once it gets inside there are problems e.g. Strontium 90 is a bone</p>	<p>There have been 28 different specialist studies, of which a number assessed the social issues, economic issues, and bio-physical issues, so it is not correct to say that the full suite of environmental impacts have not been addressed. With reference to the tourism impacts; the EIA has specifically looked at the tourism bed night impacts at all three of the sites. The tourism impact has been quantified and this has fed through to the economic impact assessment. A Human Health Risk Assessment has also been conducted (Appendix E24 of the Revised Draft EIR Version 1).</p> <p>It must furthermore be kept in mind that there is a cooperative governance agreement between the DEA and the NNR, and in terms of this, the NNR will be the decision-making authority on all aspects relating to nuclear safety and health. The DEA will not make a decision on these facets of the study.</p> <p>Chapter 1 of the EIA states that whilst "Site Safety Reports" prepared as part of the authorisation process for nuclear licensing have been included as appendices in this draft EIA Report (Appendices E24, E26 and E27), radiological issues will not be assessed in detail[7] in the Draft EIR and the DEA</p>

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			<p>seeker and can cause lymphoma and leukaemia, particularly in children, and Caesium 137 has impacts on soft tissues causing ovarian, breast and pancreatic cancers. These toxic compounds will lie around for decades. In the case of the dairy industry, a study in Long Island showed high levels of Strontium in baby teeth. Studies worldwide have shown routine nuclear power plant operations to have negative impacts on human health. We don't have the cancer studies for Koeberg; these have not been forthcoming. The WHO has been held hostage by the International Atomic Agency, and so we are not expecting to get credible results from investigations and hence we are left with our own devices.</p> <p>The issue also extends further into the economic impacts, including impacts on chokka industry, fruit growers, dairy industry, and the eco-tourism industry, which is the greatest asset of this place and the garden route in general. Many people have invested into B&amp;Bs, guesthouses, the Billabong, and it forms a substantive portion of the economics of the Kouga Municipality. Surely the jobs and bed nights could be counted and one could come up with some figures and juxtapose those against the proposal for the power plant. One wonders</p>	<p>will not consider radiological impacts in decision-making.</p> <p><i>Footnote [7] The Emergency Response (Appendix E26) and Site Access Control Report (Appendix E27) and Human Health Risk Assessment (Appendix E24), which have been prepared on a high level,, are appended to this EIR for information only. Further details on these reports will be prepared as part of the NNR nuclear licensing process, as their findings will be evaluated by the NNR."</i></p> <p>The exclusion of the detailed assessment of nuclear safety aspects from the EIA is thus in keeping with South African legislation. The NNR licensing process, during which nuclear safety aspects will be considered in detail, also provides for public hearings where issues of this detail can be raised.</p> <p>The project cannot go ahead without all the relevant authorisations.</p> <p><u>ADDITIONAL COMMENTS FROM INDEPENDENT NUCLEAR SPECIALIST</u></p> <p>As stated the overall authorisation and licensing processes are conducted independently and therefore deal with different specific aspects and details at different times and through different methodologies processes and regulations subject of course to any co-operative arrangements between the respective authorising bodies.</p>

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			<p>what the outcome of that would be.</p> <p>People have a right to choose where they want to live, this is enshrined in the constitution, and therefore the opposition to his power station actually starts tonight. Want to pay tribute to Trudi Malan, Hylton and Chris and others of the Thyspunt Alliance. And to the Supertubes Foundation in Jeffrey's bay, but you people here need to get behind your colleagues, you can't leave it to them. You need a united opposition and us as the Coalition will support you, not only politically but also in terms of your legal challenge. We are contemplating a class action.</p>	
12		Chris Barrett Thyspunt Alliance and St. Francis Kromme Trust	Regarding the last comment about the NNR and the agreement, we have asked the EAP for copies of correspondence between Eskom and the NRR. We have been waiting for 15 months. This would provide greater insight into this issue.	<p>GIBB has no copies of correspondence between Eskom and the NNR. Such a request would have to be referred to Eskom itself. A formal licence application to the NNR has not as yet been made. The licensing process cannot start until the supplier has been selected through the procurement process. You are advised to make an application in terms of the Public Access to Information Act making specific reference to the communication you are referring to.</p> <p><u>ADDITIONAL COMMENTS FROM INDEPENDENT NUCLEAR SPECIALIST</u></p> <p>As stated the process of granting a nuclear licence is totally independent of this process and this process does not require the commencement of such a process which would</p>

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				<p>be conducted independently. At the time of lodging of any licence application such application is required to be publicised.</p>
13		<p>Riaana Tolan                      Greenpeace Africa</p>	<p>Have just been to the Fukushima area. Interested in the 3km emergency zones planned for Nuclear 1, considering that I was measuring the impacts of radiation at Fukushima up to 60km from the nuclear power plant. Radioactive impacts from nuclear incidents are not limited to 3km.</p> <p>Regarding waste, the waste management practice will depend on the reactor type and the fuel used. Table 5.4 of the EIR gives key features of the Nuclear 1 station, and the nuclear fuel. Are these numbers maximum numbers of specific numbers? If they are specific numbers, this then limits the number of reactor types that could be considered.</p> <p>The specification talks about enrichment, but doesn't mention other options. Does this mean that Mixed Oxide fuel will not be allowed in the reactor? Mixed Oxide fuel is a mixture between uranium and plutonium fuel, and is associated with increased safety risks.</p> <p>It was identified that high risk waste will be kept on site, up to 10 years after</p>	<p>The figures in Table 5.4 are the maximum figures. GIBB worked on a set of criteria, and considered the worst case scenario of the many different types of nuclear plants that could be considered.</p> <p>The actual design of the reactor has not yet been decided, so Eskom cannot comment on the use of MOX fuel at this stage. At this stage, the use of MOX is not envisaged. MOX fuel is not used at the Koeberg Nuclear Power Station, but Eskom cannot comment on what might happen in 20 – 30 years' time.</p> <p>It is not accurate to state that the nuclear industry has not found solutions for long term storage. Either it is processed</p>

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			<p>decommissioning i.e. up to 70 years from commissioning. How do we know that there will be a solution for the storage of the waste after 70 years? The nuclear industry has been looking for a solution for 60 years already without any progress.</p> <p>How will the safety of the spent fuel on site be guaranteed? One of the main problems at Fukushima is the spent nuclear fuel storage pond which needs to be cooled.</p>	<p>and disposed of, or disposed of. Finland is currently building their final depository after all their testing and research. Sweden is also about to start building theirs. USA has operated a waste isolation pilot plant since 1999, and has over 11 years of experience in doing this.</p> <p>In South Africa the Vaalputs Waste Site is currently licensed for only low and intermediate level nuclear waste but would be one of the sites/areas considered for high level waste disposal. The South African Government has initiated legislation and processes to address this issue. There is no reason why a solution would not be found.</p> <p><u>ADDITIONAL COMMENTS FROM INDEPENDENT NUCLEAR SPECIALIST</u></p> <p>The proposed arrangements are in line with international best practice. Liquid and gaseous effluents will be controlled within defined and regulated limits as per license conditions and as assessed through the plant safety case. The arrangements for solid waste management are also in accordance with international best practice. i.e. either storage and disposal at Vaalputs for low and intermediate wastes or on site wet or dry storage for spent fuel pending provision of a centralised or dispersed long term storage facility are all in accordance with internationally accepted practices. It must be understood that the social discourse on radioactive waste disposal has become largely a socio-political one rather than a rigorous debate on the technical merits of particular options</p>

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14		Mike Kantey Coalition Against Nuclear Energy	Regarding this talk about the reactor type not having been chosen yet, the evidence is compelling for the Areva EPR. For example it is mentioned by name in the IRP 2010. They also talk about 9 1600 MW. If dividing that by 6, the only possible reactor technology that could meet that specification is the Areva EPR. One gets the impression that the decision to build EPR has already been taken.	Comment noted. Eskom confirms that no technology has been chosen. In the IRP the DOE may have chosen to use the EPR as reference or for modelling purposes.
15		Riaana Tolan Greenpeace Africa	Eskom says reprocessing of waste is an option but the EIR says it not option because it is too expensive.	<p>Page 31 of Chapter 3 of the Revised Draft EIR Version 1 states the following:                      “Two options for the long-term management of spent fuel are pursued internationally:                      (a) direct final storage of the spent fuel in a deep underground geological storage facility (referred to as Geological Disposal);                      (b) reprocessing of the spent fuel to extract unused uranium and plutonium for re-use and concentration and storage of the residual (about 3 – 4 % of the spent fuel) high level waste in a deep underground geological storage facility.                      In South Africa, where there are currently no facilities for the reprocessing of fuel or for geological storage, all the HLW will remain in the fuel facility inside the plant (as is the case at Koeberg)”.</p> <p>The Executive Summary of the Waste Assessment (Appendix E 29 of the Revised Draft EIR) states the following: “While reprocessing of spent fuel is not excluded as an option for spent fuel management, there is no intention to reprocess the Nuclear-1 Nuclear Power Station spent fuel at present. The main reason being the very high cost</p>

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				associated with spent fuel reprocessing.”
16		Andre Fouche Interested and Affected Party	<p>Concerned about the preferred transport route, the R330. Not enough emphasis has been placed on the impacts on people’s lives over the next 10 years. This is as long as some of us will live here. There will be an unbearable noise for the next 10 years. You have looked at flora etc, but what about people and the value of our property? We came here to live for peace and quiet and paid a lot of money for our property. Would you buy a house here now with enormous lorries coming across here? We should all be up in arms about this. It is probably the most important point.</p> <p>What about the other two sites? They probably don’t have as many numbers of houses impacted. In all the points listed as being relevant to the choice of site, nothing was mentioned about houses and the impact on people’s lives.</p> <p>I live on the river and even with the current traffic flows, if there is an easterly wind blowing; the noise from normal traffic flow is already bad.</p>	<p>A Noise Impact Assessment (NIA) was conducted as part of the EIA. It looked at various sources of noise including the roads, the R330, and the Oyster Bay Road. It concluded that the additional noise would not be an impact of high significance. There are certain areas where the Noise Impact Assessment did predict a significant impact, particularly at the Umzamuwethu informal settlement, which is close to the western access road to the power station site.</p> <p>Please note that the Transport Assessment Report was substantively amended and the feasibility of the western access road was re-assessed. The revised report recommends that a combination of both Oyster Bay Road (Route 1 to western access) and R330 (Route 2 to eastern access) be used for transportation during the construction phase, which will improve the impact on traffic congestion, noise and safety to low / medium. The construction vehicles (normal heavy loads) will utilise only the upgraded Oyster Bay Road (DR1763 - western access) to minimise the impact of construction traffic on the existing network and the infrequent abnormal loads will utilise the R330 (MR381) during the night time. Several bypasses have been recommended for construction traffic to avoid using the Humansdorp Main Street travelling between the N2 and the Oyster Bay Road, as well as to avoid the Humansdorp Main Street to travel between Voortrekker Road (R102) and the R330.</p>

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17		Randall Arnolds Interested and Affected Party	<p>I am a coloured person. What is striking about the three sites is that they are in areas where coloured people were allowed to stay. What motivated Eskom to do that? Also, the nuclear dumping site is in Namaqua land, close to the Nama people. We appreciate the chairman's way of handling the meeting, but do not trust the chairman's politeness considering how Arcus GIBB has handled these meetings up until now.</p> <p>The Humansdorp community have been waiting for houses for ages. Madiba came and launched a million houses, including in Humansdorp. The housing waiting list in Humansdorp is large. I don't know about any land that is available for Eskom to build houses. Again you are robbing the coloured community of land and we are getting tired of it.</p> <p>Last time I was here I reminded Mr Stott about the earthquake, 5 on the Richter Scale that we had under the sea. I asked him if this plant was earthquake resistant. He said sarcastically that "there are earthquakes all over the country, and these things are built to withstand earthquakes". As a Christian I believe that when a Christian asks questions with honest motives, God will raise the standard here.</p>	Comment noted.

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	18	Peter Bosman Interested and Affected Party	<p>Want to reiterate the issue of the social impacts of the transport plans in this area. The noise will be terrible. One of the reasons for choosing this road over the other one is because the noise impact at Umzamuwethu is significant. But here these vehicles will travel through residential areas which extend 3-4 km. At one point the residential area is on one side, and the primary school is in the other side of the road. The 950 vehicles per day will make the road significantly more dangerous. The other route, apart from Umzamuwethu, passes through no residential area at all. A transport consultant who recommends that the main route for heavy traffic should be diverted from Main Road Humansdorp to Saffery Road, doesn't fill me with confidence.</p> <p>Written comments were handed over to GIBB.</p>	<p>Comment noted.</p> <p>Similar concerns from the public around Humansdorp area up to St Francis have been raised and acknowledged regarding the use of Saffery Road. 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, as shown in the figure attached. All three alternatives are proposed new roads that run along existing land boundaries between farmland.</p> <p>Alternative A 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>Alternative B is connects between Voortrekker Road (MR389) and Park Street (MR381) along the east of the Boskloof area, and crosses privately owned farmlands and is 1.3km in length. The topography of Alternative B is considered acceptable, except for the section of the route where it crosses the Boskloof Stream at a deep vertical alignment. Additional cost will be required for the construction of a bridge to cross the stream at an acceptable grade.</p> <p>Alternative C is located the furthest east from Humansdorp and is the longest of all three alternatives (2.7 km). This</p>

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				<p>route also crosses privately owned farmlands. Similar to Alternative B, Alternative C crosses two relatively deep valleys, which will require additional cost for the construction of bridge structures to achieve acceptable grade crossings.</p> <p>Alternative A is therefore 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 therefore 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. The Transport Specialist Study will form part of the Revised Draft EIR Version 2 which will be made available for public review in due course.</p>
	19	Dr Yvette Abrahams Commissioner for Gender Equality	In response to complaints, we have begun to monitor this particular consultation. We are concerned as to whether this consultation upholds the Constitution and PAJA (Promotion of Administrative Justice Act) principles. There is no case law that	With regards to decommissioning costs, the Economic Assessment reports that 15% of the capital cost of the power station needs to be allocated for decommissioning. In 2009 prices, which is what the report was based on, this amounts to R17.5 billion for decommissioning. This is based on international experience of decommissioning plants.

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			<p>says that the national interest must precede the local interest. In fact in most cases the local interest is considered paramount.</p> <p>Need to raise a few points of national interest:</p> <p>PAJA section 6.2e, and case law, states that if any incorrect or incomplete information is given as part of this process, then the EIA becomes illegal. I will be submitting a full written statement. My concerns are firstly regarding costs:</p> <ul style="list-style-type: none"> <li>• decommissioning costs aren't shown;</li> <li>• the costs of a nuclear incident are not included. The insurance industry will not insure nuclear, therefore I expect you to be discounting actuarial cost over life of the project. After Fukushima, the Japanese government is now upping tax by 1.5% to pay for it.</li> <li>• costs of externalities; tarring of roads, bulk sewage services etc. Is this cost for the ratepayers?</li> <li>• low and intermediate waste will apparently be disposed of at Vaalputs, but how will it get there? Does the transport route not become part of EIA?</li> <li>• The revised EIA proposes many new measures, but you haven't revised your costs accordingly.</li> </ul>	<p>There is no EIA for the transport to the Vaalputs Waste Site. The waste will be transport via public roads, in containers designed as per specifications of the NNR. Eskom does need to obtain a license from NNR for this transportation.</p> <p>The costs remained constant at 2009 prices because the purpose of the economic assessment was to determine the preferred site from an economic point of view. So a</p>

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			<p>With regards to heritage issues, I hold a PhD in Khoisan history. I have about 150 issues with your heritage study and will supply them in writing.</p>	<p>comparison was made between the sites, and this would not differ with updated costs. The relative differences between the sites would remain the same.</p> <p>Comment noted.</p>
	20	Dr Yvette Abrahams (Commission for Gender Equality)	The answer regarding adjusting costs has not addressed my question. The transport plan is changing to 5 km instead of 2.5 km; your costs are doubling.	The economic specialist has said that these new mitigation measures are insignificant in terms of the total costs.
	21	Dr Yvette Abrahams (Commission for Gender Equality)	On what basis are you reaching your 15%? What power station decommissioning is this based on? To best of my knowledge, no power station has ever been decommissioned.	Very few of the Koeberg-type reactors have been decommissioned because they have a 40 year design life. However, Shippingport in the United Kingdom, the first reactor of its type, has been reduced to a greenfield site and is back to public use. Zion in the United States of America has been largely decommissioned and is in its final stages. So decommissioning has been done and the costs are understood and well documented.
	22	Unidentified I&AP	What was the size of the Shippingport reactor?	It is possibly 80 MW. Zion was over 2x 1 000 MW, which is larger than the Koeberg Nuclear Power Station, and was shut down about 15 years ago. Most components have left site and they are finalising the job. So decommissioning has been done. The fact is that these stations, like the Koeberg Nuclear Power Station, were built in the 1970s, and will end life in the 20s and 30s of the 21 <sup>st</sup> Century, therefore we're not into decommissioning this type of reactor yet, but it has been done because the United States shutdown happened quite early.

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	23	Mike Kantey Coalition Against Nuclear Energy	Do you have any idea of the route that the nuclear waste to Vaalputs might be travelling on?	There is no set route and it may differ from time to time.
	24	Chris Barrett Thyspunt Alliance and St. Francis Kromme Trust	Who will bear the costs of services, roads, sewage, fire brigades, etc?	Based on the approach taken with the Ingula Pumped Storage Scheme in the Drakensberg and engagement with the Provincial road authorities, upgrades of infrastructure such as roads will be for Eskom's cost. Maintenance of roads through the construction phase will also be for their cost. The EIA recommends that other infrastructure e.g. sewage works will need upgrading, because some of this infrastructure is not even capable of meeting current needs. Eskom will need to negotiate with municipalities to agree on the apportionment of financial responsibility for such upgrades.
	25	Trudi Malan Thyspunt Alliance and Cape St. Francis Civics Representative	Jaana Ball mentioned that the economic specialist indicated costs associated with the revised measures are small and insignificant. But Eskom proposed to string power lines across the dune fields by helicopter. I have costs for such procedures; they are significant. If Eskom incorporates these costs in their planning, it would immediately make Thyspunt the most expensive site.	The question was asked that between the first EIR and Revised EIR, were there new mitigation actions proposed, and have those been brought into the Economic Assessment? This was the question that was answered earlier. The stringing of the power lines by helicopter was a mitigation action proposed in the Draft EIR, and the economic specialist was given those costs.
	26	Dr Jansen Interested and Affected Party	It was announced today that Germany is planning to close all nuclear power plants by 2022. If they are closing theirs, why are we building more?	The BBC ( <a href="http://www.bbc.co.uk/news/world-europe-13592208">http://www.bbc.co.uk/news/world-europe-13592208</a> ) reports that Germany's decision to close down its nuclear power stations will most probably lead to an increase in the import of nuclear energy from France. Phasing out nuclear power will also result in increased

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			<p>Met a marine geologist from Cape Town on this coastline. He said that there was, at one stage in history, a huge tsunami of higher than 30m here.</p>	<p>dependence on fossil fuels, which result in proportionately larger releases of greenhouse gases into the atmosphere than nuclear power, which has a greenhouse gas footprint similar to some renewable technologies (see Section 4.2.2 of the Revised Draft EIR). There is a further risk that Germany will not manage to quickly halt its dependency on fossil fuels, especially coal-based energy, which creates unintended negative environmental impacts of its own.</p> <p>The Oceanographic and Hydrological specialist studies considered feasible tsunami events based on sub-sea earthquakes and slumps. The largest tsunami predicted to be possible at the Thyspunt site is a “meteo-tsunami (a tsunami coinciding with extreme meteorological events” of approximately 14.8 m above sea level. However, no evidence of tsunamis at the Thyspunt site has been found. Should I&amp;APs have scientifically valid evidence of such events, they are welcome to forward such evidence to the EIA Team.</p>
	27	Donna Interested and Affected Party	<p>Familiar with Saffery Street. There are three schools in the proposed transport corridor and a hospital. One block up from Saffery Street, possibly Du Plessis Street, is a high school. Three or four blocks down is a primary school, plus a primary school in Kwanomzamo. This must all be considered.</p>	<p>Similar concerns from the public around Humansdorp area up to St Francis have been raised and acknowledged regarding the use of Saffery Road. 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, as shown in the figure attached. All three alternatives are proposed new roads that run along existing land boundaries between farmland.</p>

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			<p>Alternative A 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>Alternative B is connects between Voortrekker Road (MR389) and Park Street (MR381) along the east of the Boskloof area, and crosses privately owned farmlands and is 1.3km in length. The topography of Alternative B is considered acceptable, except for the section of the route where it crosses the Boskloof Stream at a deep vertical alignment. Additional cost will be required for the construction of a bridge to cross the stream at an acceptable grade.</p> <p>Alternative C is located the furthest east from Humansdorp and is the longest of all three alternatives (2.7 km). This route also crosses privately owned farmlands. Similar to Alternative B, Alternative C crosses two relatively deep valleys, which will require additional cost for the construction of bridge structures to achieve acceptable grade crossings.</p> <p>Alternative A is therefore 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 therefore acknowledges that the Thyspunt site requires significant transport infrastructure upgrades. The R330 is now</p>

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				<p>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. The Transport Specialist Study will form part of the Revised Draft EIR Version 2 which will be made available for public review in due course.</p>
	28	Hylton Thorpe Thyspunt Alliance and St. Francis Bay Residents Association	<p>Would like to make a proposal that no road access to Thyspunt should pass within 1 km of any urban edge. Eskom should figure out how to get that right. The present proposal is extremely disruptive to local communities.</p>	<p>The Transport Specialist study was revised to consider other alternative routes. The revised study therefore 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. The Transport Specialist Study will form part of the Revised Draft EIR Version 2 which will be made available for public review in due course.</p>

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	29	Andrea von Holt Coega Development Corporation Environmental Manager	<p>Rebulsrus is within the 3 km emergency planning zone. I have five questions:</p> <ul style="list-style-type: none"> <li>• The wetland study apparently says the Langefontein wetland was not linked to the construction footprint therefore won't be impacted on by the dewatering. But then the specialist recommended feeding the wetland with water pumped out of the construction site. This implies there could be a link, otherwise why would you artificially supplement a natural wetland system?</li> <li>• The Waste Impact Assessment confirmed that enough waste site space was available for radioactive waste. But where will the non-nuclear hazardous waste be taken to? The only site I know of in the area is Aloes at PE, and it has a limited life span.</li> <li>• Is our country and the Kouga Municipality really ready for nuclear?</li> <li>• Has Fukushima had any impact on Eskom's planning for nuclear in South Africa. Please can you elaborate on your response in your response report?</li> </ul>	<p>The recommendation refers to the coastal seep wetlands not to the Langefontein wetland. The coastal seep wetlands are fed by groundwater from the central portion of the site.</p> <p>Specific sites have been identified. The Aloes Waste Disposal site is the only site in the Eastern Cape that can accept hazardous waste. Although this site has an estimated life span only for the next five years, upgrading and expansion of the waste site is planned.</p> <p>Yes, the Minister has stated that the Japan incident will be taken into account in planning our nuclear programme.</p>

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			<ul style="list-style-type: none"> <li>If a negative environmental authorisation is issued by DEA, what is Eskom's plan for power provision? If a power plant is not to be built at Thyspunt, would Eskom retain the land at Thyspunt?</li> </ul>	<p>If a negative authorisation is issued for Thyspunt, Eskom would look at the other two sites. If negative decisions are received on those also, other sites would have to be looked at, or request amendment of the IRP. The obvious option is more coal-fired power stations, but it would be government's decision. If Eskom couldn't build on this site, it would sell the land.</p>
	30	Bridget Elton Interested and Affected Party	<p>There are seismic readings occurring here at the moment. Along what fault lines are they occurring? There was an earth tremor this morning and a couple of weeks ago. Are readings being taken on site and do they influence what is recorded in the document?</p> <p>The report says it is based on seismic readings of the last 8 years. But it needs to consider what is happening now because it is serious, because the world is moving, things are changing e.g. Iceland volcanic eruptions and Fukushima. We feel the tremors right here on our doorsteps.</p> <p>Reuben touched earlier on a UNESCO site. Please elaborate.</p>	<p>It is the responsibility of the Council of Geosciences' to do ongoing monitoring of seismic events. GIBB do have a seismic assessment report completed earlier this year which was based on decades of monitoring.</p> <p>Eskom has an on-going seismic monitoring programme. Eskom can't comment on recent events but they are being captured. Monitoring of all the candidate sites continuously takes place and will be doing so as long as Eskom intends to build something on it.</p> <p>UNESCO stands for the United Nations Educational, Scientific and Cultural Organisation. They govern the international convention on World Heritage sites, which are sites of value to the whole of humankind. There are various criteria in terms of that convention, for example, for landscapes of cultural and scenic value. There are currently seven world heritage sites in South Africa. A nominated site has to go through a long evaluation process to approve it as</p>

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			<p>Can Eskom clarify if they are a member of any conservation group here in the St. Francis area or not?</p>	<p>a World Heritage Site. In the opinion of the heritage specialist, this site has the potential to become one of these World Heritage Sites.</p> <p>Eskom belongs to the conservancy area that the site is included in and is an active member. This is the St. Francis Bay Conservancy and Gert Greeff is the Eskom member.</p>
	31	Chris Barrett Thyspunt Alliance and St. Francis Kromme Trust	<p>The EAPs have specifically said that Eskom is not a member of the conservancy, and as a result one of their positive points was that the whole nature of the area would change and it would be a terrific plus.</p> <p>(Comment by Bridget Elton: This was in the letter dated 20 March 2010 to the Kromme Trust, from Jaana. It was response number 12.).</p> <p>Eskom historically have not cleared the site of what they should have. They only started clearing it now. Why should we think that because there is a nuclear power station, things are going to continue in a bed of roses?</p>	<p>GIBB relooked at Response 12 in the IRR (Issues and Response Report) and Eskom has confirmed that it is a founding member of the St. Francis Conservancy and remains one of the active members.</p> <p>The issue about improvements for the area is not about a conservancy. It was about possibly proclaiming the area as a nature reserve, which would give it greater protection than if it were just a conservancy.</p> <p>The statement that Eskom has only started clearing now is incorrect. Eskom has had an ongoing alien clearance programme at Thyspunt for many years.</p>
	32	Graham Wilman Interested and Affected Party	<p>We have been on the site for more than 55 years. We were all here a year ago, and Mr Christy raised the issue to the specialist regarding the marine issues, and these</p>	<p>GIBB commissioned an independent waste study and took every issue raised, in meetings and in the IRRs, and compiled a huge document, categorised it per specialist study and provided that to the specialists. Many of the</p>

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			<p>have been brushed aside and we have not been adequately answered regarding the chokka industry.</p> <p>Regarding the routes for transporting the waste; the specialist gave the routes; it would all be transported by road. It would go through Knysna, Wilderness and then through George. This was raised as a concern in case of an accident; Knysna has no bypass. I don't believe that this has been addressed during the last year.</p> <p>The transport for personnel from Humansdorp was going to be via the Oyster Bay Road, which is a gravel road. There was no intention to upgrade it to a tarred road. This brought questions from the dairy people. Don't believe this have been addressed in the last year.</p>	<p>specialist studies have undergone significant changes. Regarding the marine aspects, Dr Tammy Robinson and Prof Charles Griffiths consulted the Squid Working Group. GIBB received personal confirmation thereof the week of 11 July 2011, from a member of the Squid Working Group. The marine specialists have revised their study and have come to the same conclusion that the chokka industry will not be significantly impacted. A specialist meeting between the specialists, the industry and the squid working group has been arranged in Cape Town. If there is disagreement between specialists and the working group, then it will be recorded in the final EIR and presented to the DEA for them to decide. Specialists do sometimes disagree with each other.</p> <p>Please note that the Transport Specialist study was revised to consider other alternative routes. The revised study therefore 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. The Transport Specialist Study will form part of the Revised Draft EIR Version 2 which will be made available for public review in due course.</p>

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			<p>It was clearly stated that the Van Stadens Bridge is underrated for the size of equipment that has to be transported over it. This has not been addressed. The same applies to the bridge over the Kromme River.</p> <p>Regarding the heritage issues, we've been involved with the site for a long time. There are fish kraals that will be destroyed. There are underwater systems, and Khoi middens and these have not been addressed. The 200m green zone from the shoreline is not adequate.</p> <p>What progress has been made in a year? I have a feeling of no confidence in this EIA.</p>	<p>There have been investigations conducted for the Traffic Impact Assessment, and these investigations found that the Van Stadens and Kromme River bridges are structurally adequate for the projected traffic flows for Nuclear-1.</p> <p>Comment noted.</p> <p>Comment noted.</p>
	33	Unidentified Interested and Affected Party	Question to Eskom; how much are you influenced by consultants? Consultants seem to think this is the right place for the plant to be, but I think they are biased. How much are you influenced by the consultant's decision?	Eskom appointed the EAP as an independent consultant to evaluate the potential environmental impacts, assess alternatives and alternative sites. The EAP appointed some of the most well renowned specialists in South Africa. Eskom is influenced by both the EAP and specialist opinions since they are experienced and ethical.
	34	Ian Mcknee Interested and Affected Party	The Germans have decided to close their nuclear capacity in the next 10 years. What does the German government know, one of the most advanced countries in the world, that we are not being told?	<p>Comment noted.</p> <p>The BBC (<a href="http://www.bbc.co.uk/news/world-europe-13592208">http://www.bbc.co.uk/news/world-europe-13592208</a>) reports that Germany's decision to close down its nuclear power stations will most probably lead to an increase in the import of nuclear energy from France. Phasing out nuclear power will also result in increased dependence on fossil fuels, which result in proportionately</p>

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				<p>larger releases of greenhouse gases into the atmosphere than nuclear power, which has a greenhouse gas footprint similar to some renewable technologies (see Section 4.2.2 of the Revised Draft EIR). There is a further risk that Germany will not manage to quickly halt its dependency on fossil fuels, especially coal-based energy, which creates unintended negative environmental impacts of its own.</p>
	35	Mr Kuleku Bet Live	<p>Let's be honest; these 7000 jobs are not sustainable. Look at the people toy-toying at Medupi because the jobs were just temporary. Are we prepared to destroy the economy here, hospitality, fishing and farming, for this?</p> <p>I was at the Sea Vista public meeting the day before yesterday. GIBB was holding a meeting there. About 20-25 people were there. They were asking real questions</p>	<p>The estimated number of jobs, at the peak of construction, is 9000. This would be in approximately year six of the nine year construction period. Most of these jobs would be skilled jobs filled by people outside the area but our recommendation, from the specialist, is that 25% of jobs should go to local people.</p> <p>There was unrest at the Eskom Medupi Power Station because of welders brought in from Thailand. RSA does have a shortage of welders and this shortage is being addressed through training programmes to uplift South African skills. With regard to the Medupi Power Station, there has been much business created in the area for small businesses e.g. catering, laundry, etc. All operators from the plant and some technical staff have come out of the local area. So there are sustainable jobs created. For the operational phase of Medupi the number of jobs is estimated at less than 1000, Koeberg has more permanent employers when compared with coal fired power stations.</p> <p>Regarding the open house which was held at Sea Vista, this was held at the request of the community, through the Centre for Environmental Rights which represents them. The message GIBB gave is exactly the same as that given at all</p>

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			<p>about jobs, health etc. but they could not answer them.</p> <p>I am from Cape Town and will go back to the activists and inform them of this process. We must work together to make sure the people, especially the black people, are not misled.</p>	<p>the other meetings.</p>
36		<p>Mike Kantey Coalition Against Nuclear Energy</p>	<p>Regarding the waste report, pg. 61 of the revised draft EIR, v2.0, March 2011: the bullet summary on pg. 61 does not do justice to the issue of nuclear waste. For example, it assumes decommissioning after 60 years which has no precedent in the world; the average is 25 years. Bullet 5 of last sentence reads "It is generally agreed that these arrangements are interim and do not represent a final solution" What is long-term? Reuben has suggested 70 years, but considering the half-lives of some isotopes we should be talking thousands of years. We don't have this length of experience. To say we have 9 years experience in nuclear waste management is silly.</p> <p>Next bullet point at says "underground research labs made a very positive contribution to waste isolation research." But again the issue of time is not taken into consideration. We are not talking historical time, but geological time.</p>	<p>Radioactive waste management practices envisaged for Nuclear-1 are consistent with the IAEA guidelines for a Radioactive Waste Management Programme for nuclear power stations, from generation to disposal. Nuclear Power Station strives to minimise production of all solid, liquid and gaseous radioactive waste, both in terms of volume and activity content, as required for new reactor designs. This is being done through appropriate processing, conditioning, handling and storage systems. In addition, production of radioactive waste is minimised by applying latest technology and best practices for radiological zoning, provision of active drainage and ventilation, appropriate finishes and handling of solid radioactive waste. Where possible, the Nuclear-1 power station will reuse or recycle materials.</p> <p>All forms of radioactive wastes are strictly controlled and numerous specialised systems and management practices are in place to prevent uncontrolled contact with these substances. These controls and practices differ for the different forms of radioactive waste. South Africa still has to formally release a strategy for the long-term management of HLW, including spent fuel. Until such time, all spent fuel is stored temporarily either in spent fuel pools (wet storage), or</p>

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			<p>At the bottom of the page it reads “the assessment results indicate that with implementation of appropriate mitigation measures, all the potential impacts are low.” This is a common theme running through the EIR; “with the proper mitigation impacts will be low”. The impacts are high and we don’t know how successful the mitigation will be. How do we define “proper mitigation” and who gets to measure “proper”? This is a fatal flaw. This waste document has not been properly done.</p>	<p>in dry cask storage facilities (dry storage). This allows the shorter-lived isotopes to decay before further handling, a management strategy that is acceptable from a safety perspective. It must be noted however that as per the Department of Energy’s Media Statement on Nuclear Procurement Process Update as released on 14 July 2015 strategies are complete to develop an approach for South Africa to deal with Spent Fuel/High Level Waste disposal.</p> <p>Disposal of radioactive waste at an authorised facility is being done according to an approved disposal concept, defined and developed with due consideration of the nature of the waste to be disposed of and the natural environmental system, collectively referred to as the disposal system. The disposal system developed for this purpose makes provision for the containment of radionuclides until such time that any releases from the waste no longer pose radiological risks to human health and the environment. The safety assessment process used as basis for this purpose considers both intentional (as part of the design criteria) and unintentional (natural or human induced conditions) releases of radionuclides. Unintentional releases include consideration of unintentional human or animal intrusion conditions, which might lead to direct access and external exposure to radiation.</p> <p>Once released into the environment, radionuclides might migrate through the environmental system along three principle pathways: atmospheric, groundwater and surface water. Due to the physical nature of L&amp;ILW and HLW disposal concepts, migration along the atmospheric pathway is highly unlikely. The principle environmental pathway of</p>

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				<p>concern is thus the groundwater pathway, with the surface water pathway of secondary concern as an extension of the groundwater pathway. Disposal systems are designed so that releases to groundwater or surface water are highly unlikely as further explained in Chapter 10 of this EIR.</p> <p>Appropriate decision makers and mandated authorities will gauge the effectiveness of mitigation measures and the measurement of the waste thereof.</p>
	37	Lynn Andrews Squid Industry	<p>Do you know that squid is mostly an export product. Would you buy squid from an area near a nuclear plant? The wind and currents prevail from the west so it will affect all areas from here to PE. Our whole industry will be affected.</p> <p>I'm not talking about the land but the ocean.</p>	<p>Around the Koeberg Nuclear Power Station there are wines grown and produced which are exported all over the world, there is no reason why this should be different for squid. In addition it is our understanding that only a portion of squid are harvested close to the nuclear site.</p> <p>The impact of radiation on marine organisms was looked at by specialists in the marine report. Those are the same specialists who have done monitoring at the Koeberg Nuclear Power Station since before the power station was built. Their conclusion based on 20 years data is that there is no impact on marine organisms.</p>
	38	Helmie Tilders Member of Foster, affiliated to Thyspunt Alliance	<p>What has happened in the one year since the last EIA? Wind directions were shown as NW a year ago. We wrote comments about this but it is still shown as NW, which is convenient because if there are problems, all contaminants will blow out to sea. However we actually have a SW wind, which is the predominant wind here, and the</p>	<p>The dominant wind direction for the Thyspunt site and St Francis is west to north-west. More of a north-westerly wind in winter.</p>

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			<p>contaminants will blow our way.</p> <p>The last draft EIA agricultural report showed a positive impact of 10-15%. We queried it. It is still shown as a positive impact of 10-15%. How do you get 15% more farming out of this area? About 90% of income in this area is dairy farming. The dairy farms produce 572 million litres per annum, which is sold nationally. It's a fine balance. If they produce more, they have a surplus; if less, someone else produces it. So where does the 15% extra milk go? The answer is given that the extra people coming into the area will consume it. I have done the maths. Each man, woman and child of the newcomers will have to consume 10-15 litres per day. This has been dealt with in a haphazard manner and is not good enough.</p> <p>I asked farmers about possibly changing to other types of farming but farmers said that vegetables, fruit, and wheat would not work here because of the climate. Seems dairy is the only option.</p>	<p>The agricultural assessment by the specialist is based on increased numbers of people entering into the area. Farmers can use the opportunity to produce more.</p>

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	39	Bridget Elton Interested and Affected Party	We dispute the wind direction. If you look at dune system, it shows the wind direction.	The wind roses <sup>1</sup> in Figures 2-25, 2-26 and 2-27 clearly show that the wind direction experienced most frequently is westerly. The longest “spokes” around the circle indicate the wind direction with the greatest frequency. It is clear from all three the above-mentioned figures that a westerly wind occurs most frequently, throughout the seasons, at both Thyspunt and at Cape St. Francis. This is consistent with the east-west orientation of the Oyster Bay mobile dune system, in that sand is blown from Oyster Bay in the west to St. Francis Bay in the east.
	40	Hylton Thorpe Thyspunt Alliance and St. Francis Bay Residents Association	Please put up a map of the area. Please explain how a headland bypass dune system could exist here if the wind blows in a NW direction as you propose it does. The headland bypass dune field shows which way the wind has been blowing for thousands of years. Windblown sand is picked up from Oyster Bay and travels to the canals system at St. Francis Bay. The next one goes from Thysbaai and goes straight to Sea Vista and St. Francis. The third system is a small one going from Cape St. Francis beach over the headland. Can't see how anyone can say that SW is not the prevailing wind.	The Dune Geomorphology Assessment (Appendix 2 of the Revised Draft EIR Version 1) addresses the dune dynamics.  There are images from page 19 – 22 which explain the wind direction and how the dunes formed.

<sup>1</sup> A wind rose is a graphic tool used by meteorologists to give a succinct view of how wind speed and direction are typically distributed at a particular location. They show the frequency of winds over a long time period plotted by wind direction, with colour bands showing wind ranges. The directions of the rose with the longest spoke show the wind direction with the greatest frequency. The spokes radiating from a wind rose show the frequency of winds blowing *from* particular directions.

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	41	Riaana Tolan Greenpeace Africa	Your Thyspunt wind roses are only measuring between Jan 2008 and Sept 2009, which only gives you one season's worth of measurements. From a scientific point of view, this is not enough to determine the prevailing wind.	It is only the wind roses for the Thyspunt site itself that are based on a limited period of monitoring data. The data for Thyspunt itself is from January 2008 to September 2009. However, the wind roses for Cape St. Francis are based on data from 2004 to 2008.
	42	Pixie Anderson Interested and Affected Party	<p>A comment regarding the Economic Cost study. Are you planning to build a different type of station at Duynefontein, i.e. is the cost here different from the cost there. How is it possible that Thyspunt can be R0.5 billion cheaper to build when considering that this is the site where all the mitigation has to be done, including the fact that this site is where an open cycle gas turbine is to be built?</p> <p>In terms of costs and your transport study; we have only discussed costs from Humansdorp. What about costs from PE? Will the turbines come from PE or Coega, and what about all the other bridges that the reactor would have to pass under? Have you looked at bridge heights?</p> <p>Who will monitor the mitigation works? Will it be government or private? How will we have legal representation if it is not done?</p>	<p>Costs for other sites are higher. Bantamsklip would be the most expensive because it is remote and requires transport upgrades for roads and bridges. This factor is responsible for most of the cost difference between Thyspunt and the other two sites. The costs for the associated transmission lines have also been taken into account</p> <p>In the case of Duynefontein and Bantamsklip, the planned harbour is Saldana harbour. For Thyspunt it would be Port Elizabeth harbour. Certain interchanges will have to be ungraded and they are indicated in the transport report.</p> <p>All mitigation measures recommended by specialists are included in the Environmental Management Plan (EMP). This EMP also has to be reviewed by the DEA and will have to be approved before works commence. A team of independent Environmental Control Officers (ECOs) will monitor construction, and will report to an Environmental Monitoring Committee (EMC) which will include</p>

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				<p>representatives from the community. At the three large power station construction sites an independent auditor carries our regular audits to review compliance. The DEA will also do its own monitoring via the Environmental Management Inspectorate (green scorpions).</p>
	43	<p>Trudi Malan                      Thyspunt Alliance and Cape St. Francis Civics Representative</p>	<p>The costs of transmission lines should not be included in the costs comparisons for this EIA. Eskom decided to split the transmission line EIA from the main power station EIA. The transmission lines are not part of the study and so that cost should not be included.</p> <p>If cumulative impacts are being considered, why then haven't all cumulative impacts of the transmission lines been considered? For example, agricultural impacts. The transmission lines will impact on the pivot watering systems. This was not considered. Seems there is selective integration of the two studies. Seems strange that the power lines are not part of the EIA yet it is said that the integration of the site is its positive point.</p>	<p>GIBB, as environmental assessment practitioner, is also required to consider cumulative impacts and that is one of the cumulative impacts.</p> <p>Where possible, GIBB has considered cumulative impacts.</p>
	44	<p>Basil Webber                      Interested and Affected Party</p>	<p>A comment regarding the agricultural contribution this project will make. I am a farmer. If there is increased consumption in this area, retailers will source supplies wherever they can get it cheapest. With beef and chicken production, farmers on the</p>	<p>Comment noted.</p> <p>The Agricultural Impact Assessment (Appendix E21 of the Revised Draft EIR Version 1) details the potential economic impacts, and the influx of people during construction phase will increase the demand for agricultural produce.</p>

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			<p>highveld can produce it cheaper than we can here. Retailers will import meat from the reef and actually drive local prices down. You will probably drive some local farmers out of business. Recommend you terminate your agreement with your agricultural consultant.</p> <p>As father of four kids, will this road down here be widened? What work will be done on it? Has any costing been done re expropriation requirements?</p> <p>How will a school bus pass a truck with a heavy load? How will this happen practically?</p> <p>To the consultants, be wary of your recommendations you make. You constantly refer to you specialists, such as your economic specialist. As a chartered accountant I have some insight into these things. You will be held accountable for your recommendations. I will make sure you are held accountable. The gaping holes in all your work show that you cannot come to a conclusion on which site to recommend. Until you have done a very thorough study of the economic reality of this project, how can you responsibly make a recommendation to Eskom?</p>	<p>It will also be cheaper for retailers to get supplies from local farmers due to transport logistics, and if it is cheaper to obtain produce from the Highveld farmers surely the retailers would be using them already.</p> <p>Even if retailers source stock from multiple farmers, smaller local farms will still sell more produce due to the increase in demand.</p> <p>There are no plans to widen the roads outside the current road reserves or to expropriate any neighbouring land.</p> <p>Certain extra heavy loads will only be moved outside of peak hours.</p> <p>There are requirements in the EIA regulations regarding the independence of environmental assessment practitioners and specialists. GIBB is currently doing everything in its power to ensure a transparent and legally compliance EIA process.</p>

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			Are you comfortable that you have made a comprehensive, responsible recommendation to the client?	Yes, GIBB is comfortable that a responsible recommendation has been made.
	45	Greg Christy SASMIA	Who owns this EIA document? Eskom? Arcus GIBB? Who does one pass the buck to? If the report is found to be faulty, who does one go after?	Each specialist study is signed off by the specialist and their companies. As far the EIR is concerned, the EAP, takes the responsibility on behalf of GIBB.
	46	Dr Yvette Abrahams Commissioner for Gender Equality	The Human Rights Commission has a mining desk and investigates complaints from the public as does the Office of the Public Protector. If there is someone at the DEA or Department of Energy that you feel is not doing their job, you can complain to the Public Protector. The Gender Equity Commission is also empowered to handle public complaints and we report to parliament. People don't make enough use of our services.	Comment noted.
	47	Chris Barrett Thyspunt Alliance and St. Francis Kromme Trust	Have two questions. What has changed about the roads and bridges that now they don't need upgrading? We were told before that they would need upgrading. For example, we were told especially that the bridge over the Kromme River needs attention. What has changed with that bridge? What PI cover does your company carry?	Preliminary transport studies show that the Van Stadens and Kromme Bridges are structurally sufficient, but may need minor upgrades. It is stated on page 80 of the Transport Assessment (Appendix E 25 of the Revised Draft EIR) that "Initial assessment of the Kromme River Bridge indicates that the bridge will be capable of carrying the increased loading during the construction period".

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	48	Rudolf McDonald Interested and Affected Party	<p>A question for Eskom, not the consultant. Reading from the report “Eskom identified five sites for the construction of Nuclear 1”. These sites were given to their consultants. Where and when was the decision made to look only at five sites in the whole of RSA? I heard that it was about 30 years ago. If this is true, then I think it was poor form to begin the selection process with data from 30 years back. In those days they would not consider places like the Transkei. Is this correct?</p> <p>When we started this process in 2005, why didn't we start again, because in 2005 the politics and factors in RSA were very different from 30 years ago.</p>	<p>Eskom did indeed start the nuclear site investigation programme in the 1980s. It was done by consultants; the Environmental Evaluation Unit at UCT did the environmental investigation. This continued to the early 1990s. Eskom looked at where they believed the electricity demand would be – along the coastline. Eskom also looked at the geology, assuming it would be a Koeberg type reactor. A lot of Kwa-Zulu Natal was excluded because it was either too built up or the geology wasn't suitable. Eskom also stayed away from homelands and major cities and considered the environment, existing and projected populations, and tidal and wave actions. There were very few sites identified as suitable on the coastline. Eskom proposed the five sites to the consultants and asked them to review what was done and determine if these five sites were still valid. Although they were identified 30 years ago, the EIA still has to look at the present conditions for each of these sites.</p> <p>Specialists had access to all the original documents, but had to assess each site on its own present merits.</p>
	49	Trudi Malan Thyspunt Alliance and Cape St. Francis Civics Representative	<p>Can the consultants give us their written review of the original nuclear site investigation programme?</p> <p>I would like to quote from the International Atomic Energy Association's publication Standard Safety Series: Site Evaluation for Nuclear Installations, which our country is a signatory to.</p> <p>Point 2.13: “For nuclear power plant, the</p>	<p>GIBB's review of the Nuclear Site Investigation Report (NSIP) is an appendix to the Scoping Report. Later, in the Revised Draft EIR Version 1, the questions that the Thyspunt Alliance had regarding the NSIP were responded to in Appendix 8 IRR 45e. It must be noted that it was a review of the process that was undertaken, not a thorough review of every specialist study that comprised the Report.</p> <p>An EIA process is a detailed review of the suitability of the</p>

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			<p>total nuclear capacity to be installed on the site should be determined, as far as possible, at the first stages of the siting process. If it is proposed that the installed nuclear capacity be significantly increased to a level greater than that previously determined to be acceptable, the suitability of the site shall be re-evaluated as appropriate". It has not been done in this case. The original site was planned for a 1 800 MW plant; it was not planned for a 4 000 MW plant.</p> <p>Secondly the Nuclear Site Investigation Programme had no public participation involved. The first that the public in this area heard about it was via an announcement in Humansdorp. We then had to use the PAIA (Promotion of Access to Information Act) to get the information because it was considered confidential. It was kept confidential so that the public would not know of Eskom's intentions to buy land here so that they would not increase their selling prices. I maintain that the decision to build at the five previously identified sites is unconstitutional. Eskom has had enough time to think where they should build the plant in the new South Africa but have ignored this at their own peril.</p>	<p>alternative sites being looked at.</p>

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			<p>We are busy with an EIA on a previously selected site. This is not a site selection process. We are contending that Eskom should have relooked at the whole country when they did the Nuclear Site Investigation Programme. They are in contravention of the International Atomic Energy Association's Standard Safety Regulations for Site Selection.</p>	
	50	Kobus Reichert Heritage Representative for the Gamtkwa Khoisan Council	<p>Jaana Ball stated that the heritage report was done with consultation with the Gamtkwa Khoisan Council. She did not, however, state that we oppose this proposal. Gamtkwa people will not accept this misleading information that has been shared.</p>	<p>The heritage specialist for the EIA, GIBB and Eskom did have a key focus group meeting with the Gamtkwa Khoisan Council on 27 August 2010. Minutes of this meeting were included in the Revised Draft EIR Version 1. The Council members raised the issue of the cultural landscape, which wasn't addressed in the previous version of the heritage report. The heritage specialist therefore took this into account and has since addressed it in the Revised Draft EIR Version 1. GIBB has had a meeting with the South African Heritage Resources Agency (SAHRA) on 24 May 2011 (the minutes are available on the GIBB website) regarding the potential of this site to be considered for an UNESCO site, as well as discussing the findings of the Revised EIR and the permit application for the excavations in the central portion of the site. The additional test excavations at Thyspunt that were approved by the South African Heritage Resource Agency and conducted in 2011 (after the release of the Revised Draft EIR Version 1), have confirmed that the heritage sites in the recommended footprint of the power station at Thyspunt are few in number and of low quality. This implies that direct impacts on heritage resources can be mitigated. Nevertheless Chapter 9 and 10 of the Revised</p>

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			<p>For example, your HIA specialist made it clear that they had consulted with Dr Johann Binneman who has 25 years experience in the study area. They said he shared information with them which was taken into account. I have it in writing from Dr Binneman that this is false. He said this exchange happened at a social gathering and nothing was discussed at length. He says he has data on the site which would change the recommendations of the specialist. He has photographic evidence of an early stone age site, the size of a rugby field, situated under the sand at the site. Why has this information not been obtained from Dr. Binneman? Why are you giving misleading statements in your responses to us? Why are you contravening the NEMA regulations by not including this information in your report? Why are you shifting your process responsibilities over to the Gamtkwa Khoisan people; we have to now prove our existence and our link to the study area to you.</p>	<p>Draft EIR Version 1 recommends that Environmental Authorisation in terms of the current application is granted only if approval is received from the South African Heritage Resources Agency. Please note that the amended Heritage Study will form part of the revised draft EIR Version 2 which will be made available for public review in due course.</p> <p>Dr. Binneman is an expert on the Thyspunt area, and Dr. Hart and Dr. Halkett from the UCT Archaeological Contracts Office both recognise this and know Dr. Binneman. They have referenced his research material in their specialist report.</p> <p>Dr. Binneman, previously of the Albany Museum, spent an evening with the Heritage Impact Assessment (HIA) team during their fieldwork at the Thyspunt site, at the invitation of the HIA team and shared information with the team.</p>

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			<p>I asked three weeks ago via email, who is the author of the responses you provided us with. I received no reply, similarly to many other emails I've submitted in the past. We cannot respond to issues on that letter when you are not the author of those responses. I'm asking again; give us the names of the people who authored those responses; those who said the Khoisan people of this area did not lose their land by force; those who said there is no link between the Khoisan community and the archaeology at Thyspunt.</p> <p>We have asked you to do your research properly and if you did it, you would have had the answers to all those questions. You will find the answers in the Jeffrey's Bay library. Am getting sick and tired of people playing with words when we are dealing with fairly straight forward issues.</p> <p>If this is a cultural landscape in terms of UNESCO definition, how can putting a power station there mean a positive impact to the cultural landscape? Moving the power station back 200 m would have no effect whatsoever. It will still destroy the cultural landscape totally. Don't tell me the site is not listed in terms of UNESCO; if it has the potential to be declared a WHS, then it should be respected and this should have excluded Thyspunt from the process.</p>	

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			<p>If it is true that you have consulted with the local historians, then you are aware that Bart Logie has written books about the area. Has he been consulted? If Dr. Binneman has been consulted, then I refer you to your mitigation report: "An open day was held at UCT, where the mitigation report was formulated by inviting academics from all over the country as well as students and other stakeholders. The area that will be most affected by any mitigation work will be the Eastern Cape and all of the artefacts and archaeological material will have to be curated in the Eastern Cape, and the only facility currently is the Albany Museum." Why was the Albany Museum, who will deal with the artefacts, deliberately excluded from this process?</p> <p>To say that SAHRA will still make their decision is a lie. The SAHRA has made their decision. I spoke to Mariagrazia Galimberti from the SAHRA, who said that it doesn't matter what information you bring out of your excavation works, it will not change the SAHRA's decision. They have made their decision already.</p>	<p>Initial brief consultation was undertaken with Dr. Bartel Logie during the Scoping Phase of the EIA. Consultation has been focused on professional academics whom are knowledgeable about the specific issues at the site and surrounds.</p> <p>GIBB was not involved in the open day and mitigation workshop at UCT; it was not part of the EIA. Dr. Tim Hart arranged the workshop on his own accord, and therefore GIBB cannot comment on the proceeding of the workshop, but can say that the curation of artefacts has been discussed, should authorisation be given. The SAHRA, Eskom, Dr. Hart and GIBB are well aware of the capacity of Albany Museum. Eskom has undertaken that should mitigation need to take place, Eskom would consider a facility to curate and store these artefacts.</p> <p>Mr. Reichert is correct. SAHRA has written to GIBB regarding the Draft EIR. SAHRA's communications have been included as Appendix B3 to the Revised Draft EIR Version 1, so GIBB is not trying to hide it any communication from the Authority. As soon as the letter was received by GIBB it was posted onto the EIA's websites. What has been agreed with SAHRA during a meeting held on 24 June 2011 is that SAHRA will provide further comment on this Revised Draft EIR within the Comment Period. As has been indicated at the meeting tonight, SAHRA has given permission for the test excavations to occur in the central portion of the Thyspunt site. Once the results of these excavations are known then SAHRA will provide comment to the DEA on the</p>

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				<p>Final EIR.</p> <p>The Final Minutes of the meeting with SAHRA held on 12 October 2009 confirming the statements made above are available on the GIBB website.</p>
	51	Charles Lead Interested and Affected Party	Regarding access to the power station on the R330, does GIBB intend persisting with their recommendation that the R330 still be used as the access road? Considering the vehement opposition to this by the residents, is GIBB going to consider the feelings of the residents?	Due to the numerous concerns raised regarding the use of the R330 during construction, the Transportation Assessment Report was substantively amended and the feasibility of the western access road was re-assessed. The revised report recommends that a combination of both Oyster Bay Road (Route 1 to western access) and R330 (Route 2 to eastern access) be used for transportation during the construction phase, which will improve the impact on traffic congestion, noise and safety to low / medium. The construction vehicles (normal heavy loads) will utilise only the upgraded Oyster Bay Road (DR1763 - western access) to minimise the impact of construction traffic on the existing network and the infrequent abnormal loads will utilise the R330 (MR381) during the night time. Several bypasses have been recommended for construction traffic to avoid using the Humansdorp Main Street travelling between the N2 and the Oyster Bay Road, as well as to avoid the Humansdorp Main Street to travel between Voortrekker Road (R102) and the R330.
	52	John Hammond Pub Owner	I generally have a pro-nuclear attitude but I think it is a disgrace the way these consultants are ignoring the concerns of the residents of St. Francis Bay. This proposal of taking traffic through Humansdorp is ridiculous. The impact on people and children is a disgrace. We will toy-toying in	Due to the numerous concerns raised regarding the use of the R330 during construction, the Transportation Assessment Report was substantively amended and the feasibility of the western access road was re-assessed. The revised report recommends that a combination of both Oyster Bay Road (Route 1 to western access) and R330 (Route 2 to eastern access) be used for transportation

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			<p>the roads if need be, but we will not allow vehicles to come down the R330. We will stop them.</p>	<p>during the construction phase, which will improve the impact on traffic congestion, noise and safety to low / medium. The construction vehicles (normal heavy loads) will utilise only the upgraded Oyster Bay Road (DR1763 - western access) to minimise the impact of construction traffic on the existing network and the infrequent abnormal loads will utilise the R330 (MR381) during the night time. Several bypasses have been recommended for construction traffic to avoid using the Humansdorp Main Street travelling between the N2 and the Oyster Bay Road, as well as to avoid the Humansdorp Main Street to travel between Voortrekker Road (R102) and the R330.</p>
	53	<p>Hylton Thorpe Thyspunt Alliance and St. Francis Bay Residents Association</p>	<p>The road proposals are part of the social impact assessment in this EIA. Social impacts have been totally neglected as part of this EIA. It was not identified as one of the 8 or 9 key impacts identified. The Social Impact Report is the same pathetic document we saw a year ago. It is hypothetical and plays down everything. A recommendation from the Nuclear Site Investigation Programme reads: "small holiday resorts along the coast should be unaffected". Ha-ha. So we will be unaffected by all these hundreds of trucks coming right past us? Exactly the same problem in Humansdorp. I re-emphasise my proposal that no road access to Thyspunt should occur within 1km of any urban edge, including the R330 at Humansdorp and this end. The playing</p>	<p>GIBB has taken these comments back to the author of that specialist report. Regarding the social impacts not making it onto the list of eight key decision factors - that decision was made at the specialist integration meeting held on 25 May 2010, made together with all the 28?? specialists, including the social specialist himself.</p> <p><b>Please note that the Transportation Assessment Report was substantively amended and the feasibility of the western access road was re-assessed. The revised report will form part of the Revised Draft EIR Version 2.</b></p>

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			<p>down of social impacts is scandalous and it's one of the biggest concerns we have. There has been no mention this evening of the informal settlements that are likely to develop here if the road comes this way. We will have a situation where the population of informal settlements is greater than the population of the permanent residents here. They will be unemployed and living in squalor. The consequences are mind-blowing. Implications for Sea Vista are frightful. It will happen if this road comes this way. The mitigation plans proposed by the social impacts specialist are all just talk; they hold no teeth or power. It talks about the municipalities imposing bylaws on the informal settlements but municipalities do not have the ability to implement by-laws (if they exist). This social impact assessment is a non-starter and we really need to object strongly.</p>	
	54	Bridget Elton Interested and Affected Party	<p>You said Bantamsklip is too isolated, and the roads to access the site would cost too much. But you want to bring the transport right through St. Francis Bay. Why can't you built the roads away from us? If you are going to factor in that cost, then maybe Thyspunt is more expensive. Why can't you do us the courtesy of protecting us, our sense of place, and our lives, instead of directing all these trucks through our</p>	<p>Please note that the Transportation Assessment Report was substantively amended and the feasibility of the western access road was re-assessed. The revised report recommends that a combination of both Oyster Bay Road (Route 1 to western access) and R330 (Route 2 to eastern access) be used for transportation during the construction phase, which will improve the impact on traffic congestion, noise and safety to low / medium. The construction vehicles (normal heavy loads) will utilise only the upgraded Oyster Bay Road (DR1763 - western access) to minimise the</p>

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			<p>village? You have a social responsibility to those of us who live here to look at putting the road somewhere else and then factoring in that cost. Then maybe Bantamsklip might be cheaper; it is more remote and there are no villages on your doorstep.</p> <p>I think GIBB is just proposing this route because it is going to cost the client less, but maybe the client needs to look into this alternative road idea. Please look into this and don't just bulldoze us.</p>	<p>impact of construction traffic on the existing network and the infrequent abnormal loads will utilise the R330 (MR381) during the night time. Several bypasses have been recommended for construction traffic to avoid using the Humansdorp Main Street travelling between the N2 and the Oyster Bay Road, as well as to avoid the Humansdorp Main Street to travel between Voortrekker Road (R102) and the R330The revised report will form part of the Revised Draft EIR Version 2.</p>
	55	Mr Elwin Malgas Interested and Affected Party	<p>The consultant comes here every time with the same story; blatant lies! The farmer who spoke about meat prices: he spoke about his kids. Well I have three kids. Our children will have to walk on these roads with the 900 trucks. There is already a problem in the mornings around the schools; we are already battling to get kids over the roads. Eight hundred and forty five trucks in the morning! What will happen?</p> <p>I support Hylton Thorpe's recommendation that they have no road within 1 km from any town area. Who is this traffic specialist? He does not live here and does not know the conditions here.</p>	<p>Please note that the Transportation Assessment Report was substantively amended and the feasibility of the western access road was re-assessed. The revised report recommends that a combination of both Oyster Bay Road (Route 1 to western access) and R330 (Route 2 to eastern access) be used for transportation during the construction phase, which will improve the impact on traffic congestion, noise and safety to low / medium. The construction vehicles (normal heavy loads) will utilise only the upgraded Oyster Bay Road (DR1763 - western access) to minimise the impact of construction traffic on the existing network and the infrequent abnormal loads will utilise the R330 (MR381) during the night time. Several bypasses have been recommended for construction traffic to avoid using the Humansdorp Main Street travelling between the N2 and the Oyster Bay Road, as well as to avoid the Humansdorp Main Street to travel between Voortrekker Road (R102) and the R330The revised report will form part of the Revised Draft EIR Version 2.</p>

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	56	Leanne Swanepoel Interested and Affected Party	Proposing a bridge or a walkover is not acceptable. People will walk under bridges or climb over fences etc. so that they don't have to walk over the bridge.	Comment noted.
	57	Greg Christy, SASMIA	<p>Regards the outflow and inflow pipes, are they the same as the spoil pipe, or are there 3 separate pipes going to be flowing out?</p> <p>Has there been an Engineering feasibility study on laying a 6 km pipe out into the ocean? Not sure if this will be over or under the sea bed. This would be a first for this country. If this hasn't been done, why?</p> <p>We are being asked to comment on the EIR when we don't yet know the type of nuclear technology to be used, and we don't have the engineering feasibility for one of the main aspects of the project, the pipelines out to sea. Yet we have a comment deadline of the 07 August 2011.</p> <p>So there has been no costing done on this pumping issue, because there is no engineering feasibility. How can one do a comparison if you don't have the costing on it yet?</p>	<p>The outflow pipelines will not be the same. There will be three types of pipelines: one for spoil<sup>3</sup>, an inflow line for cooling water and an outflow line for cooling water.</p> <p>The proposed inlet duct piping will be a physical, hard rock tunnel about 17 m below the main sea level going out. It is approximately 6 m diameter by 1 km long. The inlet point would be about 700 m off the coast. The outfall pipes will be about 500 m long pipes set into the seabed. They will be covered pipes, not tunnels, and will discharge the warm water well beyond the shore to avoid desalination and encourage dispersal. The spoil pipe will be a temporary pipe. This one will be a challenge; Eskom will have to build it to get it 5 km offshore. Eskom has looked at studies with the pumping organisations and believe they can get high enough pressure to pump in one stage. In normal conditions, a booster station at 1km intervals would be required. The present thought is that a big enough pump station to pump it 6 km out can be built on shore.</p> <p>The indicative costing has already been done. Eskom previously investigated some of the costs when the Nuclear-1 tender was offered, and obtained prices from two vendors; one to pump the sand to the Cape St. Francis Beach (over 11 km), and the other was to truck it on the site. Therefore,</p>

<sup>3</sup> To be used only during construction

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			<p>Also, we were told earlier that the release depth would be 500 m, not 5 m.</p> <p>Jaana please confirm that your specialist has consulted with the squid working group, because the working group deny this. I sit on the scientific working group and that consultation hasn't happened.</p> <p>I spoke to Mr Hans Verwey<sup>2</sup>. He is not a specialist on squid and he told the scientist involved that the people they have to speak to is the scientific working group. Jaana you have been misinformed.</p>	<p>Eskom does have indicative costs, but the true costs will only come out at the end of the process. The current view is that Eskom has adequate costing. It needs to be also emphasized that the proposed intake and outfall as described is common to all the 3 sites and not specifically to the Thyspunt site</p> <p>There was never any indication provided that the release depth would be 500m.</p> <p>GIBB's specialist has given GIBB a list of people with whom they have consulted, one of which is Hans Verwey.</p> <p>J</p> <p>The marine specialists have provided GIBB with a list of five or six people they consulted with, some of which were members of the Squid Working Group.</p> <p>The Marine Specialist Report (Appendix E15 of the Revised Draft EIR) indicates that the following squid specialists have been consulted in the preparation of this report:</p> <ul style="list-style-type: none"> <li>• Dr. N. Downey, Bayworld Centre for Research and Education;</li> <li>• Ms. J. Mwicigi, Offshore Resources, Fisheries Branch, Department of Agriculture Forestry and Fisheries;</li> <li>• Dr. M. Roberts, Ocean Environment, Biodiversity and Research, Department of Environmental Affairs; and</li> </ul>

<sup>2</sup> The correct spelling is "Verheye", but for the sake of accuracy of the minutes, the pronunciation used during the meeting has been maintained.

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			<p>You spoke to someone that is on the working group, but have not necessarily consulted the working group. There is a difference. Was it a consultation or a conversation?</p>	<ul style="list-style-type: none"> <li>• Dr. H. Verheye, Ocean Environment, Biodiversity and Research, Department of Environmental Affairs.</li> </ul> <p>All the above researchers are members of the Squid Working Group.</p> <p>Dr Verheye referred the marine specialist team via email to other members of the Squid Working Group, as he indicated that other members of the group would be better qualified and/or experienced to answer the issues.</p> <p>GIBB can confirm that it was a consultation.</p>
	58	Mike Kantey Coalition Against Nuclear Energy	<p>Regarding who owns the EIA process, the EIA procedure is regulated and falls under the NEMA. The NEMA process itself is subject to section 26 of the Constitution. The right to a healthy environment has been enshrined. The point that Dr Abrahams made about local concerns is valid e.g. the case of the petrol pump lady who challenged successfully, even though they tried to put a slap suite on her. She won the slap suite as well and they were forced to pay costs. So there is legal precedence as Dr Abrahams suggested for a challenge to an EIA process. Another example would be Roodefontein in Plettenbergbay Bay. This entire process is not owned by Eskom or</p>	<p>Comment noted.</p>

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			<p>GIBB, it is owned by the public. Rest assured that we are governed by our constitution.</p>	
	59	<p>Trudi Malan Thyspunt Alliance and Cape St Francis Civics Representative</p>	<p>As a word of warning, go back to your marine ecology report, where it says “no sites of special biological significance occur within the designated area”. I don’t understand how two of the specialist studies can contradict each other. The Marine expert says that long term climate change indicates a decrease in water temperature, yet the oceanographic specialist says exactly the opposite, that temperatures along the coastline will increase.</p> <p>The marine specialists say following: “entrainment is not anticipated to have important ecological impacts”. You should research what has happened in US. Have submitted a paper (Californian Energy Commission) to you on how to determine ecological impacts of entrainment of biological species in the area of a nuclear power station. Don’t tell me that they have studies it at Koeberg, because comparing Koeberg and Thyspunt is like comparing apples and bananas. The US is now looking at phasing out Once Through Cooling systems. Why is Eskom not looking at any other alternatives for cooling their</p>	<p>All the reports were required to look at the impact of global warming. The marine report however indicated that contradictory to the general trend around the country, there has been a decrease in sea surface temperature at the Thyspunt site.</p> <p>The following is a quote from page 33 of the Marine Assessment (Appendix E15 of the Revised Draft EIR Version 1) with respect to the Thyspunt site): “... long-term climate change induced decreases in sea-surface temperatures along this section of coast (Rouault et al. 2009)”.</p> <p>GIBB has instituted the revision of the marine report and it will appear in the Revised Draft EIR Version 2. However it must be noted, the specialists have to base their studies on South African conditions, which is why the marine report has been based largely on the extensive monitoring that has been done at the Koeberg Nuclear Power Station over more than 20 years.</p> <p>While there is a move in the USA to do away with once-through cooling systems on both coastal and river based plants currently all the coastal nuclear power stations under construction in the world (in France, Finland, China, Taiwan, Russia, India and the UAE) are using once through systems as proposed for Nuclear-1.</p>

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			<p>nuclear power station? In the US it is recognised that entrainment has a much bigger impact than previously thought. I have supplied the document to the EAPs twice now.</p> <p>Why in the EIA are there no references made to flight routes, while in the original Nuclear Site Investigation Programme, the following was noted: "All light aircraft must follow the coastline. They are not allowed to fly over the sea within 15 nautical miles from PE and must fly below 500 feet ... a nuclear power station in the Oyster Bay area, would have an inhibiting affect on light aircraft. They would be forced to fly inland, closure to the mountains. It would mean that they would have to increase their altitude to 1500 feet above the mountain ranges and then descend to sea level at PE airport. The traffic controller at the PE airport considered this to be dangerous". Why if the original site investigation pointed this out, is this now no longer a problem anymore?</p> <p>Regarding the marine specialists using long terms studies, he is referencing work done in 1984 and 1988. The 1988 study actually called for more information about the benthic environment. To date it has not been done because it was seen as being</p>	<p>The issue will be addressed in a revision of the Traffic Assessment.</p>

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			<p>too costly. Your marine specialist based most of his information on desktop studies prior to the year 1988. I am warning you again, he should talk to us because we have since had a study done.</p>	
	60	Rene Royal Enviro Consultant	<p>Regarding the intake and piping. Can we not get a more detailed development plan, showing cross sections of cut and fill areas, and where roads will be, buffer zones on wetlands, where the plant will go etc. It is now a year further down the line. Surely more site specific detailed plans can be provided? Why can we not have a detailed development plan?</p> <p>But surely we can get a more detailed plan at this stage. The report says we need to a keep a 200 m corridor between the high watermark and the power plant. How are you going to achieve this; surely you will need to have fencing, pipes etc traversing this corridor? How do you know you can make this work if you haven't drawn it up on a plan?</p> <p>The cut and fill required to get foundations in also concerns me. Looking at the site, you have to move as far west as you can,</p>	<p>GIBB has recommended that should authorisation be given, detailed "walkdowns" of site be undertaken by the relevant specialists.</p> <p>Eskom has conceptual designs but are not able to do detailed site layouts until they have one of the three sites approved, and a footprint area assigned to them. Eskom has been moving the plant around the site many times because of the environmental constraints. The layout will also depend on the technology used, which hasn't been decided. Once Eskom knows what the final conditions are going to be from the EIA, Eskom can then start working.</p> <p>Eskom is working on the principle that there will be a temporary cut and fill of about 100 m wide, from the site to the coast, to get in to install the discharge pipe work, and possibly for the offshore sand discharge during construction. Apart from this, the coastal area will be left untouched. A fence will be built around it and Eskom will not be going on the ground outside the fenced area.</p> <p>Eskom is constrained by the area of least sensitivity given by the EIA consultants. The short answer is that the off-shore pumping is a function of how sand is removed off-site. The</p>

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			<p>where the difference between the rock and sand dune is at least 60m Have these calculations been taken into account for this western area?</p> <p>For the record, at this stage, one should have a good idea of what constraints are on the site, and hence should have more detailed designs available for a project of this magnitude and cost.</p> <p>So why can they not put a design on it then?</p> <p>But then what if it doesn't work? Why can't we see conceptual designs? At this far along in the process there should be at least a conceptual design.</p>	<p>terrace would have to be at least 15 m, required in terms of the tsunami study, but it may need to be as high as 18 m. This is why it is difficult to provide a drawing; it depends on the technology selected, even the tunnelling technology. Any drawings Eskom could provide would be confusing because they would change month by month.</p> <p>From an environmental perspective, GIBB has detailed mapping of constraints from specialists, for example the wetlands, flora and fauna.</p> <p>Detailed designs cost a lot, and Eskom only has the concept monies approved for this project. Government and Eskom's Board will have to give approval for detailed design. Until Eskom has definite approval for the plant to go ahead, Eskom will not get detailed design approval.</p> <p>Eskom has an idea of where the plant can be placed on the site, but the conceptual designs keep changing because of changing environmental constraints.</p> <p>At least five different PWR designs are being considered, with approximately six or seven layout options per design. Eskom is looking at commercially sensitive information which looks at what is the advantage of one type of technology over another. On a deal of this size, 1% is well over a billion rand. So if Eskom starts showing how the layout will be planned, the vendors will use that against them. Eskom has at least two solutions for each of the technical problems. For example, if construction goes</p>

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				<p>offshore through rock, is a lined tunnel or a bare rock tunnel more suited? Should a machined tunnel be used, a boring machine or drill and blast? There are many options and Eskom can make many of them work.</p>
	61	Chris Barrett Thyspunt Alliance and St. Francis Kromme Trust	<p>Maybe we can minute that we are concerned about how an EIA report can be finalised without knowing these engineering options. Are they going to blast, or bore etc? The EIA has to look at these aspects and they haven't done this as yet.</p> <p>Jaana has come up with figures as to why Thyspunt is the desired site. She says that these are based on the specialist's get together. Can you tell us whether the specialists considered any change to those rating as a result of the revised EIA and specialist studies?</p> <p>So I take it they were not consulted at all?</p>	<p>The specialists take responsibility for their assessment and reports. They use a methodology that is prescribed by the DEA. GIBB provided the specialists with standard assessment tables to ensure they report in a uniform manner. GIBB had an integration meeting on 25 May 2010 where it, with all the specialists, discussed the significant impacts and recommendations of all the studies, at all the alternative sites. It was discussed which particular studies should be used in the assessment of the preferred site. It is GIBB's responsibility to do the overall assessment. So GIBB's specialists did not get involved in the various tables assessing the preferred site that are in Chapter 9 but these significance ratings for potential impacts come from the specialist reports.</p> <p>That is untrue. GIBB has not had a follow up integration meeting, but GIBB has interacted extensively with the specialists in terms of their revised reports.</p>

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			<p>It is noted in the executive summary that the department in the Eastern Cape, DEDEA, have to comment on the report. When do their comments come into the public domain? Is it before or after it goes to DEA?</p>	<p>During the process, the authorities have a chance to comment on the report. There are minutes in the report of meetings GIBB has had with the DEA&amp;DP<sup>4</sup> on 03 August 2010 and the DEDEA<sup>5</sup> (Eastern Cape) (07 June 2011). All comments that have already been provided are included in the report. If a commenting authority chooses not to comment, GIBB cannot force them to.</p>
	62	<p>Hylton Thorpe                      Thyspunt Alliance                      and St Francis                      Bay Residents                      Association</p>	<p>The problem at Fukushima was that the cooling system failed. I presume a modern PWR system would also require the same level of cooling? If so, can Eskom guarantee that the inlet system in the sea will function perfectly for the lifetime of the plant? If they get blocked or cracked will Thyspunt be just as vulnerable as the Fukushima plant?</p> <p>Will the cooling towers be like those we see at coal fired power stations?</p>	<p>Fukushima failed because the electrical supply failed. Some modern systems are passively cooled and do not require a separate cooling system. However if Eskom does not use such passive systems at Thyspunt, then it would be required to build separate cooling towers on site, which will allow Eskom to keep the plant cool without needing the sea e.g. if an oil tanker dumped oil on the beach and clogged the intakes. It will not function at full power, but will be sufficient to keep the plant cool for shut down. The reason for two tunnels is that one of the tunnels can be closed so that maintenance can be done on one while the other one operates.</p> <p>They will only be about 5 - 6 m high, and will only be use for cooling the essential systems for shut down, not for normal operations. They will not be visible from outside the power station.</p>

<sup>4</sup> Western Cape Department of Environmental Affairs and Development Planning

<sup>5</sup> Now called "Department of Economic Affairs, Environment and Tourism"

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	63	Mike Kantey Coalition Against Nuclear Energy	<p>A comment was made that someone was cited as being consulted by a specialists, but when that person was asked, they denied having been consulted. I think it was Mr Verwey that was mentioned.</p> <p>Similarly it was reported to me by Prof Johnny Meyers from UCT that his name was used in one of the health specialist reports after only having had a 2-3 minute telephone conversation. The question is put to GIBB; who judges the verity of the specialists reports? Who vets the content and accuracy of those reports? We've heard of the very big holes in the reports. One begins to question the authority of those specialists. Similarly Dr Reed in Cape Town asked how and by what external peer review process was this process of identifying the three candidate sites conducted. What scientific or mathematical process was used to get this - 5, +8? What is that, and does it have status in the peer review literature?</p> <p>When an issue of substance is dealt with in the report, it is always referred elsewhere. At no point do the genuine impacts arise in the report and are given substantive answers which can stand peer review.</p>	<p>GIBB has requested the public to be part of the review process from the beginning. GIBB is very glad that this community has appointed specialists to act on their behalf. That is one mechanism of peer review. GIBB also reviews the specialists reports; not from a technical point of view, but from a methodology point of view. Earlier on in the EIA process GIBB also had technical peer reviews of all specialist reports undertaken. These are the three types of review that have been done. The DEA has also appointed a panel of independent reviewers, with specific areas of expertise, to review the EIR and its specialist reports.</p>

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	64	Andre Fouche Interested and Affected Party	When it comes to cost, we score very well here in Thyspunt. It is because we are providing an enormous subsidy in terms of existing infrastructure, e.g. a road which is about to be hijacked, which is getting Eskom in here on the cheap. Eskom mentioned they have budget constraints, and we are being used here unfairly because we have existing infrastructure.	Comment noted.
	65	Greg Christy SASMIA	Regarding the process review that has been done by SE Solution, and the recommendation thereon, are you going to be acting on this?	GIBB has already acted on it and hence some of the methodology has changed and Chapter 10 of the EIR has been amended. Please let us know if you feel we have not dealt with everything. GIBB has communicated the peer reviewer's recommendation as well as GIBB's subsequent changes to the DEA.
	66	Shaun Thyme Interested and Affected Party	How much will this project cost?  You said that it would cost R 5 billion more to build it at the other sites. If you are spending R170 billion, what is an extra R 5 billion?	The capital costs of this project is approximately R170 billion.  R5 billion sounds like a small sum but it equates to low cost housing in RSA for a whole year.
	67	Trudi Malan Thyspunt Alliance and Cape St Francis Civics Representative	Two things we would like to request. Firstly, the EIA should be revised and all references to the European Utility Requirements must be removed, because the European Utility Requirements, the group of companies themselves, state that they are not a statutory body. It is strange	References to the EUR requirements, as has been stated before, are one of the key assumptions of the EIA. If any of the assumptions in the consistent data set or regarding the 800 m and 3 km exclusion zones are incorrect, this EIA would have to be started again.

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			<p>that the emergency planning document in this EIA only refers to the EURs. Those EURs are not accepted. I phoned the American Nuclear Regulator. The answer that I was given was that irrespective of whether it is Generation III, or Generation II, the exclusion zone in America will remain 16km and 80km, and they are now looking at revising it. So every study in this EIR that refers to the EURs must be rectified, because those exclusion zones are ungrounded. Finland is busy building Olkiluoto, a Generation III plant, which has a 20km exclusion zone. I also phoned France, and they have defined an internal 5km and a 10km external exclusion zone at the Flamanville plant. So why are we proposing 800 m and 3 km here in RSA? This is unacceptable if it is not in line with world standards.</p> <p>Secondly, I make the request again that we would like to have a focus group meeting with the specialists. I have been told by Deidre that they don't want to expose the specialists to the public again. But if a specialist makes a statement, he must be willing to defend it in front of the world. We are not asking for a public meeting; we are asking for a focus group meeting, like we had last time. Deidre said she would prefer one-on-one, but we don't want that,</p>	<p>Prof Ellery has not supplied GIBB with a study. He supplied a selection of photographs and referred the EIA Dune Geomorphology specialists to a number of related specialists in the Eastern Cape who may have similar information and evidence. Although Prof. Ellery indicated that a Masters' thesis was in preparation on the Oyster Bay dune fields, no such study, or background research for such a study, was supplied, despite attempts by the EIA team to obtain such information.</p>

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			<p>because the public in this area has the right to know what's going on.</p> <p>When the specialist glibly states that there is no such thing as a debris flow, it has huge implications for the roads that you are going to put in. It is not mentioned anywhere in his reports on Prof Fred Ellery's study. We never said there were debris flows in only the Sand River; we referred to several other debris flows as well. The fire the Reuben was referring to happened on the other side of the R330 and had no implication on that flood.</p> <p>Lastly we would like to request that a full review of the Economic Impact Assessment and the Agricultural Impact Assessment be done immediately. We have done it; we've taken it to an actuary in JHB who looked at it and there are a huge number of costs that are not included for the Thyspunt site costing, which actually pushes the Thyspunt site to way beyond the costs of any of the other sites. We would prefer that the costs of every mitigation activity be included in the Thyspunt site costs. For example, the costs of the heritage mitigation, including the curation structure which Eskom will build, R25 million worth, should be added to the Economic Impact Assessment. We are asking for this because Arcus GIBB have</p>	

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			<p>decided in their weighting that transmission lines and integration gets the number 1 rating, and secondly economic impact. The Agricultural Impact Assessment pushes the Thyspunt site into the preferred site position. That is one of the worst agricultural assessments I have ever seen and we've also taken that to an independent specialist. And it is an embarrassment when this independent specialist phones me back saying that the author of the original agricultural report probably never got up from behind his laptop. You cannot do that to a community. Eskom should bring those scientists here and let us put these questions to them and give this community opportunity to interrogate these people that have decided that we will be the preferred site, in spite of the fact that in all the ratings, this site is the most sensitive site. They have decided this because it suits Eskom because of the existing transmission lines here.</p> <p>We would like a key focus group meeting with the specialist, as per our email, to which we have had no response. This community will take all necessary steps to get what they want. We will not stop before the Constitutional court.</p>	<p>GIBB replied to Ms Malan's email on 12 July 2011 and agreed that the public needs answers. GIBB have asked people who do have questions for specialists to list their issues regarding the studies and then meetings with specialists can be considered. The points about the economic and agricultural studies are noted and will also be considered.</p>