

5 August 2015

Our Ref: J27035 / J31314
Your Ref: Email received 25 July 2011

The Project Coordinator
Thyspunt Alliance
PO Box 102
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Email: dolphin@intekom.com

Dear Ms Malan



GIBB
ENGINEERING & SCIENCE

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

Comment 1:

Your correspondence dated 21 July 2011 has reference.

We made a timeous request (see correspondence 12 May 2011) for Key Focus Group meetings. In this first request, we specifically asked that the Key Focus Group Meetings take place within the first 45 days, as this would allow us the next 45 days of the comment period to prepare our responses.

You replied to this request on 31 May stating the following: *“With respect to the Alliance’s request for additional meetings GIBB will be facilitating Specialist Meetings during June/ July, where required.”*

You requested that we provide you with a detailed list of issues related to the specialist’s studies. You also stated that you would discuss the matter with us at the Public Meeting.

This unfortunately did not happen.

You followed-up with an e-mail on 15 June 2011 stating that you have not yet receive the list of issues. We responded on 20 June 2011 and when no reply was forthcoming from GIBB, we enquired again on the 12 July 2011. We find your reply dated 21 July 2011 unacceptable.

Response 1:

Your comments are noted. As stated in our letter dated 21 July 2011 GIBB is considering the Thyspunt Alliance’s request. GIBB wanted to wait for the expiry of the comment period for the Revised Draft EIR and the expected comments from the Department of Environmental Affairs (DEA) before making a final decision. This would enable the EIA Team to collate all issues (including those submitted by the Alliance and the DEA) related to the various specialist reports and determine whether additional issues have been raised since the meeting, which was held in 2010 with specialists in St. Francis Bay, and whether there is still a need for a Key Focus Group Meeting with the specialists. GIBB is to date still awaiting comment from the DEA. As you are also aware meetings have been held



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between specialists to obtain further resolution on the squid and the debris flow issues. Specialists representing the Thyspunt Alliance attended these meetings.

Comment 2:

We requested Key Focus Group Meetings to allow the specialist that we have approached to comment on the report, the opportunity to engage directly with the specialists that produced the various reports. We were certainly not aware that the second round of public participation focused only on the so-called changes. It was clear from the Public Meeting in St. Francis Bay that the majority of the audience was of the opinion that nothing has changed since your previous Public Meeting.

Response 2:

We refer you to response 1. All I&APs and stakeholders have had the opportunity to interact with the EIA and specialist team throughout the review period of both the Draft EIR and Revised Draft EIR via post, e-mail and telephone. The Thyspunt Alliance and other key stakeholders also engaged directly with specialists subsequent to the release of the Draft EIR, the issues raised at this intervention have been addressed in the Revised Draft EIR Version 1. To date the Thyspunt Alliance has not provided a detailed list of issues which substantiate the need for additional interaction with specialists. The invitation to the second round of public meetings clearly stated that the aim of these meetings was to discuss the changes between the first Revised Draft EIR and the revision (Revision 1).

Comment 3:

We also fail to understand how you could yet again ignore the request for a Key Focus Group Meeting with the Scientific Squid Working Group before you published the second draft. The first meeting with this group only took place on 20 June 2011 with a second meeting on 8 July 2011. Why did you have to wait until after the second draft was published if you were informed about the industry as far back as the original scoping phase of the study?

Response 3:

Your comments are noted. Meetings with the Squid Scientific Working Group took place in 2011, at which the SASMIA was a participant. The Marine Impact Assessment has subsequently been revised in accordance with the outcome of these meetings and will be made available for public comment and review.

Comment 4:

You refer to a technical specialist meeting to be held to discuss in detail the debris flow and geo-hydrology issues related to the Eastern Access. We were alerted to this meeting by two of the specialists involved with the Thyspunt Alliance.

We would like to record our objection to the following:

1. We were not notified of the meeting; and
2. We have not been given the opportunity to request the attendance of some of the other specialists involved in reviewing this specific issue. Please note that three representatives from the Thyspunt Alliance will be attending this meeting as observers.

Response 4:

Your comment is noted. Professors Fred Ellery and Richard Cowling, as well as three observers from the Thyspunt Alliance, including yourself, attended this meeting held on 29 July 2011.

Comment 5:

Furthermore we would like to strongly disagree with the following statement in your letter:

“during the round of public meetings GIBB was able to respond to all queries raised and will further expand on these explanations where necessary in the Issues & Response Report.”

There is still a very large amount of outstanding issues that were not dealt with at the Public Meetings; answers were also not forthcoming in the post meeting comments.

The Public Meetings allowed I&AP's the opportunity to raise even more issues, but as you yourself state, technical issues were not discussed or addressed in detail. We requested Key Focus Group meetings exactly for that reason.

We went out of our way to involve local specialists in the review of the reports. They were all awaiting the opportunity to ask the relevant questions, not just for the sake of the Alliance, but also so that the independent consultants can be sure to provide the Department of Environmental Affairs with a comprehensive document.

Response 5:

Please see our response 1 and we trust that as requested previously the Thyspunt Alliance has submitted their comments on these outstanding issues.

Comment 6:

As matters stand at the moment we cannot but question the independence of the consultants.

Response 6:

As the Environmental Impact Assessment Practitioner, GIBB is indeed charged with the task to act as independent consultant. We act as independent practitioner in relation to the Applicant as well as I&APs and stakeholders in order to most objectively assess the impact of the proposed development on the receiving environment. By waiting until expiry of the Revised Draft EIR Version 1 comment period and for comments from the DEA, to schedule any additional meetings, GIBB will ensure that neither the Applicant nor any other I&APs, stakeholders or interest groups are prejudiced.

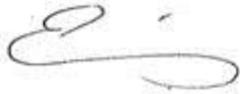
Comment 7:

We were advised that the consultants have had a Key Focus Group meeting with some members of the KhoiSan community. We would like to request that the minutes of this meeting be forwarded to us as soon as possible.

Response 7:

Your request is noted. The EIA Team met with the Chief of the First Nation on 07 June 2011. Minutes of all meetings held are attached in Appendix D of the RDEIR version 2.

Yours faithfully
for GIBB (Pty) Ltd

A handwritten signature in black ink, appearing to be a stylized 'S' or 'J' followed by a horizontal line.

The Nuclear-1 EIA Team