

05 August 2015

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Dear Frances Becker

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

**Comment 1:**

**NOISE**

I live within earshot of the Kromme river bridge. I want a proper study of the effects of increased truck traffic on the bridge.

I hear the traffic as I wake up each morning, and to say that 900 trucks a day will not impact the sound levels to the residents is LUDICROUS. We have not had an opportunity to meet the "expert" from Cape Town who must not know the wind directions.

There are laws governing noise levels - and I am sure that insufficient work has been done in this impact study.

Should the traffic continue at night - all of us will have disrupted sleep. The houses have thatched roofs and the shacks have no insulation whatsoever. 10 years is a long time to have disrupted sleep.

**Response 1:**

Your comment is noted.

Since the release of the Revised Draft EIR, the Traffic Impact Assessment (TIA) has been substantially revised so that the bulk of construction traffic will avoid Humansdorp and St. Francis (with the exception of less extra heavy loads that will have to use the Eastern Access Road to the Nuclear-1 site over the 9 year construction period). The revised TIA recommends the construction of a new interchange on the N2 to the west of Humansdorp that will bring construction traffic to the site via the Oyster Bay road and the Western Access Road to the Nuclear-1 site. The revised TIA recommended that only personnel traffic (buses and passenger vehicles) should use the R330.

**Comment 2:**

**DUNE FIELD**

After the recent slurry floods and disaster I find it incredible that Eskom continues with their plans to build in an active Dune Field.



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After discussing the situation with expert Japie Buckle (please let me know if you have not spoken to him - but you surely must have) he says that the mechanisms that create slurry floods are poorly understood.

You may be able to build a nuclear plant but you may find it buried or your access severely limited. Ultimately St Francis will have more such incidents as the coast becomes wetter due to climate change. Over 100,000 cubic meters of sand have been displaced in this one incident.

How will you position Pylons in the middle of such an active dune field?

What is the cost of doing this by helicopter?

**Response 2:**

Your comment is noted.

It is not proposed to construct the power station within the Oyster Bay Mobile Dune Field. As indicated by the recommended power station footprint in the Revised Draft EIR Version 1, the power station is proposed to be placed well to the south of the mobile dune field.

Mr Japie Buckle represented the SA National Biodiversity Institute (SANBI) and the Working for Wetlands project at a Nuclear-1 key stakeholder meeting held on 12 April 2010. He is also included on the Nuclear-1 EIA stakeholder database as a registered Interested and Affected party and has therefore been privy to all communication to I&APs throughout the history of the project.

With regards to the so-called slurry floods, an extensive study of the mechanisms that give rise to debris flows was undertaken for the Revised Draft EIR Version 1 (See Appendix E30 of the Revised Draft EIR version 1). The conclusion of this study is that there is no evidence of debris flows having occurred at or close to the site and that the conditions that would enable debris flow to take place (e.g. very steep slopes) do not occur at the Thyspunt site.

It has been proposed, to minimise the impact on the dunes that helicopters are used as far as possible to place the pylons.

**Comment 3:**

**ROUTE to SITE**

The proposed route of heavy traffic is dangerous and will destroy the community.

As the recent washing away of the bridge indicated - there is one road in and one road out - and when that is disrupted it is disastrous. The residents will have their lives severely disrupted with the amount of traffic.

I live on the R330 and will be stuck trying to get in and out of my property. As it is, I have to wait in the mornings for an opening in the traffic. The recent disruption showed how much commerce and traffic goes between Humansdorp and St Francis. It will be slowed to a crawl.

The traffic studies saying it will not disrupt the town are inaccurate.

**Response 3:**

Your comment is noted. Please refer to Response 1 above.

**Comment 4:**

**ATTITUDES TO RESIDENTS**

That lawmakers regard St Francis as an elitist community is clear - however anyone standing at the bridge and watching who crossed over to go to work in the community and how many deliveries are made on a daily basis would know that the "elitists" are much fewer in number than ordinary citizens - and that they provide an enormous number of jobs. Kouga municipality will lose far more jobs than it will gain. And those will dwindle as people choose not to stay - what with a nuclear power plant, wind farms and flooding. It is already less attractive to buyers.

I am a business owner that relies on retirees and tourists for my business - I have never once been consulted about the power plant and its possible effect on my business. None of my twelve workers who live in the area are interested in the nuclear plant and feel that their voice is not being heard.

**Response 4:**

Your comment is noted.

The proposed position of the power station is approximately 11 km from St. Francis and would not be visible from St, Francis. The experience of the operation of the Koeberg Nuclear Power Station (KNPS) shows that communities, including tourism developments, suffer no long-term negative effect on tourism due to proximity from a power station. There are, for instance, high-income golf estate developments that have been developed within sight of the KNPS in the recent past and several guest houses and organic wine farming initiatives operate within sight of the KNPS.

The Tourism Impact Assessment (Appendix E22 of the Revised Draft EIR) predicts that there may be some loss of nature-based tourism but that due to the increased business tourism to the region, the net impact on tourism around the St. Francis region will be zero. This effect is also borne out by the experience at the KNPS and the current construction of other Eskom power stations.

Your comment regarding Nuclear-1 EIA not having solicited your individual comment is noted. It is not the purpose, neither is it possible for every individual landowner or resident in a particular geographical location to be consulted individually. The EIA public participation process makes use of a range of different techniques to solicit comments from I&APs, including press adverts, site notices, public and key focus group meetings, availability of hardcopy reports for review and availability of documents for review on the internet. You have the choice, as interested and affected party, to make use of the channels of communication that the EIA team has provided to you. Whilst it is a principle of the public participation process to consult as widely as possible, it is unfortunately not possible to consult every interested and affected party individually.

**Comment 5:**

**SAFETY PLANS**

I have not yet heard any evacuation plans that satisfy me. It would be more honest to say that you choose to live in the area at your own risk. I think that people who wish to re-locate should be compensated for their loss of security. We could all be so easily trapped in St Francis - as the recent incident illustrated.

**Response 5:**

Your comment is noted.

The evacuation plan for Nuclear-1 has not yet been formulated. The development and approval of evacuation plans is within the ambit of the National Nuclear Regulator Act (NNRA), 1999 (Act No. 47

of 1999), once a technology has been determined a extensive nuclear licensing process will be initiated, this process will include an extensive emergency plan and the public will be engaged.

**Comment 6:**

**IN CLOSING**

I have found the entire EIA process to be flawed in that it has been like banging our heads against a brick wall to get answers out of Eskom. We have been treated poorly and the process has been BIASED. Crucial answers are never forthcoming. It appears that warnings about the environment have not been heeded.

WHY is Eskom going to build in a unique potential WORLD HERITAGE SITE??

WHY is Thyspunt the best site when it is clearly the most environmentally sensitive and unstable?

Eskom will easily be able to divest itself of its holdings in St Francis by creating a world class unique environmental center that would receive world acclaim and tourism income. The purchase is not in vain and could lead to significant positive effects.

I thank you for taking my points into consideration and seriously considering them and giving us proper answers.

**Response 6:**

Your comment is noted.

Please note that the Thyspunt site is not a World Heritage site. It is an opinion expressed by the heritage specialist that the Thyspunt site may qualify for listing as a World Heritage Site. Whilst this is a noteworthy conclusion, the site currently has no World Heritage Status and it would need to be nominated by South Africa and accepted by UNESCO prior to such status being applied under South Africa's World Heritage Convention Act, 1999 (Act No. 49 of 1999). Only one nomination can be made per year per country. It cannot be deduced that the expression of the heritage specialist's opinion in this regard necessarily implies that UNESCO would share the opinion that the Thyspunt site is of universal value to humankind.

There are indeed sensitive elements on the Thyspunt site (as there are on the other two alternative sites). However, given the recommended positioning of the power station in the least sensitive portion of the site, the potential environmental impacts of Nuclear-1 on this site are not regarded as fatal flaws for the site. Please refer to chapter 9 for more detailed information.

Yours faithfully  
for GIBB (Pty) Ltd



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The Nuclear-1 EIA Team