

05 August 2015



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Our Ref: J27035/ J31314
Your Ref: Email received 07 August 2011

Thyspunt Alliance
St Francis Bay Resident's Association
St Francis Kromme Trust

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Dear Mr Thorpe, Thyspunt Alliance and its members, the St Francis Bay Resident's Association and the St Francis Kromme Trust

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

Comment 1:

COMMENT ON THE BOTANY AND DUNE ECOLOGY, AND WETLAND ECOSYSTEMS IMPACT ASSESSMENTS: THYSPUNT NPS, 2nd Draft EIA REPORT.

Compiled by Prof RM Cowling BSc (Hons), PhD, ASSAf, NAS (USA), SACNAS and submitted on behalf of F.O.S.T.E.R. (Friends of St Francis Nature Areas), a member of the Thyspunt Alliance.

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Botany and Dune Ecology Impact Assessment

- (i) The Botany and Dune Ecology Impact Assessment fails to use Rouget et al. (2004) as a bioregional planning product. This assessment has been superseded by a more recent and finer-scale assessment, namely Vromans et al. (2010). This report includes finer-scale vegetation types and a more comprehensive and appropriate assessment of endangerment and recommendations for land use. Vromans et al (2010) must be incorporated in a substantive way in a revised draft of this report.

Response 1:

Rouget et al. has been considered in the Botany and Dune Ecology Assessment (Appendix E 11 of the Revised Draft EIR). The publication by Vromans *et al.* will be considered in EIR Version 2.

Comment 2:

- (ii) There is no costing for implementing the mitigation measures.

Wetland Ecosystems Specialist Study

There is no costing for implementing the mitigation measures.

- (i) The report makes reference to offsets as mitigation measures. As per my comments on the first draft, offsets are not mitigation measures and reference to this must be removed from the report.

Response 2:

Your comment is noted. The specialist stands by the recommendations and mitigation measures included in the report. Offsets are considered as valid mitigation measures by environmental authorities.

Comment 3:

References

Rouget, M, Reyers, B, Jonas, Z, Desmet, P, Driver, A, Maze, K, Egoh, B & Cowling, R M (2004). South African National Spatial Biodiversity Assessment 2004: Technical Report. Volume 1: Terrestrial Component. Pretoria: South African National Biodiversity Institute.

Vromans DC, Maree KS, Holness S, Job N and Brown AE. 2010. The Garden Route Biodiversity Sector Plan for the southern regions of the Kouga and Koukamma Municipalities. Supporting land-use planning and decision-making in Critical Biodiversity Areas and Ecological Support Areas for sustainable development. South African National Parks, Knysna.

Response 3:

Noted.

Yours faithfully



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