

Our Ref: J27035



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Attention: Ms. S. Kreutsch

Johannesburg

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Dear Madam

ESKOM ENVIRONMENTAL IMPACT ASSESSMENT (EIA:12/12/20/944) FOR A PROPOSED NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE: COMMENTS ON THE REVISED PLAN OF STUDY FOR EIA

Your correspondence to Ms. Bongi Shinga of ACER (Africa) refers.

Arcus GIBB (GIBB) acknowledges receipt of the above-mentioned letter. We thank you for your valuable comments and your participation in the Eskom Nuclear Power Station Environmental Impact Assessment (EIA) process to date. Your questions and comments concerning the Nuclear-1 have been noted.

Responses to your comments / questions are as follows:

Your comment (1)

Please note that the below are personal comments on the draft EIA Tourism report as an I&AP. Referring mostly to pages 3,4,8,9, 10, 24 and 25. I am concerned with the inaccuracy of the report of the impact of Tourism in the area.

1. The White Paper on Sustainable Tourism Development and Promotion in the Western Cape has identified a tourism policy based on the fundamental principles of social equity, **environmental integrity**, economic empowerment, co-operation and partnership and sustainability.
2. Under Constraints and **threats to tourism** it identifies the following:
 - **Inadequate environmental management.** Environmentally insensitive development along the coastline and inland urban sprawl mar the landscape. Tourism concerns have not yet been effectively integrated into planning processes.

Response (1)

Your comments are noted.

Your comment (2)

3. Wikipedia description: Bantamsklip is situated on the **Groot Hagelkraal** farm. The farm is a registered private nature reserve and a South African Nature Foundation Natural Heritage Site, its immediate neighbours are the SANParks (South African National Parks) at Waterford, Pearly Beach Nature Reserve and the Soetfontein Nature Reserve. Red Data listings show 75% of threatened plant species in South Africa occur only in the Southwestern Cape. There are 1600 listed Red Data species within 100 kilometers of Bantamsklip. There are 22 Red Data listed species on the Bantamsklip property itself, of which six are entirely restricted to the farm. The property represents the foremost



conservation priority in the Cape Floristic Region and is regarded as the world's "hottest" of biological diversity hot spots. In addition to this the Bantamsklip coastline has the highest level of marine endemism found in southern African coastal waters, due to the cool Benguela upwelling causing very high levels of primary nutrient productivity, enhanced by the seasonal south easterly and south westerly prevailing winds and the topography of the Agulhas coast lying adjacent to these climatic and oceanic systems.

Response (2)

Your comments are noted.

Your comment (3)

4. I can not find any reference to this Fauna and Flora in the EIA Tourism report.

Response (3)

Your comments are noted. Fauna and Flora are discussed in the following specialist reports attached to the Draft Environmental Impact Report:

Appendix E11: Floral Assessment
Appendix E12: Freshwater Ecology Assessment
Appendix E13: Vertebrate Faunal Assessment
Appendix E14: Invertebrate Faunal Assessment
Appendix E15: Marine Biology Assessment
Appendix E22: Tourism Assessment In terms of the impact on Terrestrial Assets

Your comment (4)

5. The White Paper specifically mentions: "Taking advantage of opportunities. Our unique fynbos floral kingdom (one of only seven in the world, and the most diverse on earth) holds **vast tourism potential** in addition to its great bio diversity value." The Batamsklip site holds a **great opportunity to develop tourism** in that area. Again the report does not even take this into account. To state on page 23 "having little or no potential for development outside of housing and recreation." is therefore misleading.

Response (4)

The Tourism Impact Assessment states the following on page 23: "In terms of the study area, the smaller holiday towns in the vicinity of Gansbaai are regarded by the IDP as having little or no potential for development outside of housing and recreation". This information is therefore taken from the Integrated Development Plan for the area prepared by the City of Cape Town.

Your comment (5)

6. Ecotourism is described as : 'environmentally and socially responsible travel to natural or near natural areas that promotes conservation, has low visitor impact and provides for beneficially active socio-economic involvement of local people' (DEAT1996:v); 'purposeful travel to natural areas...to understand the culture and natural history of the environment...**taking care not to alter the integrity of the ecosystem**, while... producing economic opportunities that make the conservation of natural resources beneficial to local people' (Gartner 1996:149) How can a Nuclear plant on this natural Heritage site protect the integrity of the ecosystem? Again this is not covered in the tourism impact study.

Response (5)

Conservation benefits are covered in Chapter 9 of the Draft EIR and the following specialist reports Fresh Water Assessment, Botany Assessment, Vertebrate and Invertebrate Faunal Assessments (Appendices E12, E11, E13 and E14 respectively). However as Bantamsklip is not the preferred site for Nuclear-1 the conservation benefits to Bantamsklip were not further discussed within the Draft EIR. All biophysical specialists did however agree that there would be benefits to conserving the Thyspunt and Bantamsklip sites, as an offset to the potential negative impacts, as neither of the sites currently has formal conservation status.

Your comment (6)

Referring to the assumptions made on Page 3:

7. It has been assumed that the “only true measure of tourism performance” is the number of bed nights. Yet on page 4 under Limitations it is reported” However, the full concept of tourism product and asset is far greater than bed-nights, and includes an array of service and support industries that have not been included or quantified in this study “

Response (6)

The report is explicitly clear that tourism is a complex and diverse industry. Indeed, “tourism” as a concept is of such an expansive nature with a vast array of causal linkages and relationships, that nearly every specialist study for this EIA could be argued under the jurisdiction and review of “tourism”. However, to establish a uniform and statistical structure to allow for clear and consistent site evaluation and comparison, bed-nights were selected as a measurement of tourism performance that could be calculated for every site on a unilateral basis for comparison and evaluation. The assumption that the entire tourism product can be quantified is not feasible as the entire tourism product for each area is undefined. The conceptual parameters and extent of tourism as an industry, business and concept are haphazardly understood throughout South Africa and, to eliminate area-specific inconsistencies, bed-nights emerges as the only statistically viable and economically reflective variable that can be calculated and compared for each site.

In summary, bed-nights is a value-figure that reflects the tourism threshold market and industry captured within the identified parameters (20 km of the nuclear platform) and is comparable across all the sites as an indication of immediate locational tourism extent and comparable value.

Your comment (7)

8. Using bed nights as the “accurate feasible representation”, the table 2.2 is misleading and inaccurate. On page 8 it clearly states that “many” visitors **overnight in Hermanus**. This clearly means that Hermanus Bed nights should also then be included.

Response (7)

This argument again stems from a lack of understanding of the comparative nature of the bed-night figure. Hermanus cannot be included as it falls outside the stipulated 20 km radius. This is not to say that Hermanus and its tourism market are ignored in the report, but that for calculation and comparison of tourism value and size, each site must be consistent in its calculation. As an extreme example, one could argue that Cape Town supplies tourists to Gansbaai, so why are they not included? By the same token, one could question Port Elizabeth’s inclusion in the Thyspunt bed-night figure, not to mention the inclusion of the entire Cape Peninsula when addressing the Duynefontein site.

However, the bed-night figure is again stressed as a size and value indicator of the immediate tourism market for comparative purposes. And to ensure the accuracy and comparability thereof, only the markets identified within the 20 km radius were included.

As an example, in the Thyspunt section, Jeffrey's Bay is not included in the bed-night calculation, but is discussed due to the publicly pronounced, highly mobilised and active anti-nuclear campaign and world-renowned surfing reputation.

Your comment (8)

9. Hermanus has approximately 1200 beds registered with their local tourism bureau in the B&B and Guesthouse sector. Furthermore they have approximately 70 self catering units available sleeping from 2 to 8 at a time. In addition to that letting agents have many more accommodation options to offer as well. I question the accuracy of the occupancy rate.

Response (8)

See responses 8 and 12. (Is the suggestion being made that all of Hermanus's accommodation users visit Bantamsklip?)

Your comment (9)

10. Hermanus has a "daisy" approach with visitors. This translates into encouraging the visitor/tourist to sleep in Hermanus and offering them 5 day trips they can enjoy. Two of these day trips fall in the area described as the Greater Gansbaai tourism region. This means that your calculated number of tourists to that area is grossly underestimated.

Response (9)

See responses 8 and 12. (Even if Hermanus accommodation was included, the impact percentages would remain the same).

Your comment (10)

11. The question arises as to the sources of data used. Tourism bureaux have accurate data of visitors who come through the bureaux for bookings and information, however it is obvious and proven fact that this is a really small percentage of visitors to the area.

Response (10)

Please elaborate on the statement "obvious and proven" fact? Proven by whom and what is the evidence?

It is an international standard practice in tourism research to refer to and utilize the data gathered by tourism bureaux and offices. Data from bureaux's are unanimously recognised and employed by tourism industry authorities, academic and research institutions and government, and form a quantitative pillar of this study.

Your comment (11)

12. The next question then arises what data was used to calculate the bed night figure. Where was this data obtained. The same applies for the percentage occupancy. I do not believe any accommodation establishment can survive on average 40% occupancy.

Response (11)

The data and occupancy rates were obtained from available tourism data, the relevant tourism bureaux and a public stakeholder meeting, and verified in tourism service provider and operator sampling. With regard to the 40% average, it is indicative to note that separate independent tourism barometer sampling confirms and corroborates that the Western Cape Overberg occupancy rate is lower than the provincial and national averages. In these barometers, the Overberg is quantified to include: Hangklip, Kleinmond, Swellendam, Stanford, Caledon, Gansbaai, L'Agulas, Bredasdorp and Hermanus, although not all are individually specified in the data breakdowns.

The Overberg's average occupancy rate was tracked in the first quarter of 2008 and 2009 as 31.5% and 31.63% respectively. This is particularly indicative as this is a period claimed by the respondent as one of the "busiest", but even Hermanus achieved only a 34.5% occupancy.

(see W.Cape Tourism Barometer's 2008 and 2009:
<http://www.tourismcapetown.co.za/ctru/content/en/za/research>).

Furthermore, accommodation establishments are indeed regularly overtraded in South Africa and the Western Cape, partly due to an over-estimation of potential demand and partly as a result of a lack of consistent and delimited tourism data, with the result of lower actual occupancy rates. However, the reality of average occupancy rates is that 100% occupancy is nearly impossible as that implies the establishment is full to capacity 365 days of the year. As an illustrative example, the ever-popular Cape Town central accommodation average occupancy is 81.5% for the same first quarter period.

Furthermore, it is an unpopular fact of the tourism industry that accommodation facilities do not all survive, and it is naïve and ill-advised to assume that all such establishments thrive and succeed, particularly in Bantamsklip which is a relatively small market by provincial and national standards.

Your comment (12)

13. It is also assumed that "resident tourism stakeholders would be most sensitive in terms of perceived impact" Were any relevant stakeholders approached. If so how many and whom? The concern is whether a comprehensive survey was done and were all stakeholders involved or were the results presumed? It is stated that stakeholders can not be divulged due to confidentiality, however I wonder if this is a cover up of assumptions and presumptions. Confidentiality of the stakeholders data and perception is a given, however to identify if the survey/ study was indeed conducted comprehensively and inclusively is important.

Response (12)

It is not clear as to what the respondent is actually asking or drawing attention to. Is it a question of procedure, representation or assumptions?

Although questioning of impact results and assumptions is welcomed in an EIA public review, scientific research protocols and protocols are non-negotiable. Please clarify the "cover-up" insinuation of the respondent. Research participant confidentiality is a cornerstone of all academic, scientific and market research. In this EIA, the confidentiality of participants cannot and will not be compromised, as this precedent would undermine the entirety of the rigorous research procedure and would discourage participant honesty, leading to inaccurate data (particularly with regard to an emotive issue such as nuclear power) and thereby ultimately hindering the public profile and participation of such investigations.

With regard to the consulted stakeholders, they were initially consulted in a public forum meeting and then further representative participants were identified and comprehensively interviewed.

Your comment (13)

14. The report states that comprehensive surveys could not be done due to budgetary constraints. How can any Environmental Impact Assessment be accepted knowing that comprehensive surveys have not been done? Thumb suck?

Response (13)

The term “comprehensive surveys” should be further clarified. The report acknowledges that not 100% of all tourism stakeholders were consulted. However, the tourism report is confident in its identification and inclusion of representative individuals and operators that accurately and comprehensively reflect the greater nature and balanced extent of tourism insight, experience, knowledge, concerns and opinion.

We do agree with the sentiment that this automatically suggests a failed research process.

Your comment (14)

15. In the limitations listed on page 4 it states “Specific tourism visitation or tourism monetary value statistics are neither conducted in, nor available for, the tourism industry delineated and affected by the Nuclear-1 sites.” How does a professional specialist draw up a conclusive report without vital data?

Response (14)

Your comment is noted however this limitation has been taken out of context. It must be understood that tourism research and data as a whole are insufficient in South Africa. This is a publicised and state-admitted condition of the industry (see sources below – could include in report?). What the limitation specifies is that there is no area-specific tourism data available for the nuclear sites, nor the area-specific extent of the impact zone (20 km). There is expansive regional data, and these have been included as part of the extrapolated sampling conducted in the tourism research and is also utilised as an accuracy verification tool (such as the occupancy rates). Such extrapolation is a standardised and industry-recognised statistical and quantitative research technique.

- Department of Economic Development and Tourism. 2004c. *Micro-Economic Development Strategy for the Western Cape: Interviews with Key Role Players and Interested Parties* [online]. Available from: <http://www.capegateway.gov.za/eng/pubs/public_info/M/115232/19>
- Department of Economic Development and Tourism. 2005. *Micro-Economic Development Strategy for the Western Cape: Synthesis Report July 2005* [online]. Available from: <http://www.capegateway.gov.za/other/2006/3/meds_final_synthesis.pdf>
- Department of Economic Development and Tourism. 2006. *Micro-Economic Development Strategy for the Western Cape: Synthesis Report July 2006* [online]. Available from: <http://www.capegateway.gov.za/eng/pubs/reports_research/M/165989>
- Department of Economic Development and Tourism. 2007. *Micro-Economic Development Strategy for the Western Cape: “New Thinking in a Changing Context” Synthesis Report December 2007* [online]. Available from: <http://www.capegateway.gov.za/eng/pubs/reports_research/M/174869>
- Department of Economic Development and Tourism. 2004a. *Micro-Economic Development Strategy for the Western Cape: Existing Policy and Macroeconomic Outlook for Tourism in the Western Cape* [online]. Available from: <http://www.capegateway.gov.za/eng/pubs/public_info/M/115232/19> Department of Economic Affairs, Agriculture and Tourism. 2001. White Paper on Sustainable Tourism Development and Promotion in the Western Cape [online]. Available from: <<http://www.capegateway.gov.za/Text/2004/1/whitepapertourism.pdf>>

- Department of Environmental Affairs and Tourism 1996. *White paper on development and promotion of tourism in South Africa* [online]. Available from: <<http://www.info.gov.za/whitepapers/1996/tourism.htm>>

Your comment (15)

16. Referring to page 8, it states that the seasonal tourist period is Christmas and New Year. I challenge this statements as being totally incorrect and a direct attempt to mislead the public. Over Christmas, New Year and Easter the greater percentage of visitors are domestic visitors. October, November and February are the busiest months for International visitors with a boost to the areas economic spend. Aug to Dec and Feb and March are busy months for International Eco- Tourist visitors. As mentioned Eco-Tourism is diverse and not limited to shark cage diving and Whale Watching, however if the specialist had done accurate research, just on those two attractions, I am sure it would be clear that peak season for eco-tourism is a lot longer than Christmas and New year.

Response (15)

The report should indeed stipulate that the Christmas and New Year holiday periods were identified as the “peak” tourism season as a point of clarity. However, there is confusion as to why this would be a direct attempt to “mislead” the public. The report does not state nor suggest that tourism is limited to only this period, or does it underestimate or dismiss other periods or seasons. It is a statement of the gathered information from the consulted stakeholders and corroborating tourism data, that the December and January months capture the greatest tourist influx.

Also the report does not in any way suggest that “eco-tourism” is limited to Shark Cage diving or Whale-watching, but they are irrefutably recognised as the cardinal tourism attractions and primary tourism resources of the Bantamsklip area, with quantifiable value and impact. And the report reflects this in its gathered and presented data.

Finally, with regard to the suggested discrepancy of international versus domestic tourists, according to the available (and industry recognised and accepted) Western Cape tourism barometers for the Overberg, in the first quarter (between January and March) of 2008 and 2009, international visitors represented only 32% and 30% of all tourists respectively, significantly less than implied by the respondent. Furthermore, in the last quarter (between October and December) of 2008 and 2009, international visitors represented only 28% and 21% of all tourists respectively.

However, the gist of the respondent’s concern seems to surround the “seasonal” aspect as opposed to the origin of tourists. As such, it must be stressed again that the report does not imply that tourism ceases to exist outside of the 25th of December and the 1st of January as the respondent seems to think.

Your comment (16)

17. As is mentioned in the report the coastline around Gansbaai is a significant location for the birth of Southern Right Whales. The Whale watching industry is not limited to that area and boosts South African economy tremendously. Therefore accurate marine impact needs to be done to ensure no negative impact in this area as it affects Whale Viewing in Walker Bay through to False Bay, as these mothers and calves frequent these waters from May to Dec. In other words the impact on tourism stretches very far from the site itself.

Response (16)

There are currently two licensed whale-watching and eight licensed white shark cage-diving operators conducting tours within the sphere of direct nuclear power station influence. Shark-cage diving occurs mainly around Dyer Island while 80% of whale-watching trips are undertaken to the west of the trawler

wreck in the Bantamsklip exclusion zone. The Marine Biology Assessment (Appendix E15 of the Draft EIR) reports that southern right whales occur mainly within 1 km of the shore from April to January, with peak abundances in September - October (Barker 1988). During the later part of this yearly cycle inshore populations are dominated by cows with calves. This species is not believed to feed while in the region (Barker 1988). While no major calving area occurs close to Bantamsklip, Walker Bay (to the west) has been identified as an important mating ground (Barker 1988). It further reports that as whales are sensitive to human activity and noise, they may avoid the area surrounding the development during the construction phase, particularly during tunnelling for the intake pipe and the building of the dam. However, none of the species that occur along this section of coast are reliant on the area and all are likely to return, as they did following the construction of the original Koeberg Nuclear Power Station.

The disruption to the marine environment described above will occur only during the construction phase, and is likely to be localised.

Your comment (17)

18. Newspaper articles give the public interesting reading, however reporters do not always have proof, they use information fed to them.(Pg 18) Often this information is a marketing ploy. The negative effect on tourism after a disaster was indicated. Selling a tour of a Nuclear plant as a tourist attraction and a reason to visit the area is ludicrous. International tourists are certainly not going to travel to South Africa to visit a Nuclear plant on a Heritage site. I am sure they have many choices nearer to home. I can not see a tour of nuclear plant especially attracting domestic travelers to the area either, maybe curiosity when already in the area.

Response (17)

Your comments are noted.

Your comment (18)

19. Following the previous point. The White Paper on Sustainable Tourism Development and Promotion in the Western Cape notes the following:

Environmental integrity

♦The environment should be acknowledged as the cornerstone of the Western Cape tourism industry and environmental assets must be constructively developed to the benefit of tourism.

The environmental impact of all tourism development plans must be carefully considered. Appropriate tourism strategies should be pursued in specific locations. For example, mass tourism is appropriate in a developed urban area because the environment has been built to cope with heavy use. **In a rural area, low impact forms of tourism such as eco-tourism are more appropriate.**

Visual, sound, water and air pollution must be limited and the effects of these hazards on tourists and the local population must be recognised. Please refer back to the definition of Eco-tourism. There is NO way that a Nuclear Power plant can be regarded as Eco-tourism. Rural areas = Eco-tourism.

Response (18)

Your comments are noted.

Your comment (19)

20. One of the strategic objectives under “Encourage sustainable tourism practices” is to: Recognise and promote world heritage sites as a major attraction of the Cape. Tourism has recognised Bantamsklip as a rich Heritage site. Promoting and developing it as such is the next step.

In summary I conclude that the report is incomplete and does not adhere to the tourism policy of Western Cape. It also presents an inaccurate bed night figure as a measure for tourism performance, while admitting that vital data like service and support industries have not been taken into account. The source of data and the scope is lacking which leaves room for concern. Time, budget and lack of expertise limit conclusive surveys to be made.

It is alarming that something so important with potentially serious impact on all tourism aspects is researched inadequately.

Response (19)

Your comments are noted.

Should you have any queries with respect to the above please do not hesitate to contact Arcus GIBB.

Yours faithfully
For Arcus GIBB (Pty) Ltd

A handwritten signature in dark ink, appearing to read 'JMBall', written in a cursive style.

Jaana-Maria Ball
Nuclear-1 EIA Manager