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**Johannesburg**

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Attention: Mr. Kobus Reichert (**GAMTKWA KHOISAN COUNCIL**)

Dear Sir

**ESKOM ENVIRONMENTAL IMPACT ASSESSMENT (EIA:12/12/20/944) FOR A PROPOSED NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT**

Your correspondence to Ms. Bongzi Shinga of ACER (Africa) (which is dated xx 2010) refers. Arcus 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 environmental assessment process have been noted.

Responses to your comments / questions are as follows:

**Your comment (1)**

**REGIONAL HERITAGE CONTEXT**

The regional heritage synopsis for Thyspunt is poorly described with regard to the colonial period heritage of the KhoiSan people. The fact that an effort was made to describe the Khoikhoi people and their history in the vicinity of Duynefontein and Bantamsklip, but not at Thyspunt shows that this area did not receive the necessary attention to provide an accurate picture of the cultural landscape. The Gamkwa (sic) tribe is briefly mentioned in the report by referring to the fact that they:

- “are particularly concerned about the future of their heritage”,
- “ must be informed and consulted when human remains are uncovered”, and
- have expressed concern with respect to the future of archaeological material which they see as the heritage of their people

The last statement is of particular concern, because it appears that the author's opinion differs from what we regard to be our heritage. If this is the case we would like clarification on this point with specific reference by the author on who should be regarded as the lawful claimants of the heritage linked to the Khoikhoi “occupation” of the area, and if it is us, why consultation should be restricted to human remains alone?

The tribe's name is even spelled incorrectly despite the fact that our information appears on the I&AP list. It shows a clear lack of respect for our traditional structure, and the consultant's lack of cultural

sensitivity is further illustrated by the fact that no attempt was made to consult with us with regard to the findings, or to obtain further information that could have been used to enhance the report.

### **Response (1)**

The miss-spelling of name of the Gamtkwa Tribe is a mistake for which an apology is offered and will be rectified in the revised Heritage Impact Assessment Report.

The background to the presence of the Khoikhoi people in South Africa is described on a number of occasions throughout the report. Since the section on Thyspunt was the last site discussed in the Heritage Impact Assessment, and the Khoisan had already been discussed under the 1<sup>st</sup> two sites, it was felt that the topic had been sufficiently covered and did not need not be repeated. Published and verifiable information on the proto-historic period in the Thyspunt area is scarce. However, your comments and any available information which the specialist has not yet considered will be considered and included into the Revised Draft EIR.

### **Your comment (2)**

It appears that the consultants perceive the public participation process as adequate for our concerns to be addressed while losing sight of the fact that we have been consulted by heritage practitioners in the past with regard to more than 30 developments planned on our ancestral land, in addition to the public processes linked to the various EIAs. If this approach has been followed by other heritage practitioners with regard to minor developments in comparison to one of this magnitude, why did the consultants for this HIA conveniently decide that direct consultation with our tribal structure is not necessary?

### **Response (2)**

The public process gives equal opportunity to all Interested and Affected Parties (I&APs) to register their comments. We are aware that at least one special site visit was arranged by Eskom for Gamtkwa representatives to visit the Thyspunt site. Comments on the proposed project have been circulated by ACER Africa as part of the Public Participation Process. Persons or groups interested in the heritage issues are welcome to contact the heritage specialist, but strictly through the project protocols (i.e. through Arcus GIBB) so that all interactions can be recorded. A Key Focus Group meeting on heritage and cultural issues has been facilitated by the EIA Team and the Gamtkwa Khoisan Council has been invited to this meeting. The outcomes of this meeting will be considered in the revision of the Heritage Impact Assessment as well as the Revised Draft EIR.

### **Your comment (3)**

It is also not clear why we need to be consulted when human remains are uncovered if no information about our historical connection to the area is provided. We therefore insist that:

- further research must be done to describe the presence of the Gamtobakwa people (Gamtkwa is an abbreviation of the original tribal name), or the so called "Gamtousch nation" (as described by early travelers such as Ensign August Beutler in 1752) within the regional heritage context.
- further information must be supplied on what causes ended the long "occupation" of the area by Khoikhoi people and what factors led to their eventual presence at Missionary Stations in Bethelsdorp, Hankey, and Clarkson. The statements that "European farmers (Trekboere) were the vanguard of formal colonization and accelerated granting of land by the British Colonial Government", and "Land which was viewed as a shared resource by the Khoekhoen was no longer available to them" are simplistic and do not provide the full reasons why our original cultural structures disintegrated and why we lost access to our ancestral land.

- the living heritage associated with the KhoiSan people with specific reference to medicinal and other useful plants that occur within the study area be investigated further. If the “intangible heritage” associated with the St. Andrews shack has been investigated, surely we should be afforded the same consideration.

### **Response (3)**

Should additional information become available, it will be considered and included in the Revised Draft EIR.

No particular groups of people were identified during the course of the study as the archaeology of the study area is of overall massive antiquity and therefore national heritage, and in some aspects, international heritage. Furthermore the limited amount of detailed study that has taken place to date does not provide secure enough evidence to equate the archaeological material to any particular grouping of people, other than to state that the presence of ceramics on some sites indicated that they developed during the last 2000 years, which coincides with the broad time period that the Khoikhoi were present in the area. Archaeological sites characteristic of this period are to be found throughout much of the Eastern Cape, Northern Cape and Western Cape, hence in broad terms, all three of these provinces are ancestral land, however defining the boundaries of ancestral land for the various groups is a highly complex task that needs acknowledgment of the detailed dynamics of the movement of groups over space and time. Mostly this history, apart from small glimpses of it in historic records, has been lost.

As regards consultation requirements in respect of any human remains that might be found, the requirements of section 36 of the National Heritage Resources Act, 25 of 1999 require public participation with respect to the exhumation, treatment and disposal of human remains that fall within the ambit of that statute, and accordingly this issue was identified during this environmental assessment process, in the expectation that there could be human remains from the historic period on the site.

The site of the St Andrews cottage was identified as it is in active use. The broader area is owned by Eskom and is access controlled. The land that comprises the Thyspunt property is not actively used for the collection of medicine.

### **Your comment (4)**

The following statement was issued on 8 August 2005 in Pretoria by the Special Rapporteur of the UN on the Human Rights and Fundamental Freedoms of Indigenous People:

“... All indigenous peoples of South Africa were brutally oppressed by the colonial system and the apartheid regime up to 1994. The Khoi-San were dispossessed of their lands and territories and their communities and cultures were destroyed. The tragic consequences of apartheid cannot be overcome in a few years and the Special Rapporteur is fully conscious of the tremendous efforts that have been made by the democratic government of South Africa to redress the many injustices inherited from the old regime. Through his conversations with Government authorities and Khoi-San people, he is also aware of the challenges faced by these communities and their longstanding demands for land rights, official statutory recognition, respect of their cultural identities and full and equal access to social services.

The Special Rapporteur is encouraged by the government’s declared commitment to meet the demands of the indigenous groups in the country and by the ongoing efforts to formulate and implement appropriate legislation and policies to address issues such as land restitution, multilingual and multicultural education, the representation of traditional authorities in public life and the delivery of health and other services...

Without the above information the regional heritage synopsis is incomplete and misleading. The KhoiSan people did not just "occupy" the area for thousands of years and then disappear from the face of the earth. They lost their land by force and through conflict, and the current government recognizes the genocide that took place in colonial times. We, the descendants of these people are very much alive today and represented by various organizations, a fact that should be recognized in the HIA.

#### **Response (4)**

Agreed and comment noted. The Draft Environmental Impact Report (EIR) and the associated Heritage Impact Assessment report acknowledge that the heritage of the area is the "heritage of many South Africans who are alive today". The heritage section of the EIR report is of a general nature and tries to be impartial in the view of the fact that the heritage of the study area is part of "the National Estate". The study has truthfully informed the public of the presence of a wide variety of archaeological sites but cannot ascribe those sites to particular groups of people apart from in the broadest of terms. The archaeological studies proposed prior to and during construction can include this aspect in the scope of work.

#### **Your comment (5)**

##### **PRE-COLONIAL HERITAGE/MITIGATION**

The information provided about the archaeology of the area is accurate, and substantiates the fact that the KhoiSan community does have a vested interest and rights with regard to the majority of the cultural heritage situated within the study area. We do not regard mitigation as a viable option for an area with the unique non – renewable resources as specified in the HIA.

Mitigation will have no benefits for the cultural group affected by the "rescue operation", especially if the majority of the archaeological sites will be destroyed as a result. The Khoikhoi and San heritage of this area will only have benefits for the research community if it is removed, and in our view it should be preserved in context for future generations as part of a National Cultural Heritage Site. Our view is supported by the HIA results and the author confirms that:

**"Mitigation can be achieved through scientific recording, sampling or excavation - however these are also destructive processes. In general, full rectification of heritage impacts is not normally possible in the case of archaeology unless the archaeological sites can be conserved in their entirety."**

We agree with the statement that:

**"However, given the broader picture, the procurement of power (in particular non-greenhouse gas producing alternatives) is critical for the future well-being of the nation, which is currently suffering from a deepening energy shortage."**

We disagree however that this can be presented as a motivation for the destruction of the cultural heritage of indigenous people, especially if other alternatives are available but were either not investigated or scoped out of the process due to financial or other implications. The specialist concludes that the cost to the National Estate is going to be high, unless properly mitigated (In the case of Thyspunt all indications are that there are severe constraints for proper mitigation).

The author states further that:

**"The sites that have been selected for the proposed activity are primarily based on their geological and engineering suitability to the task (a primary consideration in nuclear engineering). It would appear that other disciplines were either not considered or viewed as**

**sacrificial under the primary concerns of safety and engineering suitability. The result of this legacy is that the sites of Duynfontein, Bantamsklip and Thyspunt, despite their exceptional heritage qualities, have been identified for the proposed NPS"**

This supports the general view of various I&APs that the planning for Thyspunt is out-dated.

The construction of facilities to house heritage material removed from the site will cost millions. The cost for excavation work by a team of specialist over a prolonged period in an area that will be difficult to mitigate will be equally high. The total budget for the destruction of our heritage should in our view rather be used to purchase a more appropriate site with less impact on the environment and on heritage resources.

The consultants have indicated that even mitigation is destructive, and since Thyspunt is regarded as the most sensitive of the sites it should have been scoped out of the process on its cultural heritage value alone. The fact that it has not been done shows that they do not understand that the issues that should be considered are far more complex than merely providing power to the country.

### **Response (5)**

Your comments are noted. The heritage specialist indicated to the Applicant (Eskom) and the South African Heritage Resources Agency (SAHRA) that the work required is potentially very demanding on both hard-pressed archaeological expertise resources and existing state capacity. At Thyspunt the final site location has a critical bearing on how much archaeology will be affected. The heritage specialist agrees with the notion expressed that archaeological sites are best preserved in-situ for future generations and conservation minded archaeologists will always strive to achieve this goal. Mitigation by excavation is always a second best and should be avoided, where possible. However it is important to remember that the comparative assessment of the three alternative sites was based on the following:

- Results of the specialist studies: specialists have indicated the relative significance of potential impacts with mitigation at each of the three alternative sites;
- An integration workshop, involving all specialists, on 24 and 25 November 2009, where potential impacts and ranking of the alternative sites was discussed;
- Costs; and
- Transmission integration requirements.

Although there are obvious differences between the significance of the potential impacts of the three alternative sites, all specialists agreed that there are no fatal flaws at any of the sites (provided appropriate mitigation is implemented). The specialists further collectively agreed that all three alternative sites are suitable for development of a nuclear power station in time, given sufficient mitigation of impacts.

The power station has been positioned on the site to avoid the highest concentration of archaeological sites. This concentration occurs in a thin strip along the coastline west of the proposed position of the power station on the Thyspunt site. The position of the power station has been set back by at least 200 m from the high water mark in order to avoid this particularly rich concentration of archaeological sites.

### **Your comment (6)**

#### **LEGISLATION/ INDIGENOUS PEOPLES' RIGHTS**

It appears that Eskom is under the impression that by meeting South African legal criteria there is no obligation on them to act in terms of the UN's declaration of indigenous peoples rights (of which the

South African Government is a co-signatory), the UNESCO or ICOMOS: Burra Charter guidelines, and the Kari-Ocha and Kimberley declarations . These declarations and guidelines all require “informed consent” before any development can take place on indigenous peoples’ land.

The response we received from Eskom on the above statement in the Revised PoS was:

**“Eskom is the current owner of the Thyspunt site. As indicated above all due process has been followed with respect to the archaeological sensitivities on site, which Eskom considered to be serious.”**

This type of response is indicative that Eskom does not have any understanding of current developments with regard to indigenous people’s rights in South – Africa, or they are ill-advised by their consultants.

The fact that they under the impression that due process has been followed to date is also incorrect. In the Revised PoS we objected against drilling operations that took place without any archaeological supervision, and we indicated that : “We have been informed that little damage was done to some of the sites, but this is still an offence in terms of section 35 (4)(a) of the South-African Heritage Resources Act, no. 25 of 1999.”

Eskom responded as follows:

**“It should be noted that all drilling sites were inspected by the EIA Archaeologist who indicated that no damage to any sites of significant archaeological importance had occurred. In addition Eskom has a drilling EMP that requires that should any archaeological site be identified all work must stop until such time that an archaeologist has inspected the site. Eskom has been in communication with SAHRA who have indicated their satisfaction with the current process.”**

With regard to the above statement:

- Firstly, The Act does not distinguish between “significant” and “insignificant” archaeological sites. The disturbance of any archaeological site without a permit is a transgression of the Act.
- Secondly, The EIA archaeologist noted the following in the “Inventory of Observations” at 6 drilling sites : *“Buried midden deposit turned up by borehole drilling”*
- Thirdly, We followed the matter up with SAHRA and this was their response to the claim that SAHRA has indicated their satisfaction with the current process:

“Dear Mr. Reichert

SAHRA is obviously very concerned about the Nuclear Power Station development and what impact it will have on the heritage resources of the Thyspunt area. To my knowledge SAHRA did not convey to Eskom that we were happy with the process or that drilling etc. can start without the relevant studies being completed and the APM Unit have commented on these. The APM Unit had expressed its concern regarding the proposed project and the enormity of the task at hand. However, no permission was given that destructive work may continue (if this is the case) without the input from the SAHRA.

Yours sincerely

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In view of the above it is not only a case of a lack of understanding of indigenous rights issues from Eskom's side, but also a deliberate attempt to hide actions that cannot be justified. It is of no use to play with words in your responses to serious issues. If this can serve as an example, it becomes apparent that Eskom cannot be trusted to manage any aspect with regard to our heritage in a project of this size.

Eskom must be held accountable for their actions since they allowed drilling operations to proceed being fully aware of the archaeological sensitivity of the site. (Please see previous reports by Dr. Binneman commissioned by Eskom and the desktop study that formed part of the Scoping Phase for this EIA.). Possible damage to archaeological material due to the recent construction of gravel roads should also be investigated.

### **Response (6)**

In terms of the Environmental Impact Assessment process, the Heritage Assessment is conducted under the auspices of the national environmental legislation and SAHRA is a commenting authority and not the competent authority in terms of granting the environmental authorisation (see sections 38(8) and 38(10) of the National Heritage Resources Act, 1999). As such, the EIA practitioners have consulted with SAHRA regarding this matter and all evidence and records of the consultation will be included in the Revised Draft EIR as well as the Final EIR, for the attention of the competent authority as part of the decision-making process.

Secondly please note that the National Heritage Resources Act (NHRA) does consider significance in that the Act requires that Heritage Resources be graded.

Lastly, an environmental authorisation was not required for the drilling operations and an HIA for this activity was not triggered and an HIA for the drilling did not take place. The identifications of transgressions of the NHRA is a SAHRA function. The matter was discussed telephonically with Dr Jerardino (who has since left SAHRA).

We take note of your comments regarding the various international declarations on rights of indigenous peoples. In the South African context, the applicable legal processes for indigenous peoples to regain access to land and resources of which they had been dispossessed has been put in place by the Restitution of Land Rights Act, 1994 (Act No. 22 of 1994). Had the Gamtkwa Khoisan Council or the broader representatives of Khoisan believed that it had rights to the land, this is the mechanism that should have been followed to confirm these groups' rights to the land. To our knowledge, no such claims have been registered with respect to the Thyspunt site.

In terms of "informed consent" - the notion of "informed consent" as stipulated by international conventions and/or declarations must be read against the backdrop of the more specific public participation and information requirements set out in the NEMA EIA legislative regime. The Nuclear 1 EIA is continuing in terms of the provisions of the 2006 NEMA EIA regime and the only requirement regarding consent (which consent requirement has been removed from the 2010 NEMA EIA Regulations) relates to obtaining the written consent "of the landowner..." in a situation where the applicant is not the owner of the land on which the activities are to be undertaken. In the circumstances, the notion of "informed consent" as provided for in the international legal milieu does not create a binding obligation that exceeds that imposed by the NEMA EIA Regulations.

Despite the Restitution of Land Rights Act being the only legal mechanisms for indigenous people to enforce their land rights, Eskom is sensitive to the intangible connection that the descendants of the KhoiSan people have to the heritage resources at the site and to the intent of the applicable international declarations. The “*informed consent*” provisions of the UN Declaration relate to the following:

- Relocation of indigenous peoples (not applicable in this instance);
- Redress related to cultural, intellectual, religious and spiritual property that has been taken without the free, prior and informed consent of indigenous people or in violation of their laws, traditions and customs (not applicable in this instance);
- The adoption and implementation by UN Member States of legislative or administrative measures that may affect indigenous people (not applicable in this instance, as the obligation is on the government to enact legislative or administrative measures); and
- That UN Member States must take effective measures to ensure that no storage or disposal of hazardous materials shall take place in the lands or territories of indigenous peoples without their free, prior and informed consent. There is no specific measure in South African law to give effect to the intent of this article of the UN Declaration.

Whilst Eskom respects these provisions, and has taken all reasonable measures to minimise the impacts on heritage resources at Thyspunt, the Gamtkwa Khoisan Council has not established any proven legal claim to the land in terms of the relevant legal mechanisms established for this purpose by the South African government.

#### **Your comment (7)**

Although the HIA includes various examples of damage caused to archaeological material prior to and during the Scoping Phase, the fact that legislation was transgressed appears nowhere in the report. This shows a lack of objectivity on the part of the consultants by not disclosing the correct facts.

The following articles of the United Nations Declaration on the Rights of Indigenous Peoples are applicable:

#### **Article 11**

Indigenous Peoples have the right to practice and revitalize their cultural traditions and customs. This includes the right to maintain, protect and develop the past, present and future manifestations of their cultures, such as archaeological and historical sites, artifacts, designs, ceremonies, technologies and visual and performing arts and literature.

#### **Article 25**

Indigenous Peoples have the right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources, and to uphold their responsibilities to future generations in this regard.

#### **Article 29**

2. States shall take effective measures to ensure that no storage or disposal of hazardous materials shall take place in lands and territories of indigenous peoples without their free, prior and informed consent.

#### **Article 32**

2. States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain free and informed consent prior to the approval of any project affecting their lands or territories or other resources ...

Several other articles are also applicable, and although many of these articles bind the state it does not mean that it does not have implications for Eskom. To ignore the principles contained in this declaration will have far reaching effects in future. The Government is already in the process of implementing these principles and the White Paper on the recognition of Khoi and San structures has already been published. This will provide our communities with far stronger rights in future than provided for in current legislation.

The Khoi and San people regard all archaeological material and sites linked to their culture as of spiritual significance and sacred. These heritage resources are equally deserving of protection similar to the protection offered to other religious minorities in the country (See the Supreme Court of Appeal decision in: Oudekraal Estates (Pty) Ltd v. City of Cape Town and others)

We therefore want to place on record that we are opposed to the proposed project and that neither Eskom nor the Government have approached us to date to obtain free and informed consent to develop a Nuclear Station on our ancestral land.

#### **Response (7)**

Your comment is noted however more facts are required, on the assertions made in the first unnumbered paragraph to which this response relates, and where the assertion is made that there is a “lack of objectivity on the part of the consultants by not disclosing the correct facts.” Without those facts it is not possible properly to formulate a response to those assertions. What are the “various examples of damage” referred to in the circumstances?

In terms of “free and informed consent” please refer to response 6.

#### **Your comment (8)**

#### **CONSULTATION**

We have indicated that we find the public participation process lacking with regard to local KhoiSan community. It is of even bigger concern that National KhoiSan structures were not consulted as part of this process.

The Department of Provincial and Local Government is in the process of negotiations with the National Khoisan Council (N.K.C) and the National Khoi-San Conference Facilitating Agency (N.K.C.F.A) about various First Nation matters. These two structures are however unaware of this EIA process.

The N.K.C represents all the major Khoi and San groupings in South – Africa, while N.K.C.F.A has a membership of more than 70 indigenous organizations.

The HIA results show that a project of this nature will not only have an impact on the resources of a local KhoiSan community, but that the cost to the national estate may be high. It is therefore also a national issue, requiring consultations with national Khoi and San structures as specified above. The fact that this has not been done to date constitutes a serious flaw in the public participation process.  
Blasé

#### **Response (8)**

Your comments are noted. The importance of the N.K.C and N.K.C.F.A is not disputed and as such consultation has taken place as part of the formal EIA process. According to ACER records, information on the project has continuously been sent to Mr. Kobus Reichert of Gamtkwa Khoisan Council since June 2007, i.e. from the early stages of Nuclear-1 EIA and/or project announcement.

There are various levels of consultation that take place in an EIA process. The Public Participation Process creates various channels through which stakeholders can participate. During the EIA process, I&APs could contribute issues either in writing by completing and returning comment sheets, or by attending meetings (public meetings/focus group meetings/stakeholder meetings), or submission of information at any stage of the process.

Mr. Reichert has represented and submitted comments on behalf of the Khoisan Community during the Scoping Phase as well as during the EIA Phase.

In addition, various project correspondence has been sent to Mr. Reichert as per table below.

ID	Description
L02E	Acknowledgement of Comments Received June 07
L04E	Letter 04E Scoping Extension 26 July 07
L05E	DSR Availability Letter - 28 Jan 08
L08E	DSR Comment period extension - 14 Mar 08
L11E	Final Scoping Report Availability - 4 Aug 08
L12E	Project Update Letter 22 Jan 09
L13E	Letter 13 Revised POS for EIA 18 May 09
L14E	Draft EIAR Availability 3 Mar 10
L15E	Invitation to Key Stakeholder Feedback Meeting, 03 Mar 10
L17E	DEIAR Comment Period Extension 6 May 10
L23E	DEIAR Further Comment Period Extension 27 May 10

The EIA Team would however very much like to meet with the Khoisan Council to discuss the comments submitted on the Draft EIR and as such a Key Focus Group meeting was held with the Gamtwa Khoisan Council on 27 August 2010.

### **Your comment (9)**

#### **CONCLUSION**

The HIA report mentions that:

**Johan Binneman of Albany Museum, Grahamstown, has conducted by far the most detailed archaeological work in the area. He has completed surveys of the Cape St. Francis Dunfield, visited and sampled sites at Thyspunt on a number of occasions since the early 1980's as well as completed a preliminary survey commissioned by Eskom. Binneman (1996) has identified a suite of sites in the area that contain artefactual material characteristic of the full range of archaeological sites that are known to have occurred over the last 7 000 -10 000 years.**

The report also indicates that he has been consulted as part of this HIA. His opinion with regard to the suitability of a Nuclear Station at this particular site as a specialist who "has conducted by far the most detailed archaeological work in the area" has however not been provided.

We have therefore approached him for his input in this regard and it will be attached to the comments by the Thyspunt Alliance.

### **Response (9)**

Dr Binneman spent an evening with the heritage specialist team at Thyspunt. He provided useful information to the Heritage Impact Assessment practitioner and it was jointly agreed that the proposed Thyspunt site was highly sensitive, a finding that has been reflected in the HIA Report. Dr Binneman

was the author of the first report prepared for Eskom (1987), which has been reviewed by the HIA practitioner. Dr Binneman concluded that the area was rich with archaeology and that extensive mitigation would be required if the proposed activity was to take place.

The HIA specialist has used all information available to him as background to his study as well as to his site assessments.

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 black ink that reads "JMBall". The signature is written in a cursive style with a large, looped 'J' and 'M'.

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Jaana-Maria Ball  
Nuclear-1 EIA Manager