

## SCIENTIFIC SERVICES

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Ms Bongani Shinga  
ACER (Nuclear1 EIA)  
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Email: [nuclear1@acerafrica.co.za](mailto:nuclear1@acerafrica.co.za)

Dear Ms Shinga

**Re: Revised Plan of Study for Environmental Impact Assessment for Proposed Eskom Nuclear Power Stations and Associated Infrastructure**

DEAT ref: 12/12/20/944

CapeNature would like to thank you for the opportunity to comment on the above report and wish to make the following comments. Please note that our comments should be read in conjunction with our previous comments dated 14 March 2008.

1. Given the potential for highly significant negative impacts on the environment at all three of the proposed sites, CapeNature believes that it is vital that a wide range of alternatives should be investigated to help ensure that the best practicable solution is found. **We are therefore extremely concerned that it has been proposed that site alternatives will not be perused.** We strongly urge that site alternatives are considered in this assessment process as this would be in the spirit of the principles of the National Environmental Management Act (Act 104 of 1998).
2. We are confused that the report indicates that among the reasons for dismissing the two alternative sites (Brazil and Schulpfontien) is the lack of existing power corridors. This is also an issue with the proposed facility at Bantamsklip, yet this site has not been dismissed. Indications are that the new corridor(s) leading from Bantamsklip are likely to have high and irreversible negative impacts on biodiversity.
3. As highlighted in our previous comments, we urge that the more detailed biodiversity assessments that will form part of the next stage of the EIA process these studies should be thorough and rigorous. To this end we recommend that the Fynbos Forum's Terms of Reference for the Consideration of Biodiversity in Environmental Assessment are used to help guide the scope of these assessments. These should be used to inform the *minimum* requirements for assessment.
4. We also urge that the environmental impacts assessments look at the potential impacts of **all associated activities** including wastewater treatment facilities, pipes, roads, borrow pits, powerlines, associated industries and additional housing. We are,

The Western Cape Nature Conservation Board trades as **CapeNature**

Board Members: Mr Mark Botha (*Chairperson*), Ms Yasmina Pandey, Mr Elton Jethas, Adv Mandla Mdludlu, Ms Nomtha Dilima, Mr Hoosain Kagee, Mr Johan van der Merwe, Prof Sulaiman Gool, Prof Aubrey Redlinghuis, Dr Colin Johnson

for example, extremely concerned that by assessing the powerlines and nuclear facilities separately the full impacts of the proposed activity will not be fully comprehended. The powerlines are inextricably linked to the nuclear facility; one is not necessary or viable without the other. CapeNature is extremely concerned about the impacts of the proposed powerlines associated with the Bantamsklip site as it is almost certain that these will lead to the unacceptable loss of irreplaceable biodiversity. Unless alternative routes can be found that will have impacts on biodiversity of within acceptable limits, CapeNature cannot support the location of a nuclear facility at Bantamsklip. We have attached our comments submitted on this draft Scoping Report for the Bantamsklip powerlines for your information.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that might be received.

Yours sincerely



Samantha Ralston

For: Manager (Scientific Services)

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