



ST. FRANCIS KROMME TRUST

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22 June 2009-06-22

The Project Manager
Arcus Gibb (Pty Ltd
PO Box 2700
Rivonia
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Per email for attention Ms Jaana-Maria Ball

Dear Sir/Madam

ENVIRONMENTAL IMPACT STUDY: ESKOM NUCLEAR POWER STATION: PROJECT NO J27035: EIA 12/12/20/944

Referring to the above, we believe that the total Environmental Impact Assessment is completely null and void for the following reasons

- The change from the initial terms of reference to the new terms of reference i.e. a change for scoping alternative to establish which one of five proposed nuclear sites to reducing this to three without any reasons arising from the assessment to accepting that three nuclear stations will now be constructed
- the fact that alternatives are not being assessed
- No mention is made of what the "associated infrastructure" is. Obviously this can affect the scoping process
- Mention has been briefly made of the construction of a harbour – this require a full EIA on its own
- It is inappropriate to change the scope of the project in the Plan of Study at such a late stage.
- It is irregular for a Plan of Study to make assumptions that on new regulations which have not yet been promulgated.
- No other assessment in the country would be allowed to make application in this manner and it is completely out of order.
- With the change to three nuclear stations scoping has not taken into account the disposal of waste from the full programme as well as the related infrastructure.
- Over the period that the existing process has been in place confusion has arisen over the five/three sites being assessed simultaneously. Separate EIAs should be implemented.
- The assessment of alternative layouts on a particular site is totally different from the original that alternative sites will be assessed.
- An assessment of the related infrastructures is missing from the POS.

WE SUBMIT THAT THE PROJECT IS TOTALLY DIFFERENT FROM THAT ORIGINALLY INTENDED IN THE SCOPING REPORT AND REQUEST THAT THE ENVIRONMENTAL PROCESS SHOULD BE STARTED AFRESH.

In addition to the above the following are requested to be included in any assessment

- We need to know where the transmission lines will be located and their impacts,
- Full details of waste disposal and transport routes to disposal sites
- Full details of transport requirements during the construction phase (ie proposed routes, additional requirements such as roads, bridges etc) and thereafter
- Housing associated with the construction and operation phases
- The impact of movement of people during the construction phase and settlement after construction
- The listed potential adverse impacts must also address potential loss of tourism
- How the potential creation of a conservation area can be shown under “beneficial impacts” as this area is frozen from development and may not be managed for biodiversity

We have only commented briefly on the above as we believe the facts warrant, at least, a full revision of the scoping report.

Your response is awaited. In view of the magnitude of the problem as well as the effect on the areas concerned we have forwarded a copy of this letter to the Department of Environmental Affairs and Tourism.

Yours Sincerely,

CDH BARRATT
Chairman