



## The Overstrand Conservation Foundation

*...more effective conservation management through co-ordinated partnerships*

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Pretoria

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Dear Madam

### **EIA PROCESSES FOR PROPOSED BANTAMSKLIP NUCLEAR POWER STATION & ASSOCIATED TRANSMISSION LINES**

(DEAT Ref. No's: EIA: 12/12/20/745; 12/12/20/1223 & 12/12/20/1224)

The Overstrand Conservation Foundation (OCF) participates in most EIA processes that are run in the Overstrand area and has made comment on around 60 in the past 3 years. The OCF is a registered I&AP for the Bantamsklip nuclear power station EIA processes referred to above and is participating actively on behalf of our members in the Overberg. The EAP's in the processes have, however, been unable to reply to the OCF on one particular issue, to which we hereby ask you, please, to provide a response.

The OCF has the policy of commenting on development proposals after objectively analysing the sustainability of the proposed development. We have adopted the Western Cape Provincial Spatial Development Framework (WCPSDF) as the OCF's "standard" for guiding sustainable development. The sustainability of proposed developments is tested by comparing information provided by the developer's EAP with the WCPSDF. Comments submitted by the OCF highlight those aspects of development proposals that are found to be inconsistent with the policies and strategies in the WCPSDF. The OCF generally also offers suggestions where appropriate on alternatives that are consistent with the WCPSDF.

Up to now, all the EIA's for which the OCF has submitted comments have been under the jurisdiction of the Western Cape Department of Environmental Affairs and Development Planning (DEA & DP). DEA & DP naturally uses the objectives, policies and strategies contained in the WCPSDF as the basis for assessing the merits of proposed developments when dealing with EIA's and so the comments submitted by the OCF have a common basis.



The OCF has requested clarity on what standard is going to be used by DEAT as the basis against which the sustainability of the proposed Bantamsklip nuclear power station site and the associated transmission line routes will be assessed. The EAP's have not been able to respond to this request.

Please comment on:

- 1 Whether the objectives, policies and strategies contained within the WCPSDF will be used as the basis for deciding if installing a nuclear power station at Bantamsklip and the associated transmission lines are sustainable?
- 2 Whether other criteria will to be used instead of or in addition to those derived from the WCPSDF and, if so, what these criteria are and what public participation process will be used to test these criteria?

The OCF is very concerned that I&AP's must be fully informed about the criteria DEAT will be using to decide the out come of the EIA's. We are also concerned that there should be consultation with the I&AP's on the criteria to be used if the criteria are not those that were established through public participation in the process of finalising the WCPSDF.

I look forward to your response in anticipation.

Yours faithfully

Rob Fryer  
Manager

Cc: Ms Jaana-Maria Ball (Arcus Gibb); Ms Bongsi Shinga (Acer Africa); Mr Theo Hansford (NMA); Ms Nomxolisi Matyana (DEAT Director General);