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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. Bongji Shinga of ACER (Africa) entitled “*The Revised Plan of Study for Environmental Impact Assessment for a Proposed Nuclear Power Station and Associated Infrastructure*” 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 (NPS) Environmental Impact Assessment (EIA) process to date. Your questions concerning the Nuclear-1 EIA process have been noted.

Responses to your comments / questions are as follows:

Your comment (1)

Detailed below please find my objection to the proposed Bantamsklip Nuclear Power Station and Associated Infrastructure

The site

Bantamsklip, on the Overberg Coastline, is located on the farm “Groot Hagelkraal” a registered SA National Heritage site. Groot Hagelkraal is bordered by Pearly Beach Nature Reserve and the Agulhas National Park and is located approximately 10 km from Dyer Island, an important breeding area for African penguins and other birds. Several threatened species are known to breed on Groot Hagelkraal, including the critically endangered Micro frog, the endangered Cape platanna and the endangered Western leopard toad. Eight hundred plant species are known to occur on the farm. Six ultra endemic plant species have a distribution restricted to the farm itself and another twenty-one plant species are endemic to the Agulhas Plain. Groot Hagelkraal is considered to be the “hottest hotspot of floral endemism in the world” and as such widely and respectfully known amongst all international botanists.

In the several environmental assessments, Bantamsklip was considered to be the most sensitive out of all 5 sites by most of the biodiversity specialists.

Response (1)

Your comments are noted. This information will be passed on to the relevant specialists, in this case the Heritage, Fauna and Botany Specialists.



Your comment (2)

The area / marine

The area is known to support dense kelp beds and abalone resources and the region also supports a number of significant fisheries and other marine activities, such as shark diving and whale watching.

It is known that as a result of the pumping of colossal amounts of water through a nuclear plant, there is a high mortality (more than 50%) of phytoplankton. Pelagic fish and several whale species feed on phytoplankton.

The local coastline has the highest level of marine biodiversity and endemism found in southern African coastal waters. This is due to the cool Benguela Upwelling (an upwelling more intense here than anywhere else in the world) enhanced by the effects of South Atlantic high-pressure weather system and the topography of the Agulhas coast. This leads to very high levels of primary nutrient (biological) productivity occurring on this coast.

Dyer Island Nature Reserve, situated seven kilometers due south of Bantamsklip, is one of the most important islands on the Atlantic coast, a Great white Shark and seabird sanctuary of global importance. It has the highest concentration of Great Whites in the world and it is assumed to be a Great white shark breeding site (no breeding sites for this fish have been confirmed in the world). There are six Red Data bird species found breeding on the island. One of the largest colonies of African Penguins is also found here. It is said that the opportunity to view Great White Sharks is second only to the Kruger National Park, when it comes to single activities attracting tourists to South Africa.

The ecology of the Dyer Island Marine Sanctuary and the spawning grounds and nurseries of pelagic fish (anchovies and pilchards) have further attracted for millennia, the Southern Right, Humpback and Bryde's Whales close inshore on the Agulhas Bank adjacent to Bantamsklip. This coastline witnesses the movements of cow-calf pairing of the Southern Right whales moving between the breeding grounds in the marine reserve off De Hoop to nurseries in the trans-Agulhas/Walker Bay areas.

Further isolated to the South Western Cape coast are the endemic fish species of the Sparidae family, and particularly the local species of red and white Steenbras, Roman, Red Stumpnose, that are among the 25 species of this family endemic to these coastal waters. They spawn, drift and harbor in the inshore nurseries of estuaries of the Breede, De mond, Uilenkraals, Kleinrivier and the Bot river.

Response (2)

Your comments are noted. This information will be passed on to the relevant specialists, in this case the Marine Biology and Fauna Specialists.

Your comment (3)

The area / terrestrial: Agulhas Plain

Bantamsklip is located in the so-called Agulhas Plain. The Agulhas Plain covers 270'000 hectares of lowland fynbos and renosterveld, considered the highest priorities for conservation in the world. The Agulhas Plain is a globally significant repository for biodiversity recognized for its high irreplaceability and vulnerability. The diversity of habitat types, wetland eco systems, Red Data plant species and local endemics is unmatched in the Cape Floristic Regions, itself one of the world's 19 threatened biodiversity hotspots.

The Agulhas Plain houses three Important Bird Areas. Over 270 bird species have been documented in the Agulhas Plain including the largest population of blue cranes in the world (South Africa's National Bird and a threatened species) and significant numbers of other Red Data listed birds.

From the position statement of the Game Rangers Association:

The Agulhas Plain was selected by the SA Government in 2002 to serve as the model for an innovative approach to conservation and human development. The Agulhas Biodiversity Initiative (ABI), was thus



launched to address conservation and development at an ecosystem level to ensure a sustainable future for communities of the area.

This new approach requires that all parties which own, manage and utilise natural resources and land are included in planning and implementation. ABI has been a response to the government's call to encourage local ownership, responsibility and socio-economic benefits through the optimal use of the natural and human assets of the region. ABI is being championed by SANParks in partnership with all the major agencies in the area i.e. Agriculture and Land Affairs, CapeNature, the Municipal structures, public benefit organisations and commerce. The latter focuses in particular on eco-tourism. ABI is contractually bound to its many investors to develop and promote a sustainable model for the whole fynbos biome through the Cape Action for People and the Environment (C.A.P.E.).

Response (3)

Thank you for highlighting this important point. Arcus GIBB and DEA are aware that the Bantamsklip site falls within the Agulhas Biodiversity Initiative. Section 2.4.7 of DEA Letter of Approval of the FSR states that "The Bantamsklip Site is a Protected Area, as well as a Natural Heritage Site and falls within the Agulhas Biodiversity Initiative. Comments from SANParks, CapeNature and DEA Protected Areas must be included in the EIR."

Your comment (4)

Tourism

The Agulhas Plain is a growing tourism destination supported by international, national and provincial funding, e.g. the provincial road traversing the plains from Gansbaai to Elim and onwards to Bredasdorp is being tarred. The province's motivation for this project was to make the area accessible for tourism developments. The Agulhas National Park, in which all the animals which once roamed the Agulhas Plain ("the Serengeti of the Western Cape") will be released in the coming years, will be a very strong tourism drawcard. The area between Gansbaai on the Walker Bay and the Agulhas National Park is expected to become one of the most attractive nature tourism destinations by international tourism marketeers. Essential in this respect is the fact that most of the new tourism developments are expected to be organized along sustainable and responsible tourism standards. Sustainable and responsible tourism is growing exponentially, especially in the European markets. Of note is that the Agulhas Plain has already at present the highest density of tourism operators certified by Fair Trade in Tourism South Africa of all regions in South Africa. Each of these companies (Grootbos private nature reserve, farm 215 private nature reserve, Dyer Island cruises and White shark projects) is the winner of several awards in the field of responsible tourism and all of them will be severely impacted by the erection of a nuclear power plant since they depend for the attraction of their product on a pristine natural landscape which is under threat of being scarred by a high voltage transmission line corridor of 1.3 km wide.

Discussions with several national and international tourism professionals clearly indicate that the mere presence of a nuclear reactor in the area will strongly decrease the attraction of the Agulhas Plain as a nature destination up to the point where 80% of respective tour operators answered the following question with "YES". *In case a nuclear reactor will be constructed at the coastline between Gansbaai and Cape Agulhas, will you contemplate an alternative destination for your clients ?* Especially European tourists appear to stay clear from destinations in the vicinity of a nuclear plant.

Response (4)

Your comments are noted. This information will be passed on to the Tourism Specialist.

Your comment (5)

Wine growing and wine tourism industry

The Agulhas Wine Region is the newest wine growing region in South Africa. One of the reasons that this area –cooled by sea breezes- is popular for wine growers is that the climate in the traditional wine growing areas tends to become too warm. Most of the wine growers in the area are members of the Biodiversity Wine



Initiative and highly supportive and part of the Agulhas Biodiversity Initiative. Many wine growers have or aspire an organic label and make boutique- and estate-wines. A nuclear reactor in the vicinity will threaten the marketing capabilities of the winegrowers in the area and endanger the further development of an area, which –in the long run with a view to climate change- might prove to be one of the few sustainable wine growing areas left in South Africa.

Response (5)

Your comments are noted. This information will be passed on to the Economic, Tourism and Agricultural Specialists.

Your comment (6)

Summary of interests likely to surely negatively impacted if the Bantamsklip nuclear plant would be constructed :

- Pelagic fisheries along the coast
- Wine growing industry
- Boat based whale watching and shark diving industries
- Nature based tourism industry, increasingly operated on the basis of “responsible tourism standards” and more and more certified by “Fair Trade in Tourism South Africa”
- Viability of the Agulhas National Park as a tourism destination
- Livelihoods. Eskom estimates that 1500 people will be employed after the construction of the plant. This must be compared with the loss of permanent jobs in the existing and future tourism industry as a result of the presence of the nuclear plant
- The Agulhas Biodiversity Initiative as a unique and successful pilot project
- African penguin colony on Dyer Island, already threatened due to over fishing
- Threatened birds such as Blue cranes, Stanley’s bustard and white stork which regularly collide with overhead powerlines
- Threatened plant species and integrity of untransformed nature
- Various threatened land animals

Response (6)

Your comments are noted and will be passed on to the relevant specialists, as indicated in Responses (1) – (5) above.

Your comment (7)

Miscellaneous

The above is only “the best of”. There are many more interests that could be negatively impacted by the erection of a nuclear powerplant in the area, such as the sustainable indigenous flower harvesting pioneered by Flower Valley or the growing essential oils industry in the area. If you need a more comprehensive reflection of the possible consequences as a result of the erection of a nuclear powerplant in the area or supporting material for the above, please know that you (or anyone else) can always contact me. Let me finish with another quote from the position statement of the Game Rangers Association :

The partners in the Agulhas Biodiversity Initiative - and indeed the government itself - are not at liberty to put the achievements of the past five years at risk. For five years the Agulhas Biodiversity Initiative has promoted sustainability, progress and prosperity through ecotourism, sustainable use and the marketing of the region's natural assets and resources aimed at responsible and sustainable development. A nuclear power station has not been included in the Spatial Development Plans and the Integrated Development Plans of the region simply because such an installation is not regarded as a compatible land and resource use.



Response (7)

Your comments are noted and will be passed on to the relevant specialists.

In conclusion, the project team would like to assure you that Interested and Affected Parties comments are important to us and that your continued involvement in this process as an I&AP is valued. Your comments/questions will be captured in the draft EIR which will be released to the public for review and comment.

Please do not hesitate to contact us at any stage should you require any additional information regarding this proposed project.

We thank you for providing us the opportunity to respond to these questions and look forward to your ongoing involvement in the project.

Yours sincerely
For and on behalf of Arcus GIBB (Pty) Ltd

Jaana-Maria Ball
EIA Project Manager