



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

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PER MAIL / E-MAIL

Dear Ms Strong

ACCEPTANCE OF THE FINAL SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF A 5200MW NUCLEAR POWER PLANT (NPP) FACILITY LOCATED IN OVERSTRAND LOCAL MUNICIPALITY IN THE WESTERN CAPE PROVINCE/KOUGA LOCAL MUNICIPALITY IN THE EASTERN CAPE PROVINCE

The Final Scoping Report (SR) and Plan of Study for Environmental Impact Assessment (PoSEIA), dated June 2026 and received by the Department on 06 July 2026, refer.

The Department has evaluated the submitted final SR and the PoSEIA dated June 2026 for the abovementioned project and is satisfied that the documents comply with the minimum requirements of the NEMA EIA Regulations, 2014, as amended (the EIA Regulations). The final SR for the abovementioned project is hereby accepted by the Department in terms of Regulation 22(a) of the EIA Regulations.

You may proceed with the EIA process in accordance with the tasks contemplated in the PoSEIA as required in terms of the EIA Regulations. The Environmental Impact Assessment Report (EIAR) must comply with the requirements of Appendix 3 of the EIA Regulations.

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Departement van Bosbou, Visserie en die Omgewing • Department of Forestry, Fisheries and the Environment • UmNyango wezamaHlathi, zokuThiya neBhoduluko • iSebe lezamaHlathi, ezokuLoba noKusingqongileyo • Umnyango WezamaHlathi, Ezokudoba Nezemvelo • Kgoro ya Dithokgwa, Boreahlapi le Tikologo • Lefapha la Meru, Botshwasi ba ditlhapi le Tikoloho • Lefapha la Dikgwa, Ditlhapi le Tikologo • Litiko Letemahlatsi, Tinhlanti Netendzawo • Muhasho wa zwa Vhusima-magaka, Vhureakhovhe na Mupo • Ndzawulo ya Swihlahla, Vunjoveri na Mbango. The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessively for the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act, and/or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

This letter serves to inform you that the following information must be included in the draft EIAR:

1. General Overview of SR

- a) The comments issued on the Draft SR remain applicable and must be adequately addressed and incorporated into the EIAR.
- b) The Chief Directorate: Integrated Environmental Authorisations (IEA) of the Department of Forestry, Fisheries and the Environment (DFFE) acknowledges the revised specialist scoping reports against the comments issued on the draft Scoping Report (SR). Overall, the revised specialist reports have substantially addressed the Department's scoping comments by improving the scope of work, refining the methodologies and identifying the key issues that require detailed assessment during the Environmental Impact Assessment (EIA) phase. However, most specialist assessments indicated that several matters require further investigation and detailed assessment before the submission of the final EIAR.

While the final SR motivates for Thyspunt to be taken forward as the preferred site alternative, the Department notes that the Freshwater Ecology, Terrestrial Biodiversity, Marine Ecology and Noise specialist assessments identify outstanding information requirements and acknowledge varying levels of uncertainty regarding comparative site suitability. Several specialist conclusions are expressly dependent on EIA-phase investigations, modelling, field verification and final infrastructure layouts. The EIAR must therefore clearly demonstrate that the exclusion of Bantamsklip from further detailed assessment is environmentally defensible and consistent with the findings of all specialist studies. The EIAR must therefore provide a transparent and evidence-based comparative assessment of Thyspunt and Bantamsklip, clearly demonstrating why the selected site is environmentally preferable in terms of biophysical, heritage, social, economic and cumulative impacts.

- c) The Plant Parameter Envelope (PPE) approach adopted in the SR must be comprehensively assessed by all specialists. All proposed reactor configurations (including large PWRs, SMRs and HTGRs, whether independently or in combination) must be fully detailed and assessed within the PPE framework. The EIAR must clearly demonstrate how the environmental impacts differ between the various reactor technologies and configurations included within the PPE and whether cumulative impacts associated with associated infrastructure differ accordingly.
- d) The EIAR must provide a detailed assessment of all feasible alternatives associated with the proposed nuclear power station, including cooling systems, desalination facilities, intake and outfall infrastructure, spoil disposal options, construction support areas and worker accommodation facilities. The environmental implications of each alternative should be comparatively assessed.
- e) The EIA phase must substantially reduce uncertainty and identify preferred technologies, layouts and infrastructure alternatives wherever reasonably possible. The final EIAR must provide sufficient project certainty to enable an informed assessment of impacts, alternatives and mitigation measures and should avoid deferring environmentally material decisions to post-authorisation design stages.

2. Application form and Listed Activities

- a) The Department notes that several listed activities are described in generic or conditional terms and are supported by limited project-specific information. Numerous activity descriptions indicate that applicability, thresholds, capacities and final infrastructure dimensions remain to be confirmed during the EIA phase. The EAP is requested to undertake a comprehensive listed activity review and provide a consolidated schedule identifying all applicable activities, the specific project components triggering each activity, the relevant thresholds, associated footprints and supporting design parameters. Attention should be given to the transmission infrastructure, dangerous goods storage facilities, wastewater treatment facilities, marine infrastructure, road upgrades and all potentially applicable Listing Notice 3 activities.

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- b) Once listed activities have been confirmed, please ensure that the relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Please provide a full description of how the listed activity is triggered by the proposed development, including the threshold where necessary. Only activities applicable to the development must be applied for and assessed. Please note, sub-activities for all listing notices, must be chosen per activity e.g. LN3, Act 4 (f)(i)(bb). The wording of the listed activities must be more definitive and avoid the use of words such as 'may'.
- c) The terms of reference for the appointed peer reviewers must be clearly defined and included in all subsequent documentation. At the Environmental Impact Report (EIR) stage, formal letters from the peer reviewers must be submitted, confirming that they have reviewed the relevant assessment documentation and indicating their professional support for the preferred alternative identified in the EIR.
- d) The applicant must clearly indicate whether any component of the proposed development triggers activities listed under the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), and whether a Waste Management Licence (WML) application will be required. Should a WML not be required, a detailed motivation must be provided.
- e) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted for final review and decision making. Please note that the Department's templates can be downloaded from the website.

3. **Project Description and alternatives**

- a) All associated infrastructure identified as part of the proposed development and located within the defined site boundaries for both Thyspunt and Bantamsklip must be reflected on detailed layout plans. The EIAR must provide a comprehensive description and assessment of each infrastructure component, including its location, extent, function, associated impacts and proposed mitigation measures.
- b) Although the required transmission infrastructure may be subject to separate environmental authorisation processes, the EIAR must assess the cumulative environmental implications of the transmission network necessary to support the proposed NPP. The assessment should demonstrate the overall feasibility of the required grid integration infrastructure and evaluate its relationship with the proposed development.
- c) The final SR identifies a range of associated infrastructure components whose design, location and footprint may be influenced by both the preferred site alternative and the reactor technology ultimately selected under the PPE approach. The EIAR must clearly distinguish between site-dependent and technology-dependent infrastructure alternatives and demonstrate that the specialist assessments adequately evaluate the full range of reasonable and feasible alternatives. Where the nature, extent or significance of impacts differs materially between alternatives, these differences must be explicitly assessed and comparatively evaluated to support informed decision-making.
- d) While the Department notes the application of the PPE approach to the proposed NPP, it remains unclear to what extent this approach applies to the various associated infrastructure components. The Department further notes that concerns regarding the PPE approach and the assessment of associated infrastructure were raised by stakeholders during the public participation process.

The EIAR must clearly identify and assess all reasonable and feasible alternatives associated with the proposed development, including reactor technologies, cooling systems, intake and outfall structures, desalination facilities, wastewater treatment facilities, spent fuel storage facilities, access roads, transmission infrastructure, spoil disposal areas, construction support facilities, worker accommodation and all other ancillary infrastructure.

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In addition, the EIAR must clearly demonstrate how the environmental impacts associated with each technology option included within the PPE have been assessed. Infrastructure components that are dependent on the selected reactor technology must be clearly identified, and an integrated assessment of all associated infrastructure must be undertaken. This assessment must include a comprehensive evaluation of cumulative impacts arising from transmission infrastructure, cooling-water systems, desalination facilities, access roads, construction facilities, accommodation infrastructure and other supporting developments.

The EAP must further clarify whether preferred infrastructure and technology alternatives will be identified and assessed during the EIA phase, or whether environmental authorisation is being sought for multiple alternatives within a broader development envelope. The Department is of the view that the EIA process must provide sufficient certainty regarding the nature and extent of the proposed development to enable informed decision-making. The assessment of environmentally significant alternatives should therefore not be deferred to post-authorisation planning or detailed design stages.

4. Layout & Sensitivity Maps

- a) The final layout map must indicate the following (but not limited to the below):
- The NPP development area.
 - The final position of all infrastructure, including reactor containment buildings, intake structures, desalination plants, fuel storage facilities, H2 plants, high-voltage yards and access routes. Permanent laydown area footprint.
 - All supporting onsite infrastructure e.g., laydown areas, roads, (existing and proposed).
 - All existing infrastructure on the site.
 - The location of sensitive environmental features on site e.g., CBAs, ESAs, visually sensitive areas, heritage sites, wetlands, drainage lines etc. that will be affected.
 - Buffer areas recommended by specialists; and
 - All “no-go” and exclusion areas.
- b) Please ensure that the above map has a clear legend that communicates with details of the map and is at an appropriate scale.
- c) The above map must be overlain with a sensitivity map and a cumulative map.
- d) It must be emphasised that the final EIAR must include **a final layout map** of the preferred site which adheres to specialist recommendations as well as the identified no-go areas and buffer zones.
- e) Include a description of the process to determine the finalised layout i.e. specialist considerations, site sensitivities etc.
- f) Some of the current figures contained within the final SR are not legible when zoomed into for e.g. preliminary site footprint maps. The level of detail is lost and therefore difficult to interpret. Please include a separate appendix which contains all relevant mapping information. Ensure that clear, legible maps of high resolution are provided.

5. Specialist Assessments

- a) The Department notes that several specialist studies identify outstanding information requirements, knowledge gaps and uncertainties that could materially influence site suitability, technology selection and infrastructure design. Accordingly, the EIA Phase must focus on reducing these uncertainties through detailed investigations, modelling, specialist integration and comparative assessment of alternatives. The final EIAR must clearly demonstrate how specialist findings have been incorporated into project design, site selection and the application of the mitigation hierarchy.
- b) The Environmental Assessment Practitioner (EAP) must ensure effective alignment and consistent coordination between all involved specialists. This is required to ensure that the impact methodologies,

weighting criteria, assessments and mitigation measures proposed are technically sound, realistic, achievable, and mutually compatible, and that they do not compromise or contradict the recommendations of any specialist discipline.

- c) The Department notes that the terrestrial biodiversity, marine ecology and marine physical environment specialist studies identify several environmentally significant features and impact pathways that are not adequately reflected in the project description. These include the ecological importance of groundwater-dependent wetlands, dune dynamics, critical biodiversity areas, marine habitats, squid spawning grounds, spoil generation and disposal requirements, thermal plume impacts, fisheries exclusion zones, shoreline change processes, sea-level rise and tsunami-related risks. Furthermore, the Marine Physical, Water Quality, Sediment Transport and Shoreline Change Scoping Report expressly notes that a more detailed project description is required to support robust impact assessment and permitting processes. The EIAR must therefore expand the project description to adequately describe these environmental constraints, risks and associated infrastructure requirements to enable informed assessment of impacts and alternatives.

d) Freshwater supply study:

The report concludes that seawater desalination represents the only feasible long-term water supply option for the proposed development. As such, the desalination plant and all associated infrastructure, including intake structures, discharge outfalls, reservoirs, pipelines and brine management facilities, must be assessed in sufficient detail during the EIA phase. The report notes that key design parameters, including the final desalination plant configuration, demineralised water production requirements, associated brine volumes, and intake and discharge specifications, will only be confirmed during the EIA phase. Accordingly, the EIA must include detailed brine dispersion modelling, verification of potential impacts on the marine environment through specialist assessment, and a comprehensive quantification of all brine streams generated by both desalination and demineralised water production processes. Public concern regarding contamination of seawater intakes, including marine oil spills must also be addressed. Furthermore, the EIA must evaluate the long-term resilience and operational reliability of the desalination infrastructure under future climate change scenarios, including sea-level rise, increased storm intensity and extreme weather events. In response to recurring concerns raised during the public participation process, the EIA must finalise and assess the proposed desalination plant design, evaluate the potential impacts of intake and discharge infrastructure, demonstrate that groundwater abstraction will not constitute a long-term water supply source for the facility, and address concerns regarding drought resilience, water security, and potential competition with existing municipal water users.

e) Aquatic Biodiversity:

The Department notes that the Aquatic Biodiversity Scoping Assessment identifies several wetlands and groundwater-dependent ecosystems of high ecological importance, particularly at the Thyspunt site. While the report provides a preliminary indication that impacts may be mitigated through appropriate design and management measures, substantial uncertainties remain regarding key project components and associated infrastructure. It is therefore imperative that the EIA phase includes detailed investigations into groundwater-wetland interactions, the potential effects of dewatering, infrastructure placement, habitat fragmentation, stormwater management, effluent disposal and cumulative impacts to ensure that impacts on aquatic ecosystems are fully assessed and that the mitigation hierarchy has been appropriately applied.

f) Geohydrology study:

The geohydrology study identifies Langefonteinvelei, dune-slack wetlands and coastal seeps/springs as groundwater-dependent ecosystems of high ecological importance. Although the specialist concludes that dewatering impacts can be mitigated, this conclusion relies heavily on model assumptions and proposed artificial recharge measures. The EIA must therefore:

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- Demonstrate, with detailed modelling and monitoring data, the hydraulic connection between the dual aquifer system and wetlands.
- Verify that construction dewatering will not alter the ecological functioning of Langefonteinlei and associated wetlands.
- Assess risks to coastal freshwater seeps and springs under worst-case dewatering scenarios.
- Evaluate the effectiveness and long-term feasibility of managed aquifer recharge as mitigation.
- Integrate findings from geohydrology, ecology and dune geomorphology studies.
- Assess cumulative impacts of dewatering together with climate variability and drought conditions.

g) Water resource Perspective:

The public participation process and specialist studies indicate that the EIA must concentrate primarily on groundwater-dependent wetlands, dewatering impacts, long-term water supply, desalination-related marine impacts, contamination risks, and climate-change-driven flooding and sea-level rise. While the specialists generally conclude that impacts can be reduced to low significance through mitigation, many of these conclusions remain dependent on assumptions, detailed design information, and future monitoring. The EIA must therefore provide a substantially higher level of technical certainty and demonstrate, through integrated specialist assessments, that the ecological functioning of Thyspunt's sensitive wetland, groundwater and coastal systems can be maintained throughout the construction, operation and decommissioning phases of the proposed nuclear development.

h) Terrestrial biodiversity, fauna and plant species:

While the terrestrial biodiversity assessment identifies Thyspunt as the preferred site alternative from a regional biodiversity perspective, the Department notes that the site contains several highly sensitive, process-driven ecological systems, including groundwater-dependent wetlands, mobile dune systems, ecological corridors, Critical Biodiversity Areas (CBA) and Ecological Support Areas (ESA) features, and Key Biodiversity Area (KBA)-linked biodiversity. The EIA phase must therefore place particular emphasis on demonstrating the avoidance of significant impacts to wetland functioning, dune dynamics, landscape connectivity and Species of Conservation Concern, and must clearly determine whether residual impacts on these potentially irreplaceable ecological features can be reduced to acceptable levels.

i) Offsets:

The specialist scoping studies acknowledge that biodiversity offsets may be required to address residual impacts on CBAs, ecological corridors, species of conservation concern, and sensitive dune-wetland ecosystems. However, the final SR does not provide sufficient detail regarding the proposed offset approach, including offset feasibility, potential receiving environments, offset objectives, or preliminary offset requirements. The EIA Phase must assess the extent to which identified residual impacts are capable of being offset and demonstrate how biodiversity offset requirements will be implemented in accordance with the mitigation hierarchy and the National Biodiversity Offset Guideline, published under section 24J of the National Environmental Management Act, 1998 (Act No. 107 of 1998), Government Notice No. 3569, Government Gazette No. 48841 of 23 June 2023. The biodiversity offset plan to be developed during the EIA Phase must include, inter alia:

- Identification and quantification of residual biodiversity impacts requiring offsetting;
- An assessment of the offset-ability of identified residual impacts;
- Clearly defined no-net-loss and/or net-gain objectives;
- Identification and assessment of suitable offset receiving areas;
- Details of stakeholder engagement undertaken in the development of the offset strategy;
- Clearly defined implementation measures, responsibilities, timeframes, and management requirements; and
- A monitoring, auditing and reporting framework to assess the effectiveness of offset implementation and achievement of offset objectives.

This information must be provided to enable the competent authority to adequately assess the feasibility, effectiveness, and long-term sustainability of the proposed biodiversity offset measures.

j) The Marine Specialist Studies

The study identifies dredging, excavation and spoil disposal as key project activities with the potential to result in sediment plumes, habitat loss, benthic habitat smothering, disruption of sediment transport processes, shoreline change, concerns raised during public participation and impacts on fisheries resources, particularly the chokka squid fishery at Thyspunt. The EIA must therefore provide detailed spoil management and disposal proposals, sediment plume modelling, disposal site alternatives, fisheries impact assessments, shoreline response modelling and cumulative impact assessments, together with clear justification for the preferred disposal option and associated mitigation measures. The EIA must further demonstrate that the proposed brine discharge design will achieve adequate dilution and mixing and will not result in unacceptable long-term impacts on marine ecosystems or ecosystem services. Additionally, it must clearly identify all marine permits and approvals likely to be required and indicate how the specialist assessment findings will inform these approvals.

k) Heritage Impact Study:

The Department notes that the Thyspunt site falls within an area that has been provisionally protected under Section 29 of the National Heritage Resources Act and is currently being investigated by SAHRA for possible declaration as a Grade I National Heritage Site Cultural Landscape. While the SR acknowledges this status, significant uncertainty remains regarding the final boundaries, statement of significance, and implications of the proposed declaration. The EIA must therefore include a comprehensive cultural landscape assessment informed by direct engagement with SAHRA, consideration of the heritage values underpinning the nomination, and an assessment of the compatibility of the proposed NPP with the objectives of protecting a nationally significant cultural landscape. The assessment must integrate heritage, visual, socio-economic and public participation findings and evaluate impacts on landscape integrity, cultural significance, sense of place and associated heritage resources. The EIA must specifically examine implications of provisional SAHRA protection, potential declaration as a National Heritage Site, cumulative impacts from wind farms, powerlines and the NPP, landscape-scale heritage significance, visual and sense-of-place impacts and whether heritage impacts can realistically be mitigated.

l) Dune Geomorphology:

The specialist concludes that Bantamsklip is preferred from a dune geomorphology perspective, because Thyspunt has higher geomorphological sensitivity and more complex dune systems. The EIA must therefore clearly explain how Thyspunt remains a feasible alternative despite this finding and how impacts can be reduced to acceptable levels. Both the Dune Geomorphology and Geohydrology Scoping Reports identify several outstanding investigations that are required to inform the impact assessment phase. The EIA must demonstrate, through detailed specialist investigations and modelling, how sensitive dune systems, groundwater-dependent ecosystems, wetlands, coastal seeps, groundwater resources, spoil disposal areas, associated infrastructure and climate change risks have been avoided and/or mitigated. The final EIA must provide sufficient detail to support the assessment of the preferred site and all associated infrastructure alternatives.

m) Marine and Shoreline scoping:

According to the scoping assessment, the primary marine impacts relate to cooling water and desalination discharges, dredging and spoil disposal activities, and shoreline and sediment transport changes. The assessment indicates that Thyspunt may be more sensitive to shoreline and sediment transport impacts than Bantamsklip. The report asserts that further investigations are necessary in the EIA phase to address thermal and saline discharge impacts on marine ecosystems. The dredging and spoil disposal impacts on habitats and water quality. Most importantly the potential shoreline erosion and altered sediment transport, especially at Thyspunt.

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n) Climate Change Impact Assessment (CCIA):

The Department notes that the CCIA identifies several relevant climate change considerations; however, the assessment remains largely qualitative at the scoping stage. The report does not adequately describe the methodology, spatial and temporal boundaries, or approach to quantifying cumulative greenhouse gas emissions and cumulative climate risks associated with other regional developments. These aspects must be comprehensively addressed during the EIA phase. Furthermore, while alternatives have been acknowledged, the CCIA does not provide sufficient detail on how the proposed site alternatives (Thyspunt and Bantamsklip) will be comparatively assessed in terms of climate vulnerability and resilience, nor does it explain whether technology, design, construction, or operational alternatives will be evaluated for their influence on greenhouse gas emissions and climate adaptation outcomes.

The Department therefore requires that the EIA Phase CCIA include a quantitative lifecycle greenhouse gas inventory covering construction, operation and closure/decommissioning phases; a detailed cumulative climate change assessment; a comparative climate resilience assessment of the site alternatives; quantitative modelling of sea-level rise, storm surge, coastal erosion and compound coastal hazard scenarios over the design life of the project; and an assessment of risks to critical infrastructure, including cooling-water and emergency systems. The assessment must also identify robust climate adaptation measures and include a comprehensive uncertainty and sensitivity analysis to demonstrate the resilience of the proposed development under future climate change scenarios.

o) Air Quality Assessment:

While the specialist acknowledges the need for recent meteorological and ambient air quality data and proposes the use of 2023-2025 datasets during the EIA phase, the current SR remains dependent on historical monitoring datasets, some of which are significantly older than five years. The EIA must demonstrate how updated monitoring information influences the baseline characterisation, dispersion modelling, impact predictions and site comparison.

p) Avifaunal Impact Assessment:

- The EIA phase must include additional seasonal surveys and monitoring to better characterise avifaunal utilisation patterns, breeding activity, migratory species movements and seasonal habitat use, particularly for coastal and wetland-dependent species of conservation concern (SCC's).
- The EIA phase must include a detailed flight path assessment and collision-risk assessment where possible based on sufficient seasonal survey effort to inform infrastructure placement, lighting design and mitigation requirements. The EIA must assess the cumulative avifaunal implications of the transmission infrastructure required to support the proposed NPP and evaluate collision and electrocution risks associated with the broader power evacuation network.
- The report identifies a cormorant colony at Thyspunt and adopts a precautionary approach assuming it may represent Cape Cormorant breeding habitat. The area is identified as a no-go area during the breeding season. The EIA phase must confirm the species utilising the breeding colony, quantify breeding activity, and evaluate whether project infrastructure, lighting, noise or marine activities may affect breeding success.
- The EIA phase must assess whether avifaunal impacts differ between reactor technologies, cooling system alternatives and associated infrastructure configurations assessed under the PPE approach.

q) Socio-Economic Impacts:

The EIA phase must provide a more detailed, site-specific assessment of directly affected communities, tourism and fisheries-dependent livelihoods, worker influx and accommodation requirements, housing impacts, cumulative effects, and impacts on vulnerable groups. The EIA must also establish stakeholder engagement and grievance-management mechanisms, and finalise mitigation commitments relating to tourism, fisheries, heritage resources and vulnerable communities. The EIA must further demonstrate how issues raised during the public participation process have

informed the assessment of impacts, alternatives and mitigation measures, and provide a robust comparative assessment of the socio-economic implications of the Thyspunt and Bantamsklip alternatives.

r) Health risk scoping report:

The assessment is currently limited to PM_{2.5}-related health impacts and remains dependent on the outcomes of the Air Quality Impact Assessment. The EIA phase must include a quantitative assessment of health impacts based on modelled pollutant concentrations, identify and assess all sensitive receptors, consider cumulative and construction-related health impacts, improve the use of local health baseline information where available, and demonstrate how health concerns associated with the proposed NPP, including issues raised during the public participation process, will be comprehensively addressed through the integrated specialist assessment process.

s) Visual Impact:

The Department notes that the Visual Scoping Report identifies Thyspunt as the preferred site from a visual perspective, primarily due to the screening effect provided by the surrounding dune systems and the lower number of visually exposed receptors relative to Bantamsklip. However, this conclusion is based on a high-level assessment and remains subject to several uncertainties relating to the final project layout, infrastructure footprint, reactor technology, and associated infrastructure requirements. The EIA phase must therefore substantiate the preference for Thyspunt through detailed visual simulations, photomontages and viewshed analyses, and demonstrate that the visual advantages identified at the scoping stage remain valid once the final development configuration has been defined.

The Department further notes that concerns raised during the public participation process frequently related to potential impacts on dark skies and night-time lighting, tourism and recreational activities, and the visual integrity and character of the coastline. The EIA phase must therefore include a detailed assessment of night-time visual impacts, supported by visual simulations, light-spill modelling, sky-glow modelling and a cumulative lighting assessment. Attention must be given to sensitive visual receptors, including protected areas, tourism and recreational destinations, cultural landscape resources, coastal settlements and scenic routes.

The EIAR must ultimately include detailed visibility modelling, photomontages and visual simulations based on the final infrastructure layout and technology alternatives assessed under the PPE approach. The assessment must demonstrate how visual impacts have been avoided and minimised through project design, infrastructure siting, layout refinement and the implementation of specialist recommendations, and must clearly assess the cumulative visual implications of the proposed NPP and all associated infrastructure.

t) Traffic Impact Assessment:

The Department acknowledges that the Traffic Impact Assessment demonstrates an understanding of the key transportation considerations associated with the proposed nuclear power project and appropriately identifies matters requiring further investigation during the EIA phase. However, the current assessment remains preliminary and does not provide the detailed quantitative analyses required to fully assess potential traffic-related impacts.

- The EIA-phase Traffic Impact Assessment must therefore include detailed baseline traffic counts and road condition surveys, as well as capacity analyses for all affected road links and intersections. A comprehensive abnormal load transportation assessment must be undertaken, including the identification of haul routes, evaluation of bridge and pavement capacities, escort requirements, and confirmation of any road upgrades necessary to accommodate oversized or heavy components associated with the development.
- In addition, the assessment must evaluate emergency access and evacuation requirements in alignment with the National Nuclear Regulator's emergency planning framework and quantify cumulative traffic impacts arising from concurrent regional developments and construction

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activities. Evidence of engagement with the relevant national, provincial and municipal road authorities must be provided, together with confirmation of any required transport infrastructure improvements. The final assessment must also include a comprehensive traffic management plan addressing construction traffic, abnormal load movements, worker transportation, road safety measures, delivery scheduling, and measures to minimise disruption to surrounding communities and existing road users. This information is necessary to adequately assess the traffic impacts of the proposed development and the suitability of proposed mitigation measures.

u) Noise Impact Assessment:

The Department notes that the Noise Impact Assessment identifies the general location of potential noise-sensitive receptors and commits to undertaking baseline noise monitoring during the EIA phase. The current assessment remains largely desktop-based and does not demonstrate that all potentially affected receptors have been verified in the field. The EIA-phase assessment must therefore include field verification of all noise-sensitive receptors, provide GPS coordinates, confirm occupancy status, identify sensitive land uses such as schools, clinics, tourism facilities and places of worship, and clearly justify the inclusion or exclusion of receptors from the assessment.

In addition, while the proposed baseline monitoring responds to concerns raised during the scoping phase, the final Noise Impact Assessment must include representative daytime and night-time monitoring undertaken in accordance with SANS 10103 and other applicable standards, supported by details of monitoring locations, meteorological conditions and any seasonal considerations relevant to the assessment.

The Department further requires that the EIA-phase Noise Impact Assessment assess cumulative noise impacts associated with construction, operation, traffic and related infrastructure; include predictive noise modelling and noise contour mapping for both site alternatives; assess noise impacts associated with construction traffic, abnormal loads and ancillary infrastructure; verify the occupancy status of Eskom-owned residences and assess these receptors where appropriate; and quantify the effectiveness of proposed mitigation measures where exceedances of applicable noise criteria are predicted. This information is necessary to adequately evaluate the potential noise impacts of the proposed development and the effectiveness of proposed management measures.

v) Town Planning:

The EIA-phase Town Planning Impact Assessment must undertake a comprehensive comparative assessment of the Thyspunt and Bantamsklip site alternatives and provide a clear motivation for the preferred alternative from a spatial planning perspective. This must include a detailed evaluation of the planning advantages, constraints and long-term development implications of each site to support the competent authority in assessing the appropriateness of the preferred location.

Furthermore, the assessment must evaluate cumulative spatial planning impacts associated with the proposed development and all supporting infrastructure, including the implications of induced development, worker accommodation, municipal service demands and future growth within the surrounding area. The assessment must also demonstrate the project's consistency with the principles contained in the Spatial Planning and Land Use Management Act, 2013 (SPLUMA), including spatial justice, spatial sustainability, spatial resilience, spatial efficiency and good administration.

The final Town Planning Impact Assessment must include appropriate planning mitigation measures and recommendations to support coordinated land use management, infrastructure planning and long-term development objectives, and must demonstrate alignment with the strategies and requirements of the relevant national, provincial and municipal planning authorities.

w) Radiological Impact Assessment:

The Department notes that the Radiological Impact Assessment provides a comprehensive preliminary assessment of potential radiological impacts on members of the public and the environment for both the Thyspunt and Bantamsklip site alternatives. The assessment applies

recognised national and international methodologies and concludes that predicted radiation doses to the public, as well as impacts on non-human biota, remain below applicable regulatory thresholds, with both sites considered suitable from a radiological perspective.

However, the assessment is based on conservative assumptions and a PPE approach, given that a final reactor technology has not yet been selected. The EIA phase must refine the assessment using design-specific information, updated environmental baseline information, current habits surveys, and more detailed atmospheric and marine dispersion modelling. Attention must be given to uncertainty analyses, marine bioaccumulation pathways, cumulative impacts, and the assessment of any reactor technologies ultimately selected for implementation. The Department also notes that neither site is identified as preferred from a radiological perspective, and the EIA must clearly demonstrate how radiological considerations are integrated into the overall site selection process.

x) Radioactive Waste Management and Transport Scoping Report:

The EIA phase must provide a more detailed assessment of the proposed Radioactive Waste Management Programme, including waste inventories, waste minimisation measures, storage requirements, transport routes and frequencies, emergency preparedness measures, cumulative impacts, and the long-term management strategy for spent nuclear fuel and high-level radioactive waste. The EIA must further demonstrate alignment with current national policies, National Radioactive Waste Disposal Institute (NRWDI) planning, International Atomic Energy Agency (IAEA) requirements, and evolving international best practice, while addressing societal, institutional, financial, and long-term stewardship considerations associated with radioactive waste management and disposal.

6. Public Participation Process (PPP)

- a) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR. This includes but not limited to the; Provincial Department for both sites, South African Heritage Resources Agency (SAHRA), Earthlife Africa, Eastern Cape Provincial Heritage Resources Authority (ECPHRA); Heritage Western Cape (HWC), Wildlife and Environment Society of SA (WESSA); Local alliances or environmental bodies; South African Civil Aviation Authority, Birdlife South Africa, as well as the affected district and local municipalities.
- b) Proof of correspondence with the various stakeholders must be included in the EIAR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.
- c) The comments and response trail report (C&R) must be submitted with the EIAR and subsequent documentation. The C&R report must incorporate all comments received for this development. The comments and responses report must address all comments received and present them in chronological order, while allowing the reader to follow how the issues have been addressed and translated into the report findings. The report must include responses to the I&APs.
- d) Please ensure that all issues raised, and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction (including this Department's comments) in respect of the proposed activity are adequately addressed. Comments made by I&APs must be comprehensively captured (copy verbatim if required) and responded to clearly and fully. Please note that a response such as "Noted" will not be regarded as an adequate response to I&APs comments.
- e) The Department notes that the PPP undertaken during the Scoping Phase appears to comply with the requirements of Chapter 6 of the EIA Regulations and provided multiple opportunities for stakeholder participation. Notwithstanding this, the EIAR must clearly demonstrate how issues raised by stakeholders have influenced the project design, alternatives assessment, specialist investigations and impact assessment findings. Attention must be given to concerns relating to the PPE approach, associated infrastructure, transmission infrastructure, fisheries and marine impacts, cultural landscape

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considerations, and the comparative assessment of alternatives to ensure meaningful consideration of stakeholder inputs during the EIA phase.

7. Impact Assessment:

- a) Impacts must be equitably and comparatively assessed across both sites to ensure there is no bias.
- b) The impact assessment framework identifies the principal environmental, social, heritage and economic issues associated with the proposed development and generally provides an adequate basis to proceed to the EIA phase. However, the assessment remains largely issue-identification focused and several key impact assessments are dependent on unresolved site, technology and infrastructure alternatives. The EIA phase must therefore provide a more detailed comparative assessment of alternatives, quantify impacts where possible, strengthen cumulative impact assessment, and demonstrate how the significance of impacts may vary between the technology and infrastructure options assessed under the PPE approach. Attention must be given to marine ecology, fisheries, cultural landscape impacts, associated infrastructure and socio-economic impacts.
- c) The EIAR must clearly assess residual impacts following the implementation of mitigation measures and provide a reasoned statement regarding the acceptability of residual impacts at both site and project level. Confidence levels, assumptions and uncertainties identified by specialists must be incorporated into the impact significance assessment.

8. Cumulative Assessment to be conducted in the EIA Phase

The cumulative impact assessment presented in the final SR identifies several potential cumulative impact pathways; however, the Department is of the view that the EIA phase must substantially expand the scope of the cumulative assessment. The assessment must consider the combined impacts of the NPP and all associated infrastructure, including transmission infrastructure, desalination facilities, intake and outfall structures, spoil disposal areas, construction support facilities, worker accommodation and access roads. Attention must be given to cumulative impacts on marine ecosystems and fisheries, biodiversity and ecological connectivity, heritage and cultural landscape resources, municipal infrastructure and services, and the interaction between project-related impacts and long-term climate change. The assessment must clearly define spatial and temporal boundaries, identify other existing and reasonably foreseeable developments, and evaluate the significance of cumulative impacts at local, regional and national scales.

9. Environmental Management Programme (EMPr)

- a) The Department notes that no draft EMPr has been included as part of the SR. While the submission of an EMPr is not necessarily required at the Scoping Phase, the EIAR must include a comprehensive EMPr prepared in accordance with Appendix 4 of the EIA Regulations. The EMPr must be informed by the findings of the specialist studies and provide site-specific management measures for all phases of the development, including construction, operation, decommissioning and rehabilitation. Attention must be given to marine ecology and fisheries, biodiversity, heritage and cultural landscape resources, spoil management, desalination infrastructure, worker accommodation, municipal services, cumulative impacts and all associated infrastructure. The EIAR and EMPr must explain how management measures may differ between reactor technologies, cooling systems and associated infrastructure alternatives, and whether separate management requirements would apply depending on the technology ultimately selected.
- b) The EMPr must include the following:
 - i. It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the EIA Regulations Listing Notice 1 and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme/s, must be signed and submitted with the final report over and above the EMPr for the facility.

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- ii. Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the EIA Regulations.
 - iii. You are reminded that EMPr's must be subjected to PPP as part of the Scoping/EIA process and cannot only be submitted with the final EIAR.
- c) The EMPr must consider the following, and where possible, include:
- i. adaptive management measures linked to measurable monitoring thresholds and predefined management responses where monitoring indicates impacts greater than those predicted during the EIA phase. Where environmental management requirements differ between technology alternatives assessed under the PPE, these differences must be clearly identified and addressed within the EMPr.
 - ii. An alien invasive management plan must be implemented during construction and operation of the facility. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken.
 - iii. A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site and be implemented prior to commencement of the construction phase.
 - iv. An avifauna monitoring and management plan to be implemented during the construction and operation of the facility. This plan must be drafted by a suitably qualified avifauna specialist.
 - v. A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility. Restoration must be undertaken as soon as possible after completion of construction activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats.
 - vi. An open space management plan must be implemented during the construction and operation of the facility.
 - vii. A traffic management plan for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time and avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations.
 - viii. A transportation plan for the transport of components, main assembly cranes and other large pieces of equipment. The transport plan must look at how and the time these loads will have to be transported.
 - ix. A storm water management plan must be implemented during the construction and operation of the facility. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off.
 - x. A fire management plan must be implemented during the construction and operation of the facility.
 - xi. An erosion management plan for monitoring and rehabilitating erosion events associated with the facility. Appropriate erosion mitigation must form part of this plan to prevent and reduce the risk of any potential erosion.
 - xii. An effective monitoring system to detect any leakage or spillage of all hazardous substances during their transportation, handling, use and storage. This must include precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems.
 - xiii. Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.

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- xiv. a detailed and site-specific EMPr addressing all marine-related activities and impacts associated with the proposed development. Attention must be given to cooling-water abstraction and discharge, desalination and brine disposal, dredging activities, spoil disposal, marine biodiversity, fisheries resources, squid spawning habitat, marine noise and cumulative impacts. The EMPr must establish clear management objectives, monitoring requirements, performance indicators, trigger thresholds, adaptive management measures, reporting requirements and responsibilities for implementation throughout the construction, operational and decommissioning phases of the project. Furthermore, the EMPr must demonstrate how the identified management measures will remain applicable across the range of technology alternatives assessed under the PPE approach.
 - xv. The EMPr must include clearly defined environmental performance indicators and trigger thresholds e.g. thermal plumes, salinity, turbidity, marine ecology, fisheries resources, marine mammals, underwater noise, and spoil disposal impacts, for all significant marine impacts. Where monitoring identifies that environmental conditions exceed predicted levels or approved thresholds, the EMPr must specify the corrective actions, reporting requirements, adaptive management measures and responsibilities to be implemented to prevent unacceptable environmental impacts. These trigger thresholds must be measurable, auditable and linked to the impact predictions contained in the EIAR.
- d) The EAP must provide detailed motivation if any of the above requirements is not required by the proposed development and not included in the EMPr.

General

All comments issued on the draft SR remain applicable and must be addressed in the EIAR. You are further reminded that the EIAR to be submitted to this Department must comply with all the requirements in accordance with Regulation 23 of the EIA Regulations.

Further note that in terms of Regulation 45 of the EIA Regulations, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).

You are hereby reminded that, in terms of section 24F of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended, no listed activity may commence prior to the granting of an Environmental Authorisation by the Department.

Yours sincerely



Dr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Forestry, Fisheries & the Environment

Signed by: Mr Wayne Hector

Designation: Deputy Director: Prioritised Infrastructure Projects

Date: 14/08/2026

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DFFE REFERENCE NUMBER: 14/12/16/3/3/2/2806:

ACCEPTANCE OF THE FINAL SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF A 5200MW NUCLEAR POWER PLANT (NPP)
FACILITY LOCATED IN OVERSTRAND LOCAL MUNICIPALITY IN THE WESTERN CAPE PROVINCE/KOUGA LOCAL MUNICIPALITY IN THE
EASTERN CAPE PROVINCE
