

THYSPUNT ALLIANCE

NUCLEAR 1

REVISED DRAFT ENVIRONMENTAL REPORT

COMMENT ON APPENDIX 18: SOCIAL IMPACT ASSESSMENT

Response compiled by T. Malan & H.Thorpe, and submitted on behalf of the Cape St Francis Civics, St Francis Bay Residents' Association, the St Francis Kromme Trust and the Thyspunt Alliance.

General Comment

If anything illustrates the partisan stance and amateurish approach of the EIA, it is this report. It is so bad that it calls into question the independence and competence, not only of the specialist, but also that of the EAP.

Our major objections are the following:

1. The Assessment remains purely philosophical, with little reference to facts.
2. The Assessment totally disregards Recommendation 2 in the Nuclear Site Investigation Programme, that "the small coastal resorts be left unaffected".
3. The social impact of the current proposal has been arbitrarily excluded from the list of nine decision-making factors identified on page 6 of the Executive Summary.
4. The revised impact assessment criteria found in Chapter 7, Table 7 – 16 have been ignored, with major implications for significance ratings.
5. Objections raised in the first draft have been completely ignored. No material changes have been made. The report remains entirely theoretical, playing down serious social impact issues as if they were pure speculation or simply perceptions. No serious attempt is made to address these issues.
6. The Assessment feeds directly from the Transportation & Noise Assessments. These are equally inadequate. Our more detailed comments on these should be read in conjunction with this submission.

7. The demographics used in the assessment are out-dated.
8. Total failure to address the uncontrollable and unmitigable impact of increased unskilled and unemployed job-seekers arriving from elsewhere in the country; growth in informal settlements, and consequent social pathologies which will inevitably arise.
9. Completely inadequate assessment of the infra-structural and social services implications and costs for the Kouga Municipality
10. Mitigation measures proposed by the specialist are so naïve as to lack all credibility.

DETAILED DISCUSSION

1. Theoretical and non-factual nature of assessment

The SIA makes the following statement:

- Different people tend to view the realities of life differently and therefore the impact that may be perceived negatively by one individual or community could be perceived as the best and most positive impact by the next individual;

To avoid this confusion about the realities of life it is necessary that the studies conducted as part of this EIA should be based on fact. The department will base their response not on perceptions and the specialist therefore **has** the responsibility **to** provide both the department as well as I&AP's with a clear and truthful description of the social situation as it is currently reflected in the affected environment. Whether people perceive Nuclear as good or bad has a very small role to play in the social impact assessment and although these perceptions can be recorded the social impact assessment should focus on the actual impact of a development of this size on the society at present.

Furthermore, where facts are given, they are contradictory. For example the background information in the the SIA states:

Thyspunt site is located in the Eastern Cape, between Oyster Bay and Cape St. Francis, 20 km south of the town of Humansdorp, and approximately 50 km west of Port Elizabeth, as shown in Figure 1.02.

In the Transport Impact Assessment, Thyspunt is 80km west of Port Elizabeth, Humansdorp is 15km north of Thyspunt and 7km west of Oyster Bay. These

inconsistencies are present throughout the DEIR. They highlight yet again one of the constant issues that we have been raising from the start. The most elementary facts are contradictory, and in each case, St Francis Bay and Sea Vista are ignored.

The section on Assumptions and limitations goes out of its way to dismiss input by the local community.

The DEA is requested to take note of this in considering any application for a ROD.

2. Recommendation 2

Recommendation 2 stated clearly that the coastal holiday resorts should be left unaffected by the development.

This was a clear recommendation, of which the Social Impact Specialist should be aware, and has been completely ignored. If he believes that having thousands of heavy-load trucks passing through St Francis Bay daily for nine years, together with a potential massive influx of unemployed job-seekers is leaving the resort “unaffected”, then words have no meaning.

The DEA is requested to ask the EAP for reasons why Recommendation 2 of the Nuclear Siting Investigation Programme has been disregarded, and to consider whether this does not constitute a fatal flaw.

3. Exclusion of the Social Impact from the nine decision factors used in weighting the various impacts

It is completely unacceptable that the Social Impact has been excluded from the nine “decision factors”. The Social disruption caused by the selection of the R330 as the main access road will be massive, as will any expansion of the informal settlements which is inevitable if this route is selected.

One of the objections to this entire EIA is the arbitrary and secretive manner in which weightings have been given to different impacts. This is left to the EAP in conjunction with the various specialists. It is not a reliable process, since the specialists are only familiar with their own disciplines, and are not in a good position to evaluate impacts from other areas. It leaves the way open to the EAP to influence the process.

No minutes of the weighting meeting held prior to the First Draft have been made available, and no I & APs were present at that meeting. It appears to have been a brief and superficial meeting, at which major decision affecting the final outcome were taken.

It is our view that serious and unmitigable impacts are being deliberately relegated to insignificant weightings, or ignored completely, whilst less serious objections, which can be mitigated with some confidence, are promoted to high weightings.

The DEA is asked to require the EAP to give written reasons for the weightings which have been given; what the process was to determine these weightings; why social impact is not included; whether the process used is a credible one, or is open to manipulation; and whether the entire weighting process should not be re-done in a transparent, fair and reasonable manner. The responses to be made available immediately to I & APs.

4. Changes in impact rating criteria

The criteria have been revised in response to comment in the Peer Review in Appendix H. These are outlined in Chapter 7 “Methodology”. Table 7 – 16 in section 7.8.1 on p.7-32 outlines very specifically the new criteria to be applied. The revisions are discussed in detail in our response to Impact Assessment Criteria, Ch 7. In our view there have been some improvements, but overall the criticisms remain.

Typically of this EIA, the criteria outlined are immediately contradicted by the accompanying notes below it, which revert to those used in the first draft. We have assumed that Table 7 – 16 is correct, and should be used by all the specialists in determining the significance of different impacts. This has clearly not been done in this particular case.

The DEA is requested to seek confirmation from the EAP that the impact rating criteria contained in Table 7-16 of Chapter 7 are correct, and to explain why the explanatory notes which follow have not been altered to conform with the Table.

The EAP should also be requested to confirm that all impact significance assessments have been done in terms of Table 7-16, and not in terms of Table 7 – 10 in the First Draft Impact Report. Should this not be the case, then all non-conforming specialist reports to be reviewed in terms of these criteria, and no ROD considered prior to this.

Section 3 of the Social Impact Report, from p.139 – 212 presents a number of impact analyses. In every single case the impact is clearly assessed in terms of the earlier criteria, and not those proposed in Table 7 – 16 of Chapter 7.

The DEA is requested to check that impacts in the Social Impact Report have been assessed in terms of the criteria outlined in Table 7 – 16 of the revised draft, and not

in terms of table 7 -10 in the first draft, and to demand that impacts be re-assessed in terms of the revised criteria.

5. Failure to address objections raised in the First Draft

The Social Impact Assessment was severely criticized in the First Draft on the grounds of being highly theoretical, backed by an almost complete absence of relevant fact, and blatantly designed to play down the social impact of placing a nuclear plant at Thyspunt. The original Social Impact Assessment has not changed in any way.

6. Transportation and noise assessments

The social impact is strongly influenced by the Transportation and Noise impacts. Unfortunately the Noise and Transportation Assessments are as weak as the Social Impact Assessment, and fail completely to indicate the impact on the Kromme River and St Francis Bay communities. This has given the Social Impact specialist a further opportunity to play down the real impacts.

It is clear from the Transport Impact Assessment that the impact on the communities of Humansdorp, St. Francis and Oyster Bay will be large. We fail to understand how the SIA can come to the startling conclusion that the impacts at Bantamsklip and Thyspunt would be similar.

The specialist appears to be blissfully unaware or unconcerned that, if the present plans to use the R330 for the main road access are approved, this would lead to a total, permanent and unmitigable change of sense of place for both Humansdorp and the Greater St Francis area. The impacts at Humansdorp, St Francis Bay & Sea Vista will be HIGH.

This contravenes the requirements of both Section 33 (1) of the Constitution, and the requirements of the Promotion of Administrative Justice Act that administrative actions must be fair and reasonable. Apart from the ludicrous proposal to take all the heavy & ultra-heavy loads down Saffery Street in Humansdorp, none of these reports have been revised in any way in the second draft, despite the criticisms made in the response to the first draft.

The DEA is requested to consider whether any of these reports pay adequate attention to the disruption which will be caused to the local communities by the volumes, size and noise of the proposed vehicle trips, or of the impact of the influx of unemployed job seekers into the area; and whether these should not be included in

the list of decision factors and given a high significance rating in terms of the impact rating criteria set out in Table 7-16.

The same applies to road access. Every time a public meeting is held in connection with Thyspunt, a new road access plan is presented. The reality is that the Oyster Bay by-pass headland dune system makes access to Thyspunt extremely problematic.

Whichever way the access roads go, in the light of the volume of traffic expected, it will have massive environmental, social and impacts. Table 3-14 in Chapter 3 predicts over 400000 2-way (i.e. over 800000 single) trips during year 6. Even at this late stage, it has not been possible to ascertain what proportion and type of traffic will use the R330 and what the Oyster Bay road. This despite several requests for clarification (See appendix to Transportation Assessment). Nor is it clear whether all transport will be during daylight hours, or whether a shift system will operate 24 hours per day for 30 days per month. The public has been assured that all traffic will be during daylight hours, but Table C 12 of The Transport Assessment indicates that a shift system will be the case, which is directly contrary to what the public has been told. What is clear is that hundreds of thousands of trips will be involved, incorporating both commuter and heavy load traffic, over a period of nine or more years. The estimated traffic figures for the construction period, found in Table 3-14 of Chapter 3 (Project Description), which is itself riddled with errors, imply that traffic will continue for 30 days per month without break. Depending on the routes to be taken, all of this has massive potential social impact. This appears to have no significance to the specialist, who dismisses it all as speculation and perception.

The DEA is requested to refuse any application for an ROD until such time as a final decision has been taken on the access roads, and the full environmental impacts of this, and cost implications, have been determined and evaluated.

7. Out-dated demographics

The International Atomic Energy Association (IAEA), to which South Africa is a signatory states in the Safety Standards Series No. NS-R-3 that:

4.12. The most recent census data for the region, or information obtained by extrapolation of the most recent census data, shall be used in obtaining the population distribution. In the absence of reliable data, a special study shall be carried out.

It is clear that the data provided as part of this SIA is outdated and therefore a special study should be conducted to determine more exact figures. The use of 2001 census figures is not acceptable and more recent data should be used.

The biggest problem with the use of outdated data is that the decision-making authorities would never be able to get a clear picture of the current situation on the ground. As I&AP's residing in the described environment we are fully aware that the numbers are not just slightly skew, they are wrong to such an extent that it would be laughable if the situation was not so serious. For example:

Table 2.61: Population Gender per Suburb within 16 km from the Thyspunt Site (2001)

Town	Male	Female	Total
Cape St. Francis	83	85	168
Kouga	2104	2001	4105
Oyster Bay	172	170	342
St. Francis Bay	1065	1133	2198

Source - Statistics South Africa: Census 2001

We would assume that the figure for St Francis Bay includes Sea Vista. The Eastern Cape Socio-Economic Consultative Council (ECSECC) reflected a total male population for the Kouga area in 2009 as 36 133 a discrepancy of 32 709 when compared with the figures above.

No attention is paid to the peak holiday influx, which can quadruple the normal resident population.

The DEA is requested not to grant an ROD until a thorough assessment of population figures in the Greater St Francis area, including peak holiday periods, has been completed and approved.

8. Job creation

It is stated that 25% of the construction workers will be sourced locally. Even this is not guaranteed. No final decision has yet been taken on the vendor. Eskom has stated publicly in Sea Vista that this could be as little as 5% or 10%. If the vendor were to be Chinese, which is possible, experience elsewhere is that no local labour will be used. Estimates of direct local jobs opportunities have been hugely exaggerated. Eskom has been spreading the word that up to 8000 jobs will be created. This includes Eskom & the vendor's professional staff. The construction component is estimated to be about 5000. 25% of this is 1250, so a more realistic figure is a maximum of 1250 jobs, and then only in years 6 & 7. Spread over the whole of Kouga, it represents a fairly small number for

each community. Once the higher number gets around, it is an absolute given that our locally unemployed will support the project, and that large numbers of unemployed people will flock to the area in the hope of obtaining jobs. With our present level of infra-structure, this simply cannot be supported.

Job-seekers from outside will be competing with the genuine locals, and every job awarded to an outsider (who will present himself as local) will be at the expense of a genuine local. This can only lead to a xenophobic reaction. This is dismissed by the specialist as speculation – something which “could “ happen.

On the other hand there is the distinct possibility of the chokka industry, based at St Francis Bay, moving to Port Elizabeth or Mossel Bay if Eskom persists with its plan to place 6 million cubic metres of spoil on the sea bed in the prime chokka spawning ground in the country. This established industry employs 4000 people on a permanent basis.

The very presence of a nuclear plant could have a major negative impact on the surfing world, which flocks to Jeffreys Bay, as one of the best surfing venues in the world, but which has shown itself to be highly sensitive to the perceived dangers of nuclear power. If this were to happen one of the Eastern Cape’s major tourism attractions would have gone, and with it one of the mainstays of tourism in Jeffreys Bay .

The entire job-creation scenario should be treated with great circumspection, and should certainly not be rated too highly in the weightings of pros and cons for Thyspunt.

An analysis of the likely actual direct job creation potential for the Kouga area is given below. It indicates that the direct jobs at Thyspunt, whilst not insignificant, will be much smaller than Eskom has suggested to the local communities, and would be short-term.

Based on the assumption that the majority of direct job opportunities will be during the construction period; will be limited to construction staff of 5000; and will constitute a maximum (unconfirmed) 25% being recruited locally; the maximum number is 1250. These will be recruited from the whole of the Kouga region. However, these requirements will fluctuate from year to year and this will only apply to year 6.

An approximate estimate of plant construction jobs for the whole Kouga region, will read as follows:

Year	1	2	3	4	5	6	7	8	9
	220	275	450	670	825	1250	900	750	600

Bearing in mind that this submission is concerned mainly with the social impact on the St Francis community, including Sea Vista, the fact that a maximum of 25%, and possibly much less than this, of construction staff will be recruited locally, and that “local” covers the entire Kouga area, based on population figures for PDIs contained in the current Kouga Spatial Development Framework, it can be predicted that the job opportunities for the Sea Vista community will amount to approximately the following:

Year	1	2	3	4	5	6	7	8	9
	10	13	23	33	45	56	46	38	31

Against this should be placed the likely competition from the influx of job-seekers from outside the area, whose identification is highly problematic, and the potential loss of jobs in the chokka industry, which is by far the leading employer in Sea Vista.

The optimization measures proposed for the securing of local labour are highly idealistic and probably optimistic, unless they are incorporated as a condition of approval. Even with this, they will be difficult to apply.

In view of all this, the positive rating of employment opportunities as “high” in Table 3.08 on p.152, and repeated in the Summary Table for Thyspunt, is optimistic. So far as Sea Vista is concerned, it is more likely to be highly negative.

There would, of course, be indirect job creation in the form of construction of the various accommodation villages & roads, and in ancillary business opportunities, and these are not to be scoffed at, but they must be viewed in proportion to other impacts which will occur. To state that local labour should be used for the building of the vendors and construction staff village is easier said than done. For large construction projects like this it is very difficult for local operators to provide the necessary financing and guarantees for large scale projects like the proposed project.

The DEA is requested to demand a much more accurate picture of the direct job opportunities likely to be available to the local population in the event of Nuclear 1 going ahead at Thyspunt, with reasons given, and to evaluate this in relation to the negative impacts which will accompany a site at Thyspunt.

9. Influx of job-seekers and growth of illegal dwellings

How can the impact of job seekers be evaluated in the absence of any numbers? There is a vast difference between 100, 1000 & 5000 job seekers, but this is not even mentioned, nor is there any attempt to evaluate the possible impacts based on numbers. Nor is there any mitigation measure that can address this.

The SIA makes the following statement:

These job seekers, including those from areas outside the “local” area, enter the area with the hope of securing employment. When they do not secure employment, the potential exists that they will add to the usual difficulties related to informal settlement, pressure on existing resources, services and infrastructure. The possibility also exist that “new” job seekers may contribute towards crime and other social problems such as alcohol abuse and prostitution. Even if particular instances of crime are not as a result of the job seekers, these may still be attributed to them by local communities.

The impact goes further than this. These “job seekers” have the right to services like housing, schooling, police and medical services as well. At present the local community is under-serviced in most of these departments. Development should be sustainable and therefore current backlogs should first be addressed before an added load is heaped onto the authorities.

The inescapable conclusion is that illegal dwellings will mushroom in proportion to the influx. This will lead to all the social pathologies identified in the report, but for which no effective mitigation measures exist.

The social impact of this will be worst for the population of Sea Vista, but almost as bad for the town as a whole. The complacency with which this is addressed in the Social Impact Assessment is breath-taking. No attempt is made to assess the intensity of this impact in terms of specific numbers, and proposed mitigation measures are completely inadequate. The local authority is incapable of catering for the needs of the existing informal settlement at Sea Vista. Competition for the limited number of jobs is bound to lead to xenophobic reaction.

The mitigation measures for the prevention of more illegal dwellings states:

- Cooperate with local authorities to ensure that all legislation preventing illegal settlement, is enforced at all times; and

This is unbelievably complacent and impractical. We would like to see a more practical and workable solution to this problem. Thus far the local authority could not prevent the erection of illegal dwellings. It is therefore doubtful that they will now suddenly

succeed. It must be clearly stated who must cooperate with the local authority and what this cooperation will entail. There will be a cost to the local authority to appoint more enforcement officers. These issues should be discussed in more detail.

To lower the impact in one pen stroke to a impact of low significance is not only unacceptable but the mitigation measures are untested. We believe that the SIA practitioner should provide examples of where these mitigation measures have been successfully implemented.

Nobody objects to a natural growth of job-seekers in proportion to the natural growth of a town, but this is a completely artificial growth, which will place huge strain on both the local authority and on the existing population. The Social Impact Specialist virtually ignores it.

It is our view that this is a fatal flaw. The only solution to it is to avoid bringing any access road through St Francis Bay.

The DEA is requested to require the specialist to determine the actual impacts of job-seekers from outside the municipal area, in terms of specific numbers (e.g. 100, 1000, 5000), and to assess the significance of each level; and to consider whether any road access should be permitted through St Francis Bay , in view of recommendation 2 of the NSIP that the coastal resorts should be left unaffected.

10. Social pathologies

These are listed in the assessment, but simply not addressed. They include crime & increased risk of HIV/AIDS. This in a community which is already seriously under-staffed in law-enforcement provision.

The community is not just concerned about the possibility of the increase in criminal activities. They are concerned about the level of service that they currently receive and the impacts of an increased population on the provision of these services. This impacts particularly strongly on Sea Vista Township.

The mitigation measures suggested are again all “nice to have” but do not address the practical implementation of service delivery on the ground. If the SAPS does not have the budget to provide a larger staff contingent, we can have as many Community Monitoring Committees as we want, it will not deal with the actual situation. No police vehicles, staff shortages, no lock-up facilities – these are facts at present. No pie in the

sky perceptions and paper based solutions. These impacts and cost implications must be addressed.

HIV/AIDS is not just a risk – it is a certainty, as is increased prostitution. As with everything else in the SIA, it is simply raised and then breezed over.

The mitigation measures are all aimed at the workers. The impact that this proven increase will have on the present population is not discussed. The workers will be dealt with most probably at an Eskom clinic. What will happen to the people not employed by Eskom? There are several on-going education campaigns on the prevention of HIV and AIDS and more campaigns would always be welcome. Unfortunately it again does not address the true situation on the ground. The impact of HIV & Aids on any community cannot be described as medium-term; those infected will have to go on life-long treatment the impact is also not just local. The impact is National as most of these patients will become move on, as well as being reliant on social grants.

The DEA is requested to consider whether the impact of social pathologies arising from a major influx of outsiders has been adequately addressed in the SIA.

11. Inadequate coverage of municipal infra-structural & social service requirements

The project description states that: ***“The infrastructural requirements associated with the proposed nuclear power station will be similar to that of the Koeberg nuclear power station located in Duynfontein, Western Cape Province.”*** This statement is simply not true as Nuclear 1 will be at least 3 times the size of the Koeberg plant. The two situations are entirely different.

The same applies for the SIA discussions about Municipal Infrastructure. The SIA is little more than a copy of the Kouga IDP 2009 – 2012 and the Kouga Spatial Development Framework. Although these documents can be used as a baseline for the SIA it is important that the specialist compares the documents with the reality on the ground. This has not been done for this SIA.

This is one of the biggest social impacts and yet again most of the information contained in this SIA is copied from the Kouga IDP. Nowhere in the SIA is a table or indication provided of the possible costs of this development to the Local Authority. We have requested that these possible cost implications for the Local Authority should be included to provide a full overview. At present a large amount of emphasis is placed on the positives. We find this unacceptable as the local ratepayers are in the end going to bear the brunt of these costs. No mention is made of the provision of Emergency

Services as per the Disaster Management Act. Eskom is responsible for Disaster Management on the site but the Local Authority is required to have a standard level of service available in case of a disaster.

In the description of impact the SIA notes:

It is probable that the new nuclear power station and residential development will place strain on municipal services such as water, sanitation, roads, waste and refuse removal.

It is not probable, it is a fact. Furthermore the SIA focuses all the attention on the residential development with little or no consideration of the added burden due to population influx. Although Eskom is willing to invest in the upgrade of infrastructure such as sewerage treatment facilities, this does not solve or alleviate the back log problems currently experienced in the area. The 2011 Green Drop Report gives the Kouga Municipality an overall Municipal Green Drop Score of only 36.3%. The maximum risk rating for Humansdorp, Jeffreys Bay and St. Francis indicates that all of these plants are already a high-critical or critical risk that warrants urgent attention.

The SIA reports that:

When considering the backlog, the municipality has taken cognisance of an additional element, viz. the ability to maintain the existing infrastructure. Subsequently, operational budget to attain effective repairs and maintenance programmes has been allocated.

The current municipal budget does not reflect the operational budget to effect the repairs and maintenance programme. These issues should have been investigated by the practitioner and the impacts should have been recorded.

The mitigation measures suggested are again theoretical and do not provide detailed solutions to age-old problems. There are no specific actions listed, no responsible parties nominated and again no discussion of cost implications.

There is no discussion in the SIA about the current road conditions, again just a theoretical rehash of the Transport Impact Assessment.

Accommodation of Staff and Construction workers:

Although the SIA makes it clear that the accommodation arrangements have not yet been finalised and that an exact location has not yet been established the practitioner states that : ***“Provision for future residential development has been made in the Kouga Spatial Development Plan (2009), in and around Sea Vista, Cape St. Francis, Oyster Bay and Humansdorp.”***

Yet there is no discussion about the fact that these future plans were actually to serve the **current** population of the Kouga area. At present we are dealing with not only a backlog in the provision of housing but also with the problem of land and infra-structure available to add these developments. If the areas identified as future residential developments are now used for Nuclear 1, this will mean that people who have been residing in the area for years, will now have to step back. The current back-log in infra-structure provision in the Kouga has already delayed several housing projects in the area. Even if Eskom promises to provide their own sewerage treatment plant, the land actually earmarked for the community at present will be lost to this development.

This aspect is completely ignored in the SIA and the impacts on the community are not discussed at all.

This, of course, will involve major infra-structural factors such as water, electricity and sewerage, schools and clinics, etc., etc. all of which are operating at capacity at this stage. Quite how any social impact can be assessed in the absence of this information is not clear.

The DEA is requested to reject any application for an ROD until such time as the siting of the various accommodation villages has been determined, backlogs have been addressed; and the environmental impact and infra-structural requirements of these has been fully addressed in terms of Table 7 – 16.

Hospitals

The SIA states under the heading Hospitals that:

Humansdorp:

Humansdorp Hospital is a Public Private Partnership Hospital with 33 private beds and 70 general bed facilities. There are about 35 nurses and 15 doctors on the staff. Humansdorp Hospital is about 20 km's from the proposed Thyspunt Nuclear Power Station. It is the only hospital for patients from Oyster Bay, Cape St. Francis, St. Francis Bay, Jeffreys Bay and the rural areas.

The dream for Humansdorp Hospital may be to have 15 doctors on the staff, but this has not been true for a very, very long time. This illustrates the problem with desktop studies, we can all access relevant government information and this SIA made full use of this information. It is however very unfortunate that the specialist did not verify this information to ensure that the real social impacts can be discussed and considered.

12. Mitigation measures

Much depends on mitigation measures which are proposed to deal with the multitude of social impacts and pathologies which would arise from a decision to proceed with Thyspunt. These completely fail to stand up to any kind of scrutiny. In general those proposed in this report are little more than talk shops, designed to address problem areas after they have arisen, and with no teeth. By this time it will be too late to correct anything meaningfully. These have to be anticipated and addressed at the decision-making stage. Those proposed have no prospect of even reducing, let alone addressing the issues raised. Once again, these measures reflect the extreme complacency of the Social Impact Specialist, and place a question mark over his impartiality

The DEA is requested to look very critically at the proposed mitigation measures in connection with the social impact, and to determine whether these address the problem areas identified.

13. CONCLUSION

In the Impact Identification and Assessment section of the SIA most of the recommended mitigation measures cannot be accepted as they are too vague, there is no responsibility attached to the mitigation measure and the implementation of some of these measures is debatable.

The Social Impact Assessment is complacent, partial, lacking in factual content and totally inadequate. It should be rejected out of hand.