

FORMAL COMMENT AND OBJECTION

Draft Environmental Scoping Report
Thyspunt Nuclear Power Plant

WSP Ref: ZA0058322.7774 | April 2026 DSR

Submitted by

St Francis Bay Community Policing Forum

a statutory community-policing structure constituted under Chapter 7 of the South African Police Service Act, 1995

Contact details



Submitted to

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Formal public comment and objection. All rights of appeal and review reserved.

Executive Summary

This is a formal objection by the St Francis Bay Community Policing Forum (the CPF) to the Draft Environmental Scoping Report (DSR) for the proposed Eskom Nuclear Power Plant at Thyspunt. The CPF is the statutory community-policing structure for St Francis Bay, Sea Vista, Cape St Francis, Oyster Bay and the rural area between these settlements and the proposed site. Its objection is not to nuclear energy. It is an objection, on community-safety grounds, to Thyspunt being carried forward as the preferred site on the current record.

The CPF accepts that detailed specialist assessment belongs to the environmental impact assessment phase, not to scoping. Its objection is therefore framed as a set of scoping gaps: matters that the Plan of Study for EIA must be directed to assess, and which, until they are assessed, leave the preferred-site recommendation unsupported from a community-safety perspective.

Four matters bear directly on the site recommendation. The institutions the applicant names as its community-safety mitigation partners, the South African Police Service and the Community Policing Forums, were not engaged in scoping. The worker accommodation that drives community-safety impacts has been placed outside the current scope. The workforce-influx impacts the applicant's own specialist anticipates, including crime and gender-based violence, are named but not assessed, and the proposed mitigation is named but not specified. And the single-route evacuation of the affected area, over the R330 and its bridge, is not scoped at the population levels actually present during the holiday peak.

Four further matters require correction in the Plan of Study: an understated affected-population baseline, the absence of any construction-disruption and public-order risk assessment, the absence of a cumulative community-safety assessment, and the absence of committed workforce-management plans for the demobilisation phase.

The CPF asks, primarily, that Thyspunt not be carried forward as the preferred site on the current record. In the alternative, it asks that the scoping report not be accepted until the scope additions and recommended conditions set out in Section 7 are required of the applicant.

1. Introduction and Standing

The CPF submits this formal comment and objection in response to the Draft Environmental Scoping Report for the proposed Eskom Nuclear Power Plant at Thyspunt, EIA Reference ZA0058322.7774, WSP Reference 2025-10-0003, dated April 2026, prepared by WSP Group Africa (Pty) Ltd as the independent Environmental Assessment Practitioner on behalf of Eskom Holdings SOC Ltd.

The CPF is a statutory community-policing structure constituted under Chapter 7 of the South African Police Service Act 68 of 1995, with its objects set out in section 18 and station-level establishment contemplated in section 19, read with the SAPS Interim Regulations for Community Police Forums and Boards (Government Notice R384 in Government Gazette 22273 of 11 May 2001). Section 18(1) of that Act requires the Service to liaise with the community through Community Policing Forums. Its role is directly engaged where a proposed development carries foreseeable implications for crime prevention, policing capacity, public order, emergency communication and community safety.

The CPF's area of responsibility covers St Francis Bay, Sea Vista, Cape St Francis, Oyster Bay and the rural area between these settlements and the proposed Thyspunt site, so the development falls within the area it serves. The CPF also asks that the affected SAPS stations and Community Policing Forums for the neighbouring policing areas be identified and engaged in the EIA phase.

This submission is made by Clint Carstens in his capacity as Chairperson of the CPF and with the authority of the forum, its members having agreed to its submission by correspondence. The CPF is a registered Interested and Affected Party and asks that all correspondence be addressed to the Chairperson.

2. Scope of this Submission

This submission is filed by the CPF in its community-policing capacity. It is not a general environmental objection and not a position on national nuclear-energy policy. The CPF's mandate is to promote community-police partnership, advise on local policing needs, and support crime prevention. This submission is confined to that mandate: the workforce-driven impacts on crime, gender-based violence, child safeguarding and substance abuse, the capacity of the South African Police Service and the affected Community Policing Forums to respond to them, and the emergency access and evacuation of the affected settlements.

Where this submission refers to traffic, worker accommodation or emergency planning, it does so because each has a direct community-safety consequence. The CPF does not seek to replace the role of the specialist environmental, heritage, marine, economic or engineering experts, and reserves the right to support and rely on the submissions of other Interested and Affected Parties on those matters.

3. Legal and Procedural Framework

A scoping report must contain enough information for the competent authority and Interested and Affected Parties to understand the key issues, assess reasonable alternatives, and determine the scope of the EIA phase, and where it identifies a preferred site, the information before the competent authority must be sufficient to support that preference. The adequacy of the DSR is to be measured against:

- the National Environmental Management Act, 1998 (Act No. 107 of 1998), and the principles in section 2;
- the Environmental Impact Assessment Regulations, 2014 (Government Notice R982 in Government Gazette 38282 of 4 December 2014, as amended), and the scoping-report content requirements in Appendix 2;
- the South African Police Service Act, 1995 (Act No. 68 of 1995), in particular section 18, which provides the basis for the CPF's existence and mandate, and section 18(1), which requires police-community liaison through Community Policing Forums;
- the National Nuclear Regulator Act, 1999 (Act No. 47 of 1999), in respect of the emergency planning zones referred to in this submission;
- the Disaster Management Act, 2002 (Act No. 57 of 2002), in respect of emergency preparedness and multi-agency coordination;

- section 24 of the Constitution of the Republic of South Africa, 1996 (the environmental right) and section 33 (the right to administrative action that is lawful, reasonable and procedurally fair), as given effect by the Promotion of Administrative Justice Act, 2000.

The CPF reserves the right to develop these grounds further in any subsequent comment, appeal, review or judicial proceeding.

4. Summary of the CPF's Primary Objection

The case on community safety is made in large part by the applicant's own evidence. The socio-economic specialist anticipates workforce-driven crime, gender-based violence, substance abuse and social tension, and the DSR rates the community health, safety and security impact as high before mitigation and only moderate after mitigation (DSR, Table 10-28, p. 677). The applicant names coordination with SAPS and the CPFs as its mitigation, yet engaged neither in scoping, has not specified the form or resourcing of that mitigation, and has placed the workforce accommodation that drives these impacts outside the current scope. The result is a recommendation to carry Thyspunt forward as preferred while the matters most relevant to community safety remain to be assessed.

5. Issue Register

The CPF raises eight issues. The four marked as bearing on the preferred-site recommendation are those that, taken together, leave the recommendation unsupported on community-safety grounds. The four marked as Plan of Study items are matters that must be added to the scope of the EIA phase. The grounds are developed in Section 6 and the corresponding requests are consolidated in Section 7.

Code	Issue	Relevance to relief
CPF-001	The institutions the applicant names as its community-safety mitigation partners, SAPS and the affected Community Policing Forums, were not engaged in scoping.	Preferred-site recommendation
CPF-002	The worker accommodation that drives community-safety impacts has been placed outside the current scope, and no workforce-configuration alternatives have been compared.	Preferred-site recommendation
CPF-003	Acknowledged workforce-influx impacts, including crime, gender-based violence and child safeguarding, are named but not assessed; the crime baseline is inadequate and the mitigation is named but not specified.	Preferred-site recommendation
CPF-004	Emergency access and the single-route evacuation of the affected settlements over the R330 and its bridge are not scoped at peak-season population levels.	Preferred-site recommendation
CPF-005	The affected-population baseline is understated, and site security is treated as if it contains the workforce.	Plan of Study scope
CPF-006	Construction-disruption and public-order risk is not scoped.	Plan of Study scope
CPF-007	The cumulative community-safety load of concurrent developments is not assessed.	Plan of Study scope
CPF-008	The demobilisation phase is not assessed and no workforce-management plans are committed.	Plan of Study scope

6. Grounds of Objection

Each ground states the position on the record, why it bears on either the site recommendation or the scope of the EIA phase, and the scope of EIA the CPF requests. The requests are consolidated as relief in Section 7.

6.1 No Demonstrated Engagement with SAPS and the Affected Community Policing Forums

Relevance to relief: bears on the preferred-site recommendation.

The applicant's own socio-economic assessment names coordination with the South African Police Service and the Community Policing Forums as a mitigation measure for the community-safety impacts it anticipates. The record does not show that those institutions were engaged in scoping the impacts they are expected to help mitigate. Appendix B records database entries for the Community Police Forum, Community Safety and the South African Police Service, but a database entry is not structured engagement. Of the eight pre-application focus group meetings recorded in Table 2-9 of the DSR, none was held with SAPS at any level, with any Community Policing Forum, or with any department responsible for community safety, child protection or gender-based violence.

This bears on the preferred-site recommendation. An institution cannot be relied upon as a mitigation partner in support of a site decision if it has not been engaged in scoping the impacts it is expected to mitigate. If targeted engagement did occur and is simply not reflected in the Public Participation Report, the applicant should produce the record of it.

Separately, Chapter 6 of the 2014 EIA Regulations entitles organs of state that have jurisdiction in respect of the activity to be consulted and to comment on the reports. The South African Police Service is the organ of state with jurisdiction over policing and crime prevention in the affected area. The record does not show that it was consulted in that capacity, as distinct from being listed on the stakeholder database, during the scoping phase.

Scope of EIA requested: that the Plan of Study for EIA require structured engagement with the St Francis Bay CPF, the affected SAPS stations and the other affected CPFs, and the relevant safety, social-development, education and gender-based-violence bodies, with that engagement shaping the terms of reference for the EIA-phase specialist studies.

6.2 Worker Accommodation and Its Community-Safety Impacts Left Outside the Current Scope

Relevance to relief: bears on the preferred-site recommendation.

The principal driver of community-safety impacts is where the workforce lives and how it interacts with the surrounding settlements. The DSR at section 4.2.2.23 records that the staff housing does not form part of the current ESIA scope and would require a separate process, that approximately 1,400 operational staff will buy, build or rent in the adjacent towns, and that a separate construction village will be built for migrant workers on land Eskom will rezone, with a public transport hub, canteen, liquor outlet, clinic and recreation facilities, and that this village may be retained for 10 to 15 years. Appendix G22 records that off-site staff accommodation and construction camps fall outside the battery limits of the current assessment.

The effect is that the impact pathway most relevant to community safety sits outside the assessment the public is presently able to comment on. The DSR does not specify the location

of the construction village. It also assesses only one workforce configuration, dispersed accommodation plus a single construction village with an on-site liquor outlet, and compares no alternative such as a closed compound, an off-site village isolated from residential areas, or an alcohol-free village, even though the applicant's own assessment identifies alcohol-related incidents as a foreseeable workforce impact.

Scope of EIA requested: that the Plan of Study for EIA bring worker accommodation within the scope of the assessment, or provide a binding mechanism for its concurrent assessment and consolidated public participation, and require workforce-configuration alternatives to be compared against community-safety criteria.

6.3 Acknowledged Workforce-Influx Impacts Named but Not Assessed, and Mitigation Named but Not Specified

Relevance to relief: bears on the preferred-site recommendation.

Appendix G14 anticipates that the construction workforce will drive crime, gender-based violence, alcohol-related incidents and social tension, and the DSR rates the community health, safety and security impact as high before mitigation and moderate after mitigation (DSR, Table 10-28, p. 677). Gender-based violence, sexual exploitation and abuse, and sexual harassment are defined in the appendix but are not carried into any substantive assessment. The assessment also provides no gender-disaggregated demographic baseline for the affected area, without which the impact of gender-based violence, sexual exploitation and harassment on women and girls cannot be measured. No child-protection assessment has been commissioned, and although the DSR records 46 schools in the Kouga Local Municipality (DSR, p. 440), it provides no inventory of the schools, early-childhood-development facilities or after-school facilities in the affected area near the site, and assesses no child-safeguarding risk pathway.

The crime baseline for the affected area is qualitative rather than quantified. The DSR records only that crime in the Sarah Baartman District decreased after 2014 and began to rise again in 2018 and 2019, with theft and burglary identified as the main problems, and it provides no station-level crime data for St Francis Bay, no year-on-year trend, and no seasonal, sector or demographic breakdown. There is therefore no measured baseline against which the workforce-driven increase in crime that the applicant's own specialist anticipates could be assessed. The proposed mitigation is described in general terms, such as managed worker accommodation, a worker code of conduct and coordination with the police and community-safety structures, but is not resourced, specified or given measurable success criteria.

The compounding effect on a single station is acute: the St Francis Bay station already polices a population that multiplies several times over during the December and January peak, and a multi-thousand-person workforce would arrive on top of that. The pattern of naming mitigation without specifying it is documented at a comparable Eskom project. The World Bank Inspection Panel found, in its investigation into Medupi, that mitigation relying on consultation with local authorities, lacking defined targets and indicators and with decisions deferred to the developer, was unlikely to be effective or enforceable (Inspection Panel Report No. 64977-ZA, 2011).

Scope of EIA requested: that the Plan of Study for EIA require a dedicated community-safety assessment covering crime, gender-based violence and child safeguarding, a crime-baseline methodology agreed in advance with SAPS Kouga and the affected CPFs, and a costed

community-safety mitigation framework offered as recommended conditions of any authorisation.

6.4 Emergency Access and Single-Route Evacuation Not Scoped

Relevance to relief: bears on the preferred-site recommendation.

The R330 and its bridge are the only vehicular route out of St Francis Bay, Sea Vista and Cape St Francis. Appendix G20 defers the Traffic Impact Assessment and the Evacuation Time Estimate to the EIA phase, and uses a June 2010 traffic study as its planning basis. The DSR leaves the Emergency Planning Zone for the facility undefined at scoping stage and assumes, for present purposes, the Koeberg zones of 5 km and 16 km, together with the National Nuclear Regulator criteria attached to them: the inner Precautionary Action Zone must be capable of full 360-degree evacuation to mass-care centres within four hours, demonstrated by a traffic evacuation model accepted by the Regulator, and the outer Urgent Protective Action Zone within sixteen hours (DSR, p. 95). No such evacuation model has been produced for Thyspunt. The affected settlements all fall within these zones: Oyster Bay about 3 km west, Klippepunt about 10 km west, St Francis Links about 10 km east, Sea Vista about 12 km east, and Cape St Francis about 13 km east-southeast (DSR, p. 368). The population that would have to be moved is not modelled at peak-season levels; the CPF's planning estimates and the basis for them are set out in Annexure A.

The most urgent physical-safety question the project raises for the affected area is whether a full evacuation can be carried out over the existing road and single bridge, within the four-hour requirement, at the population levels actually present during the holiday peak, and that question is not addressed at scoping. The point is one of road capacity, route redundancy and emergency-services coordination, which are community-safety matters.

Scope of EIA requested: that the Plan of Study for EIA require a public-reviewable Traffic Impact Assessment and Evacuation Time Estimate, based on current traffic data rather than the 2010 study, testing both the out-of-season and the peak-season population scenarios in Annexure A over the R330 and its bridge, tested against the four-hour and sixteen-hour evacuation criteria, and including a scenario for failure of the bridge; that the Emergency Planning Zone be defined; and that an emergency communication and multi-agency coordination protocol be developed with SAPS, disaster management, the municipality and the affected CPFs.

6.5 Understated Affected-Population Baseline and Conflation of Site Security with Workforce Containment

Relevance to relief: Plan of Study scope item.

Two framing assumptions require correction in the EIA phase. First, the assessment uses a permanent-resident population snapshot as its baseline. That figure excludes the seasonal population of the affected area, which during peak holiday periods is several multiples of the resident figure, and it excludes the project's own workforce and the dependants and informal residents that workforce will attract. A baseline that understates the affected population understates the scale of every community-safety impact measured against it. Second, the record treats a secured construction site as if it contains the workforce. Site security controls who enters the construction site; it does not determine where workers live, how they travel, or how they behave off shift, which are the channels through which a workforce of this scale affects surrounding settlements.

Scope of EIA requested: that the Plan of Study for EIA require a scenario-based affected-population baseline, using the methodology and the two scenarios set out in Annexure A, and assess off-shift workforce movement and integration separately from construction-site security.

6.6 Construction-Disruption and Public-Order Risk Not Scoped

Relevance to relief: Plan of Study scope item.

Large public-sector construction projects in South Africa have, since around 2015, been subject to organised disruption and extortion by groups that style themselves "local business forums", which occupy sites and demand money or a stake in projects, commonly through intimidation, violence and sabotage. The phenomenon originated in KwaZulu-Natal and has spread to other provinces, including the Eastern Cape; by 2019 at least 183 infrastructure and construction projects, worth more than R63 billion, had been affected across the country (Global Initiative Against Transnational Organised Crime, J. Irish-Qhobosheane, "Extortion or Transformation? The Construction Mafia in South Africa", 2022; ENACT Africa). The DSR does not identify this category of risk, does not assess it, and does not propose a coordination protocol between project security, SAPS and the affected CPFs. The nearest police station is St Francis Bay, the closest of the six stations in the Kouga Local Municipality, approximately 10.7 km from Thyspunt in a straight line and 14.2 km by road via the R330 (DSR, p. 440), so the policing burden of any such disruption would fall on a distant station.

Scope of EIA requested: that the Plan of Study for EIA require a construction-disruption and public-order risk assessment, including a coordination protocol between project security, SAPS at local and district level and the affected CPFs, contractor and subcontractor vetting, and a community communication mechanism so that residents are not used as cover for disruption directed at the project.

6.7 Cumulative Community-Safety Load Not Assessed

Relevance to relief: Plan of Study scope item.

A construction workforce of approximately 9,700 on-site personnel would arrive in the Kouga corridor over a period during which other infrastructure, transport and industrial developments are foreseeable. The DSR addresses cumulative impact only in the narrow context of the Emergency Planning Zone, and does not assess the cumulative load on SAPS, the affected CPFs and local social services. The risk of treating each project in isolation is documented: the World Bank Inspection Panel found the cumulative impacts of the Medupi plant, its associated coal mine and the expanding local population to have been inadequately assessed (Inspection Panel Report No. 64977-ZA, 2011).

Scope of EIA requested: that the Plan of Study for EIA require a cumulative community-safety assessment across the foreseeable concurrent developments in the Kouga corridor over the construction period, measured against the capacity of SAPS, the affected CPFs and local services.

6.8 Demobilisation Impacts and the Absence of Committed Workforce-Management Plans

Relevance to relief: Plan of Study scope item.

The construction workforce of approximately 9,700 declines to an operational workforce of about 2,400, and the construction village may be retained for 10 to 15 years. The community-

safety consequences of that transition are not assessed: unemployment-related crime following the loss of construction income, vacant or vandalised contractor housing, distortion of the local rental market, and the displacement of the dependants and informal residents the construction phase will have attracted. The applicant cites IFC Performance Standard 4 and the World Bank Environmental, Health and Safety Guidelines as its governing framework, but commits to neither a Labour Influx Management Plan nor a Workers' Camp Management Plan to that standard, and the mitigation framework has no documented monitoring system.

Scope of EIA requested: that the Plan of Study for EIA require a Labour Influx Management Plan and a Workers' Camp Management Plan to the standard the applicant cites, a bust-phase community-safety assessment, and a monitoring and corrective-action framework, offered as recommended conditions of any authorisation.

7. Relief Sought

Under regulation 22 of the 2014 EIA Regulations, the competent authority must, within the prescribed period, either accept the scoping report, with or without conditions, and advise the applicant to proceed with the plan of study for the environmental impact assessment phase, or refuse the environmental authorisation. A scoping report must contain the information set out in Appendix 2 to those Regulations, including a site-selection process that supports the preferred site, the key issues to be assessed, and a public participation process that engages the parties with jurisdiction over those issues. The CPF accepts that detailed specialist assessment belongs to the EIA phase, and frames its requests as additions to the scope of that phase and as recommended conditions, rather than as assessments the scoping report ought already to contain. The relief is set out as an escalating sequence.

7.1 Primary Relief

The CPF requests that Thyspunt not be carried forward as the preferred site on the current record, and that the scoping report not be accepted in its current form. The reason is confined to community safety and to the CPF's mandate: the institutions the applicant names as its community-safety mitigation partners were not engaged in scoping (ground 6.1); the worker accommodation that drives community-safety impacts sits outside the current scope (ground 6.2); the acknowledged workforce-influx impacts are named but not assessed and the mitigation is named but not specified (ground 6.3); and the single-route evacuation of the affected area is not scoped at the population levels actually present (ground 6.4). On these matters the record does not yet support the conclusion that Thyspunt is an appropriate site from a community-safety perspective.

7.2 Recommended Scope Additions and Conditions, in the Alternative

If the competent authority is nevertheless minded to allow the process to continue, the CPF requests that the following be required before the scoping report is accepted, whether by amendment and re-circulation of the report or by conditions attached to any acceptance under regulation 22. Each is a scope-of-EIA addition or a recommended condition of authorisation.

- (a) Structured engagement with the St Francis Bay CPF, the affected SAPS stations and other affected CPFs, and the relevant safety, social-development, education and gender-based-violence bodies, together with production of the record of any such engagement already undertaken. (ground 6.1)

- (b)** Inclusion of worker accommodation within the scope of the assessment, or a binding mechanism for its concurrent assessment and consolidated public participation. (ground 6.2)
- (c)** Comparison of workforce-configuration alternatives against community-safety criteria, including a closed compound, an off-site village isolated from residential areas, and an alcohol-free option. (ground 6.2)
- (d)** A dedicated community-safety assessment covering crime, gender-based violence and child safeguarding, informed by a gender-disaggregated demographic baseline for the affected area, including an inventory of schools, early-childhood-development and after-school facilities in the affected area. (ground 6.3)
- (e)** A crime-baseline methodology, agreed in advance with SAPS Kouga and the affected CPFs, using multi-year station-level data with seasonal, sector and demographic breakdowns. (ground 6.3)
- (f)** A costed community-safety mitigation framework, including budget lines, responsible entities and review intervals, offered as recommended conditions of any authorisation. (ground 6.3)
- (g)** A public-reviewable Traffic Impact Assessment and Evacuation Time Estimate, based on current data, testing both the out-of-season and peak-season scenarios in Annexure A over the R330 and its bridge, and including a bridge-failure scenario. (ground 6.4)
- (h)** Definition of the Emergency Planning Zone for the facility, and an emergency communication and multi-agency coordination protocol developed with SAPS, disaster management, the municipality and the affected CPFs. (ground 6.4)
- (i)** A scenario-based affected-population baseline using the methodology and scenarios in Annexure A, and separate treatment of off-shift workforce movement from construction-site security. (ground 6.5)
- (j)** A construction-disruption and public-order risk assessment, with a coordination protocol between project security, SAPS and the affected CPFs, contractor vetting, and a community communication mechanism. (ground 6.6)
- (k)** A cumulative community-safety assessment across the foreseeable concurrent developments in the Kouga corridor over the construction period. (ground 6.7)
- (l)** A Labour Influx Management Plan and a Workers' Camp Management Plan to the IFC Performance Standard 4 and World Bank EHS standards the applicant cites, a bust-phase community-safety assessment, and a monitoring and corrective-action framework. (ground 6.8)
- (m)** Public release for comment of any new or materially revised assessment produced in response to this submission, for not less than thirty days, before the scoping report is accepted. (grounds 6.1 and 6.4) This reflects the requirement under the 2014 EIA Regulations, as amended (Government Notice R706 in Government Gazette 41766 of 13 July 2018; Government Notice 517 of 11 June 2021), that where significant changes are made or significant new information is added to a report after its public participation process, the revised report be subjected to a further public participation process of at least 30 days (regulations 21 and 23).

- (n) A substantive response to each ground, identifying the EIA-phase task to be added, the responsible specialist or authority, the intended output and the report section affected, a generic deferral to the EIA phase being insufficient on its own. (all grounds)

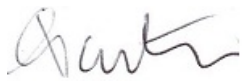
7.3 Alternative Relief, Without Prejudice

If the process is nevertheless allowed to proceed to the EIA phase, and without prejudice to the primary relief, the CPF requests that the Plan of Study for EIA be amended to include the scope additions set out under each ground in Section 6 and consolidated in 7.2.

8. Reservation of Rights

The CPF reserves all rights available to it in relation to this process, including the right to submit further comment, request information, participate in any further public participation process, support the submissions of other Interested and Affected Parties, and pursue any appeal, review or other remedy available in law. This submission does not constitute acceptance of the adequacy of the DSR, of the preferred-site recommendation, or of the deferral of community-safety matters to later processes without proper assessment and public review.

Signed:



Clint Carstens

Chairperson, St Francis Bay Community Policing Forum

[Redacted signature area]

Date: 28 May 2026

Annexure A: Population Estimate Methodology and Verification Requirements

The CPF's population figures are presented as planning estimates for scoping purposes only and must be verified during the EIA phase. They are not final census figures. The estimate is informed by the 2011 Census count for the St Francis Bay Main Place (4,933 people), the fact that 2022 settlement-level census data has not been released, and a preliminary assessment based on available local indicators. These indicators include property registration data and local knowledge of accommodation occupancy, water-use patterns, and traffic conditions during peak holiday periods.

The EIA phase should verify these estimates using transparent data sources, including municipal records, dwelling counts, water and electricity consumption, traffic counts, accommodation occupancy, holiday-rental data, visitor estimates and emergency-services planning assumptions.

For evacuation, municipal capacity and emergency-planning purposes, the CPF requests that the EIA test at least two scenarios: an ordinary out-of-season scenario of approximately 10,000 to 11,000 people, and a December/January peak-season scenario of approximately 30,000 to 50,000 people, or such corrected ranges as are established through verified source data.