

**SUPPLEMENTARY SUBMISSION
RE DRAFT ENVIRONMENTAL SCOPING REPORT
FOR ESKOM NUCLEAR POWER PLANT
PROJECT NUMBER ZA0058322.7774
DFFE REF: 2025-10-0003**

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The Kromme Enviro Trust is a voluntary association of residents of the greater St Francis area in Kouga Local Municipality in the Eastern Cape Province, working together since 1981 to preserve and protect the environment for the benefit of current and future generations. It is a registered Public Benefit Organisation PBO reference number 930038246.

The Kromme Enviro Trust hereby submits this supplementary comment to expand upon and clarify our submission dated 30 April 2026 in response to the Draft Environmental Scoping Report (DSR) for the proposed nuclear power plant. This addendum is intended to provide further clarity on our position and to consolidate key concerns arising from our review of the DSR.

1. Statement of Position

The Kromme Enviro Trust opposes the development of a nuclear power station at Thyspunt on the grounds that the site has not been demonstrated to be environmentally suitable for a development of this scale, permanence and sensitivity, and that the current Draft Scoping Report does not provide a sufficient basis upon which environmental suitability can be meaningfully assessed.

The Kromme Enviro Trust accordingly formally objects to the acceptance of the Draft Scoping Report (DSR, WSP Ref: ZA0058322.7774) in its current form, on the grounds of the environmental concerns and unresolved uncertainties set out in this submission and the Enviro Trust's primary submission dated 30 April 2026.

The Enviro Trust is not opposed to energy development in principle, nor to the potential role of nuclear energy within an appropriately justified national energy strategy. However, the current DSR does not establish that Thyspunt is a suitable location for a development of this scale, permanence and environmental sensitivity.

The Enviro Trust accordingly submits that the DSR does not yet provide a sufficient basis upon which environmental suitability can be meaningfully assessed and should not be accepted in its present form without substantial revision, additional specialist assessment, and independent review.

2. Executive Summary — Key Areas of Concern Regarding the Thyspunt Draft Scoping Report (DSR)

The Kromme Enviro Trust submits that the current Draft Scoping Report does not yet provide a sufficiently complete, integrated or scientifically reliable basis to conclude that the proposed Thyspunt Nuclear Power Plant is environmentally compatible with the receiving environment or suitable for development at this site. Regulation 21 of the NEMA EIA Regulations (GN R982 of 2014) requires that a Scoping Report contain a description of the environment adequate for identifying and scoping significant impacts. For the reasons set out below, the Enviro Trust submits that the current DSR does not yet clearly demonstrate compliance with this requirement across multiple environmental disciplines.

Six areas of concern are identified in this submission.

1. The DSR treats critical project components, transmission infrastructure, construction areas, worker accommodation, access routes and service corridors, as separate or future processes, despite their being functionally inseparable from the proposed development. This prevents meaningful assessment of the true cumulative environmental and social footprint at scoping stage.
2. The DSR identifies potentially very high impacts on sensitive marine and coastal ecosystems but does not demonstrate that these can be managed to acceptable levels over the long term. The chokka squid (*Loligo reynaudii*) fishery operating out of St Francis Bay and the broader Algoa Bay region is one of the most economically significant inshore fisheries in South Africa, supporting livelihoods across the Kouga Local Municipality. The marine assessment does not reflect the full 5,200 MW operational scale, is not linked to a defined reactor technology given the significant range in the Plant Parameter Envelope and has not been subject to independent peer review equivalent to that conducted for the Deynefontein specialist studies in 2023.
3. Significant uncertainty remains regarding groundwater behaviour, hydrological connectivity and long-term water resource impacts within the highly interconnected dune and wetland environment. As with the marine assessment, no independent peer review of the Thyspunt-specific hydrological studies has been identified.
4. The heritage and cultural landscape assessment raises unresolved compatibility concerns across the entire site. The DSR does not adequately address the implications of the provisional Grade I Cultural Landscape designation gazetted by SAHRA in January 2025, including the Section 28 permit requirement under the National Heritage Resources Act (Act 25 of 1999).
5. The DSR acknowledges that the Oyster Bay Headland Bypass Dunefield is unique on a local, regional and probably global scale, yet does not establish that permanent nuclear infrastructure can coexist with a mobile dune system moving at 10 to 30 metres per year over a multi-generational operational lifespan.
6. The DSR does not adequately assess the ecological significance and unresolved conservation status of St Francis Strandveld, a recently reclassified vegetation type occurring extensively within the Thyspunt footprint and broader St Francis–Oyster Bay corridor

Across all six areas, the submission requests that the Final Scoping Report's Plan of Study include explicit, mandatory commitments to the additional fieldwork, integrated

assessments and independent peer reviews required before environmental suitability can be meaningfully determined. The current DSR does not yet provide a sufficient basis for informed progression to the EIA phase.

3. Inadequate Assessment of Associated Infrastructure and Cumulative Impacts

3.1 Segmentation of the Project and Associated Infrastructure

During engagement with representatives of Eskom and WSP, it was expressly acknowledged that associated infrastructure forms part of the broader project, that cumulative impacts are recognised and that additional authorisations would be required for infrastructure such as transmission lines and construction camps. This is consistent with DSR Appendix G22 (Radioactive Waste Management and Transport Scoping Report), which expressly identifies transmission infrastructure, external access roads, off-site construction camps and associated enabling infrastructure as activities excluded from the current ESIA battery limits and subject to separate environmental authorisations. The report further acknowledges that these associated and enabling activities may influence the environmental acceptability of the proposed Nuclear Power Plant and identifies key interfaces and dependencies between the nuclear site and external infrastructure. See DSR Appendix G22 (Radioactive Waste and Transport Scoping Report) (WSP Ref: ZA0058322.7774), pp.45–47. See minutes ZA0058322.7774_Eskom Nuclear_FGM_Thyspunt_Alliance_13May26 point 4.

It was further stated that transmission infrastructure would be subject to separate Environmental Impact Assessment processes due to the separate legal structure of the National Transmission Company.

This approach raises significant concern. While separate authorisation processes may apply administratively, the associated infrastructure remains functionally inseparable from the proposed nuclear power station and is necessary for the project to operate. The environmental impacts of the development therefore cannot yet be comprehensively or reliably assessed if critical enabling infrastructure is deferred to separate future processes.

The Draft Scoping Report does not provide sufficient integrated assessment of the full extent of reasonably foreseeable associated infrastructure, including but not limited to:

- transmission infrastructure and servitudes;
- construction, accommodation and laydown facilities;
- transport, access and service corridors; and
- associated regional infrastructure and service demands.

The existence of separate legal entities or future authorisation processes does not remove the need for integrated assessment of the full environmental footprint and cumulative impacts of the proposed development. Infrastructure required for the operation of the nuclear power station forms part of the overall development context and should be assessed accordingly.

3.2 Admission that Cumulative Impacts Exist

The project team acknowledged during the engagement process that cumulative impacts are recognised and that broader social impacts associated with worker influx, transport, accommodation and infrastructure demand would be considered.

This acknowledgement is significant. Once cumulative impacts are recognised, there is a corresponding requirement for those impacts to be properly identified, spatially assessed, quantified where possible, and evaluated holistically within the scoping and EIA process.

The current DSR does not yet adequately assess or integrate:

- the combined impacts of multiple project components;
- the interaction between the power station and associated infrastructure;
- the cumulative effects on sensitive ecological systems; or
- the long-term operational implications of infrastructure within a dynamic dune environment.

The fragmentation of project components across separate authorisation processes therefore leaves Interested and Affected Parties unable to evaluate the true scope of the development at the scoping stage.

3.3 Fragmentation of Sensitive Dune and Ecological Systems

The Enviro Trust is further concerned that the fragmentation and cumulative impact issues identified above are particularly serious in the context of the Oyster Bay Headland Bypass Dune System. Associated infrastructure, access routes, servitudes, construction activity and increased human activity may extend impacts beyond the immediate reactor footprint and disrupt ecological, sediment, hydrological and landscape processes. These concerns are addressed in greater detail in Section 7, which deals specifically with the fundamental compatibility of the proposed development with the dunefield system.

3.4 Required Plan of Study Commitments

The following matters are not addressed in the current DSR and must be explicitly included in the Plan of Study as mandatory EIA phase requirements. The Enviro Trust requests that the Final Scoping Report's Plan of Study commit to:

- a comprehensive integrated assessment of all associated and enabling infrastructure, with explicit Plan of Study commitment to scope, methodology and timeline;
- spatial mapping of all reasonably foreseeable associated infrastructure and disturbance corridors;
- a cumulative impact assessment addressing both direct and indirect impacts on the dune systems, biodiversity, hydrology, landscape character and surrounding communities, with clear methodology and thresholds specified in the Plan of Study;
- detailed assessment of transmission corridors, substations, and associated access infrastructure within sensitive dune and ecological systems;
- assessment of the environmental implications of spoil disposal associated with large-scale excavation activities;
- clarification regarding how cumulative impacts from separately authorised infrastructure will be incorporated into overall site suitability assessment;
- a clear explanation of how the DFFE will evaluate the overall cumulative footprint of the project where components are subject to separate authorisation processes.

4. Inadequate Assessment of Marine and Coastal Ecosystem Impacts

4.1 Failure to Demonstrate Acceptable Impacts on Marine Ecosystems

The DSR identifies potentially very high impacts on sensitive marine ecosystems associated with the proposed Thyspunt Nuclear Power Plant and associated marine infrastructure. While particular attention is given to chokka squid spawning habitat, the concern extends more broadly to the integrity and functioning of the marine ecosystem as a whole.

The Thyspunt marine environment, as documented in DSR Appendix G12 (Marine Ecology Scoping Report) (WSP Ref: ZA0058322.7774), supports ecologically and economically important systems, including:

- squid spawning grounds;
- rocky shore ecosystems and benthic habitats;
- marine biodiversity and ecological functioning; and
- coastal nutrient and sediment processes.

The chokka squid (*Loligo reynaudii*) fishery operating out of St Francis Bay and the broader Algoa Bay region represents an economically significant inshore fishery within South Africa. It supports the livelihoods of commercial and small-scale fishing operators across the Kouga Local Municipality and surrounding communities. Irreversible degradation of spawning habitat within the Thyspunt marine zone would have direct and lasting consequences for local employment and the regional fishing economy.

Of particular concern is that the specialist assessment itself identifies several marine impacts as ‘Very High’ prior to mitigation, while also acknowledging that certain mitigation measures rely on management assumptions, timing restrictions, or regulatory exceptions rather than demonstrated long-term certainty. This is reflected in the impact screening tables contained in DSR Appendix G12 (Marine Ecology Scoping Report) (WSP Ref: ZA0058322.7774), pages v–viii, as well as the accompanying discussion on page viii identifying several “impacts of particular concern”. The Thyspunt marine environment falls within the Agulhas marine ecoregion, characterised by the influence of the warm Agulhas Current system and associated upwelling dynamics. This ecoregion presents specific thermal and ecological sensitivities that distinguish the Thyspunt marine receiving environment from other potential nuclear sites and which require site-specific assessment of thermal discharge impacts.

The DSR does not adequately establish:

- that sensitive marine habitats can be maintained under operational conditions;
- that thermal and chemical discharges will remain within ecologically acceptable limits;
- that marine biodiversity and ecological functioning will not be degraded over time; or
- that long-term cumulative impacts can be mitigated with sufficient certainty.

The Enviro Trust further notes that no independent peer review equivalent to the SRK Consulting (2023) review of the Nuclear-1 (Duynefontein) specialist studies has been identified for the Thyspunt-specific specialist assessments.

Where very high impacts are identified and mitigation remains uncertain or unproven, the precautionary principle should apply.

4.2 Marine Impact Modelling Should Reflect Full Operational Scale

It is unclear from the DSR whether the marine impact modelling has been undertaken using assumptions reflecting the full proposed generating capacity of approximately 5,200 MW. The DSR should explicitly confirm that all marine modelling, including seawater abstraction, thermal plume dispersion and ecological impact assessment, has been based on the maximum reasonably foreseeable operational scenario.

This is significant because key marine impacts, including thermal discharge, cooling water abstraction, entrainment, chlorination, desalination requirements and discharge volumes, are directly dependent on operational scale. While operational thermal discharge impacts are acknowledged within the broader DSR and Oceanography assessments, the current marine ecological assessment framework does not clearly demonstrate that cumulative thermal impacts on sensitive marine ecosystems have been assessed using full-scale operational assumptions with sufficient scientific certainty. The PPE confirms a maximum once-through cooling water flow rate of 76,000 litres per second per reactor unit, at a maximum discharge temperature of 52.8°C, with a maximum temperature rise across the condenser of 12°C (DSR Appendix K, Plant Parameter Envelope, WSP Ref: ZA0058322.7774, s.2.3). These parameters apply per unit and are to be prorated based on the total number of units on site. The cumulative abstraction and thermal discharge volumes associated with a multi-unit 5,200 MW installation have not been assessed against site-specific marine ecological thresholds in the current DSR.

If modelling assumptions do not reflect the full proposed operational capacity, then impact predictions may materially understate:

- thermal plume extent and cumulative heating effects;
- chemical discharge and seawater abstraction impacts;
- impacts on marine organisms and benthic ecosystems; and
- broader coastal and sediment process interactions.

This uncertainty is compounded by the Plant Parameter Envelope approach adopted in the DSR, which encompasses a very wide range in potential reactor unit size and associated operational parameters. In the absence of a defined reactor technology and operational configuration, it is unclear on what basis marine thermal plume, abstraction and discharge modelling has been calibrated.

The DSR therefore does not provide for a marine impact assessment that reflects a realistic worst-case operational scenario.

4.3 Failure to Adequately Assess Cumulative Marine Stressors

The DSR does not provide for adequate assessment of the cumulative interaction between multiple marine stressors arising from the proposed development.

The marine environment may be simultaneously affected by:

- thermal and chemical discharge;
- desalination and seawater abstraction processes;
- sediment disturbance, spoil disposal and altered transport dynamics;
- offshore spoil disposal; and
- long-term operational marine infrastructure impacts.

These impacts require integrated cumulative assessment rather than isolated specialist evaluation.

The interaction between multiple stressors has the potential to amplify ecological impacts beyond those predicted by individual specialist assessments. The DSR does not sufficiently demonstrate how combined impacts on water quality, marine biodiversity, benthic ecosystems, spawning habitat and coastal ecological functioning have been assessed at a system-wide level.

Particular concern remains regarding the lack of adequate assessment of large-scale offshore spoil disposal and sediment redistribution associated with excavation and marine construction activities. The scale of proposed sand movement represents a major intervention within an interconnected coastal and marine sediment system, yet the long-term implications for marine ecology and coastal processes remain insufficiently assessed.

The DSR also does not adequately detail how cumulative operational impacts may interact with:

- climate-driven ocean warming;
- changing current dynamics;
- existing fishing pressures;
- marine ecosystem stress associated with climate change; and
- other coastal and marine developments within the broader region.

4.4 Framing of the Objection

The current DSR therefore does not yet provide a sufficiently reliable basis upon which the long-term significance, manageability and cumulative implications of marine ecosystem impacts can be meaningfully assessed within such a sensitive coastal environment.

At present:

- very high marine impacts are acknowledged;
- mitigation effectiveness remains uncertain;
- cumulative marine stressors are not fully integrated into the assessment; and
- key modelling assumptions do not appear to reflect the full proposed operational scale.

The current DSR therefore does not provide a sufficiently reliable basis upon which to conclude that marine ecosystem impacts are acceptable, avoidable or capable of long-term mitigation within such a sensitive coastal environment.

4.5 Required Plan of Study Commitments

The following matters are inadequately addressed in the current DSR and must be strengthened in the Plan of Study as mandatory EIA phase requirements. The Enviro Trust requests that the Final Scoping Report's Plan of Study commit to:

- marine impact modelling based on the full proposed generating capacity of 5,200 MW, with the Plan of Study specifying the modelling methodology, technology assumptions and worst-case scenario parameters to be applied;

- full disclosure of all assumptions used within marine specialist studies and modelling processes;
- detailed cumulative assessment of interacting marine stressors and discharges;
- quantitative assessment of thermal plume extent under worst-case operational scenarios;
- integrated assessment of impacts on marine biodiversity, benthic systems, spawning habitat and broader ecosystem functioning;
- detailed assessment of offshore spoil disposal impacts and sediment redistribution processes;
- updated marine ecological baseline assessment using current environmental and fisheries data;
- assessment of long-term marine ecosystem impacts over the full operational lifespan of the facility;
- assessment of cumulative impacts under future climate change scenarios; and
- independent peer review of the marine ecological and oceanographic specialist assessments, with the Plan of Study confirming the review methodology, reviewer independence criteria and timing relative to public comment periods.

In the absence of this information, the Enviro Trust submits that the current DSR does not yet provide a sufficient basis for concluding that the proposed Thyspunt Nuclear Power Plant is compatible with the long-term protection and functioning of the marine and coastal ecosystem.

5. Inadequate Assessment of Water Systems, Groundwater and Hydrological Impacts

5.1 Water Supply Uncertainty and Incomplete Demonstration of Legal Compliance

The DSR does not clearly identify the long-term water source for the proposed development or demonstrate how water use requirements will comply with the National Water Act (Act 36 of 1998) and associated authorisation processes.

For a development of this scale and lifespan, secure and sustainable long-term water supply is a critical component of environmental assessment and site suitability. However, the DSR does not provide sufficient clarity regarding:

- the proposed long-term water source and abstraction requirements;
- the sustainability of supply within a water-scarce region;
- interaction with local and regional water systems and existing users; or
- the extent of water use authorisations likely to be required.

This uncertainty limits meaningful assessment of:

- cumulative impacts on regional water resources;
- impacts on groundwater-dependent ecosystems;
- impacts on wetlands and surface water systems; and
- the long-term sustainability of project-related water demand.

The current assessment therefore does not establish sufficient certainty regarding either long-term water security or compliance with applicable water legislation.

5.2 Inadequate Understanding of Groundwater and Aquifer Systems

The geohydrological assessment appears to rely on limited baseline information within a highly dynamic and environmentally sensitive dune and groundwater system.

DSR Appendix G01 (Dune Geomorphology Scoping Report), p.15 (WSP Ref: ZA0058322.7774), acknowledges that only two boreholes were drilled within the mobile Oyster Bay dunefield and that no hydrological investigation of the mobile dunefield itself was undertaken. This raises significant uncertainty regarding groundwater dynamics, wetland connectivity and the long-term hydrological implications of large-scale infrastructure development within such a sensitive and interconnected dune system. The DSR identifies the approximate Thyspunt development footprint as 250 hectares (DSR, WSP Ref: ZA0058322.7774, p.266). Two boreholes across a 250-hectare footprint within a dynamic dune and groundwater system — representing one monitoring point per 125 hectares — does not constitute an adequate baseline for a development of this scale and sensitivity.

Specialist concerns raised during the review process indicate that existing groundwater monitoring and borehole coverage may be insufficient to support reliable assessment of impacts associated with excavation, infrastructure development and long-term operation.

Of particular concern is the interconnected nature of:

- mobile dune systems and interdune wetlands;
- shallow groundwater and groundwater daylighting processes; and
- associated freshwater-dependent ecosystems.

The DSR does not adequately establish:

- groundwater flow dynamics and seasonal variability;
- connectivity between dune, wetland and marine systems;
- the impacts of excavation and dewatering activities;
- potential contamination pathways; or
- long-term ecological impacts associated with altered groundwater conditions.

The Enviro Trust further notes that no independent peer review equivalent to the SRK Consulting (2023) review of the Nuclear-1 (Duynefontein) specialist studies has been identified for the Thyspunt-specific geohydrological and hydrological assessments.

Given the scale of excavation and long-term infrastructure requirements, unresolved uncertainty regarding groundwater behaviour represents a significant limitation within the current scoping process. Where baseline hydrological understanding remains incomplete, potential impacts cannot be reliably predicted, cumulative effects cannot be meaningfully assessed, and appropriate mitigation measures cannot yet be evaluated with sufficient scientific confidence. The current DSR therefore does not yet provide a sufficiently reliable basis upon which the competent authority can assess hydrological feasibility, groundwater-related environmental risk, or long-term site compatibility within such an interconnected dune and wetland system.

5.3 Failure to Adequately Treat Wetlands as a Primary Development Constraint

The interdune wetlands and groundwater-dependent systems associated with the Thyspunt dune environment represent ecologically sensitive systems within an interconnected dune landscape. These wetlands constitute protected watercourses under

the National Water Act (Act 36 of 1998) and therefore represent significant environmental constraints requiring careful assessment within the site suitability process.

The DSR identifies two distinct wetland types at Thyspunt as Class A Ecological Importance and Sensitivity (EIS) — the highest classification under the wetland assessment framework — including the dune slack wetlands within the mobile dunefield and the Langefonteinvelei hillslope seep complex on the eastern site boundary. A further category of hillslope seep wetlands is classified as Class B EIS. Class A wetlands represent systems of very high ecological importance, the loss or degradation of which is considered unacceptable under the NWA assessment framework (DSR, WSP Ref: ZA0058322.7774, p.401).

This is particularly significant because:

- groundwater and wetland systems within the dune field are highly interconnected;
- wetland systems are sensitive to relatively small hydrological changes; and
- excavation, dewatering, spoil disposal and infrastructure development may alter groundwater levels, drainage patterns and wetland functioning.

The DSR does not sufficiently demonstrate:

- how wetland functioning will be maintained;
- how hydrological connectivity will be preserved;
- how groundwater-dependent ecosystems will be protected; or
- how impacts to sensitive wetland systems will be avoided rather than merely mitigated.

The current assessment framework therefore appears to understate the significance of wetlands and groundwater-dependent ecosystems as major environmental constraints requiring careful consideration within the broader assessment of site suitability and impact significance.

5.4 Wastewater, Effluent and Water Quality Risks Remain Insufficiently Defined

Key aspects of wastewater treatment, effluent management, stormwater control and water quality protection remain insufficiently defined within the DSR.

The dune aquifer system at Thyspunt presents specific contamination vulnerability characteristics: highly permeable sandy soils with high infiltration rates, a shallow unsaturated zone, and direct recharge from rainfall and dune moisture. These characteristics mean that contaminants introduced at the surface can reach the groundwater table rapidly and migrate through the system with limited natural attenuation. The DSR does not adequately characterise these vulnerability parameters or assess their implications for contamination risk management over the operational lifespan of the facility.

The report does not provide adequate detail regarding:

- wastewater generation, treatment and discharge systems;
- stormwater and contaminated water management measures;
- construction and operational water quality risks; and
- monitoring and response measures for accidental releases or system failures.

Without clearly defined engineering and operational parameters, it is not possible to meaningfully assess:

- impacts on groundwater quality;
- impacts on wetlands and freshwater ecosystems;
- impacts on marine receiving environments;
- cumulative contamination risks; or
- long-term water quality implications over the operational lifespan of the facility.

This uncertainty is particularly significant within a highly permeable dune and groundwater environment where contamination pathways may be difficult to predict and potentially difficult to remediate.

5.5 Framing of the Objection

The concern is not simply that hydrological impacts may occur, but that the current DSR does not yet establish a sufficiently defined, scientifically reliable or legally coherent basis upon which groundwater, wetland and broader hydrological impacts can be meaningfully assessed.

Significant uncertainty remains regarding long-term water sourcing, groundwater interaction pathways, wetland functioning, contamination risks and cumulative hydrological impacts within this highly interconnected dune environment. In the absence of a more comprehensive baseline understanding, the current DSR does not yet provide a sufficiently reliable basis upon which the competent authority can meaningfully assess hydrological feasibility, environmental compatibility or the adequacy of proposed mitigation measures at the scoping stage.

Where groundwater baseline understanding is incomplete and contamination pathways remain undefined, precautionary assessment obligations under the National Environmental Management Act (Act 107 of 1998) apply with particular force.

5.6 Required Plan of Study Commitments

The following matters are inadequately addressed in the current DSR and must be strengthened in the Plan of Study as mandatory EIA phase requirements. The Enviro Trust requests that the Final Scoping Report's Plan of Study commit to:

- clear identification and assessment of the proposed long-term water source or combination of water sources;
- detailed demonstration of compliance with the National Water Act (Act 36 of 1998) and associated water use authorisation requirements;
- expanded groundwater and aquifer investigations supported by additional borehole monitoring and a minimum of two full seasonal cycles of data collection prior to commencement of impact assessment, with methodology specified in the Plan of Study;
- detailed assessment of groundwater connectivity between dune systems, wetlands, freshwater systems and the marine environment;
- quantitative assessment of excavation, dewatering and infrastructure impacts on groundwater dynamics;
- detailed assessment of long-term hydrological impacts associated with dune alteration, spoil disposal and infrastructure development;

- full disclosure of wastewater treatment, effluent management and stormwater system assumptions;
- detailed assessment of contamination pathways and long-term water quality risks;
- assessment of cumulative impacts on regional water systems under future climate change conditions; and
- independent peer review of the geohydrological and hydrological specialist assessments, with reviewer independence criteria and timing confirmed in the Plan of Study.

In the absence of this information, the current DSR does not provide a sufficient basis for meaningful assessment of the hydrological, groundwater and water resource implications of the proposed Thyspunt Nuclear Power Plant.

6. Inadequate Assessment of Heritage and Cultural Landscape Constraints

6.1 Heritage Assessment Raises Serious Unresolved Compatibility Concerns

The heritage and cultural landscape specialist material contained within the DSR, DSR Appendix G16 (Heritage and Cultural Landscape Scoping Report), pp.89–91 (WSP Ref: ZA0058322.7774), raises serious concerns regarding the compatibility of the proposed Thyspunt Nuclear Power Plant with the heritage significance of the site and surrounding landscape.

The G16 Heritage and Cultural Landscape Scoping Report appears internally inconsistent and does not provide a clear conclusion regarding overall development acceptability. While the report repeatedly identifies the area as highly sensitive and acknowledges potentially significant and irreversible impacts on landscape character, sense of place, and heritage resources, it stops short of clearly stating whether a development of this scale is considered compatible with the receiving environment. This lack of clarity undermines informed public participation and decision-making at the scoping stage.

The Enviro Trust further notes that Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) requires that a heritage impact assessment report provide a statement of significance and a clear recommendation regarding the impact of the proposed development on identified heritage resources. Where the G16 specialist report fails to provide a clear conclusion on development compatibility, this represents not merely a quality concern but raises concerns regarding whether the heritage assessment adequately addresses the implications of the provisional Grade I Cultural Landscape.

The cultural landscape significance of Thyspunt is not limited to isolated archaeological sites or individual heritage resources. Rather, the significance arises from the integrity, continuity and interconnected character of the broader landscape, including:

- dune systems;
- coastal landforms;
- archaeological deposits;
- palaeoenvironmental records;
- visual landscape character; and
- long-standing relationships between natural and cultural systems.

Despite this, the DSR proceeds on the basis that impacts may potentially be mitigated through project layout refinement and management measures, without adequately reconciling these assumptions with the specialist material identifying the landscape as highly sensitive and raising significant concerns regarding development compatibility at this scale.

The current DSR therefore does not clearly establish whether the proposed development is considered compatible with the identified heritage and cultural landscape significance of the site, nor does it provide a sufficiently coherent basis upon which the competent authority can meaningfully assess heritage-related site suitability at the scoping stage.

Where the applicant's own specialist material raises significant concerns regarding the compatibility of the proposed development with the cultural landscape resource, the EIA process should clearly demonstrate, with appropriate supporting evidence, how those concerns will be addressed within the broader assessment of site compatibility, impact significance and mitigation.

6.2 Entire Site Identified as Highly Sensitive

The heritage and cultural landscape studies associated with the DSR identify the broader Thyspunt site as a landscape of high heritage sensitivity.

The implication of this finding is that:

- no clearly defined low-impact development zone has been identified within the site;
- impacts cannot reasonably be reduced through minor layout adjustment alone; and
- the cultural and landscape impacts of development may be unavoidable at a site-wide scale.

The DSR does not adequately reconcile the identified landscape-wide sensitivity with the scale and permanence of the proposed development footprint, associated infrastructure, construction activity and long-term operational presence.

In the absence of a demonstrably less sensitive development area within the site, the DSR does not establish how significant heritage impacts could realistically be avoided.

6.3 Failure to Address Provisional Grade I Cultural Landscape Status and Associated Legal Implications

The Thyspunt landscape has been provisionally designated as a Grade I Cultural Landscape under the National Heritage Resources Act (Act 25 of 1999), representing the highest level of heritage significance and protection within the South African heritage framework. This provisional protection was gazetted by SAHRA in Government Gazette No. 52013, Notice No. 5803, dated 31 January 2025 and covers the Thyspunt development footprint. It lapses on 1 February 2027. The provisional protection notice may trigger Section 28 permit requirements under the National Heritage Resources Act (Act 25 of 1999) prior to construction activities within the protected area.

Despite the significance of this designation, the DSR does not adequately address the implications of the provisional Grade I status for overall site suitability, project feasibility, and the environmental authorisation process. In particular, the DSR does not clearly explain:

- the legal and regulatory implications associated with the provisional Grade I designation and the Section 28 permit requirement;
- how heritage protection requirements under the National Heritage Resources Act (Act 25 of 1999) will interact with the EIA and environmental authorisation process and the February 2027 lapse date;
- whether the proposed development is compatible with the identified heritage significance and sensitivity of the landscape under provisional Grade I protection; or
- whether the required heritage approvals, including a Section 28 permit, are realistically achievable within a landscape subject to the highest level of national heritage protection.

The failure of the DSR to acknowledge or address the provisional Grade I designation and its associated permit requirements is a significant gap within the current DSR. The current DSR therefore does not provide sufficient clarity regarding whether the proposed development is compatible with the statutory protection objectives associated with a landscape already subject to provisional national heritage protection.

6.4 Inadequate Assessment of Archaeological Significance

The Thyspunt area contains archaeological resources of significant scientific, cultural and heritage importance, including material relevant to human prehistory, palaeoenvironmental history and long-term coastal occupation. However, the current DSR does not adequately demonstrate that the full extent, distribution and significance of these archaeological resources have been comprehensively identified or assessed relative to the scale and permanence of the proposed development.

This concern is particularly significant within the context of the dynamic Oyster Bay dune system. The interaction between archaeological sensitivity and ongoing dune mobility raises uncertainty regarding the extent to which archaeological material may remain buried, obscured or periodically exposed within the broader landscape over time. The cumulative archaeological significance of the area may therefore extend beyond currently identified or individually recorded sites.

Given the scale of the proposed excavation and infrastructure development, there is significant concern that construction activities, dune disturbance and large-scale earthworks may result in irreversible damage to currently unidentified archaeological resources before their significance has been fully understood or documented.

The DSR does not adequately establish:

- the full extent of archaeological sensitivity across the broader landscape;
- the degree to which buried or currently unidentified archaeological resources may exist within the development footprint;
- how dune mobility and geomorphological change may influence archaeological exposure and preservation over time; or
- how irreversible impacts to archaeological resources of potential regional or national significance would be identified, avoided, minimised or managed within the broader EIA and heritage assessment process.

Given the scale and permanence of the proposed development, and the acknowledged sensitivity of the dune landscape, the precautionary principle should apply where archaeological understanding remains incomplete.

6.5 Framing of the Objection

The concern is not merely that heritage impacts may occur, but that the current DSR does not establish a sufficiently reliable or legally coherent basis upon which the compatibility of the proposed development with the heritage landscape can be concluded.

At present, the DSR contains a significant internal inconsistency:

- the heritage specialist material identifies landscape-wide sensitivity and incompatibility concerns; yet
- the broader EIA process continues to advance the site as suitable for development without adequately resolving those concerns.

The current DSR does not sufficiently demonstrate that significant heritage and cultural landscape impacts can realistically be avoided, that the integrity of the broader landscape can be maintained, or that the proposed development is compatible with the identified sensitivity and significance of the site.

The issue is therefore not simply one of impact management, but one of unresolved site compatibility concerns and insufficient clarity regarding how the identified heritage sensitivities and protection objectives will be addressed within the broader EIA and authorisation process.

6.6 Required Plan of Study Commitments

The following matters are either not addressed or inadequately addressed in the current DSR. The Enviro Trust requests that the Final Scoping Report's Plan of Study explicitly commit to each of the following as mandatory EIA phase requirements:

- a clear and detailed explanation of the heritage specialist's conclusions regarding the compatibility of the proposed development with the Thyspunt cultural landscape, with the Plan of Study confirming how heritage compatibility will be assessed in the EIA phase;
- clarification regarding whether the specialist ultimately supports or does not support the proposed development from a heritage perspective;
- comprehensive mapping of heritage sensitivity across the full development footprint and associated infrastructure corridors;
- detailed clarification regarding the provisional Grade I Cultural Landscape status of Thyspunt gazetted January 2025 under the National Heritage Resources Act (Act 25 of 1999), including the Section 28 permit implications, the February 2027 lapse date, and how the EIA timeline interacts with this statutory protection, with the Plan of Study confirming how SAHRA's requirements will be integrated into the authorisation process;
- assessment of whether the proposed development is compatible with the protection objectives associated with a provisionally protected nationally significant cultural landscape;
- updated and comprehensive archaeological assessment incorporating the potential for buried and currently unidentified archaeological resources;

- assessment of cumulative landscape impacts associated with associated infrastructure, transmission corridors, construction activity and long-term industrialisation of the coastal landscape; and
- independent peer review of the cultural landscape and archaeological specialist assessments.

In the absence of this information, it is submitted that the current DSR does not provide a sufficient basis for concluding that the proposed Thyspunt Nuclear Power Plant is compatible with the heritage, archaeological and cultural landscape significance of the site, or capable of meeting the applicable heritage protection requirements within such a sensitive and provisionally nationally protected landscape.

7. Unresolved Compatibility Concerns Relating to the Oyster Bay Dunefield System

7.1 Failure to Demonstrate Compatibility with a Globally Unique Dunefield System

The DSR and associated specialist studies identify the Oyster Bay Headland Bypass Dunefield as a geomorphological system of high conservation value and note that the headland-bypass dunefields at Cape St Francis are "unique on a local, regional and probably global scale", as stated in DSR Appendix G01 (Dune Geomorphology Scoping Report), s.4.2.7 (WSP Ref: ZA0058322.7774). However, despite recognising this significance, the DSR does not adequately assess whether a large-scale industrial and nuclear development is compatible with the functioning and integrity of such a system.

The issue is not limited to the presence of environmental impacts within an otherwise suitable site. Rather, the central concern is whether a fixed, highly engineered industrial development with a multi-generational operational lifespan can realistically coexist with a dynamic, mobile and interconnected dune system of acknowledged global significance.

The report fails to establish:

- that the dune system can retain its geomorphological integrity under long-term industrialisation;
- that major excavation and infrastructure placement will not fundamentally alter dune processes;
- that the long-term functioning of the broader dune system can be maintained over the lifespan of the facility.

The current assessment therefore does not yet provide a sufficient basis upon which compatibility between the proposed development and the environmental system within which it would be located can be meaningfully assessed.

7.2 Long-Term Instability and Lifecycle Risk within a Mobile Dune System

The Oyster Bay dunefield is not a static landscape. DSR Appendix G01 (Dune Geomorphology Scoping Report), p.22 (WSP Ref: ZA0058322.7774), states that according to aerial photographs of the past 50 years, dunes and the leading tongues of dunefields move eastwards at rates of 10 to 30 metres per year.

Despite this, the report fails to establish the implications of placing permanent nuclear-related infrastructure within a mobile dune environment over the full operational and

post-operational lifespan of the facility. This raises unresolved questions regarding long-term infrastructure resilience and site suitability within a mobile dune environment.

The proposed development includes infrastructure expected to remain in place for many decades, potentially extending beyond the operational life of the power station itself through long-term management and storage requirements. However, the DSR does not fully assess:

- the interaction between migrating dunes and fixed infrastructure over time;
- the implications of changing dune morphology for infrastructure stability and maintenance;
- the effects of climate change on dune mobility and sediment dynamics;
- long-term groundwater and drainage changes associated with dune movement; or
- the cumulative implications of these processes over the full project lifecycle.

The absence of this assessment is significant because the environmental conditions within the dune system are dynamic over decadal and century-scale timeframes, while the proposed infrastructure relies upon long-term physical stability, predictability and containment integrity.

In the absence of a detailed lifecycle assessment addressing dune mobility, geomorphological change and long-term infrastructure interaction, the current DSR does not provide a sufficiently reliable basis upon which the competent authority can meaningfully assess long-term site suitability, infrastructure resilience or the environmental feasibility of locating permanent nuclear infrastructure within such a dynamic dune system.

The current assessment leaves unresolved whether the Thyspunt site is physically suitable for infrastructure of this nature and lifespan.

7.3 Large-Scale Sand Movement and Spoil Disposal Impacts Remain Inadequately Assessed

The DSR further identifies the need for very large-scale excavation and movement of sand material associated with site preparation and construction activities, including the handling and disposal of approximately 6.4 million cubic metres of excavated sand spoil. To contextualise this volume: 6.4 million cubic metres of sand, if spread one metre deep, would cover an area of approximately 6,400 hectares — more than 25 times the approximate 250-hectare development footprint identified in the DSR. The redistribution of this material within an interconnected dunefield and coastal sediment system represents a geomorphological intervention of unknown impacts in the existing specialist assessment framework.

The scale of this activity represents a major geomorphological intervention within an interconnected dune and coastal sediment system.

However, the report falls short of demonstrating:

- the long-term geomorphological consequences of large-scale sand removal and redistribution;
- the implications of spoil placement and offshore disposal for coastal sediment dynamics;

- the interaction between terrestrial dune systems and offshore sediment processes;
- cumulative impacts on shoreline behaviour and dune migration patterns; or
- the extent to which these interventions may permanently alter natural system functioning.

The significance of this issue extends beyond the immediate construction footprint, as large-scale excavation and spoil redistribution may alter broader coastal sediment and geomorphological processes across the dunefield system.

The DSR currently assesses many of these components separately. However, it does not sufficiently demonstrate how the cumulative system-level impacts of large-scale excavation, spoil movement and sediment redistribution have been integrated into the assessment of long-term site suitability.

7.4 Framing of the Objection

The concern is not merely that development within the dune system may result in environmental impacts. The concern is that the current DSR does not establish that the proposed Thyspunt Nuclear Power Plant can operate compatibly with the long-term functioning, stability and integrity of the Oyster Bay dunefield system itself.

The current DSR identifies a highly dynamic and environmentally sensitive dune system requiring major long-term geomorphological intervention, yet does not adequately demonstrate that the proposed development is compatible with the long-term functioning, stability and integrity of the broader dunefield environment.

The issue therefore extends beyond mitigation of local impacts and raises unresolved questions regarding whether the current DSR provides a sufficient basis upon which the long-term physical and environmental suitability of the site for development of this scale, permanence and operational duration can be meaningfully assessed.

7.5 Required Plan of Study Commitments

The following matters are inadequately addressed in the current DSR and must be strengthened in the Plan of Study as mandatory EIA phase requirements. Given the acknowledged global significance of the Oyster Bay Headland Bypass Dunefield system, the Enviro Trust requests that the Final Scoping Report's Plan of Study commit to:

- a dedicated long-term compatibility assessment addressing the interaction between permanent nuclear infrastructure and the Oyster Bay Headland Bypass Dunefield system over the full operational and post-operational project lifecycle, with assessment methodology and specialist qualifications specified in the Plan of Study;
- detailed evaluation of the interaction between permanent infrastructure and long-term dune mobility over the full project lifecycle;
- quantitative assessment of dune migration dynamics under future climate scenarios;
- integrated assessment of geomorphological, hydrological, coastal and sediment transport interactions;
- detailed assessment of the long-term implications of large-scale excavation and spoil redistribution;
- assessment of offshore spoil disposal impacts on coastal and marine sediment systems;

- clear demonstration that the integrity and functioning of the dunefield system can be maintained under operational conditions;
- assessment of the long-term infrastructure resilience implications associated with a mobile dune environment;
- integrated system-level assessment linking terrestrial, groundwater and marine sediment processes; and
- independent peer review of the dune geomorphology and associated coastal process assessments.

In the absence of this information, it is submitted that the specialist material does not provide a sufficient basis for concluding that the Thyspunt site is physically, geomorphologically or environmentally suitable for the long-term operation of a nuclear power facility within a globally unique and dynamic dune system.

8. Inadequate Consideration of the Conservation Status and Ecological Significance of St Francis Strandveld

8.1 Recent Reclassification of St Francis Strandveld

The terrestrial biodiversity specialist material repeatedly states that no threatened ecosystems occur within the proposed Thyspunt development footprint. This is primarily discussed in the Terrestrial Biodiversity Scoping Report (pages 27, 45, 52, 56 and 71), also noted in the Plant Species Scoping Report (page 25) and the Fauna and Invertebrate Scoping Report (page 67). However, recent scientific revision and updated SANBI vegetation mapping raise unresolved questions regarding the conservation significance and ecological sensitivity of the St Francis Strandveld ecosystem occurring extensively within the affected area. The majority of the site falls within St Francis Strandveld, a vegetation type only incorporated into the SANBI National Vegetation Map in 2024 (Cowling et al., 2023) following recent scientific revision. Prior to this revision, the area was mapped as St Francis Dune Thicket, which is classified as Least Concern.

The vegetation type has an estimated Extent of Occurrence (EOO) of approximately 1,120 km², below the IUCN threshold commonly associated with highly restricted ecosystems under Criterion B1. The assessment also notes ongoing regional pressures including coastal development, alien plant invasion and ecological disturbance.

The concern is that the DSR does not adequately engage with the implications of the recent reclassification, the restricted extent of this vegetation type, or the ecological uncertainty associated with its presently unassessed conservation status. This is particularly relevant given that the St Francis–Oyster Bay corridor represents the largest remaining extent of this vegetation type.

8.2 Required Plan of Study Commitments

The following matters should be incorporated into the Plan of Study for the EIA phase:

- updated terrestrial biodiversity assessment reflecting the 2024 SANBI vegetation mapping revisions;

- explicit assessment of the ecological significance and conservation sensitivity of St Francis Strandveld within the Thyspunt footprint and surrounding landscape;
- assessment of the implications of unresolved ecosystem threat-status uncertainty for site suitability assessment;
- assessment of cumulative impacts and ecological fragmentation risks affecting the St Francis–Oyster Bay corridor; and
- independent peer review of the terrestrial biodiversity assessment, including the treatment of St Francis Strandveld and associated vegetation mapping assumptions.

In the absence of this information, the current DSR does not yet provide a sufficiently reliable basis upon which the ecological sensitivity and long-term compatibility of the proposed development with the St Francis Strandveld ecosystem can be meaningfully assessed.

9. Requested Outcomes and Administrative Relief

In light of the concerns outlined in this supplementary submission, read together with the Kromme Enviro Trust's submission dated 30 April 2026, the Enviro Trust submits that the current Draft Scoping Report does not yet provide a sufficiently complete, integrated or scientifically reliable basis upon which the competent authority can assess the adequacy of the current DSR or the scope of the proposed EIA phase.

The Enviro Trust therefore respectfully requests that the competent authority and applicant undertake the following actions before any further advancement of the application process:

9.1 Revision of the Current Draft Scoping Report Prior to Acceptance

The Enviro Trust submits that the current DSR should not be accepted in its present form, as significant uncertainty, unresolved cumulative impacts, incomplete specialist assessment and serious unresolved questions regarding site compatibility remain across multiple environmental disciplines. The Enviro Trust requests that the competent authority require revision of the Draft Scoping Report prior to acceptance in terms of the applicable provisions of the EIA Regulations.

9.2 Preparation of a Revised and Integrated Scoping Assessment

Should the process continue, the Enviro Trust requests that a substantially revised DSR be prepared incorporating:

- integrated assessment of all associated infrastructure and cumulative impacts;
- revised specialist studies addressing marine, hydrological, geomorphological and heritage constraints;
- full lifecycle assessment of long-term operational and post-operational impacts;
- explicit assessment of site suitability and environmental compatibility; and
- clear disclosure of specialist assumptions, limitations and uncertainties.

9.3 Independent Peer Review of Specialist Studies

Given the significance, complexity and national importance of the proposed development, the Enviro Trust requests that independent peer review be undertaken for the following specialist disciplines:

- dune geomorphology and coastal processes;
- marine ecology and oceanography;
- groundwater and hydrology;
- heritage and cultural landscape assessment; and
- cumulative impact assessment methodologies.

Such review should be undertaken by appropriately qualified independent specialists with no prior involvement in the preparation of the DSR or associated specialist reports.

9.4 Full Disclosure of Referenced Information and Supporting Data

The Enviro Trust further requests that all information relied upon within the DSR and specialist studies be made publicly available, including:

- modelling assumptions, methodologies and input data;
- baseline environmental and groundwater information;
- marine, hydrological and infrastructure planning outputs; and
- any specialist peer review or supporting technical material relied upon within the DSR process.

Meaningful public participation is materially constrained where critical underlying information remains unavailable or insufficiently disclosed.

9.5 Expanded Alternatives Assessment

The current DSR does not adequately demonstrate that reasonable alternatives have been comprehensively assessed.

The Enviro Trust therefore requests:

- expanded assessment of alternative sites;
- assessment of alternative infrastructure configurations;
- assessment of alternatives that avoid highly sensitive dune and heritage systems; and
- explicit consideration of whether the "no-go" alternative represents the environmentally preferable outcome.

This includes, specifically, that both Thyspunt and Bantamsklip be carried forward to the full Environmental Impact Assessment phase for comparative evaluation, as formally requested in the Enviro Trust's primary submission dated 30 April 2026. The Enviro Trust requests that Bantamsklip remain under active comparative consideration, as it forms part of the Draft Scoping Report but does not appear to have been subject to the same level of assessment detail as Thyspunt at this stage of the process.

9.6 Fresh Public Participation Process Following Revision

Should substantial revisions, new specialist findings, revised modelling or additional infrastructure assessments be introduced, the Enviro Trust submits that a fresh public participation process will be required in order to ensure procedural fairness and meaningful participation.

Interested and Affected Parties cannot reasonably be expected to comment on material information that has not yet been disclosed or adequately assessed within the current DSR.

9.7 Application of the Precautionary Principle

The Enviro Trust submits that the precautionary principle, as recognised within South African environmental law, should apply throughout the assessment process.

Where:

- environmental sensitivity is exceptionally high;
- uncertainty remains unresolved;
- impacts may be irreversible;
- mitigation effectiveness has not been demonstrated with sufficient certainty; and
- long-term ecosystem functioning may be compromised,

the absence of full scientific certainty should not be used as a basis to advance development authorisation.

9.8 Conclusion

For the reasons set out in this supplementary submission and the Enviro Trust's primary submission dated 30 April 2026, the Kromme Enviro Trust maintains its objection to the acceptance of the Draft Scoping Report (WSP Ref: ZA0058322.7774) in its current form.

The submission has identified six areas in which the current DSR does not yet provide a sufficient basis for informed progression to the EIA phase. The cumulative footprint of associated infrastructure remains unassessed in any integrated sense. The marine assessment does not clearly demonstrate that it reflects the full proposed operational scale of the development, is not anchored to a defined reactor technology, has not been independently peer reviewed, and does not adequately account for the livelihood and ecological significance of the chokka squid fishery in the Thyspunt marine zone. The hydrological and groundwater assessment relies on a baseline that is insufficient for a development of this scale within such a dynamic dune and wetland environment, and similarly lacks independent peer review equivalent to that conducted for the Duynfontein specialist studies. The heritage assessment does not adequately address the implications of the provisional Grade I Cultural Landscape designation already gazetted by SAHRA, including the Section 28 permit requirement. And the dunefield compatibility assessment does not establish that permanent nuclear infrastructure can coexist with a globally unique mobile dune system over a multi-generational operational lifespan. The terrestrial biodiversity assessment also does not adequately address the ecological significance, restricted extent and unresolved conservation status of the recently reclassified St Francis Strandveld ecosystem occurring within the Thyspunt footprint and broader St Francis–Oyster Bay corridor.

Across all six areas, the Enviro Trust has requested that the Final Scoping Report's Plan of Study include explicit, mandatory commitments to the additional fieldwork, cumulative assessments and independent peer reviews required before environmental suitability can be meaningfully determined. Without these commitments locked into the Plan of Study, the EIA phase cannot be relied upon to address the gaps identified at scoping stage.

The Enviro Trust accordingly requests that the competent authority decline to accept the current DSR and require substantial revision, expanded specialist assessment and independent peer review before any progression of the application process is considered.

The Trust reserves all rights arising from or in connection with this EIA process, including the right to make further submissions, to appeal any environmental authorisation granted, and to seek judicial review under PAJA and NEMA.

The Trust requests written acknowledgement of receipt of this supplementary submission and the primary submission dated 30 April 2026.

References

Primary Process Documents

WSP Group Africa (2026). Draft Scoping Report: Proposed Nuclear Power Plant (up to 5,200 MW), Thyspunt. WSP Ref: ZA0058322.7774. DFFE Ref: 2025-10-0003. April 2026. [DSR]

WSP Group Africa (2026). Appendix G01: Dune Geomorphology Scoping Report. In: DSR ZA0058322.7774.

WSP Group Africa (2026). Appendix G12: Marine Ecology Scoping Report. In: DSR ZA0058322.7774.

WSP Group Africa (2026). Appendix G16: Heritage and Cultural Landscape Scoping Report. In: DSR ZA0058322.7774.

WSP Group Africa (2026). Appendix G22: Radioactive Waste and Transport Scoping Report. In: DSR ZA0058322.7774.

WSP Group Africa (2026). Appendix G09 - Terrestrial Biodiversity Scoping Report. In: DSR ZA0058322.7774.

WSP Group Africa (2026). Appendix G10 - Plant Species Scoping Report. In: DSR ZA0058322.7774.

WSP Group Africa (2026). Appendix G08 - Fauna Invertebrate Scoping Report. In: DSR ZA0058322.7774.

Cowling, R.M., Cawthra, H., Privett, S. and Grobler, B.A., 2023. The vegetation of Holocene coastal dunes of the Cape south coast, South Africa. PeerJ, 11, p.e16427.

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Legislation

Republic of South Africa. National Environmental Management Act 107 of 1998 (NEMA), as amended.

Republic of South Africa. EIA Regulations, GN R982 of 2014 (as amended by GN R325 of 2017), promulgated under NEMA s24(5).

Republic of South Africa. National Water Act 36 of 1998 (NWA), as amended.

Republic of South Africa. National Heritage Resources Act 25 of 1999 (NHRA), as amended.

South African Heritage Resources Agency (SAHRA) Government Gazette No. 52013, Notice No. 5803, dated 31 January 2025.

Republic of South Africa. Integrated Coastal Management Act 24 of 2008 (ICMA), as amended.

Republic of South Africa. National Nuclear Regulator Act 47 of 1999 (NNRA), as amended.

South African National Biodiversity Institute (SANBI). Established under the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)

Signed by Sandra Galer, authorised representative of the Kromme Enviro Trust.

Date: 23 May 2026