



9 Philippa Place
St Francis Bay
6312

Tel: 042 294 0594
eMail: info@sfpo.co.za
Website: www.stfrancispropertyowners.co.za

FORMAL COMMENT AND OBJECTION

Draft Environmental Scoping Report Thyspunt Nuclear Power Plant

WSP Project No.: ZA0058322.7774 | April 2026 DSR

Submitted by	St Francis Bay Property Owners Association
Contact details	9 Philippa Place, St Francis Bay, 6312 Tel: 042 294 0594 Email: info@sfpo.co.za Website: www.stfrancispropertyowners.co.za
Submitted to	Director-General, DFFE; WSP Group Africa (Pty) Ltd, EAP
Submission date	28 May 2026
Status	Formal submission.

Executive Summary

This submission is a formal objection by the St Francis Bay Property Owners Association (SFPO) to the Draft Environmental Scoping Report (DSR) for the proposed Thyspunt Nuclear Power Plant. The DSR is materially incomplete and cannot, on the current record, support the recommendation that Thyspunt be carried forward as the preferred site.

SFPO represents property owners and ratepayers in St Francis Bay. The objection is grounded in the direct and foreseeable consequences for property values, property insurance, development rights, ratepayer exposure, municipal services, emergency planning, tourism and the long-term residential and tourism character of the affected area.

Principal grounds of objection:

1. The DSR fails to quantify property-value, insurance and the economic consequences of an Emergency Planning Zone of undetermined boundaries imposed on the affected area.
2. Evacuation Time Estimate modelling has not been done, the single paved access route into St Francis Bay, which crosses the Kromme River, is not assessed as the evacuation bottleneck, and the peak holiday population has not been specified.
3. Municipal capacity, supporting infrastructure and ratepayer exposure have not been assessed. The proposed development is not reflected as a committed or funded project in the Kouga Integrated Development Plan, and the reference to the site in the Revised Draft Spatial Development Framework (2024/2025), which is currently out for public comment, is itself subject to formal objection in that public participation process.
4. Construction traffic, dust and noise impacts on the affected area are not adequately assessed at receptor level over a 10 to 15 year construction period.
5. The tourism, retirement, holiday-rental and commercial property economy of the affected area is not modelled.
6. Nuclear-1's Final Environmental Impact Report (FEIR) recommended Thyspunt, but the competent authority ultimately authorised Duynfontein instead. The current DSR must therefore explain why Thyspunt is now preferred, especially for a larger 5,200 MW facility. The DSR scopes Bantamsklip out on grounds of site readiness, transmission distance, cost and schedule, but does not provide a current comparative environmental, social, emergency-planning and property-impact assessment of the two sites.
7. The public participation process did not provide Interested and Affected Parties with a meaningful opportunity to engage with the specialist material, with key specialist reports only made available on a staged basis from 10 April 2026 onward and minutes of public meetings not made available within the review period.

Relief sought, in summary:

Primarily, that the Final Scoping Report not be accepted on the current record and that Thyspunt not be confirmed as the preferred site. A defined set of corrections must be made before any Final Scoping Report is accepted. In the alternative, and without prejudice to the primary objection, that the Plan of Study for EIA be amended to include the assessments and public review requirements set out in this submission and Annexure A.

1. Introduction and Standing of the St Francis Bay Property Owners Association

The St Francis Bay Property Owners Association (SFPO) submits this formal public comment and objection in response to the Draft Environmental Scoping Report (DSR) for the proposed Thyspunt Nuclear Power Plant, WSP Project No. ZA0058322.7774, WSP Reference 2025-10-0003, dated April 2026.

The DSR was prepared by WSP Group Africa (Pty) Ltd as the independent Environmental Assessment Practitioner on behalf of Eskom Holdings SOC Ltd. This submission responds to the publicly released DSR and the specialist appendices made available for public review.

SFPO represents the interests of property owners and ratepayers in the St Francis Bay area. This submission is made through Wayne Furphy, Chairman of SFPO, using the contact details on the cover page. For convenience, this submission refers to St Francis Bay as “the affected area”. Where the submission refers to neighbouring communities such as Sea Vista, Cape St Francis, Humansdorp and Oyster Bay, it does so only insofar as impacts on those communities bear on the St Francis Bay property market, the shared Kouga Local Municipality rates base and shared municipal services. SFPO does not purport to represent those communities. This submission refers to property values, the ability to insure and finance property, and development rights collectively as “the core property-owner impacts”.

SFPO has a direct and substantial interest in this process because the proposed Thyspunt site is close to the affected area. The DSR and its specialist appendices raise issues that go directly to the core property-owner impacts and to municipal services, emergency planning, infrastructure, tourism, ratepayer exposure and the long-term residential, economic and tourism character of the affected area.

2. Legal and Procedural Framework

SFPO submits that the DSR must contain sufficient information to allow the competent authority and interested and affected parties to understand the key issues, assess reasonable and feasible alternatives, identify material impacts, and properly determine the scope of the EIA phase. SFPO further submits that, where the DSR identifies Thyspunt as the preferred site, the information before the competent authority must be sufficient to support that preference. Material issues that affect property owners, ratepayers, municipal services, emergency planning, land-use rights, tourism, property values and local infrastructure cannot be deferred in a way that predetermines the site-selection outcome.

This objection is brought, and the adequacy of the DSR is to be measured, against the framework provided by the National Environmental Management Act 107 of 1998 (NEMA) and the principles in section 2 thereof; the Environmental Impact Assessment Regulations of 2014 (Government Notice R982 of 2014, as amended); the National Nuclear Regulator Act 47 of 1999 in respect of emergency planning zones and licensing; the Spatial Planning and Land Use Management Act 16 of 2013 (SPLUMA), together with the Kouga Local Municipality Spatial Development Framework and Integrated Development Plan; the Promotion of Administrative Justice Act 3 of 2000 (PAJA) and section 33 of the Constitution of the Republic of South Africa, 1996, in respect of procedurally fair, lawful and reasonable administrative action; and section 25 of the Constitution of the Republic of South Africa, 1996, in respect of the protection of established property rights and land-use interests.

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

3. Scope of the SFPO's Submission

The SFPO's objection is not framed as a general objection to nuclear energy. It is an objection to the adequacy of the DSR, the premature preferred-site recommendation, and the failure to properly assess impacts on property owners, commercial property owners, residents, ratepayers, local businesses, municipal services, emergency planning, tourism, infrastructure, the core property-owner impacts and the long-term residential and tourism character of the affected area.

The SFPO does not attempt in this submission to deal with every environmental, heritage, marine, energy-policy or national fiscal issue raised by the proposed project. Other interested and affected parties may deal with those issues in detail. The SFPO's focus is deliberately narrower: the effect of the DSR's omissions on property owners and the communities that depend on the residential, tourism, retirement and property-based economy of the affected area.

4. Summary of the SFPO's Primary Objection

The SFPO objects to the acceptance of the DSR in its current form. The DSR is materially incomplete and does not provide sufficient information to support the recommendation that Thyspunt should be carried forward as the preferred site.

The deficiencies identified in this submission are not minor information gaps that can simply be deferred to the EIA phase. They go to site suitability, the core property-owner impacts, development rights, emergency planning, municipal capacity, construction disruption, tourism, business confidence, ratepayer exposure and the basic question whether Thyspunt can be responsibly preferred at this stage.

A further material omission is the DSR's failure to assess impacts against the actual seasonal population profile of the affected area. The 2011 Census recorded a population of 4,933 for the St Francis Bay Main Place. The 2022 Census results have not been released at settlement level, and no measured peak-season figures are publicly available. Drawing on SFPO's preliminary estimate based on available local indicators, property registration data, and local knowledge of accommodation, water-use and traffic patterns, SFPO uses an out-of-season planning estimate of approximately 10,000 to 11,000 people, rising to between approximately 30,000 and 50,000 people during the December/January peak holiday period. SFPO uses these figures as reasonable planning estimates based on available local information and the known seasonal character of the area. They should be verified through the EIA process using transparent source data, including municipal records, dwelling counts, water and electricity consumption patterns, traffic counts, accommodation occupancy and seasonal visitor data. The seasonal increase is directly relevant to evacuation feasibility, road capacity, municipal services, emergency response, tourism, public safety and the assessment of whether Thyspunt can responsibly be treated as the preferred site. SFPO reserves the right to supplement this submission with supporting material, including population source material, insurance advice, property-market information, municipal records and further expert input as these become available.

The central objection is that the DSR recommends Thyspunt as preferred while leaving unresolved matters that are material to whether Thyspunt is suitable at all. A preferred-site recommendation cannot be rationally or procedurally supported where the report has not yet demonstrated evacuation

feasibility, confirmed emergency planning zones, assessed municipal infrastructure capacity, quantified property impacts, or evaluated the cumulative consequences for affected property owners, ratepayers, residents and local businesses.

Outcome sought by SFPO: SFPO requests that DFFE should not accept the Final Scoping Report unless the material deficiencies identified in this submission are corrected, and that Thyspunt should not be confirmed as the preferred site on the current record. If the process is nevertheless allowed to proceed to the EIA phase, SFPO requests that the Plan of Study for EIA be amended to include the specific assessments and public review requirements set out in this submission and Annexure A.

5. Without-Prejudice Fallback Position

The SFPO's primary position is that the Final Scoping Report should not be accepted unless the material deficiencies identified in this submission are corrected and the preferred-site recommendation is reconsidered. In the alternative, and without prejudice to that primary objection, if the competent authority allows the process to proceed to the EIA phase, the Plan of Study for EIA must be amended to include the mandatory assessments, corrections and public review requirements identified in this submission and in Annexure A.

6. Consolidated Issue Register

SFPO has identified twenty-three issues as having the highest direct relevance to property owners and ratepayers in the affected area, on a judgement basis. These are the issues that go most directly to property values, property insurance, access to bond finance, development rights, ratepayer exposure, emergency planning, municipal services, construction-period impacts, tourism, the retirement market and site-selection rationality. The consolidated issue register and expanded entries for each issue are set out in Annexure A.

7. Key Grounds of Objection

SFPO classifies each ground of objection set out below as either a Fatal Flaw in the Assessment or a Material Defect, defined as follows. A Fatal Flaw in the Assessment is a ground on which the DSR is so materially incomplete that it cannot, on the current record, support a recommendation to carry Thyspunt forward as the preferred site for the EIA phase. A Material Defect is a ground on which the DSR is incomplete on a matter that must be addressed before it can be relied upon as the basis for a site selection decision.

7.1 Core Property-Owner Impacts: Property Values, Insurance, Bond Finance and Development Rights (Fatal Flaw in the Assessment)

This is the central pillar of SFPO's objection. As a property owners association, SFPO's primary concern is that the DSR fails to assess the direct and foreseeable property consequences of identifying Thyspunt as the preferred site. The issues raised in this submission, including emergency planning, municipal services, construction disruption, tourism impacts and social impacts, all ultimately affect the value, use, enjoyment, marketability and long-term security of property in the affected area.

The DSR acknowledges that property values may decline due to perceived nuclear risk, construction disruption and post-construction housing market effects, but it does not quantify this impact for the affected area. It also does not assess the related consequences for property insurance, access to bond finance, saleability, market confidence, development potential or long-term investment value.

SFPO notes that the DSR's socio-economic assessment records a positive property-value effect during the construction period, driven by contractor and worker demand. That short-term, demand-driven effect does not address the long-term consequences of EPZ proximity for property value, the ability to insure and finance property, and development rights, which the DSR leaves unquantified. A transient construction-period uplift cannot substitute for an assessment of the enduring impacts on the affected area.

On insurance, the DSR does not assess insurance consequences at all. SFPO understands, based on insurance advice received, that nuclear-incident exclusions are a common feature of South African insurance and may affect the availability, scope, exclusions, terms or risk assessment applied to certain categories of insurance, including life, funeral, medical and short-term property insurance. This is a foreseeable and material risk to property owners the moment a property is identified as falling within, or near, a designated Emergency Planning Zone, and it must be assessed before the affected area can responsibly be carried into a preferred-site recommendation.

On development rights, the DSR describes restrictions associated with Precautionary Action Zones and Urgent Protective Action Zones but does not quantify the property-level consequences. Depending on the final EPZ controls imposed, EPZ designation may effectively restrict subdivision, second-dwelling rights, guesthouse use, retirement-village development, commercial use and other land-use rights in the affected area. The result may be a form of land-use restriction imposed on existing properties, with consequences for property value, saleability and market confidence, but without the procedural protections that ordinary down-zoning under SPLUMA would attract. SFPO is not asserting a constitutional compensation claim at this stage, but the DSR must disclose and assess whether EPZ designation would impose de facto land-use restrictions, and what the property-value consequences would be. SFPO submits that this is a material property-rights issue that cannot be deferred.

On holiday rental and short-term letting income, a significant proportion of properties in the affected area earn income from short-term holiday letting, agency lettings and online platforms. This income forms part of the value of those properties. Construction noise, traffic, prolonged disruption and the perception of nuclear proximity are all foreseeable risks to rental yield, occupancy rates and the willingness of holiday-makers to book. The DSR does not assess this rental-income channel at all.

This omission underpins many of SFPO's objections. The Emergency Planning Zone has not been confirmed for the proposed 5,200 MW facility. Without confirmed EPZ boundaries, property owners cannot know whether their properties may fall within areas affected by development restrictions, emergency planning obligations, insurance or finance impacts, reduced marketability, loss of subdivision potential, or restrictions on guesthouse, second-dwelling, retirement, commercial or other property uses. These are not secondary or speculative concerns. They go directly to property ownership, property value, property rights and the long-term functioning of the affected area as residential, tourism, retirement and commercial property markets.

Several of the applicant's own specialist findings record material impacts on the affected area that, on the applicant's own evidence, cannot be effectively mitigated. The Visual Impact Assessment (Appendix G.15) rates the operational visual intrusion and change to sense of place as HIGH both before and after mitigation, indicating that mitigation does not materially reduce the impact of a nuclear facility of this scale in a coastal landscape. The Heritage Impact Assessment (Appendix G.16) records that the Thyspunt site is provisionally protected as a Grade I Cultural Landscape under section 29 of the National Heritage Resources Act, with that protection lapsing on 1 February 2027, and that the site would be unable to be supported from a cultural landscape perspective. The Marine Ecology

assessment (Appendix G.12) records that the permanent marine exclusion zones would have a HIGH negative impact on the chokka squid fishery at Thyspunt, for which no practical mitigation is available.

Coastal amenity, scenic quality and cultural landscape are not peripheral concerns for the property market in the affected area. They are primary drivers of demand, rental yield and price for a residential, retirement and tourism-led economy. Where the applicant's own specialists have produced findings of this character at the scoping stage, those findings bear directly on property value, the ability to sell, and the residential and holiday-market character of the affected area, and must be assessed as part of the property and tourism impact analysis.

The Final Scoping Report cannot rationally treat Thyspunt as the preferred site while specialist findings of high significance and unmitigated character sit on the applicant's own record. SFPO does not in this submission lead the specialist environmental objection on these matters but raises them insofar as they bear on its property-owner mandate.

The SFPO therefore submits that the DSR cannot rationally recommend Thyspunt as the preferred site while leaving these core property-owner impacts unquantified and unresolved. These impacts must be assessed before the Final Scoping Report is accepted, not merely deferred as matters for later consideration.

7.2 Municipal Services, Infrastructure and Ratepayer Exposure (Material Defect)

The DSR identifies major municipal and infrastructure implications but does not provide the necessary assessment of local capacity, funding responsibility or ratepayer exposure. The proposed construction workforce and associated job-seeker influx would require water, sanitation, electricity, waste services, roads, healthcare, emergency services, policing and housing support. While SFPO notes that the dedicated worker village is planned to be built outside Humansdorp, the wider Kouga municipality, including the affected area, would still face cumulative pressure from contractors, sub-contractors, job-seekers, accompanying households and additional service demand. The DSR itself identifies the need for a municipal infrastructure capacity assessment, but that assessment has not been completed before Thyspunt is recommended as preferred.

The municipal capacity assessment must also account for existing seasonal pressure. The affected area already experiences a major December/January population increase from approximately 10,000 to 11,000 people out of season to between approximately 30,000 and 50,000 people during the peak holiday period. The DSR does not assess whether municipal water, sanitation, electricity, roads, waste, healthcare, emergency services and policing can absorb both the normal seasonal peak and the additional project-related demand.

SFPO further submits that the EIA must assess whether the proposed Thyspunt development and its associated infrastructure are consistent with the Kouga Local Municipality Spatial Development Framework, Integrated Development Plan and municipal infrastructure planning. A development of this scale has direct implications for land use, municipal services, road infrastructure, emergency planning, rates, local economic planning and public investment priorities. These implications must be assessed transparently against the planning instruments adopted under SPLUMA, and not left to separate future processes that bypass the property-owner and ratepayer constituency.

The SFPO objects to the fragmented treatment of supporting infrastructure. The DSR excludes external road upgrades, off-site construction camps, staff accommodation and emergency planning infrastructure from the ESIA battery limits, while also acknowledging that excluded activities may

influence the environmental acceptability of the project. That approach is not adequate for property owners and ratepayers who will experience the consequences through service pressure, infrastructure disruption, rates exposure and municipal capacity constraints.

7.3 Emergency Planning and Evacuation (Fatal Flaw in the Assessment)

Emergency planning and evacuation are not only public safety concerns. They are also central to property market confidence, insurance, access to bond finance, development restrictions and the long-term residential and tourism character of the affected area.

The DSR carries Thyspunt forward without demonstrating that evacuation is feasible for the affected area. It records evacuation timeframes and states that evacuation must be demonstrated through a traffic evacuation model accepted by the National Nuclear Regulator, yet no Evacuation Time Estimate modelling is presented. The DSR also does not specify the peak holiday population to be used for evacuation planning and does not assess the single paved access route into St Francis Bay, which crosses the Kromme River, as a likely evacuation bottleneck.

Any evacuation model that does not test the peak holiday population would materially understate the population at risk. SFPO's planning estimate is that the normal out-of-season population is in the order of 10,000 to 11,000 people, increasing to between approximately 30,000 and 50,000 people during the December/January peak holiday period. Evacuation must be tested against both scenarios, and against a credible failure scenario for the Kromme River bridge crossing.

For property owners, this is not a theoretical matter. It affects personal safety, family safety, visitor safety, insurance and lending confidence, property marketability and the long-term viability of the area as a retirement and tourism destination. A site cannot be treated as preferred while the most basic emergency-planning question remains unanswered: whether the affected population can be evacuated safely and within the required timeframes.

7.4 Construction Traffic, Dust, Noise and Residential Amenity (Material Defect)

The DSR identifies construction traffic, dust and noise impacts but does not adequately assess their community-level consequences. Construction traffic estimates rely on old Nuclear-1 data rather than current project-specific estimates for the proposed 5,200 MW facility. Construction routing through or near residential and business areas is treated mainly as a road management issue, not as a long-term amenity, safety and property impact.

The air quality assessment identifies significant dust impacts, yet the DSR does not provide a receptor-specific assessment for affected communities and properties. The noise study states that construction noise will not be quantified, despite the likely 10 to 15 year construction period and despite the impact at Thyspunt remaining moderate after mitigation. The DSR's own comparative noise findings indicate that Bantamsklip performs better, which is a comparative point that goes directly to the rationality of the preferred-site recommendation. For property owners, these impacts affect daily life, holiday accommodation, rental appeal, tourism confidence and property values.

7.5 Tourism, Retirement Market and Local Economy (Material Defect)

The affected area's property market is closely linked to tourism, retirement, holiday-home ownership and coastal lifestyle value. The DSR recognises that the area has scenic coastal landscapes, low levels of industrial development and a tranquil natural character, but it does not model the construction-period impact on seasonal tourism, accommodation demand, holiday rentals, restaurants, local businesses or commercial property. It also does not assess how nuclear proximity

and prolonged construction may alter the affected area's competitive positioning as a retirement and lifestyle destination.

The EIA should also assess impacts on beach access, coastal recreation and coastal amenity, including the role these features play in property value, tourism demand, holiday rentals and the area's market identity. Coastal amenity is not a peripheral concern in this market: it is a primary driver of demand and price.

The scale of the seasonal population increase is itself evidence of the area's tourism and holiday-home character. A population increase from approximately 10,000 to 11,000 people out of season to between approximately 30,000 and 50,000 people during the December/January peak period is inconsistent with any assessment that treats the affected area as only lightly tourism-dependent.

The DSR also acknowledges that the local economy may suffer when the construction workforce leaves, but it does not model the transition from a large construction workforce to a much smaller operational workforce. SFPO is concerned that short-term construction benefits may be overstated while longer-term market and business risks are under-assessed.

7.6 Housing, Informal Settlement, Security and Cumulative Community Burden (Material Defect)

SFPO's concern under this heading is practical and property-focused. Workforce-driven housing pressure, informal settlement growth, untreated service strain and increased crime exposure depress property values, increase rates and policing costs, undermine tourism confidence and shift cost onto ratepayers. These are property-owner and ratepayer impacts before they are anything else.

The DSR identifies serious social risks associated with a large construction workforce and job-seeker influx, including housing pressure, informal settlement growth, crime, gender-based violence, substance abuse and social tension. Several of these impacts are rated very high before mitigation and high after mitigation. The DSR does not provide adequate housing, informal settlement, policing capacity or cumulative community impact assessments.

St Francis Bay and surrounding communities should be assessed properly where they bear concentrated or disproportionate impacts. SFPO does not frame this submission as a general social-justice objection. It is raised because the cumulative effects directly influence the stability and functioning of the broader property-owning and ratepaying community.

7.7 Site-Selection Logic and Nuclear-1 History (Fatal Flaw in the Assessment)

The DSR records that Duynefontein was authorised under the Nuclear-1 process and that the current process therefore investigates the remaining sites. SFPO submits that this is insufficient. The Nuclear-1 record is directly relevant to the current preferred-site conclusion and must be expressly disclosed, explained and reconciled.

Although the Nuclear-1 FEIR recommended Thyspunt, the competent authority did not authorise Thyspunt and instead granted Environmental Authorisation for Duynefontein.¹ The current DSR carries Thyspunt forward as the preferred site for a substantially larger 5,200 MW facility, without providing a reasoned analysis of what has changed environmentally, socially, technically, legally or institutionally since the Nuclear-1 process.

¹ SRK Consulting, *Review of the Environmental Impact Reports for Eskom's proposed Nuclear-1 Project, Duynefontein*. The Nuclear-1 Final Environmental Impact Report identified Thyspunt as the preferred site, but the Department granted environmental authorisation for the Nuclear-1 project at Duynefontein on 11 October 2017.

This omission is material. The DSR does not explain why the considerations that ultimately resulted in Duynefontein being authorised rather than Thyspunt no longer apply. It also does not explain why the larger scale of the proposed facility alleviates, rather than intensifies, those considerations. The DSR scopes Bantamsklip out on grounds of site readiness, transmission distance, cost and schedule, while recording that Bantamsklip is not fatally flawed and remains a viable site. It does not, however, provide a current comparative environmental, social, emergency-planning and property-impact assessment of the two sites on updated data.

For property owners and ratepayers in the affected area, the consequence is that a preferred-site recommendation has been advanced on an incomplete comparative record. The DSR asks affected communities to accept renewed site-preference consequences for Thyspunt without explaining why the previous Nuclear-1 outcome no longer matters, and without showing how Bantamsklip compares against Thyspunt under current environmental, social, technical, emergency-planning, infrastructure and property-impact conditions.

SFPO submits that this does not demonstrate the reasoned consideration of feasible and reasonable alternatives required at scoping stage. The Final Scoping Report must engage with the Nuclear-1 record on its merits, must explain why Thyspunt is now supportable for a larger facility where it was not authorised for the earlier Nuclear-1 proposal, and must provide a genuine comparative assessment against Bantamsklip on current data before any preferred-site conclusion is confirmed.

7.8 Procedural Unfairness and Public Participation Defects (Fatal Flaw in the Assessment)

The public participation process for the DSR materially constrained the ability of Interested and Affected Parties, including SFPO and its members, to engage meaningfully with the specialist material on which the DSR's preferred-site recommendation depends.

This concern is supported by a contemporaneous email from the Thyspunt Alliance to WSP dated 8 April 2026, which recorded that several appendix files could not be opened on either the project website or the free data site, that the appendices on the free data site were not clearly named or labelled, and that these access and navigation problems were hampering stakeholders' ability to review the material and compile informed comments. The email requested urgent resolution of the accessibility issues, clearer naming and organisation of the appendices, and an extension to the comment period. A copy of the email is included as Annexure C.

SFPO acknowledges that the public review period was extended, first to 25 May 2026 and subsequently to 29 May 2026. However, the concern is not simply the number of calendar days allowed for comment. The concern is that the effective review period for key specialist material was materially reduced by the unavailability, staged release, split-file release or intermittent availability of specialist reports and supporting documents.

In particular, the Socio-Economic and Oceanographic Scoping Reports were not available for download from the start of the public review period and were only made available, on a split-file basis, on or after 10 April 2026. Further specialist files, including parts of the Public Participation Report and other supporting material, were either unavailable during parts of the review period or were not reliably accessible. The later extensions did not fully cure this defect, because Interested and Affected Parties did not have a full and reliable review period for the complete specialist record.

The public meetings convened during the review period also did not cure the defect. They did not present the substantive findings, assumptions and limitations of the specialist reports in a manner that enabled affected communities to test the evidentiary basis for the preferred-site recommendation. In addition, minutes of key public participation meetings were not available for the

full duration of the review period, reducing the time available to consider the meeting record, responses given and unresolved issues before comments were due.

The cumulative effect is that SFPO, its members and other Interested and Affected Parties were not afforded a meaningful opportunity to participate in the scoping process. SFPO submits that the Final Scoping Report should not be accepted unless all specialist appendices, supporting documents and public-meeting minutes are first made publicly available, and a further public participation period of not less than thirty (30) days is provided from the date of full and reliable document availability.

8. Consolidated Relief Sought

The relief sought is set out in three parts: primary relief, required corrections before any acceptance of the Final Scoping Report, and alternative relief, without prejudice.

8.1 Primary Relief

SFPO requests that the Director-General, DFFE:

1. Decline to accept the Final Scoping Report unless the material deficiencies identified by SFPO are corrected.
2. Direct that Thyspunt not be confirmed as the preferred site on the current record, because the DSR does not provide sufficient information to support that conclusion.
3. Require the Final Scoping Report to be revised and reissued for public comment if any new or materially revised assessments are produced.

8.2 Required Corrections Before Acceptance of the Final Scoping Report

SFPO requests that the Final Scoping Report not be accepted unless the Final Scoping Report and Plan of Study for EIA are amended to address the following matters as mandatory requirements:

1. The Plan of Study for EIA must include an Evacuation Time Estimate (ETE) as a mandatory specialist study. The draft ETE must be released for public review during the EIA phase and must model, at minimum, ordinary out-of-season conditions and the December/January peak holiday period. For scoping purposes, this should include a planning range of approximately 10,000 to 11,000 people out of season and approximately 30,000 to 50,000 people during the peak holiday period, or such corrected ranges as are established through a transparent population methodology. The study must expressly model the single paved access route and the Kromme River bridge crossing as a potential bottleneck, road-capacity constraints, traffic-control assumptions, emergency-services capacity, vulnerable populations, visitor populations, schools, retirement facilities, Sea Vista, Cape St Francis, St Francis Bay and Oyster Bay, together with public disclosure of all assumptions, inputs and limitations.
2. The Plan of Study for EIA must require confirmation or scenario-based assessment of the Emergency Planning Zone boundaries for the proposed 5,200 MW facility, with mapping of affected properties, affected populations, evacuation routes and institutional responsibilities.
3. The Plan of Study for EIA must require a municipal infrastructure capacity assessment covering water, sanitation, electricity, roads, waste, emergency services, healthcare, schooling, policing, costs, timing and funding responsibility, including peak seasonal demand and additional project-related demand.

4. The Plan of Study for EIA must require integrated assessment of associated and enabling infrastructure, including roads, worker accommodation, construction camps and emergency-planning infrastructure, rather than treating these as disconnected future processes.
5. The Plan of Study for EIA must require an affected-area-specific property-value assessment, conducted by independent valuation expertise, with peer review and transparent methodology. The assessment must be segmented by property type, including residential property, holiday letting property, commercial property, retirement property and vacant erven. It must include engagement with insurers, reinsurers and bond-finance providers, and must define a geographic study area covering the Emergency Planning Zone and an appropriate buffer.
6. The property-value assessment must include a review of available international evidence on property-value impacts in communities adjacent to nuclear installations, applied to the affected area with clear explanation of relevance, limitations and local differences.
7. The Plan of Study for EIA must require updated construction traffic estimates based on the current proposed 5,200 MW project, and not merely on earlier Nuclear-1 traffic assumptions.
8. The Plan of Study for EIA must require receptor-specific assessment of dust, noise, construction traffic and amenity impacts on affected residential, tourism and coastal communities.
9. The Plan of Study for EIA must require a tourism, retirement-market, holiday-rental and local economic assessment focused on the affected area, including coastal amenity, beach access and the role these factors play in property values, rental values and local economic confidence.
10. The Plan of Study for EIA must require housing, informal settlement, crime and security assessments tied to municipal capacity, SAPS capacity and funded implementation commitments.
11. The Final Scoping Report must assess the consistency of the proposed development and its associated infrastructure with the Kouga Local Municipality Spatial Development Framework, Integrated Development Plan and municipal infrastructure planning.
12. The Final Scoping Report must disclose the Nuclear-1 FEIR recommendation in favour of Thyspunt, the competent authority's subsequent authorisation of Duynefontein rather than Thyspunt, and a reasoned explanation of what has changed environmentally, socially, technically, legally or institutionally to justify the current preferred-site recommendation.
13. All specialist appendices and supporting documents that were unavailable, inaccessible or only partially available during the original public review period must be released to the public, together with the minutes of all public meetings held during that period. A further public participation period of not less than thirty (30) days must run from the date of full document availability.
14. Any new or materially revised assessments produced in response to this submission must be released for public comment for a period of not less than thirty (30) days before they are relied upon to confirm a preferred-site conclusion or to support any later environmental authorisation recommendation.
15. SFPO requests that the applicant and EAP engage directly with SFPO as an organised property-owner and ratepayer body on property values, development rights, insurance,

access to bond finance, municipal services, emergency planning, tourism impacts and local infrastructure implications.

8.3 Alternative Relief, Without Prejudice

If DFFE nevertheless allows the process to proceed to the EIA phase, and without prejudice to SFPO's primary objection, SFPO requests that the Plan of Study for EIA be amended to include all assessments, corrections and public review requirements listed in this submission and in Annexure A.

9. Reservation of Rights

The SFPO reserves all rights available to it and its members in relation to this process, including the right to submit further comment, request information, participate in any further public participation process, object to any Final Scoping Report, appeal any decision where applicable, and seek appropriate legal relief should the process proceed on an inadequate or procedurally defective basis.

This submission does not constitute acceptance of the adequacy of the DSR, the preferred-site recommendation, or the deferral of material issues to the EIA phase. Any requests made for matters to be included in the EIA phase are made in the alternative and without prejudice to the SFPO's primary objection that the DSR should not be accepted in its current form.

Annexure A: Consolidated SFPO Issue Register

This annexure summarises the issue register prepared for the SFPO. Each issue is framed through the SFPO mandate: property owners, commercial property owners, ratepayers, residents, local businesses, municipal services, emergency planning, tourism, infrastructure, property values, insurance, access to bond finance, development rights and the long-term residential and tourism character of the area.

Issue	Objection	Classification
001	Property value impacts within EPZ not quantified	Fatal Flaw
002	Property insurance within EPZ not assessed	Material Defect
003	No compensation framework for property value diminution	Material Defect
004	Loss of subdivision and development rights within EPZ	Material Defect
005	Municipal rates base erosion from property value decline	Material Defect
006	EPZ dimensions for 5,200 MW not established	Fatal Flaw
007	No Evacuation Time Estimate modelling conducted	Fatal Flaw
008	Evacuation planning does not specify peak holiday population	Fatal Flaw
009	Single access route and river bridge not assessed as evacuation constraint	Fatal Flaw
010	Municipal services capacity not assessed	Material Defect
011	Supporting infrastructure not budgeted or integrated into assessment	Material Defect
012	Traffic data is 16 years old	Material Defect
013	Construction access and traffic impacts on Sea Vista not assessed at receptor level	Material Defect
014	Construction traffic routing through residential areas not assessed	Material Defect
015	Construction dust from major earthworks not properly assessed	Material Defect
016	Construction noise over 10 to 15 years not quantified	Material Defect
017	Construction period impact on seasonal tourism economy not modelled	Material Defect
018	Retirement destination market positioning altered	Material Defect
019	Construction-to-operation economic contraction not modelled	Material Defect
020	Housing affordability and tenant displacement not assessed	Material Defect
021	Informal settlement growth from job-seekers not assessed	Material Defect
022	Crime and security impacts not adequately assessed	Material Defect
023	Nuclear-1 FEIR recommended Thyspunt but DFFE authorised Duynefontein; no explanation of changed circumstances for larger facility	Fatal Flaw

ISSUE-001: Property value impacts within EPZ not quantified

Classification: Fatal Flaw

The DSR acknowledges possible property value decline but does not quantify the impact or assess the affected-area property market specifically.

Requested outcome: Require an independent, peer-reviewed property value assessment addressing saleability, market confidence, EPZ proximity and local property types, including residential, holiday-letting, commercial, retirement and vacant erven.

ISSUE-002: Property insurance within EPZ not assessed

Classification: Material Defect

The DSR does not assess whether EPZ designation affects insurance availability, premiums, exclusions, policy terms or insurance-related property market confidence. SFPO understands, based on insurance advice received, that nuclear-incident exclusions are a common feature of South African insurance and may affect the availability, scope, exclusions, terms or risk assessment applied to certain categories of insurance, including life, funeral, medical and short-term property insurance.

Requested outcome: Require formal engagement with insurers, reinsurers, and disclosure of the insurance consequences for the affected area.

ISSUE-003: No compensation framework for property value diminution

Classification: Material Defect

The DSR acknowledges possible property value decline but proposes no property value guarantee, buy-out or compensation framework.

Requested outcome: Require the property-value assessment to quantify residual financial loss to property owners in the affected area. Questions of compensation arising from any such loss fall to be addressed in the appropriate forum; the EIA should disclose and assess the issue rather than leave it unquantified.

ISSUE-004: Loss of subdivision and development rights within EPZ

Classification: Material Defect

The DSR describes restrictions on development rights within the PAZ and UPZ but does not quantify the property-value loss. Depending on the final EPZ controls imposed, EPZ designation may effectively restrict subdivision, second-dwelling rights, guesthouse use, retirement-village development and commercial uses, with material consequences for property value, marketability and development potential.

Requested outcome: Require a property-level audit and valuation of sterilised development rights, and an explicit assessment against SPLUMA and the Kouga SDF/IDP.

ISSUE-005: Municipal rates base erosion from property value decline

Classification: Material Defect

The DSR does not assess the effect of property value decline on the Kouga Municipality rates base while service demands increase.

Requested outcome: Require a Kouga-specific local fiscal impact assessment.

ISSUE-006: EPZ dimensions for 5,200 MW not established

Classification: Fatal Flaw

The DSR assumes Koeberg-style EPZ dimensions while acknowledging that Thyspunt-specific zones are still to be determined. This affects evacuation, property values, development rights, insurance and bond finance.

Requested outcome: Require NNR-confirmed or scenario-tested EPZ boundaries with property and population mapping for the affected area.

ISSUE-007: No Evacuation Time Estimate modelling conducted

Classification: Fatal Flaw

The DSR states that evacuation must be demonstrated through a traffic evacuation model accepted by the NNR, but no such model is presented. This leaves unresolved whether the affected area can be evacuated within required timeframes, especially during peak holiday periods and over constrained roads.

Requested outcome: The FSR should not be accepted unless ETE modelling is completed or expressly required, with public disclosure of assumptions and results, modelling both the normal population of approximately 10,000 to 11,000 and peak holiday population of approximately 30,000 to 50,000.

ISSUE-008: Evacuation planning does not specify peak holiday population

Classification: Fatal Flaw

The DSR recognises seasonal population peaks but does not specify the peak holiday population for evacuation modelling. SFPO's planning estimate is approximately 10,000 to 11,000 out of season, rising to approximately 30,000 to 50,000 during the December/January peak holiday period.

Requested outcome: Require evacuation modelling based on both normal out-of-season and peak holiday population scenarios, using the above range pending verified figures from the EAP.

ISSUE-009: Single access route and river bridge not assessed as evacuation constraint

Classification: Fatal Flaw

The single paved access route into St Francis Bay, which crosses the Kromme River, is a likely physical constraint on evacuation but is not assessed as a capacity-limiting bottleneck.

Requested outcome: Require bridge-capacity modelling, blockage and failure scenarios and alternative evacuation arrangements, tested against the peak holiday scenario.

ISSUE-010: Municipal services capacity not assessed

Classification: Material Defect

The DSR identifies the need for a municipal infrastructure capacity assessment but does not complete it before recommending Thyspunt.

Requested outcome: Require a full municipal capacity assessment and funding-responsibility matrix, including peak seasonal demand and additional project-related demand.

ISSUE-011: Supporting infrastructure not budgeted or integrated into assessment

Classification: Material Defect

The DSR excludes key associated infrastructure from the ESIA while acknowledging that it may influence environmental acceptability.

Requested outcome: Require integrated assessment of all associated infrastructure, including cost, funding responsibility and municipal capacity.

ISSUE-012: Traffic data is 16 years old

Classification: Material Defect

The DSR's Traffic and Transportation Scoping Study uses Eskom's June 2010 'Nuclear-1 Traffic Estimates during Construction and Operation' as its planning basis (Appendix G.20; DSR p.60). These estimates are approximately 16 years old and were prepared for the smaller Nuclear-1 project. Current construction traffic generation for the proposed 5,200 MW facility has not been provided, and updated traffic counts are deferred to the EIA phase.

Requested outcome: Require updated project-specific construction traffic estimates before traffic, safety and evacuation conclusions are relied on.

ISSUE-013: Construction access and traffic impacts on Sea Vista not assessed at receptor level

Classification: Material Defect

The construction entrance and related traffic impacts are treated largely as road-engineering matters. Sea Vista is not properly assessed as a receptor community across traffic, noise, air quality and health risk studies.

Requested outcome: Require Sea Vista to be assessed as a primary receptor community across traffic, noise, air quality and health risk studies, and require a comparative access-option assessment based on community exposure.

ISSUE-014: Construction traffic routing through residential areas not assessed

Classification: Material Defect

The DSR does not assess route-specific impacts on communities along the R330, R102 and Humansdorp routes, including safety, dust, noise, road damage and amenity.

Requested outcome: Require a dedicated construction traffic routing assessment and public review of the construction traffic management plan.

ISSUE-015: Construction dust from major earthworks not properly assessed

Classification: Material Defect

The DSR identifies significant PM10 and dustfall impacts but does not provide receptor-specific assessment for affected communities and properties.

Requested outcome: Require current data, expanded modelling, affected-property identification and enforceable dust monitoring.

ISSUE-016: Construction noise over 10 to 15 years not quantified

Classification: Material Defect

Construction noise will not be quantified, key receptor communities are omitted, and Thyspunt remains moderate after mitigation while Bantamsklip performs better.

Requested outcome: Require quantified noise modelling, noise contour maps and explanation of site-comparison implications.

ISSUE-017: Construction period impact on seasonal tourism economy not modelled

Classification: Material Defect

The DSR recognises the tourism character of the area but does not model visitor numbers, accommodation, holiday rental or revenue impacts during construction.

Requested outcome: Require an affected-area-specific tourism, holiday-rental and holiday-property economy assessment.

ISSUE-018: Retirement destination market positioning altered

Classification: Material Defect

The DSR does not assess how nuclear association and long construction impacts may alter the affected area's position as a retirement and lifestyle destination.

Requested outcome: Require a retirement and lifestyle destination assessment and correction of the tourism/agricultural characterisation issue.

ISSUE-019: Construction-to-operation economic contraction not modelled

Classification: Material Defect

The DSR acknowledges reduced income after construction workers leave but does not model business, accommodation or commercial property impacts.

Requested outcome: Require a local economic transition model and vulnerable-sector assessment.

ISSUE-020: Housing affordability and tenant displacement not assessed

Classification: Material Defect

The DSR acknowledges rental pressure and post-construction surplus housing but does not assess rental stock, vacancy, displacement or managed accommodation delivery.

Requested outcome: Require a dedicated housing impact assessment.

ISSUE-021: Informal settlement growth from job-seekers not assessed

Classification: Material Defect

The DSR acknowledges informal dwelling growth but does not map likely settlement areas or assess municipal capacity and long-term legacy.

Requested outcome: Require a spatial informal settlement risk assessment.

ISSUE-022: Crime and security impacts not adequately assessed

Classification: Material Defect

The DSR rates workforce presence risks very high before mitigation and high after mitigation but does not assess policing capacity or provide a funded security plan.

Requested outcome: Require a dedicated crime and security assessment agreed with SAPS and Kouga Municipality.

ISSUE-023: Nuclear-1 FEIR recommended Thyspunt but DFFE authorised Duynefontein; no explanation of changed circumstances for larger facility

Classification: Fatal Flaw

The DSR records Nuclear-1 history but does not explain why Thyspunt, not previously selected, is now viable for a larger project.

Requested outcome: Require disclosure of Nuclear-1 findings and a reasoned explanation of changed circumstances.

Annexure B: Population Estimate Methodology and Verification Requirements

SFPO'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 SFPO's 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, SFPO 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.

Annexure C: Email to WSP Regarding Inaccessible Public Documents

This annexure records a contemporaneous email sent to WSP by the Thyspunt Alliance on 8 April 2026 regarding public access problems with the DSR appendices and supporting documents. SFPO relies on this email as evidence that document-access and file-identification problems were raised during the public review period and were not merely identified after the fact.

Subject: Documents not available

Date: Wednesday, 8 April 2026 at 09:27:58 +0200

From: Thyspunt Alliance <thyspunt@amaziko.co.za>

To: Nuclear-PP-EIA@wsp.com

WSP Team,

We would like to bring to your attention that several of the relevant appendix files are currently not accessible. These files cannot be opened on either the project website or the free data site. This is significantly hampering our ability to properly review the material and compile informed comments. Given the already very tight timeframes provided for submissions, these technical issues place us at a clear disadvantage. Until such time as full and reliable access to all supporting documentation is rectified, we believe it would be reasonable and necessary to consider an extension to the commenting period.

In addition, it is problematic that the appendices on the free data site are not clearly named or labelled. This makes navigation and cross-referencing extremely difficult, further compounding the challenge of conducting a thorough review.

The email requested that WSP resolve the accessibility issues as a matter of urgency, clearly name and organise the appendices on the free data site, and grant an extension to the comment period to allow stakeholders sufficient time to engage meaningfully with the full set of documents.

The email was signed by Trudi Malan, Co-ordinator, Thyspunt Alliance.