



FORMAL SUBMISSION IN RESPONSE TO THE DRAFT SCOPING REPORT

Nuclear 2 Environmental Impact Assessment — Thyspunt

Submitted by:	Seal Point Boardriders Club
In respect of:	Proposed Nuclear Power Station at Thyspunt, Eastern Cape
EIA Proponent:	Eskom SOC Ltd
Lead EIA Consultant:	WSP Group Africa
Date:	25 May 2026

To the EIA Project Manager and Competent Authority,

The Seal Point Boardriders Club ("the Club") hereby submits this formal submission in response to the Draft Scoping Report for the proposed Nuclear 2 project at Thyspunt. The Club registers its significant concern regarding the anticipated negative impacts on Seal Point and the surf breaks of the St Francis Bay region, and objects to the adequacy of the current Scoping process in addressing those impacts.

The Club is a registered sports organisation affiliated to Surfing South Africa, the national federation and governing body for the sport of surfing in South Africa, established in 1993. The Club represents hundreds of surfers — from young children in development programmes to lifelong residents — who use Seal Point and surrounding breaks daily. The Club conducts competitive surf contests, youth coaching programmes, and community surf development activities. These surf breaks are among the most visited and economically significant in South Africa, attracting surf tourists year-round from across the country and internationally, with associated economic activity supporting accommodation, food and beverage, retail, and surf-related enterprises throughout the St Francis Bay and Cape St Francis communities.

The Club requests formal registration as an Interested and Affected Party in terms of GNR 982 of 2014, to the extent that such registration has not already been confirmed.

1. Eskom's Own Evidence Confirms Negative Impact on Seal Point

This submission draws directly from two sources of Eskom's own documentation: first, the *Impact of Sediment Disposal on Local Surf Breaks* (Giljam, 2011b, forming Appendix E16 Ap1 of the Nuclear-1 FEIR, Gibb, 2016, "the 2011 Addendum"); and second, the current Marine Physical, Water Quality, Sediment Transport and Shoreline Change Scoping Report (Appendix G13, WSP W&M; S01.REV01, March 2026, "G13"). Both documents confirm negative surf break impacts at

Thyspunt.

G13 itself acknowledges the significance of what is at stake. Section 5.3.1.1 states:

"Thyspunt is associated with internationally significant surf breaks (e.g., Seal Point and Jeffreys Bay), where wave breaking behaviour is highly sensitive to seabed morphology. The Surfbreaks Addendum by Giljam (2011b) indicates that even minor bathymetric changes or thin sediment deposits could alter wave quality, with effects potentially persisting if sediment remains in place."

The 2011 Addendum's formal impact assessment rates the effect of sediment disposal at the shallow disposal site on Seal Point as follows:

Nature	Intensity	Extent	Duration	Probability
Negative	Medium	Medium	Medium	Medium

G13's own current impact rating table (Table 5-14) confirms and updates this finding, rating spoil disposal impacts on surf breaks as follows across the two candidate sites:

	Bantamsklip (no mitigation)	Bantamsklip (mitigated)	Thyspunt (no mitigation)	Thyspunt (mitigated)
Significance	VL	VL	M	L
Confidence of rating	High	—	Moderate	—

The surf break impact at Thyspunt is rated Medium significance without mitigation, with only Moderate confidence — while Bantamsklip is rated Very Low with High confidence. This is not a speculative concern raised by objectors. It is a finding recorded in Eskom's own current specialist documentation.

2. No Effective Mitigation Exists — and the Impact May Be Irreversible

The 2011 Addendum concludes that no effective mitigation exists for the sediment impact on Seal Point. Halving the disposal rate was assessed but found inadequate: it "did not reduce the sediment thickness, since the transport of the coarser sediment away from the disposal mound occurs on a much longer time scale than the disposal operation." The report concludes:

"The only effective mitigatory measure to reduce sediment thickness is to reduce the volume of sediment requiring marine disposal through finding alternative disposal methods."

No confirmed alternative disposal methodology has been identified, committed to, or assessed in the current Scoping process.

G13 Table 5-14 goes further, stating for Thyspunt:

"Disposal of large quantities of material may have an irreversible impact on surf breaks in the long-term, but is dependent on disposal locality and material type."

The word "irreversible" does not appear in the 2011 Addendum. It appears in Eskom's current specialist report. The mitigation proposed in G13 Table 5-14 — "avoid shallow disposal near

sensitive reef bathymetry; shift to deeper disposal/alternative sites" — is conditional on alternative sites being identified and confirmed. None have been. This unresolved matter is a material gap in the current Scoping process.

3. The Bruce's Beauties Finding Does Not Offset the Seal Point Finding

The Club acknowledges that the 2011 Addendum and G13 both note that shallow disposal may produce a minor positive effect on Bruce's Beauties in St Francis Bay. This finding does not offset the negative finding at Seal Point and should not be interpreted as such, for the following reasons:

- The 2011 Addendum notes that Bruce's Beauties "has been negatively affected" by prior development and is "not nearly as good or consistent as when it was first ridden." The marginal sediment addition modelled is partial restoration of a break already damaged by unrelated development, not a new environmental benefit.
 - Seal Point and Bruce's Beauties are distinct surf breaks operating under different bathymetric conditions and serving different communities. A minor modelled improvement at one break cannot be traded off against a medium-intensity potentially irreversible impact at another.
 - The net assessment across both breaks, on Eskom's own ratings, remains negative.
-

4. The Current Scoping Process Has Failed to Adequately Address Known Prior Findings

The current Scoping process is being conducted for a proposed project at the same site by a proponent with direct access to the previous EIA record. The Draft Scoping Report has not adequately addressed the documented adverse finding on surf break impact from that previous EIA.

Moreover, G13 Section 1.2 describes itself as providing "an update of the 'Oceanography and Surf Breaks' (Giljam, 2011a, b) specialist impact assessment report." However, the note appended to Table 1-1 in G13 states, in the authors' own words:

"These reports were not yet available/received by the time that this report was written, consequently the assessment is based on the interpretation of the data contained in these reports provided in the main EIA specialist assessment 'Oceanography and Surf Breaks (Giljam, 2011a, b) undertaken for the Nuclear-1 EIA.'"

G13 therefore cannot constitute a genuine update of the 2011 assessment. It is a re-description of it, produced without access to the underlying technical studies. The surf break impact assessment in the current EIA scoping process is unchanged in substance from 2011 — not because the conditions have not changed over fifteen years, but because the data required to assess whether they have changed was unavailable. This is precisely why G13's surf break impact rating for Thyspunt carries only Moderate confidence. A scoping process that proceeds on this basis does not meet the standard required by NEMA or GNR 982 of 2014.

5. Multiple Unassessed Surf Break Impact Pathways

The Club notes that surf break impacts arise across three distinct disposal pathways identified in G13, none of which has been fully assessed at scoping stage:

5.1 Offshore and nearshore disposal

G13 Table 5-1 explicitly identifies, as a typical impact of nearshore disposal near Thyspunt, that incompatible sediment may "alter wave breaking" at the surf breaks. Table 5-14 rates this impact as Medium significance without mitigation, with Moderate confidence, based on 2011 data. No updated modelling has been conducted.

5.2 Beach nourishment oversupply

G13 Section 5.3.1.2 identifies a separate surf break risk pathway arising from the proposed beneficial use of spoil for beach nourishment at St Francis Bay. The section notes that disposal volumes from Thyspunt could be "up to roughly six times" the total nourishment requirement of the authorised St Francis Bay coastal protection scheme, and that oversupply could cause "changes to wave breaking patterns (notably important given the surf breaks in the area)." G13 then states expressly that "the present scoping assessment does not consider it beyond the contextual discussion provided above." A scoping report that identifies a surf break risk arising from a proposed disposal methodology and then declines to assess it has produced an incomplete assessment. This risk pathway must be included as a named issue in the Plan of Study.

5.3 Operational phase

G13 Table 5-14 records the surf break impact phase as "Operation" rather than Construction, reflecting that the bathymetric change from disposed material constitutes a persistent operational-phase phenomenon. The current Scoping process has not addressed the operational phase surf break impact pathway independently. A nuclear power station involves permanent coastal infrastructure with ongoing effects on sediment dynamics over its operational life of sixty years or more.

6. Site Comparison: Bantamsklip

This is a comparative site selection process. G13 itself provides the most direct statement of the surf break impact differential between the two sites. Section 5.3.1.1 states:

"From a physical-process perspective, no comparable surf-break or geometry-sensitive hydrodynamic receptors are currently identified offshore of Bantamsklip, although this should be confirmed through ongoing assessment."

This is confirmed quantitatively in G13 Table 5-14, which rates spoil disposal impacts on surf breaks as Very Low with High confidence at Bantamsklip, versus Medium with only Moderate confidence at Thyspunt. Eskom's own current specialist report therefore confirms, with high confidence, that the surf break impact pathway at Bantamsklip is not a material concern — while simultaneously rating the same impact at Thyspunt as medium significance with only moderate confidence, on the basis of 15-year-old data. The contrast could not be more clearly stated in Eskom's own documentation.

Notwithstanding that qualification, the site suitability assessment in G13 Table 7-1 does not list surf break impact as a standalone named criterion. The overall preference for the Thyspunt site expressed in Table 7-1 is reached without the surf break impact differential being explicitly weighed as a factor in the comparative conclusion. A site suitability assessment that rates surf break impact as Medium versus Very Low across the two sites in Table 5-14, then omits it as a named criterion in the site suitability summary in Table 7-1, has not properly carried that finding through to the comparative conclusion. The site selection process must explicitly weigh the confirmed, potentially irreversible surf break impact at Thyspunt against the relative absence of this impact pathway at

7. Requests and Requirements

The Club formally requests that the following be incorporated into the Final Scoping Report and the Plan of Study for the EIA phase:

- 7.1 That the impact of the project on Seal Point and the surf breaks of the St Francis Bay region be designated as a **key issue** in the Final Scoping Report, with a dedicated, updated Surf Break Impact Assessment — including updated numerical sediment transport modelling to current baseline conditions — commissioned as a named specialist study in the Plan of Study. The Club notes that even G13's own Moderate confidence rating for Thyspunt surf break impact is acknowledged to be based on the 2011 Giljam assessment, because the underlying technical modelling studies were unavailable at time of writing (G13, Table 1-1 note). Updated modelling is not optional — it is the minimum standard required for a credible EIA phase assessment.
- 7.2 That the specialist surf break study address all three identified impact pathways: (a) offshore and nearshore spoil disposal; (b) the beach nourishment oversupply scenario identified but not assessed in G13 Section 5.3.1.2; and (c) the operational phase, given that G13 Table 5-14 records the surf break impact as an operational-phase phenomenon persisting beyond the construction period.
- 7.3 That a quantified socio-economic assessment of surf-related tourism and economic activity in the affected region be conducted as part of the EIA phase, with specific assessment of the economic consequences of surf break degradation on the St Francis Bay and Cape St Francis communities.
- 7.4 That all spoil disposal alternatives — marine and terrestrial — be identified and assessed in the EIA phase, with the 2011 finding that deep disposal reduces but does not eliminate impacts on Seal Point explicitly addressed, and with any proposed beneficial use scenario (including beach nourishment) assessed against the specific technical requirements of the authorised St Francis Bay coastal protection scheme.
- 7.5 That the surf break impact assessment expressly address the site comparison between Thyspunt and Bantamsklip, with the differential identified in G13 Table 5-14 (Medium versus Very Low) carried through as a named criterion in the site suitability assessment.
- 7.6 That the Seal Point Boardriders Club, surf industry stakeholders, and surf tourism operators be formally consulted as Interested and Affected Parties throughout the EIA process.

8. Reservation of Rights

The Club reserves its right to submit further detailed technical and legal comment during the EIA phase, to commission independent specialist input, and to pursue all available legal remedies under the National Environmental Management Act 107 of 1998 and the Promotion of Administrative Justice Act 3 of 2000, should the process fail to address the concerns set out in this submission adequately.

Submitted on behalf of the Seal Point Boardriders Club, affiliated to Surfing South Africa.

Name:	Dan Thornton
Capacity:	Chairman, Seal Point Boardriders Club
Date:	25 May 2026
Contact:	