

As a first time proponent to the EIA report process, having never been involved in anything like this; I would like to submit my comments.

I would like to comment firstly regarding the public participation meetings. These meetings are a complete sham and designed as a front to appease the conscience of Eskom and Argus Gibb. I would imagine a large sum of money and time is spent convening these meetings (consultants travelling to the relevant areas, - travel and accommodation costs, facilitation charges etc.) however, in reality, the meetings achieve very little in terms of perceived objectives. Public Participation meetings are held from 18h00 to 20h00. The consultants go through their presentations for an hour and a half (slightly more as they finished at 20h00). These presentations do not cover many of the relevant topics covered in the report. Thereafter, half an hour is offered for public participation (questions). I have to wonder what can possibly be achieved in this timeframe on a report of hundreds of pages of highly technical information. In the meeting I attended in Hermanus the Facilitator welcomed the community and in her introduction, listed a number of points she'd made note of, as being the most important or significant listed from comments made during the scoping phase. None of these points were covered subsequently by the Argus Gibb consultants during their presentations. The word participation would imply that these meetings should involve and engage constructively with participants and consultants and not that the meeting would be a lecture driven exercise, designed to manipulate the community into discussion based on the information the consultants wish to discuss. Secondly to leave 30 minutes for public comment on a report of this magnitude is a fatal flaw itself. I find it mind boggling that issues like health impacts are scoped out – supposedly to be dealt with by the Nuclear Commission. This makes the assumption that they will do so effectively. I don't believe one can assume anything of the kind. This is merely taking advantage of man in the street, who may not know how the process fits together.

My comments regarding the specialist report itself, specifically the Impact on Tourism within the Bantamsklip area, follow:

As a successful business owner with more than 7 years experience in the tourism arena, I feel qualified to comment on some of the misconceptions uttered by the consultants in the tourism section of the Draft EIR.

1. **Section 1.2.2.** Assumption • *The sphere of impacted tourism asset is between 0km and approximately 20km from the proposed nuclear power station platform.*

In **Section 2.** Description of Affected Environment the report states that *“This marine asset draws the majority of visitors and is largely responsible for driving the local tourism economy and associated industry. However, many of these are day visitors who stay overnight in Hermanus where the accommodation sector is much larger than at Gansbaai.”* ... *“The general tourism product is relatively underdeveloped, and tourist support services, facilities and industries are few in number and still developing.”*

If the consultants knew and admitted that because the tourism infrastructure within the 20km sphere is under developed, why have they not included statistics from further a field. If the consultants were really interested in portraying the accurate tourism impact figures, surely Hermanus and perhaps even a mention of a % of Cape Town bed-nights to be included. The figures between the numbers doing shark dives and bed-nights do not correlate – surely these people must sleep somewhere and these figures should be taken into account for impact in both sectors (bed-nights and shark diving numbers).

2. more assumptions ...

- *As tourism is a complex sector, the comparative figure used for each area is the number of bed-nights which is the only true measure of tourism performance. The value of bed-nights spent in each area was accepted as the most accurate feasible representation of the value of tourism.*
- *Tourism bureaux accurately present industry data in each area.*

I disagree that this is a true representation of value of tourism for an area. I also challenge that Tourism bureaux present accurate data (not that they are purposely being misleading, just that they do not collect data on a regular basis). In the first instance the number of bed-nights is completely inaccurate even within the 20km area. **Table 2.2** used a figure of 1111 bed-nights, (and yes that was in 2007) is misrepresentative today. According to SATSA staff and the tourism statistics barometer for the region, there was a 43% increase in the region in the last year alone – specifically in eco/adventure tourism. The Tourism Bureaux information is not updated regularly and represents only a slight percentage of visitors actually going into these centres. As has been outlined, national, provincial and local government/municipalities don't have a cohesive strategy and therefore most tourism related establishments do their own marketing and research.

Having done a snap survey myself, taking 10 establishments within the 20km area and then including another 10 in the Hermanus area, to ensure international tourism perceptions are comparable. (Establishments surveyed were distributed between different economic and grading ranges as well as between seafront and non seafront accommodation.) I was found that less than 0.1% of establishment annual business comes via the tourism office or has any involvement with the tourist bureaux. Approximately 70% is made up of internet bookings, there is a significant % of walk-in business for some establishments, as well as a % word of mouth return guests and travel agent bookings. None of these %'s were presented. More than 50% of establishment annual bookings come to the region for Eco tourism – sharks, whales, flora and fauna, and the closer establishments are to the Bantamsklip area, the higher the percentage coming for Eco Tourism.

Note: These figures were obtained from actual practical experience and interviews with longstanding industry stakeholders who have knowledge of International tourism preferences.

3. In **Section 1.2.3 Limitations** the report states *“Tourism by nature is complex and diverse but, due to time and budgetary constraints and moreover for comparative purposes, the annual value of bed-nights was accepted in this study. However, the full concept of tourism product and asset is far greater than bed-nights, and includes an array of service and support industries that have not been included or quantified in this study.”*

**Table 4.4** Estimates the annual value of the Shark and Whale watching industry, however, I must again reiterate, figures have been quoted on shark diving at 40 000. These people must sleep somewhere (20km area, Hermanus or even Capetown), this impact has not been calculated into the bed-night impact calculation. Additionally no impact study was presented for flora and fauna tourism i.e. botanical or birding societies, which would also contribute to eco-tourism. The area contains a number of red data species.

**Section 2.** represents Bantamsklips' “seasonal period” being Christmas to New Year. This may be so for local tourism where tourism impact is restricted largely to family visitation and holiday house letting, however eco tourism impact would need to be measured for ‘high season’ in terms of International Eco-tourist season, which is actually from August – December. The figure of R350 per bed-night is vastly misrepresentative (taking into account establishments such as

Grootbos and many others, where exclusivity is not taken into account. What surveys or evidence has been collected from interviews of the Overseas market tourist? The Overseas tourist market are the higher proportion of spend on both accommodation and eco or adventure tourism, than specified.

The statement that due to time and budgetary constraints, only the annual value (albeit inaccurate) of bed-nights was accepted in this study. Statements like “due to time and budgetary constraints’, ‘these concepts are very difficult to quantify’ ‘Specific tourism visitation or value statistics are neither systematically collected in, nor available for, the areas in proximity to proposed’ are clearly a cop out by the consultants for work inaptly completed. I find these types of statements unacceptable as excuses for improper research as a basis for a report which will have such significance to the impact on eco tourism.

The point was made that because of the complex and diverse industry tourism, as a product, includes service and support industries which were not included or quantified. These industries are an important consideration and although difficult to quantify should not go without mention.

Job creation within Hospitality Industry  
Hardware (maintenance of structures)  
Interior Design Retail Outlets  
Food stuffs and Cleaning Products  
Florists  
Restaurants  
Beauty Treatments  
Media related industries (web design / internet connectivity and printed media)  
Transport and fuel costs

Incidentally, having consulted in the Shark and Whale Watching industries for the past few years, I was surprised to see that only the actual figures for the boat trip (R1250) had been included in the impact assessment. This would have been a very simple example for the calculation to quantify the various service and support industries which go hand in hand with the basic industry, had the consultants so wished. Excluded totally were the figures from the peripheral spend, T-shirts, Caps, bags, DVD's books etc. as well as the positive spin off spend towards local communities. The direct BEE contribution to Socio Economic Development spend and Enterprise Development Spend. Believe me, these are substantial. The other support industry the consultants neglected to mention in the Shark Diving industry was the volunteer programs, where students contribute money and services in volunteer conservation programs.

In a study commissioned in 2003 and done by Jane K Turpie, Barry J Heydenryck and Stephen J Lambert, they utilised accurate data from, the surveys conducted by the University of Cape Town, S A National Parks Board and, Marine Coastal Management and estimated the cost of conservation. The study included the value of Tourism. It stated “Western Cape has a 28% share of the national tourist market, and more than 50% of international visitors include this province in their itinerary. In 1998 a study by West Gro & KPMG it was established that tourism accounts for 9% of the Western Capes Gross Geographic Product.

One way of estimating the contribution of natural resources to tourism receipts is to establish their contribution of tourist decisions to visit the area. In this study, international visitors rated natural environment more highly than domestic tourists, visiting the Agulhas Plain. Figures were extrapolated to determine a value of R6406 million of value of tourism that could be ascribed to the natural environment. Alternatively one could use the proportion of tourists for whom an aspect of the natural environment was the main motivation for their visit. In a study by Grossman & Koch 1995 80% of tourists surveyed cited natural or semi-natural (rural) attractions as the primary reason for their visit.

Although figures above were derived many years ago the motivations remain consistently significant today and values are substantially increased.

4. *“Tourism is also inherently linked to the concepts of brand, image and perception. These concepts are very difficult to quantify but have a tremendous impact on the industry. The success of a tourism destination is determined by the competitive choice that exists between various destinations. This choice, in turn, is based on the perceptions of those destinations held by potential tourists, specifically in terms of the degree of attraction and the ultimate satisfaction of their visitation requirements. These requirements are as diverse as the tourists themselves, ranging from location to environment to cost. Specific tourism visitation or value statistics are neither systematically collected in, nor available for, the areas in proximity to proposed Nuclear-1 sites.”*

(This confirms there is some amount of emotion to the motivation of destination) *“The success of tourist destination determined by competing choices”* Tourists choose South Africa because of its natural unspoiled beauty – they chose this destination to get away from Industry and Nuclear Power Stations in their own countries.

The specialists have tried to manipulate the facts by comparing a ‘rural’ ‘small country village’ environment, abundant in unspoiled natural beauty and heritage, with an urban city environment. It is for this specific reason that visitors come to the area. The report would have us believe that the *“change in the areas visual attractiveness”* (power-lines and power-station) and the *“change in residential and holiday visitor perception of character and appeal”* would not have any negative impact. The increase in business trade and construction staff was portrayed as a positive. I don’t believe they have an understanding on the Tourism industry. Increases in business and construction staff trade may have a positive impact on “bed-nights”, however, at what cost? This is not a long term sustainable increase. It will create an artificial tourism industry and change the dynamic of eco tourism in changing the social amenity. The charm of the unspoiled country side and the undeveloped towns add to the value.

5. In **Section 5.1** specialists would have us believe that people only have problems with Nuclear Power Stations where accidents are concerned. It suggests that tourists, in fact, want to visit Nuclear Power Stations.

Picture the scene, two visitors talking. (They’re on a 14 day holiday between Cape Town and travelling down the garden route. 4 days in the Mother City and then 1 or 2 nights taking in some of the scenic wonders)

Visitor 1 – “Honey, should we take in the sunshine today and explore the coastline look at the flowers and plants, visit the nature reserve, watch some whales?”

Visitor 2 – “No darling, I’d rather do a tour of the Nuclear Power Station, we’ve only got a day and I’d rather spend it there!”

In a recent article in the Cape Times, Melanie Gossling interviewed a group of Italian tourists alighting from a Shark Diving Trip, on their feelings about a Nuclear Power Station be built near Dyer Island and they were absolutely ‘horrified’ at the thought.

I would think it’s a little naive in these days of suicide bombers to consider allowing day visitors near a Nuclear plant?

Bisconti's Research was put forward showing recent studies in America, where Public Support for Nuclear Energy has increased dramatically. Having read the research, by Bisconti's own admission these studies show that understanding of public opinion should be viewed in different contexts depending on which and how questions were posed. The study found, for example that there was an increased positive response to building more Nuclear Power Stations, however, there was also an increase in the respondents saying no they definitely didn't want them built near 'their' homes. Respondents also thought the government should give more tax breaks to companies trying to bring in alternative energy sources.

Bear in mind the research was done in America, one of the worlds' biggest energy guzzlers, and the survey taken directly after President Obama voiced his support of building more Nuclear Plants during a speech shortly after taking office. Finally Bisconti's March survey, also found that the public was far more concerned about job creation and economic growth than energy and the environment at the present time.

I believe European based research would paint a different picture.

6. The report found that *"the community in the Bantamsklip area expressed concern was relating to the impact of heavy-vehicle traffic during the construction period on local roads. These roads are not built for such traffic, and it was felt that there would be a need for strict control both over the routes to be used and over noise pollution from heavy vehicles which could be a factor in Gansbaai with negative impacts on tourism"*. In mitigation *"Transport Controls"* were suggested. The wording *"Adequate controls on heavy-vehicle traffic during the construction phase will be required in order to mitigate negative impacts such as noise, road damage and congestion."* Brings me to ask, What is meant by Adequate and who will police this? Would this be the task of local or provincial traffic authorities? They are already inadequately trained and staffed (by their own admission). The report seems bent on comparing our standards with overseas first world countries. Does this go for our driving standards too?