



**To: The Honourable Minister Dr. Dion George  
Minister of Forestry, Fisheries and Environment**

**For attention: Department of Forestry, Fisheries and the Environment  
Appeals and Legal Review Directorate**

**Attention: Director: Appeals and Legal Review**

**Per Email: [appeals@dffe.gov.za](mailto:appeals@dffe.gov.za)**

**Copy to: SRL Consulting (Pty) Ltd.**

**Attention: Environmental Assessment Practitioner: Mr Jeremy Blood**

**Per E-mail: [jblood@slrconsulting.com](mailto:jblood@slrconsulting.com)**

**Copy to: Shell Offshore Upstream South Africa B.V.**

**Contact Person: Ms Fabiola Rossato**

**Per E-mail: [Fabiola.Rossato@shell.com](mailto:Fabiola.Rossato@shell.com)**

**29 July 2025**

Dear Honourable Minister

**APPEAL PURSUANT TO SECTION 43(1A) OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 AND REGULATION 4(1) OF THE NATIONAL APPEAL REGULATIONS, 2025 AGAINST ENVIRONMENTAL AUTHORISATION GRANTED TO SHELL OFFSHORE UPSTREAM SOUTH AFRICA B.V. IN RESPECT OF THE PROPOSED OFFSHORE EXPLORATION WELL DRILLING IN LICENSE BLOCK NORTHERN CAPE ULTRA-DEEP, LOCATED OFFSHORE BETWEEN PORT NOLLOTH AND LAMBERTS BAY, WESTERN CAPE (OFF THE WEST COAST OF SOUTH AFRICA).**

Application Reference Number: 12/3/274

1. This is an appeal against the decision (dated 20 June 2025) of the Director General: Department of Mineral and Petroleum Resources (“**Director General**”) in respect of the proposed development of the proposed offshore exploration well drilling in license block northern cape ultra-deep, located offshore between Port Nolloth and lamberts bay, western cape (off the west coast of South Africa).
2. This appeal is made jointly by the Green Connection and Natural Justice.
  - 2.1. The Green Connection is a registered non-governmental organisation, that believes that economic growth and development, improvement of socio-economic status and conservation of natural resources can only take place within a commonly understood framework of sustainable development. The Green Connection aims to provide practical support to both the government and non-governmental/civil society sectors, which are an integral part of sustainable development.

- 2.2. Natural Justice: Lawyers for Communities and the Environment, a non-profit organisation specialising in environmental and human rights law in Africa – with a focus on the pursuit of social and environmental justice for local and indigenous communities. Natural Justice offers direct support to local and indigenous communities impacted by the ever-increasing demand for land and resources, through legal empowerment.
3. In compliance with regulation 4(1) and 4(2) of the Appeal Regulations, 2025, we hereby confirm that:
- 3.1. we received notification of the environmental authorisation on 9 July 2025, from the EAP, and accordingly this appeal is submitted within 20 days;
- 3.1.1. We wish to place it on record that Natural Justice was unable to access the Final Environmental and Social Impact Assessment Report (“**ESIAR**”) from the website of the EAP due to the link being defective. We wrote to the EAP on 15 July 2025 and the defective link was only repaired and made operation on 18 July 2025. The appeal administrator opted not to issue a decision to our request for an extension citing that there was insufficient time to consider and comment on the appeal due to the timing of the request.
- 3.2. this letter, with the attached appeal submissions and supporting documentation, is copied – and will be sent simultaneously – to:
- 3.2.1. the applicant, Shell Offshore Upstream South Africa B.V. and
- 3.2.2. the SRL Consulting (Pty) Ltd.
4. We enclose and hereby submit the following documents:
- 4.1. a copy of the notification email from the Environmental Assessment Practitioner is attached hereto as **Annex A**.
- 4.2. the detailed Grounds of Appeal, together with supporting documentation as **Annex B**;
- 4.3. the DFFE’s appeal response form containing the grounds of appeal, in Word format as **Annex C**;
- 4.4. proof of the Appellants’ mandates to submit this appeal as **Annex D** and
- 4.5. A Copy of the Environmental Authorization as **Annex E**.
5. The Appellants have sought, to the best of their ability, to comply with the legal requirements of the National Appeal Regulations, 2025.
6. Please confirm receipt of this letter and the enclosed annexes comprising the Appeal.
7. Should you have any queries in relation to this Appeal, or require any additional information, please let us know.
8. Kindly also keep us updated on the progress of the Appeal.

Yours faithfully,



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**NATURAL JUSTICE**

*Per:* Rantsho Moraka

[rantsho@naturaljustice.org](mailto:rantsho@naturaljustice.org)



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**THE GREEN CONNECTION**

*Per:* Liziwe McDaid

[liziwe@mweb.co.za](mailto:liziwe@mweb.co.za)

**AND COPY TO:**

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