IN THE HIGH COURT OF SOUTH AFRICA

(WESTERN CAPE DIVISION, CAPE TOWN)

Case No 24492 / 2024

In the matter between:

AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED	First Applicant
THE GREEN CONNECTION NPC	Second Applicant
NATURAL JUSTICE	Third Applicant

and

DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES	First Respondent
MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT	Second Respondent
TGS GEOPHYSICAL COMPANY (UK) LIMITED	Third Respondent
MINISTER OF MINERAL AND PETROLEUM RESOURCES	Fourth Respondent

---

FILING SHEET

Documents filed herewith:

1. Supplementary Founding Affidavit with annexures;
2. Confirmatory Affidavit – Shahil Singh;
3. Confirmatory Affidavit – Lucien Limacher;
4. Confirmatory Affidavit – Fiona Bester; and
5. Proof of electronic service on Bowmans

CHENNELLS ALBERTYN
REF: FIONA BESTER – 021 883 3189
Email: fiona@chennellsalbertyn.co.za

DATED AT STELLENBOSCH THIS 9TH DAY OF MAY 2025.

CHENNELLS ALBERTYN
Attorneys for Applicants
44 Alexander Street
STELLENBOSCH, 7600
Tel: 021 883 3189
E-mail: fiona@chennellsalbertyn.co.za
and carol@chennellsalbertyn.co.za
Per: Fiona Bester/cvdv/12252FB
C/O CHENNELLS ALBERTYN
18A Greenwich Grove
Station Road
RONDEBOSCH, 7700

TO: **THE REGISTRAR**
HIGH COURT
CAPE TOWN

AND TO: **THE STATE ATTORNEY CAPE TOWN**
Attorneys for First and Fourth Respondents
4th Floor, 22 Long Street
Cape Town, 8001
Attention: L Ngwenya and B Cata
Ref: Your ref: 4399/24/P11

AND TO: **THE STATE ATTORNEY CAPE TOWN**
Attorneys for Second Respondents
4th Floor, 22 Long Street
Cape Town, 8001
Attention: A Hoosain
Ref: Your ref: 4402/24/P40

AND TO: **BOWMANS ATTORNEYS**
Attorneys for Third Respondent
11 Alice Lane
SANDTON, 2196
Tel: 011 669 9402
Ref: C Tucker / S Sibeko/TGS
Attention: Claire Tucker
Per email: claire.tucker@bowmanslaw.com
Attention: Sibongile Sibeko
Per email: Sibongile.sibeko@bowmanslaw.com

IN THE HIGH COURT OF SOUTH AFRICA

(WESTERN CAPE DIVISION, CAPE TOWN)

Case No 24492 / 2024

In the matter between:

AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED	First Applicant
THE GREEN CONNECTION NPC	Second Applicant
NATURAL JUSTICE	Third Applicant

and

DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES	First Respondent
MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT	Second Respondent
TGS GEOPHYSICAL COMPANY (UK) LIMITED	Third Respondent
MINISTER OF MINERAL AND PETROLEUM RESOURCES	Fourth Respondent

---

SUPPLEMENTARY FOUNDING AFFIDAVIT

I, the undersigned,

JOHANNES WALTER STEENKAMP

do hereby make oath and say:

5093

1. I am an adult small-scale fisherman and the Chairperson of the first applicant. I deposed to the founding affidavit and I remain authorised to represent the first applicant in this matter.

2. The averments contained herein are within my direct knowledge and belief, unless the context indicates otherwise, and are both true and correct. When I make assertions of a legal nature I do so with due regard to privileged advice provided to the first applicant by the applicants' legal representatives (which privilege is not hereby waived) and which advice I believe to be sound.

3. I refer to the confirmatory affidavits deposed to by Shahil Singh, on behalf of the second applicant, and Lucien Limacher, on behalf of the third applicant confirming the content of this affidavit, filed together with this affidavit.

4. The applicants have perused the Rule 53 records made available by the State Attorney on behalf of the First and Second Respondents, and the purpose of this affidavit is to supplement the founding affidavit as contemplated in Rule 53(4) and present further evidence in support of the relief that the applicant seeks in this matter.

5. The applicants stand by the relief sought in their notice of motion and the grounds of review set out in my founding affidavit and supplement their grounds of review as set out below.

6. This supplementary affidavit is structured as follows:

6.1. In SECTION A, I discuss the Rule 53 Records of the First and Second

5028

Respondents;

6.2. In SECTION B, I discuss additional relevant documents obtained from the Rule 53 Records in support of the grounds of review and add further grounds of review:

6.2.1. After discussing the Rule 53 Record of the First Respondent, I add a ninth ground of review relating to documents and information that were not before the First Respondent and were not taken into consideration;

6.2.2. I discuss the Rule 53 Record of the Second Respondent in three parts and insert a tenth ground of review, relating to the following flaws in the appeal process:

(a) no application form;

(b) a fundamentally flawed appeal process; and

(c) the Minister's expert advice.

7. In this affidavit I make use of the same abbreviations and acronyms as I did in the applicants' Founding Affidavit.

SECTION A – THE RULE 53 RECORDS

8. As I shall explain below, a Rule 53 Record was made available to the applicants' attorneys on 5 March 2025, and it was not until 8 April 2025 that the Rule 53 Record of the First Respondent was made available to the

applicants' attorneys and it was clarified that the first record was the Rule 53 Record of the Second Respondent.

9. The review application was filed on 14 November 2024. On 4 February 2025 the applicants' attorneys served a notice in terms of Rule 30A on the First and Second Respondents calling upon them to despatch the Rule 53 Record within fifteen days.

10. On 19 February 2025 the applicants' attorneys in an email requested the State Attorney to provide the Rule 53 Record, and to indicate which portion of the Rule 53 Record served before the First Respondent, and which portion served before the Second Respondent. A copy of the letter containing this request, dated 19 February 2025, is attached marked "**JWS1**".

11. The distinction between the records is material because without it the parties cannot know what information was before the First Respondent ("the DG") when he approved the EA and what information was before the Minister when she decided the appeals. It is also a requirement of Rule 53(2) that the First Respondent and the Second Respondent file their respective records.

12. A flash drive containing a digital copy of what purported to be the Rule 53 Record of the First and Second Respondents was delivered to the applicants' attorneys by the State Attorney on 5 March 2025. That record runs to 3252 pages. I attach a copy of the Index thereto marked "**JWS2**", from which it can be seen that it was called "INDEX: FIRST AND SECOND RESPONDENTS' RECORD". However, it failed to indicate which portion of the Rule 53 Record

served before the First Respondent, and which part served before the Second Respondent.

13. The State Attorney thus failed to comply with the applicants' attorneys' request on 19 February 2025 in JWS1. As a result, the applicants' attorneys repeated their request. A copy of this letter, dated 7 March 2025, is attached marked "**JWS3**".

14. The State Attorney again failed to comply with this request, and the applicants' attorneys sent a further letter to the State Attorney on 12 March 2025 repeating the request, and requesting confirmation that the record delivered is the complete record. A copy of this letter, dated 12 March 2025, is attached marked "**JWS3a**".

15. The State Attorney again failed to comply with this request. As a result, the applicants' attorneys repeated their requests, and submitted that the time limits for service and filing of the applicants' supplementary affidavits should be extended depending on receipt of clarification in regard to the requests. A copy of this letter, dated 19 March 2025, is attached marked "**JWS3b**".

16. The State Attorney eventually responded thereto in an email on 7 April 2025 alleging that two separate electronic records had been delivered to the applicants' attorneys, and providing in the email what it purported to be both a link to the record which served before the First Respondent and a link to the record which served before the Second Respondent. A copy of this email is attached marked "**JWS3c**"

17. As the applicants' attorney pointed out to the State Attorney in an email reply the next day, 8 April 2025, this was not correct. A copy of that email is attached marked "**JWS3d**". The reply stated that:

17.1. firstly, only one record had been delivered to the applicants' attorney on a flash drive on 5 March 2025 – the one I have referred to above, purporting to be the record of the First and Second Respondents, the index of which is "JWS2";

17.2. secondly, what purported to be a link in the State Attorney's email of 7 April 2025 to the First Respondent's record was not able to be opened; and

17.3. thirdly, since the applicants' attorneys were unable to ascertain which part of the Record received relates to which respondent, an extension of time to file the supplementary papers until 30 April 2025 was requested.

18. Attached to the email in JWS3d were three documents I have referred to above: the index to the Record (JWS2) and the two prior emails to the State Attorney to which JWS3a and JWS3b refer.

19. Thereafter, on 8 April 2025 the State Attorney sent the applicants' attorney an accessible link to the First Respondent's Rule 53 Record, comprising 266 pages, and an index thereto, entitled "RECORD OF DECISION INDEX". However, the said record was not paginated and the index also did not reflect any pagination. I attach a copy thereof marked "**JWS3e**".

20. On 10 April 2025 the applicants' attorney wrote to the State Attorney

JWS

requesting a paginated bundle, and requesting further that the index to the Second Respondent's Rule 53 Record be amended to reflect that it only pertains to the Second Respondent, as the State Attorney had indicated in JWS3c. The letter also requested an extension of time to file the applicants' supplementary papers until 9 May 2025 given the circumstances. A copy of this letter is attached marked "**JWS4**".

21. The applicants' attorney received no response thereto from the State Attorney and therefore paginated the record of the First Respondent and amended its index to reflect the pagination. For convenience, the pagination of the Rule 53 Record of the First Respondent has the prefix "R" to distinguish it from the Rule 53 Record of the Second Respondent. A copy of the paginated Rule 53 Record of the First Respondent and index thereto is attached marked "**JWS5**".

22. I refer to the confirmatory affidavit of Fiona Bester in this regard.

SECTION B – ADDITIONAL RELEVANT DOCUMENTS AND FURTHER GROUNDS OF REVIEW

A: THE RULE 53 RECORD OF THE FIRST RESPONDENT

23. The Rule 53 Record of the First Respondent, JWS5, reveals that the only document that served before the DG was the application form submitted by the third respondent to the Petroleum Agency South Africa ("PASA"), together with the appendices thereto.

24. Notably, the documents before the DG when he considered and granted the

JWS

EA did not include any BAR, specialist reports, EMPr, or comments from IAPs thereon, as required by the EIA Regulations.

Ninth ground of review

25. The applicants' ninth ground of review is that the DG granted the EA without considering any BAR, specialist reports, EMPr, or comments from IAPs thereon, in breach of section 24O of NEMA read with Regulation 18 of the EIA Regulations, with the result that the DG's decision to grant the EA is reviewable on one or more of the following PAJA review grounds:

25.1. a mandatory and material procedure or condition prescribed by an empowering provision was not complied with, as contemplated in section 6(2)(b) of PAJA;

25.2. relevant considerations were not considered and irrelevant considerations were taken into account, as contemplated in section 6(2)(e)(iii) of PAJA;

25.3. the EA contravened a law and was not authorised by the empowering provision, as contemplated in section 6(2)(f)(i) of PAJA); and

25.4. the EA is not rationally connected to the information before the DG, as contemplated in section 6(2)(f)(ii)(cc) of PAJA.

26. Alternatively, the EA is reviewable in terms of the constitutional principle of legality.

27. In asserting the ninth ground of review the applicants have relied on the

representations by the State Attorney, referred to above, that the Record of the First Respondent, "JWS5", is a complete record of the documents that served before the DG. In the event that the DG discloses that any documents other than those reflected in "JWS5" served before the DG, the applicants reserve the right to further supplement their papers.

B THE RULE 53 RECORD OF THE SECOND RESPONDENT

28. The Final BAR included correspondence documents as a result of the public participation process. Inputs from IAPs and responses from TGS were tabulated, which is commonly referred to as a comments and responses report ("CRR").

29. A copy of the CRR relating to the initial notification in August 2022 is attached marked "**JWS6**", and a copy of the CRR, comprising several tabulated responses to the Draft BAR, is attached marked "**JWS7**". I have inserted these for the sake of completeness, since these were relevant documents for the decisions of both the DG and the Minister.

Flaws in the Appeal Process

(a) A fundamentally flawed appeal process

30. The appeal process was fundamentally flawed, as I shall explain, by the absence of key information and the failure of the Minister to apply her mind to the material before her, the failure to take relevant considerations into account, and her taking irrelevant considerations into account.

JWS

31. The NEMA appeal regulations in GNR 933 dated 12 March 2015 ("the Appeal Regulations"), in Appeal Regulation 4(2)(a), require an appeal to be submitted to the appeal administrator in the form obtainable from the appeals administrator.

32. Appeal Regulation 5 provides for responding statements, including one by "the decision maker", to be submitted to the appeal authority and the appellant. The "decision-maker" in this case was the competent authority, who was the DG, presumably acting under delegated authority. The appeal authority was the Minister.

33. In order to explain what was done in the appeals in this matter, I first need to describe the format in which responding statements are required to be contained, which is a form obtainable from the appeals administrator.

34. The appeal forms include a form in Microsoft Word format listing the grounds of an appellant's appeal in the first of three columns. Responses to the grounds of appeal are then added by the applicant in the second column, and comments by the competent authority (the decision maker) are added in the third column. I shall refer to the composite document as the appeal response report ("ARR").

35. As I shall explain, the Rule 53 Record of the Second Respondent shows that the responses purportedly made by the competent authority were not made by the decision maker, as required by the Appeal Regulations, but by PASA.

36. The appeal decision addresses all six appeals that were lodged against the DG's decision. I have attached the ARRs for each of the six appellants:

SUB

36.1. the ARR for the first appellant, the Western Cape Government, is attached marked "**JWS8**";

36.2. the ARR for the second appellant, the first applicant in this matter, is attached marked "**JWS9"**;

36.3. the ARR for the third appellant, Angela Joubert, from the Berg River Local Municipality, is attached marked "**JWS10**", although I note that the last three pages thereof containing the comments of the applicant (TGS) and the department are not on the appeal form but in separate documents;

36.4. the ARR for the fourth appellant, Oceans Not Oil, is attached marked "**JWS11**";

36.5. the ARR for the fifth appellant, Elaine Mills, is attached marked "**JWS12**"; and

36.6. the ARR for the sixth appellant, being the second and third applicants in this matter, is attached marked "**JWS13**".

37. Regulation 5 of the Appeal Regulations requires the decision-maker, among others, to submit a response to the appeal.

38. The decision-maker, that is, the competent authority, who in regard to the EA was the DG, submitted no response to any of the appeals, as reflected in the response reports, JWS8 to JWS12. The response in each case was submitted by officials of the PASA.

JWS

38.1. In support hereof I point out that the comments by "the Department" in the right-hand column of the appeal response reports were made by PASA officials, where the competent authority was supposed to comment.

38.2. As can be seen from the last page of each of the Annexures JWS9, JWS10, JWS11 and JWS12, they were signed off by S Mnyaka, as the case officer who made the comments on the appeal report, and P Ngesi, the approving supervisor.

38.3. JWS8 was signed off by S Mnyaka and N Thomas as approving supervisor.

38.4. As can be seen from their LinkedIn Profiles that appear in "**JWS14**", S Mnyaka and N Thomas are PASA officials.

38.5. As can be seen from the PASA website, and extract of which appears in "**JWS15**", P Ngesi is a PASA official.

38.6. JWS13 was unsigned, and it is most probable that the comments in the right-hand column were likewise made by PASA officials. I note that the third column of this APP has been changed from 'Comments by Department' to read 'Comments by the DMRE/PASA'.

38.7. The email chain forming part of JWS10 also contains email communication between the Department ("the Department" refers to the the Department of Minerals and Energy, as in the founding affidavit) and PASA, in which the Department, in an email on 10 November 2023 at 1.33pm advised PASA's Sinazo Mnyaka that it could not find 'your comments' regarding two of the

JWS

appellants (Aukotowa and A Joubert).

39. PASA is not the competent authority and had no power to perform the functions of the DG as the decisionmaker in the appeal process.

40. PASA is the agency appointed in terms of section 70 of the MPRDA to perform the functions referred to in Chapter 6 thereof, and whose functions, set out in section 71 of the MPRDA, include "to promote onshore and offshore exploration for and production of petroleum", "to receive applications for reconnaissance permits", and "to evaluate such applications and make recommendations to the Minister of Minerals and Energy".

41. As such, PASA is not an unbiased party in the process. Its function to promote onshore and offshore exploration for and production of petroleum means that it is biased in favour of upholding the EA. PASA cannot lawfully perform the functions of the decision maker, who is required to be objective.

42. PASA's powers and functions as an agency appointed in terms of the MPRDA are contained in the MPRDA, not in NEMA. A competent authority's powers and functions are set out in NEMA.

43. The First Respondent was the competent authority appointed in terms of NEMA, read with section 38A of the MPRDA, presumably acting under delegated authority. I am not aware of any delegation of powers of the competent authority to PASA in terms of NEMA.

44. The Minister, in considering each appeal, made specific mention of "The

Competent Authority's Response", and in doing so quoted directly from the ARRs compiled by PASA. For example, paragraph 2.4 of the Minister's decision, Annexure A3 to the founding affidavit, quotes verbatim from the right-hand column in JWS8.

45. It is plain to see that the Minister considered the responses by PASA in the ARRs to be the responses by the competent authority.

46. On 13 May 2024 the Director and the Chief Director of the Department of Forestry, Fisheries and the Environment sent a briefing note to the Minister advising that the appeal should be decided by 20 May 2024. A copy thereof is attached marked "**JWS16**".

47. Sent together with that briefing note was a recommendation to the Minister from the Director and Chief Director of the Department of Forestry, Fisheries and the Environment, dated 13 May 2024 ("the recommendation"), and a draft appeal decision attached thereto. The recommendation to the Minister was to consider and sign the draft appeal decision that was attached to the recommendation. A copy of the recommendation, signed by the Director and the Chief Director on 13 May 2024, is attached marked "**JWS17**".

48. As appears from the last page of JWS17, the Minister indicated on 22 May 2024 that she took the first of the following three possible actions in regard to the draft appeal decision: "decision signed"; "amended and signed"; and "not approved". In other words, she signed the draft decision unamended.

49. The Record does not include the unsigned draft appeal decision that was

attached to the recommendation. However, I submit that it is most probable that the signed appeal decision in the Rule 53 Record of the Second Respondent (page 3217), which is also annexure A3 to the founding affidavit, is a signed copy of the draft appeal decision that was attached to the recommendation.

50. I attach marked "**JWS18**" a copy of the draft appeal decision that was signed by the Minister on 22 May 2024. As one would expect, it is identical to Annexure A3 to the founding affidavit.

51. I pause to point out that JWS18 is incorrectly described in the index to the Record of the Second Respondent (referring to Item 87 dated 22 May 2024) as "Email enclosing Appeal Decision to Total Energies".

52. I note that the recommendation to the Minister, JWS17, describes some of the background and details of the appeal.

52.1. In paragraph 2.11 thereof it states: "The DMRE submitted comments in respect of the First, Second, Fourth and Fifth Appellants' grounds of appeal on 26 June 2023."

52.2. The only documents in the Record containing comments dated 26 June 2023 are annexures JWS9, JWS11 and JWS12, being the ARRs of the second, fourth and fifth appellants respectively, containing the comments of PASA in the third column.

52.3. The reference in paragraph 2.11 of the recommendation to "the DMRE" is

therefore a reference PASA.

52.4. Paragraph 3 of the recommendation states: "The DMRE was consulted."

52.5. There is no evidence in the Record of any consultation whatsoever with the DMRE.

52.6. The draft appeal decision in JWS18 refers to the "Competent Authority's Response" to the appeals of:

52.6.1. the first appellant, in paragraph 2.4;

52.6.2. the second appellant, in paragraph 2.9, and

52.6.3. the fourth and fifth appellants in paragraph 2.19.

53. The comments that the appeal decision alleges are comments by the competent authority are in fact comments by PASA.

54. The draft appeal decision, JWS18, alleges, in paragraph 2.13 thereof, that there was no response from the competent authority to the third appellant's appeal. While this is technically correct since the competent authority did not respond to any of the appeals, it appears to be a mistaken allegation that there was no appeal response in regard to the third appellant's appeal. However, there was a response from PASA, as can be seen from the last two pages of JWS10.

55. The draft appeal decision makes no reference whatsoever to a response to

the appeal of the sixth appellant, being the second and third applicants in this matter. As I have said, these were contained in JWS13.

56. I note from the draft appeal decision, JWS18, and indeed, from the signed appeal decision, annexure "A3" to the founding affidavit, which is identical to the draft, that the Minister states, in paragraph 3.1.3 thereof, that she has taken into consideration "Comments submitted by the CA on 26 June 2023".

57. "CA" is an abbreviation of "Competent Authority". This is a reference to the comments from PASA on 26 June 2023 referred to above which the Minister thought were the comments of the competent authority.

58. I note further from the draft and signed appeal decisions that the Minister states, in paragraph 3.1.4 thereof, that she has taken into consideration "The information contained in the project file PASA ref: 12/1/40."

59. However, there is no reference to "the project file PASA ref: 12/1/40" in the index to the Record of the Second Respondent and no such file appears in that Record.

60. Had the Minister applied her mind to the information before her, which she failed to do, she would have realised that:

60.1. there was no "project file PASA ref: 12/1/40" before her and that she was lacking relevant information;

60.2. there was no application form before her and that she was lacking relevant

information;

60.3. there were indeed comments in the ARR relating to all six appeals, not just four of them as she states in her appeal decision; and

60.4. the comments in the ARR that were required to be made by the decision-maker were in fact made by PASA.

61. The Minister failed in this regard, which resulted in material errors of fact.

62. In the alternative to paragraph 60.4 above, in the event that the Minister was aware that the comments in the ARR were made by PASA, which is not admitted, the Minister made a material error of law in that she was under the mistaken impression that the PASA was acting in terms of a lawful delegation of the power in terms of NEMA.

(b) Minister's expert advice on the appeals

63. A further flaw in the appeal process is that the Minister instructed the appeals administrator to seek advice from an independent expert in regard to the appeals in terms of Appeal Regulation 6(1), but such advice was not obtained.

64. Appeal Regulation 6 provides:

"*(1) If the appeal authority reasonably believes that expert advice must be sought or that an appeal panel must be appointed, the appeal administrator must source an independent expert or constitute an independent appeal panel, or both, within 10 days from the date of receipt of an instruction from*

the appeal authority.

(2) The appeal panel contemplated in sub-regulation (1) may consist of such number of independent experts and with such expertise as the Appeal Authority may deem necessary under the circumstances.

(3) The expert or appeal panel must provide advice to the appeal administrator within 10 days from the receipt of an instruction from the appeal administrator."

65. In this regard I attached marked "**JWS19**" a copy of a letter that appears in the Record of the Second Respondent, from the Acting-Director: Appeals and Legal Review, who is the appeals administrator contemplated in the Appeal Regulations, dated 5 March 2024, to the State Attorney to brief Advocate Shahnaaz Bismilla, in her capacity as a member of the "Minister's Advisory Appeals Team" to advise the Minister on the appeals lodged.

66. From the existence of the said letter it is necessarily inferred that the Minister, as appeal authority, reasonably believed that expert advice in regard to the appeals was required, and duly instructed the appeals administrator to source such advice.

67. In the light of the complexity of the appeals it was not only reasonable for the Minister to believe that independent expert advice was required, but also necessary to take such advice into consideration.

68. As a legal consequence thereof the independent expert was obliged to render

such advice in terms of Appeal Regulation 6(3).

69. As appears from the Record of the Second Respondent there is no such expert advice, and no other reference to any such expert advice in any of the documents.

70. The Minister therefore, having formed the view that independent expert advice was required in regard to the appeals, and having instructed the appeals administrator to source independent expert advice, failed to take such independent expert advice into consideration.

71. Such failure was in breach of Appeal Regulation 6.

(c) No application form

72. Regulation 16 of the EIA Regulations requires a duly completed application form to be submitted to the competent authority and specifies what it must contain.

73. Since the appeal was an appeal in the wide sense and was a reconsideration by the Minister of the application for the EA, it was essential for the Minister to have regard thereto and to satisfy herself that a valid application had been made.

74. The Rule 53 Record of the Second Respondent contains no application form, and the Final BAR makes no reference to an application form. Therefore, it was impossible for the Minister to consider whether a duly completed

application form in compliance with Regulation 16 had been submitted.

75. The applicants therefore supplement their grounds of review by adding a tenth ground of review, as follows.

The tenth ground of review

76. The applicants' tenth ground of review is that is that in the appeal process:

76.1. the decision maker who granted the EA did not comment on the appeals, which constituted a breach of Appeal Regulation 5 of GNR 993 dated 12 March 2015;

76.2. as a result thereof, the Minister failed to take the comments of the decision maker into consideration;

76.3. as a further result thereof, the Minister took into consideration the comments of PASA, which were irrelevant;

76.3.1. in the alternative to sub-paragraph 3, the Minister made a material error of law in taking the comments of PASA into consideration;

76.4. the Minister failed to have regard to external independent advice sought in terms of Appeal Regulation 6(1); and

76.5. the Minister failed to consider the application form, as required by EIA Regulation 16, and the project file PASA ref: 12/1/40,

with the result that the Minister's decision to uphold the EA is reviewable on one or more of the following PAJA review grounds:

76.5.1. a mandatory and material procedure or condition prescribed by an empowering provision was not complied with, as contemplated in section 6(2)(b) of PAJA;

76.5.2. relevant considerations were not considered and irrelevant considerations were taken into account, as contemplated in section 6(2)(e)(iii) of PAJA;

76.5.3. the decision was materially influenced by an error of law, as contemplated in section 6(2)(d) of PAJA;

76.5.4. the appeal decision contravened a law and was not authorised by the empowering provision, as contemplated in section 6(2)(f)(i) of PAJA; and

76.5.5. the EA and the Minister's decision are not rationally connected to the information before them, as contemplated in section 6(2)(f)(ii)(cc) of PAJA.

77. Alternatively, the EA and appeal decision are reviewable in terms of the constitutional principle of legality.

78. In asserting the tenth ground of review the applicants have relied on the representations by the State Attorney, referred to above, that the Record of the Second Respondent, the index of which appears in JWS2, is a complete record of the documents that served before the Minister. In the event that the Minister discloses that any documents other than those reflected in JWS2

JWS

served before the Minister, the applicants reserve the right to further supplement their papers.

JWSteenkamp

JOHANNES WALTER STEENKAMP

I hereby certify that the deponent has declared that he knows and understands the contents of this Affidavit and that to the best of his knowledge and belief it is the truth, which Affidavit has been signed to and affirmed to before me at Rondebosch on this the 8 day of May 2025.

Karen Crouse.

COMMISSIONER OF OATHS

NAME:

TITLE:

ADDRESS:

KAREN CROUSE
COMMISSIONER OF OATHS
PRACTISING ATTORNEY - R.S.A
2ND FLOOR TANNERY PARK
21 BELMONT ROAD
RONDEBOSCH

JWS

CHENNELLS ALBERTYN
ATTORNEYS, NOTARIES & CONVEYANCERS

P.O. BOX 1022
STELLENBOSCH 7599

44 ALEXANDER STREET
STELLENBOSCH 7600
SOUTH AFRICA

TEL: +27 (0) 21 883 3189
FAX: +27 (0) 21 883 8910
E-MAIL: fiona@chennellsalbertyn.co.za
WEBSITE: www.chennellsalbertyn.co.za

19 February 2025

Our ref: 12391FB/cvdv

The State Attorney
Attention: Mr L Ngwenya
Per email: LNgwenya@justice.gov.za
and BCata@justice.gov.za

Your ref: 4399/24/P11

The State Attorney
Attention: Ms A Hoosain
Per email: AHoosain@justice.gov.za

Your ref: 4402/24/P40

cc: Bowmans Attorneys
Attention: Claire Tucker – Per email: claire.tucker@bowmanslaw.com
Attention: Sibongile Sibeko – Per email: Sibongile.sibeko@bowmanslaw.com

Dear Sirs

RE: AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED, THE GREEN CONNECTION NPC AND NATURAL JUSTICE // DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES, MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT, TGS GEOPHYSICAL COMPANY (UK) LIMITED AND MINISTER OF MINERAL AND PETROLEUM RESOURCES
WESTERN CAPE HIGH COURT CASE NO. 24492/2024 (TGS)

We refer to our Rule 30A Notice served on your offices and request that the Record to be delivered by your client is defined as to indicate clearly which part of the Record served before the First Respondent and which part of the Record served before the Second Respondent.

Kind regards

FIONA BESTER
CHENNELLS ALBERTYN

Partners: GE Williams BA LLB; F Bester BIuris BProc; AJ Dorer LLB; S Etsebeth LLB; GJ Hendriksz BSocSc LLB
Assisted by: E Mukasa LLB;
Consultants: RS Chennells BCom LLB LLM PhD

Rondebosch: 18A Greenwich Grove, Station Road, Rondebosch, 7700 • PO Box 78, Newlands, 7725
Tel: 021 685 8354 • Fax: 021 685 0710
• E-mail: info@chennellsalbertyn.co.za

Stellenbosch: 44 Alexander Street, Stellenbosch, 7600
• PO Box 1022, Stellenbosch, 7599
Tel: 021 883 3189/883 8069 • Fax: 021 883 8910
• E-mail: chenstel@chennellsalbertyn.co.za

In association with Chrystelle van Staden Attorneys

WESSA
BRONZE MEMBER

Carol van der Vyver | Chennells Albertyn

From: Carol van der Vyver | Chennells Albertyn <carol@chennellsalbertyn.co.za>
Sent: Thursday, 20 February 2025 10:52
To: 'L Ngwenya'; 'Bongi Cata'; 'Hoosain Aayesha'; 'Claire Tucker'; 'Sibongile Sibeko'
Cc: 'Fiona Bester'
Subject: Case No. 24492/2024: Aukotowa Fisheries and others / Director-General: Department of Mineral and Petroleum Resources and others
Attachments: doc25868120250220104743.pdf

Dear Sir / Madam

Attached is our letter for your attention.

Kind regards
Carol van der Vyver
Secretary to Fiona Bester (Senior Partner)

CHENNELLS ALBERTYN
Attorneys and Conveyancers

44 Alexander Street, Stellenbosch, 7600
PO Box 1022, Stellenbosch, 7599
Tel: 021 883 3189 Fax: 021 883 8910
Email: carol@chennellsalbertyn.co.za

www.chennellsalbertyn.co.za

Rondebosch Office
18A Greenwich Grove, Station Road, Rondebosch
Tel: 021 685 8354 Fax: 021 685 0710

Always confirm our banking account details telephonically before making any payment. Should you fail to do so, you indemnify Chennells Albertyn Attorneys against any loss you may suffer as a result of your failure to do so.

Disclaimer: The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorised to receive it. If you are not the recipient you are hereby notified that any disclosure, copying, distribution or taking action in relation to the contents of this information is strictly prohibited and may be unlawful.

Spoofing, Whaling and Phishing Alert: Should you receive an email from us stating that our bank details have changed please do not act on such notification. We have not changed our banking details. We ask you to be extremely diligent about checking that all information is 100% correct. Make sure that any email that we send you is from a correct Chennells Albertyn email address and is from a partner or authorised member of staff of Chennells Albertyn which you can ascertain by checking the Chennells Albertyn website. If you are unsure about the banking details you have been provided with, please verify this telephonically with us before making payment. Thank you."

BWS

2458
JWS2

IN THE HIGH COURT OF SOUTH AFRICA

(WESTERN CAPE DIVISION, CAPE TOWN)

Case No: 24492-2024

In the matter between:

AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED	First Applicant
THE GREEN CONNECTION NPC	Second Applicant
NATURAL JUSTICE	Third Applicant
and	
DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES	First Respondent
MINISTER OF FORESTRY, FISHERIES, AND THE ENVIRONMENT	Second Respondent
TGS GEOPHYSICAL COMPANY (UK) LIMITED	Third Respondent
MINISTER OF MINERAL AND PETROLEUM RESOURCES	Fourth Respondent

INDEX: FIRST AND SECOND RESPONDENTS' RECORD

ITEM NO	DATE	DESCRIPTION	PAGE(S)
1.	5 December 2022	EIMS Letter enclosing Final BAR and Application form	1
2.	6 December 2022	Basic Assessment Report	2-349

JW3

3.	17 October 2022	Appendix 1- EAP CVs+declaration	350-366
		Appendix 2: Public Participation	
4.	Undated	Public Participation Report (PPR) Splitter Pages	367-379
5.	05 December 2022	Public Participation Report	380-393
6.	15 December 2022	App 1 - Interested &Affected Parties	394-431
7.	19 August 2022	App 2 - Advertisements-final	432-438
8.	22 August 2022	App 3 - Initial Notification	439-482
9.	29 August 2022 – 03 September 2022	App 4 - CTR Site Notice Proof	483-539
10.	26 August 2022 – 03 September 2022	App 5 - Radio Advertisements	540-544
11.	24 October 2022	App 6 - Initial Public Meeting Minutes	545-715
12.	29 August 2022	App 7 - Public Meeting Reminder Notification	716-736
13.	24 October 2022	App 8 - DBAR Notification	737-797
14.	31 October 2022	App 9 - DBAR Review Public Meeting Documentation	798-867
15.	24 November 2022	App 10 - DBAR Review Reminder Notification	868-916
16.	16 November 2022	App 11 - Datafree SMS Notification	917-925
17.	23 August 2022	App 12 - Table of Correspondence	926-965
18.	29 August 2022	App 13 - Correspondence Document	966-1527

		Appendix 3 – Specialist Studies	
19.	September 2022	App 3.1 - Marine Ecology Impact Assessment final	1528-1805
20.	September 2022	App 3.2 - Fisheries Impact Assessment final	1806-1926
21.	12 October 2022	App 3.3 - Heritage Impact Assessment	1927-2002
22.	05 December 2022	App 3.3.1 - Heritage Declaration	2003-2004
23.	September 2022	App 3.4 - Social Impact Assessment_final	2005-2144
24.	10 October 2022	App 3.5 - Acoustics Technical Report1	2145-2223
25.	5 December 2022	App 3.5.1 - Acoustics Declaration	2224
26.	5 December 2022	App 3.5.2 - Acoustics Declaration2	2225
		Appendix 4: Impact Assessment Matrix	
27.	Undated	App 4 - Impact Matrix	2226
		Appendix 5: Environmental Management Programme	
28.	05 December 2022 October 2023	App 5 - Environmental Management Programme	2227-2291
		Appendix 6: Rehabilitation, Decommissioning and Closure Plan	
29.	25 October 2023	App 6 - Final Rehabilitation Decommissioning and Closure Plan	2292-2304
		APPELANT NO. 1 **WESTERN CAPE GOVERNMENT**	
30.	15 May 2023	Notice of Appeal Email from Western Cape Government	2305
31.	12 May 2023	Western Cape Government Appeal Submission	2306-2307

32.	12 May 2023	Appendix 1 Appeal Form PASA ref 12 1 040 not signed Word format	2308-2312
33.	26 April 2023	Appendix 2 EA Notification (English)	2313-2314
34.	17 April 2023	Appendix 3 Ref 12 1 040 Environmental Authorisation	2315-2331
35.	25 November 2025	Appendix 4 DEADP comments 2022 Nov 25 - Draft BAR for the proposed TGS Orange Basin Reconnaissance Permit	2332-2334
36.	1 March 2022	Appendix 5 WC High Court Judgment case number 1306-22	2335-2357
37.	2 June 2023	37 Email from TGS enclosing ARR for Western Cape Gov Appeal	2358-2359
38.	2 June 2023	38 WCDEADP Applicant Appeal Response	2360-2368
39.	10 November 2023	39 WCDEADP Applicant Appeal Response and PASA Comments Word Format	2369-2382
40.	10 November 2023	40 WCDEADP Applicant Appeal Response and PASA Comments signed PDF Format.pdf	2383-2396
		APPELANT NO. 2 **AUKOTOWA**	
41.	18 May 2023	Autokowa email enclosing Appeal	2397
42.	17 April 2023	2 Aukotowa TGS appeal	2398-2403
43.	18 May 2023	Aukotowa email enclosing appeal second time and EA Notification	2404
44.	17 April 2023	Aukotowa TGS appeal enclosed for a second time	2405-2410

45.	30 October 2023	TGS EA Notification	2411-2412
46.	07 June 2023	email from TGS enclosing comments for Autokowa	2413-2414
47.	26 April 2023	PASA Ref 12.1.040 - Aukotowa Applicant Appeal Response (003)	2415-2431
48.	26 April 2023	8 Responding Statement word format (002)	2432-2448
49.	28 February 2024	9. Email from PASA enclosing Autokowas Comments	2449-2451
50.	26 June 2023	10 email from PASA enclosing Autokowa Oceans Not Oil and Elaine Mills Comments	2452
51.	26 June 2023	11 PASA comments Aukotowa Fisheries Primary Cooperative Ltd due on 29 June 23 (006)	2453-2470
		APPELANT NO. 3 **ANGELA JOUBERT**	
52.	26 April 2023	Email from Angila Joubert	2471-2472
53.	26 April 2023	Bergrivier LM appeals_form - TGS seismic surveys Appeal Questionaire and with response from TGS	2473-2484
54.	29 February 2024	Email enclosing PASA comments to Angela's Appeal	2485-2487
55.	29 February 2024	DFFE Notice to Total Energies about SDCEA appeal	2488
		APPELANT NO. 4 **OCEANS NOT OIL**	
56.	16 May 2023	Email enclosing Oceams Not Oil Appeal	2489-2490
57	17 April 2023	Appendix 1 Oceans Not Oil Appeal Form TGS 1520 AGAINST GRANTING OF LICENCE	2491-2505

58	17 April 2023	Appendix 3 EA	2506-2522
59	16 May 2023	Appendix 4 Oceans Not Oil Appeal against Authorisation of TGS_1520 application	2523-2527
60	16 May 2023	Appendix 11 Oceans Not Oil compliance with Regulations	2528-2532
61	26 June 2023	Email from PASA enclosing comments for Oceans Not Oil, Autokowa, and Elaine Mills Appeal	2533
62	26 June 2023	Oceans Not Oil Appeal PASA comments	2534-2550
		APPELLANT NO. 5 ELAINE MILLS	
63	16 May 2023	Email from Elaine Mills lodgement of Appeal	2551-2552
64	17 April 2023	TGS 1520 Appeal Form	2553-2567
65	16 May 2023	TGS 1520 Appeal	2568-2571
66	26 June 2023	PASA Comments for Appeal by Elaine Mills	2572-2588
		APPELLANT NO. 6 GREEN CONNECTION & NATURAL JUSTICE	
67	18 May 2023	Green Connection & Natural Justice Appeal email	2589-2590
68	Undated	68 TGS Green Connection and Natural Justice Cover Letter	2591-2593
69	18 May 2023	Annexure B	2594-2670
70	28 February 2022	Annexure B1 – Adria N. Weiss Affidavit	2671-2701
71	2021	Annexure B2 – Douglas Nowacek Affidavit	2702-2712
72	19 January 2022	Annexure B3 – Jean Harris Affidavit	2713-2747

73	02 September 2022	Annexure B4 – Social Impact Assessment	2748-2872
74	20 January 2022	Annexure B5 – Camelita Mostert Affidavit	2873-2882
75	14 February 2025	EMail enclosing correct Annexure B5	2883-2885
76	18 May 2023	Correct Annex B5 Carmelita Mostert Letter	2886
77	18 May 2023	Further E-mail from Green Connection enclosing Annexures	2887
78	18 May 2023	Email enclosing Annexure C	2888-2889
79	18 May 2023	Annex C Email to IAPs	2890-2891
80	19 May 2023	Email confirming Annexures received	2892-2894
81	7 June 2023	TGS email enclosing a response	2895-2896
82	26 April 2023	TGS Response GC and NJ Appeal Response Form Template	2897-2994
83	25 October 2023	PASA response to Green Connection and Natural Justice Appeal	2995-3205
		APPEAL DECISION DOCUMENTS	
84	5 March 2024	Letter to State Attorney Johannesburg	3206-3207
85	13 May 2024	Orange Basin Route Form 13 May 2024	3208
86	22 May 2024	LSA 231067 Submission	3209-3216
87	22 May 2024	Email enclosing Appeal Decision to Total Energies	3217-3254

ANNEXURE

The following documents were considered however, due to the confidential nature not included in the record:

ITEM NO.	DESCRIPTION
1.	N/A

CHENNELLS ALBERTYN
ATTORNEYS, NOTARIES & CONVEYANCERS

P.O. BOX 1022
STELLENBOSCH 7599

44 ALEXANDER STREET
STELLENBOSCH 7600
SOUTH AFRICA

TEL: +27 (0) 21 883 3189
FAX: +27 (0) 21 883 8910
E-MAIL: fiona@chennellsalbertyn.co.za
WEBSITE: www.chennellsalbertyn.co.za

7 March 2025

Our ref: 12391FB/cvdv
Your ref: 4399/24/P11

URGENT

The State Attorney
Attention: Mr L Ngwenya
Per email: LNgwenya@justice.gov.za
and BCata@justice.gov.za

The State Attorney
Attention: Ms A Hoosain
Per email: AHoosain@justice.gov.za

Your ref: 4402/24/P40

cc: Bowmans Attorneys
Attention: Claire Tucker – Per email: claire.tucker@bowmanslaw.com
Attention: Sibongile Sibeko – Per email: Sibongile.sibeko@bowmanslaw.com

Dear Sirs

RE: AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED, THE GREEN CONNECTION NPC AND NATURAL JUSTICE // DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES, MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT, TGS GEOPHYSICAL COMPANY (UK) LIMITED AND MINISTER OF MINERAL AND PETROLEUM RESOURCES
WESTERN CAPE HIGH COURT CASE NO. 24492/2024 (TGS)

We acknowledge receipt of the electronic Record in this matter and refer you to our letter dated 19 February 2025 in which we requested that:

> *"the Record to be delivered by your client is defined as to indicate clearly which part of the Record served before the First Respondent and which part of the Record served before the Second Respondent."*

It appears that the first and second respondents have filed a composite record, but have failed to indicate which part of the record served before the first respondent, and which part of the record served before the second respondent. It is imperative that we know what documents served before each of the first and second respondents.

In the circumstances, we are of the opinion that the complete record has not been served and we request an indication of which part of the record served before the first respondent and which part

served before the second respondent, as required by Rule 53(3) read with Rule 53(1). In this regard, it may be necessary for you to amend the index to the Record or file a supplementary index.

Kind regards

FIONA BESTER
CHENNELLS ALBERTYN

CHENNELLS ALBERTYN
ATTORNEYS, NOTARIES & CONVEYANCERS

P.O. BOX 1022
STELLENBOSCH 7599

44 ALEXANDER STREET
STELLENBOSCH 7600
SOUTH AFRICA

TEL: +27 (0) 21 883 3189
FAX: +27 (0) 21 883 8910
E-MAIL: fiona@chennellsalbertyn.co.za
WEBSITE: www.chennellsalbertyn.co.za

12 March 2025

Our ref: 12391FB/cvdv

The State Attorney
Attention: Mr L Ngwenya
Per email: LNgwenya@justice.gov.za
and BCata@justice.gov.za

Your ref: 4399/24/P11

URGENT

The State Attorney
Attention: Ms A Hoosain
Per email: AHoosain@justice.gov.za

Your ref: 4402/24/P40

cc: Bowmans Attorneys
Attention: Claire Tucker – Per email: claire.tucker@bowmanslaw.com
Attention: Sibongile Sibeko – Per email: Sibongile.sibeko@bowmanslaw.com

Dear Sirs

RE: AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED, THE GREEN CONNECTION NPC AND NATURAL JUSTICE // DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES, MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT, TGS GEOPHYSICAL COMPANY (UK) LIMITED AND MINISTER OF MINERAL AND PETROLEUM RESOURCES
WESTERN CAPE HIGH COURT CASE NO. 24492/2024 (TGS)

We refer to our letter dated 7 March 2025, a copy of which is attached for ease of reference.

Please urgently advise:

1. Which part of the Record served in front of which Respondent; and

2. Please confirm that the Record delivered to us on 4 March 2025 constitutes the full Record.

We await your urgent response.

Kind regards

pp Lawyer

FIONA BESTER
CHENNELLS ALBERTYN

CHENNELLS ALBERTYN
ATTORNEYS, NOTARIES & CONVEYANCERS

P.O. BOX 1022
STELLENBOSCH 7599

44 ALEXANDER STREET
STELLENBOSCH 7600
SOUTH AFRICA

TEL: +27 (0) 21 883 3189
FAX: +27 (0) 21 883 8910
E-MAIL: fiona@chennellsalbertyn.co.za
WEBSITE: www.chennellsalbertyn.co.za

7 March 2025

Our ref: 12391FB/cvdv
Your ref: 4399/24/P11

The State Attorney
Attention: Mr L Ngwenya
Per email: LNgwenya@justice.gov.za
and BCata@justice.gov.za

URGENT

Your ref: 4402/24/P40

The State Attorney
Attention: Ms A Hoosain
Per email: AHoosain@justice.gov.za

cc: Bowmans Attorneys
Attention: Claire Tucker – Per email: claire.tucker@bowmanslaw.com
Attention: Sibongile Sibeko – Per email: Sibongile.sibeko@bowmanslaw.com

Dear Sirs

RE: AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED, THE GREEN CONNECTION NPC AND NATURAL JUSTICE // DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES, MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT, TGS GEOPHYSICAL COMPANY (UK) LIMITED AND MINISTER OF MINERAL AND PETROLEUM RESOURCES
WESTERN CAPE HIGH COURT CASE NO. 24492/2024 (TGS)

We acknowledge receipt of the electronic Record in this matter and refer you to our letter dated 19 February 2025 in which we requested that:

> *"the Record to be delivered by your client is defined as to indicate clearly which part of the Record served before the First Respondent and which part of the Record served before the Second Respondent."*

It appears that the first and second respondents have filed a composite record, but have failed to indicate which part of the record served before the first respondent, and which part of the record served before the second respondent. It is imperative that we know what documents served before each of the first and second respondents.

In the circumstances, we are of the opinion that the complete record has not been served and we request an indication of which part of the record served before the first respondent and which part

8003

served before the second respondent, as required by Rule 53(3) read with Rule 53(1). In this regard, it may be necessary for you to amend the index to the Record or file a supplementary index.

Kind regards

FIONA BESTER
CHENNELLS ALBERTYN

JWS

Carol van der Vyver | Chennells Albertyn

From: Carol van der Vyver | Chennells Albertyn <carol@chennellsalbertyn.co.za>
Sent: Friday, 07 March 2025 12:27
To: 'L Ngwenya'; 'Bongi Cata'; 'Hoosain Aayesha'; 'Ilse Cedras'; 'Claire Tucker'; 'Sibongile Sibeko'
Cc: 'Fiona Bester'
Subject: URGENT: Case No: 24492/2024: Aukotowa Fisheries and others / Dept Mineral & Petroleum Resources and others
Attachments: doc25988720250307122209.pdf

Dear Sir / Madam

Attached is our letter for your urgent attention.

Kind regards
Carol van der Vyver
Secretary to Fiona Bester (Senior Partner)

CHENNELLS ALBERTYN
Attorneys and Conveyancers

44 Alexander Street, Stellenbosch, 7600
PO Box 1022, Stellenbosch, 7599
Tel: 021 883 3189 Fax: 021 883 8910
Email: carol@chennellsalbertyn.co.za

www.chennellsalbertyn.co.za

Rondebosch Office
18A Greenwich Grove, Station Road, Rondebosch
Tel: 021 685 8354 Fax: 021 685 0710

Always confirm our banking account details telephonically before making any payment. Should you fail to do so, you indemnify Chennells Albertyn Attorneys against any loss you may suffer as a result of your failure to do so.

Disclaimer: The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorised to receive it. If you are not the recipient you are hereby notified that any disclosure, copying, distribution or taking action in relation to the contents of this information is strictly prohibited and may be unlawful.

Spoofing, Whaling and Phishing Alert: Should you receive an email from us stating that our bank details have changed please do not act on such notification. We have not changed our banking details. We ask you to be extremely diligent about checking that all information is 100% correct. Make sure that any email that we send you is from a correct Chennells Albertyn email address and is from a partner or authorised member of staff of Chennells Albertyn which you can ascertain by checking the Chennells Albertyn website. If you are unsure about the banking details you have been provided with, please verify this telephonically with us before making payment. Thank you."

FCJS

CHENNELLS ALBERTYN
ATTORNEYS, NOTARIES & CONVEYANCERS

P.O. BOX 1022
STELLENBOSCH 7599

44 ALEXANDER STREET
STELLENBOSCH 7600
SOUTH AFRICA

TEL: +27 (0) 21 883 3189
FAX: +27 (0) 21 883 8910
E-MAIL: fiona@chennellsalbertyn.co.za
WEBSITE: www.chennellsalbertyn.co.za

19 March 2025

Our ref: 12391FB/cvdv

Your ref: 4399/24/P11

URGENT

Your ref: 4402/24/P40

The State Attorney
Attention: Mr L Ngwenya
Per email: LNgwenya@justice.gov.za
and BCata@justice.gov.za

The State Attorney
Attention: Ms A Hoosain
Per email: AHoosain@justice.gov.za
and ICedras@justice.gov.za

cc: Bowmans Attorneys
Attention: Claire Tucker – Per email: claire.tucker@bowmanslaw.com
Attention: Sibongile Sibeko – Per email: Sibongile.sibeko@bowmanslaw.com

Dear Sirs

RE: AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED, THE GREEN CONNECTION NPC AND NATURAL JUSTICE // DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES, MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT, TGS GEOPHYSICAL COMPANY (UK) LIMITED AND MINISTER OF MINERAL AND PETROLEUM RESOURCES
WESTERN CAPE HIGH COURT CASE NO. 24492/2024 (TGS)

We refer to the above and confirm that we received the Record on the 4th instant, and we addressed letters to your offices on the 7th and the 12th March 2025 requesting your advices in respect of the following:

1. To indicate which part of the Record served in front of which Respondent;

2. To confirm that it is the complete Record.

We wish to place on record that we have not yet received any response to the above queries and we submit that the time limits for service and filing of our client's supplementary affidavits should be extended depending on us receiving clarification in respect of the above.

Yours faithfully

FIONA BESTER
CHENNELLS ALBERTYN

5628

kantorcc@iafrica.com

From: Hoosain Aayesha <AHoosain@justice.gov.za>
Sent: Monday, 07 April 2025 18:20
To: Carol van der Vyver | Chennells Albertyn; Ngwenya Lawrence; Cata Bongi; Cedras Ilse; 'Claire Tucker'; 'Sibongile Sibeko'
Cc: 'Fiona Bester'
Subject: RE: URGENT: Case No. 24492/2024: Aukotowa Fisheries and others / Director-General: Dept of Mineral and Petroleum Resources and others

Good evening

Your emails and correspondence dated 20, 12 and 7 March 2025 refer.

Please be advised that we have served you with the complete Rule 53 record under case number 24492/2024.

Herewith the link to the record which served before the First Respondent:

Record of decision

Herewith the link of the record which served before the Second Respondent:

https://www.transfernow.net/dl/20250407lsEuEaje

The above documents were placed in separate folders on the flash drive provided by your offices and each record has its own separate index.

Please let me know if you have any difficulties in accessing the records in either of the links.

We now look forward to receiving your supplementary papers in due course.

Kind regards,

Aayesha Hoosain
Assistant State Attorney
Office of the State Attorney
5th Floor, 22 Long Street, Cape Town
Tel: 021 441 9200

the doj&cd
Department:
Justice and Constitutional Development
REPUBLIC OF SOUTH AFRICA

[Please copy my secretary Ms Cedras into our respective emails]

From: Carol van der Vyver | Chennells Albertyn <carol@chennellsalbertyn.co.za>
Sent: Thursday, 20 March 2025 14:38
To: Ngwenya Lawrence <LNgwenya@justice.gov.za>; Cata Bongi <BCata@justice.gov.za>; Hoosain Aayesha <AHoosain@justice.gov.za>; Cedras Ilse <ICedras@justice.gov.za>; 'Claire Tucker' <claire.tucker@bowmanslaw.com>; 'Sibongile Sibeko' <sibongile.sibeko@bowmanslaw.com>

JCJS

Cc: 'Fiona Bester' <fiona@chennellsalbertyn.co.za>
Subject: URGENT: Case No. 24492/2024: Aukotowa Fisheries and others / Director-General: Dept of Mineral and Petroleum Resources and others

Dear Sir / Madam

Attached is our letter for your attention.

Kind regards
Carol van der Vyver
Secretary to Fiona Bester (Senior Partner)

CHENNELLS ALBERTYN
Attorneys and Conveyancers

44 Alexander Street, Stellenbosch, 7600
PO Box 1022, Stellenbosch, 7599
Tel: 021 883 3189 Fax: 021 883 8910
Email: carol@chennellsalbertyn.co.za

www.chennellsalbertyn.co.za

Rondebosch Office
18A Greenwich Grove, Station Road, Rondebosch
Tel: 021 685 8354 Fax: 021 685 0710

Always confirm our banking account details telephonically before making any payment. Should you fail to do so, you indemnify Chennells Albertyn Attorneys against any loss you may suffer as a result of your failure to do so.

Disclaimer: The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorised to receive it. If you are not the recipient you are hereby notified that any disclosure, copying, distribution or taking action in relation to the contents of this information is strictly prohibited and may be unlawful.

Spoofing, Whaling and Phishing Alert: Should you receive an email from us stating that our bank details have changed please do not act on such notification. We have not changed our banking details. We ask you to be extremely diligent about checking that all information is 100% correct. Make sure that any email that we send you is from a correct Chennells Albertyn email address and is from a partner or authorised member of staff of Chennells Albertyn which you can ascertain by checking the Chennells Albertyn website. If you are unsure about the banking details you have been provided with, please verify this telephonically with us before making payment. Thank you."

Disclaimer

Privileged/Confidential information may be contained in this message. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person) you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply E-Mail. Please advise immediately if you or your employer do not consent to e-mail messages of this kind. Opinions, conclusions and other information in this message that do not relate to the official business of the Department of Justice and Constitutional Development shall be understood as neither given nor endorsed by it. All views expressed herein are the views of the author and do not reflect the views of the Department of Justice unless specifically stated otherwise.

FW 3

kantorcc@iafrica.com

From:	Carol van der Vyver | Chennells Albertyn <carol@chennellsalbertyn.co.za>
Sent:	Tuesday, 08 April 2025 11:27
To:	'Hoosain Aayesha'; 'Ngwenya Lawrence'; 'Cata Bongi'; 'Cedras Ilse'; 'Claire Tucker'; 'Sibongile Sibeko'
Cc:	'Fiona Bester'
Subject:	RE: URGENT: Case No. 24492/2024: Aukotowa Fisheries and others / Director-General: Dept of Mineral and Petroleum Resources and others
Attachments:	1 AUKOTOWA 24492-2024 INDEX.pdf; URGENT: Case No: 24492/2024 / Aukotowa Fisheries / Dept of Mineral & Pet... (1.57 MB); URGENT: Case No: 24492/2024: Aukotowa Fisheries and others / Dept Mineral... (694 KB); URGENT: Case No. 24492/2024: Aukotowa Fisheries and others / Director-Ge... (640 KB)

Dear Ms Hoosain

We refer to your email below and advise that we have checked the USB served on us and advise that the Record served on us only consisted of 1 index (see attached) – You will note that the heading refers to "*Index: First and Second Respondents' record*". We have since receipt of service, on numerous occasions, forwarded letters to you requesting you to differentiate between the Records in order to indicate which Record served in front of which Respondent (see letters attached), to which we only received your email of yesterday evening. Although we are unable to open the link to Record for the First Respondent, we deduce from your email that there is 1 record with 1 index for 2 respondents. As we are unable to ascertain which part of the Record received relates to which Respondent, we request an extension of time, to file the supplementary papers, until 30 April 2025.

We have been endeavouring to contact you telephonically this morning but have been advised that you are in Court. Kindly respond as a matter of urgency and provide us with proper service of both Records.

Kind regards
Carol van der Vyver
Secretary to Fiona Bester (Senior Partner)

CHENNELLS ALBERTYN
Attorneys and Conveyancers

44 Alexander Street, Stellenbosch, 7600
PO Box 1022, Stellenbosch, 7599
Tel: 021 883 3189 Fax: 021 883 8910
Email: carol@chennellsalbertyn.co.za

www.chennellsalbertyn.co.za

Rondebosch Office
18A Greenwich Grove, Station Road, Rondebosch
Tel: 021 685 8354 Fax: 021 685 0710

Always confirm our banking account details telephonically before making any payment. Should you fail to do so, you indemnify Chennells Albertyn Attorneys against any loss you may suffer as a result of your failure to do so.

JWS3

Disclaimer: The information contained in this communication from the sender is confidential.

in relation to the contents of this information is strictly prohibited and may be unlawful.

Spoofing, Whaling and Phishing Alert: Should you receive an email from us stating that our bank details have changed please do not act on such notification. We have not changed our banking details. We ask you to be extremely diligent about checking that all information is 100% correct. Make sure that any email that we send you is from a correct Chennells Albertyn email address and is from a partner or authorised member of staff of Chennells Albertyn which you can ascertain by checking the Chennells Albertyn website. If you are unsure about the banking details you have been provided with, please verify this telephonically with us before making payment. Thank you."

From: Hoosain Aayesha <AHoosain@justice.gov.za>
Sent: Monday, April 7, 2025 6:20 PM
To: Carol van der Vyver | Chennells Albertyn <carol@chennellsalbertyn.co.za>; Ngwenya Lawrence <LNgwenya@justice.gov.za>; Cata Bongi <BCata@justice.gov.za>; Cedras Ilse <ICedras@justice.gov.za>; 'Claire Tucker' <claire.tucker@bowmanslaw.com>; 'Sibongile Sibeko' <sibongile.sibeko@bowmanslaw.com>
Cc: 'Fiona Bester' <fiona@chennellsalbertyn.co.za>
Subject: RE: URGENT: Case No. 24492/2024: Aukotowa Fisheries and others / Director-General: Dept of Mineral and Petroleum Resources and others

Good evening

Your emails and correspondence dated 20, 12 and 7 March 2025 refer.

Please be advised that we have served you with the complete Rule 53 record under case number 24492/2024.

Herewith the link to the record which served before the First Respondent:

Record of decision

Herewith the link of the record which served before the Second Respondent:

https://www.transfernow.net/dl/20250407lsEuEaje

The above documents were placed in separate folders on the flash drive provided by your offices and each record has its own separate index.

Please let me know if you have any difficulties in accessing the records in either of the links.

We now look forward to receiving your supplementary papers in due course.

Kind regards,

Aayesha Hoosain
Assistant State Attorney
Office of the State Attorney
5th Floor, 22 Long Street, Cape Town
Tel: 021 441 9200

the doj&cd
Department:
Justice and Constitutional Development
REPUBLIC OF SOUTH AFRICA

[Please copy my secretary Ms Cedras into our respective emails]

From: Carol van der Vyver | Chennells Albertyn <carol@chennellsalbertyn.co.za>

FL28

Sent: Thursday, 20 March 2025 14:38
To: Ngwenya Lawrence <LNgwenya@justice.gov.za>; Cata Bongi <BCata@justice.gov.za>; Hoosain Aayesha <AHoosain@justice.gov.za>; Cedras Ilse <ICedras@justice.gov.za>; 'Claire Tucker' <claire.tucker@bowmanslaw.com>; 'Sibongile Sibeko' <sibongile.sibeko@bowmanslaw.com>
Cc: 'Fiona Bester' <fiona@chennellsalbertyn.co.za>
Subject: URGENT: Case No. 24492/2024: Aukotowa Fisheries and others / Director-General: Dept of Mineral and Petroleum Resources and others

Dear Sir / Madam

Attached is our letter for your attention.

Kind regards
Carol van der Vyver
Secretary to Fiona Bester (Senior Partner)

CHENNELLS ALBERTYN
Attorneys and Conveyancers

44 Alexander Street, Stellenbosch, 7600
PO Box 1022, Stellenbosch, 7599
Tel: 021 883 3189 Fax: 021 883 8910
Email: carol@chennellsalbertyn.co.za

www.chennellsalbertyn.co.za

Rondebosch Office
19A Greenwich Grove, Station Road, Rondebosch
Tel: 021 685 8354 Fax: 021 685 0710

Always confirm our banking account details telephonically before making any payment. Should you fail to do so, you indemnify Chennells Albertyn Attorneys against any loss you may suffer as a result of your failure to do so.

Disclaimer: The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorised to receive it. If you are not the recipient you are hereby notified that any disclosure, copying, distribution or taking action in relation to the contents of this information is strictly prohibited and may be unlawful.

Spoofing, Whaling and Phishing Alert: Should you receive an email from us stating that our bank details have changed please do not act on such notification. We have not changed our banking details. We ask you to be extremely diligent about checking that all information is 100% correct. Make sure that any email that we send you is from a correct Chennells Albertyn email address and is from a partner or authorised member of staff of Chennells Albertyn which you can ascertain by checking the Chennells Albertyn website. If you are unsure about the banking details you have been provided with, please verify this telephonically with us before making payment. Thank you."

Disclaimer

Privileged/Confidential information may be contained in this message. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person) you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply E-Mail. Please advise immediately if you or your employer do not consent to e-mail messages of this kind. Opinions, conclusions and other information in this message that do not relate to the official business of the Department of Justice and Constitutional Development shall be understood as neither given nor endorsed by it. All views expressed herein are the views of the author and do not reflect the views of the Department of Justice unless specifically stated otherwise.

JWS3e

IN THE HIGH COURT OF SOUTH AFRICA

(WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 24492/2024

In the appeal matter of:

AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED	1st Applicant
THE GREEN CONNECTION NPC	2nd Applicant
NATURAL JUSTICE	3rd Applicant

and

DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES	1st Respondent
MINISTER OF FORESTRY, FISHERIES AND ENVIRONMENT	2nd Respondent
TGS GEOPHYSICAL COMPANY (UK) LIMITED	3rd Respondent
MINISTER OF MINERAL AND PETROLEUM RESOURCES	4th Respondent

RECORD OF DECISION INDEX

JWS3

ITEM	DOCUMENT
A.	1.1 - Environmental Authorisation Application Form & cover letter

1.	Appendix 1 – EAP Declaration and Curriculum Vitae
2.	Appendix 2 – Locality Map
3.	Appendix 4 – Activities Locality Map
4.	Appendix 5 – Proof of Reconnaissance Permit Submission
5.	Appendix 6 – Impact Assessment Methodology
6.	Appendix 7 – Proof of Public Participation
7.	Appendix 8 – Screening Report
8.	Appendix 9 – Application Fee Proof of Payment
9.	Appendix 10 – Consent Letter from Rights Holders
10.	1st Respondent's Decision dated 17/04/2023

5403

2482
JWS4

CHENNELLS ALBERTYN
ATTORNEYS, NOTARIES & CONVEYANCERS

P.O. BOX 1022
STELLENBOSCH 7599

44 ALEXANDER STREET
STELLENBOSCH 7600
SOUTH AFRICA

TEL: +27 (0) 21 883 3189
FAX: +27 (0) 21 883 8910
E-MAIL: fiona@chennellsalbertyn.co.za
WEBSITE: www.chennellsalbertyn.co.za

10 April 2025

Our ref: 12391FB/cvdv

Your ref: 4399/24/P11

The State Attorney
Attention: Mr L Ngwenya
Attorney for Minister and DG: Department of Mineral and Petroleum Resources
Per email: LNgwenya@justice.gov.za
and BCata@justice.gov.za

Your ref: 4402/24/P40

The State Attorney
Attention: Ms A Hoosain
Attorneys for Minister of Forestry, Fisheries and the Environment
Per email: AHoosain@justice.gov.za
and ICedras@justice.gov.za

cc: Bowmans Attorneys
Attention: Claire Tucker – Per email: claire.tucker@bowmanslaw.com
Attention: Sibongile Sibeko – Per email: Sibongile.sibeko@bowmanslaw.com

Dear Sirs

RE: AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED, THE GREEN CONNECTION NPC AND NATURAL JUSTICE // DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES, MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT, TGS GEOPHYSICAL COMPANY (UK) LIMITED AND MINISTER OF MINERAL AND PETROLEUM RESOURCES
WESTERN CAPE HIGH COURT CASE NO. 24492/2024 (TGS)

We refer to the above as well as numerous telephonic attendances between Ms Hoosain, acting on behalf of the Second Respondent, and Carol van der Vyver of our offices on the 8th instant and wish to place the following on record regarding the Records of Decision of both First and Second Respondents:

1. We confirm that we received a Record purporting to be the Record for the First and Second Respondents on 5 March 2025.

JWS

2. However, the Index to the Record received, as indicated in paragraph 1 above, referred to the First and Second Respondents' Record and since 7 March 2025 we have requested your offices to differentiate which Record served in front of either the First or the Second Respondent.

3. On 7 April 2025 an email was received from Ms Hoosain, acting on behalf of the Second Respondent, providing us with two links regarding the 2 Records, but we could only download the Record of the First Respondent on 8 April 2025. The Index of the Record of Decision pertaining to the First Respondent and received on the 8th instant is not paginated and we will request you to attend to the pagination as soon as possible and we suggest that you paginate the Record with a prefix "R" in front of the page numbers in order to differentiate it from the Record of the Second Respondent. We also note that Appendix 3 forms part of Item A. Is this correct or should it be changed to Item 3 as a stand-alone item? We trust that we will receive an amended Index as well as paginated bundle by close of business on the 11th instant.

4. With regard to the Second Respondent's Record we request you to amend the Index in order to indicate that the Record only pertains to the Second Respondent's Record of Decision.

In the light of the fact that we have not yet been placed in possession of the paginated Record of the First Respondent, we request an extension of time to file our client's supplementary papers until 9 May 2025 on condition that we receive a paginated bundle before close of business as indicated in paragraph 3 above.

Your confirmation in respect of the above will be appreciated as soon as possible.

Yours faithfully

pp

FIONA BESTER
CHENNELLS ALBERTYN

JWS5

IN THE HIGH COURT OF SOUTH AFRICA

(WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 24492/2024

In the appeal matter of:

AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED	1st Applicant
THE GREEN CONNECTION NPC	2nd Applicant
NATURAL JUSTICE	3rd Applicant

and

DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES	1st Respondent
MINISTER OF FORESTRY, FISHERIES AND ENVIRONMENT	2nd Respondent
TGS GEOPHYSICAL COMPANY (UK) LIMITED	3rd Respondent
MINISTER OF MINERAL AND PETROLEUM RESOURCES	4th Respondent

RECORD OF DECISION INDEX

FIRST RESPONDENT

Redrafted by Chennells Albertyn

ITEM	DOCUMENT	PAGE NUMBER
A.	1.1 – Environmental Authorisation Application form and cover letter	
	1520_EA Application cover letter	R1
	1520_EA application signed	R2 – R12
	Application cover pages	R13 – R22

5003

1.	Appendix 1 Declaration and Curriculum Vitae EAP CV – L M Whitlow CV – G P Kriel Declaration – L M Whitlow Declaration – G P Kriel I&AP DB	 R23 – R24 R25 – R30 R31 – R37 R38 – R39 R40 – R41 R42 – R76
2.	Appendix 2 – Locality Map	R77
3.	Appendix 3 - EAs	R78
3.	Appendix 4 – Activities Locality Map	R79
4.	Appendix 5 – Proof of Reconnaissance Permit Submission	R80
5.	Appendix 6 – Impact Assessment Methodology	R81 – R85
6.	Appendix 7 – Proof of Public Participation: CTR Email CTR Newspaper – Cape Times CTR Newspaper – Sentinel CTR Notification Registers CTR Site Notice Proof CTR SMS proof	 R86 – R101 R102 R103 R104 – R117 R118 – R174 R175 – R178
7.	Appendix 8 – Screening Report DBAR Notification TGS Screening Tool Report	 R179 – R239 R240 – R248
8.	Appendix 9 – Application Fee Proof of Payment	R249
9.	Appendix 10 – Consent Letter from Rights Holders Africa Oil Corp re Orange Basin MC3D Consent Ingress TGS TE	 R250 – R252 R253 – R256
10.	1st Respondent's Decision dated 17/04/2023	R257 – R266

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

6 September, 2022

Our ref: 1520

PASA Ref: 12/1/040

Petroleum Agency of South Africa

P.O Box 5111

Tygervalley

7536

Ms Phumla Ngesi

Dear Madam:

TGS Reconnaissance Basic Assessment: Environmental Authorisation Application

Please receive herewith the **application for the Environmental Authorisation (EA)** for the above project.

This Application includes the following:

- Signed application for EA Form
- Appendix 1 - EAP Declaration and Curriculum Vitae
- Appendix 2 - Locality Map
- Appendix 3 - Environmental Authorizations Obtained (N/A)
- Appendix 4 - Activities Locality Map
- Appendix 5 - Proof of Reconnaissance Permit Application submission
- Appendix 6 - Impact Assessment Methodology
- Appendix 7 - Proof of Public Participation
- Appendix 8 - Screening Report
- Appendix 9 - Application Fee Proof of Payment
- Appendix 10 – Consent letters from Rights Holders

We trust that you find this submission in order. If you have any queries or concerns, please do not hesitate to contact the undersigned

Sincerely,

Liam Whitlow

8 Dalmeny Road, Pine Park, 2194 | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | **F** (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London | **PO** Box 19731, Tecoma, 5214, South Africa
T (043) 783-9826 | **F** (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

BOS

mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

APPLICATION FORM FOR ENVIRONMENTAL AUTHORISATIONS IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 AND THE NATIONAL ENVIRONMENTAL MANAGEMENT WASTE ACT, 2008 IN RESPECT OF LISTED ACTIVITIES THAT HAVE BEEN TRIGGERED BY APPLICATIONS IN TERMS OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT, 2002 (MPRDA) (AS AMENDED).

IMPORTANT NOTICE

Kindly note that:

1. As from 8 December 2014, this document serves as the application form, and incorporates the requisite documents that are to be submitted together with the application for the necessary environmental authorisations in terms of the said Acts.

2. This application form is applicable while the Mineral and Petroleum Resources Development Amendment Act of 2008 is in effect, as the form may require amendment should the Act be further amended.

3. Applicants are required to apply for the necessary water use licence and any other authorisations nor licences to the relevant competent authorities as required by the relevant legislation. Upon acceptance of an application for a right or permit in terms of the MPRDA, applicants will be required to provide evidence to the Regional Manager that a water use licence has been applied for.

4. The Regional Manager will respond to the application and provide the reference and correspondence details of the Competent Authority, and in the event that the application for a right or permit is accepted, together with the date by which the relevant environmental reports must be submitted. Notwithstanding anything that may appear to be stated to the contrary in the acceptance letter, the timeframes are in fact aligned and the prescribed timeframes for the submission of documents as regulated by the NEMA regulations must be strictly adhered to.

5. The application must be typed within the spaces provided in the form. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. Spaces are provided in tabular format and will extend automatically when each space is filled with typing.

6. The failure to submit complete information as required in this application form may result in the refusal of the application for an environmental authorisation and consequently of the right or permit applied for.

7. This application must be submitted through the SAMRAD online application system of the Department of Mineral Resources under "Other documents to upload".

8. Unless protected by law, all information filled in on this application form will become public information on receipt by the competent authority. Any interested and affected party should and shall be provided with the information contained in this application on request, during any stage of the application process.

9. Please note that an application fee is payable in terms of the National Environmental Management Act and the National Waste Management Act, which fees must be paid upon lodgement of the application. Should the said application fees not be paid as prescribed the application for a right or permit in terms of the Mineral and Petroleum Resources Development Act cannot be considered to have been made in the prescribed manner and the said application for a right or permit will have to be rejected. In this regard the type of applications must be identified in the table below.

PLEASE STATE TYPE OF AUTHORISATIONS BEING APPLIED FOR.

APPLICATION TYPE	APPLICABLE FEE	Mark with an X where applicable
NEMA S&EIR application on its own	R10 000.00	☐
NEMA BAR application on its own	R 2 000.00	☒
NEMWA S&EIR application on its own	R10 000.00	☐
NEMWA BAR application on its own	R 2 000.00	☐
NEMA S&EIR application combined with NEMWA S&EIR application	R 15 000.00	☐
NEMA BAR application combined with NEMWA BAR application	R 3 000.00	☐
NEMA S&EIR application combined with NEMWA BAR application	R 11 000.00	☐

1. CONSULTATION BASIC ASSESSMENT AND/ OR SCOPING REPORT

2. DETAILS OF THE APPLICANT

Project applicant:	TGS Geophysical Company (UK) Limited		
Registration no (if any):	5731700		
Trading name (if any):			
Responsible Person, (e.g. Director, CEO, etc).:	Project Development Manager		
Contact person:	Jevon Hilder		
Physical address:	TGS, Dukes Court, Duke Street, Woking, GU21 5BH, United Kingdom		
Postal address:	TGS, Dukes Court, Duke Street, Woking, United Kingdom		
Postal code:	GU21 5BH	Cell:	+44 7788 315682
Telephone:	+44 1483 742644	Fax:	-
E-mail:	Jevon.hilder@tgs.com		

3. ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP) INFORMATION

EAP:	Liam Whitlow		
Professional affiliation/registration:	South African Council Natural and Scientific Professions (SACNASP) (400148/08) Registered EAPASA Environmental Practitioner (2019/222		
Contact person (if different from EAP):	Same as above		
Company:	Environmental Impact Management Services (Pty) Ltd		
Physical address:	8 Dalmeny Road, Pine Park, Randburg, 2194		
Postal address:	PO Box 2083, Pinegowrie		
Postal code:	2123	Cell:	+27 83 393 2208
Telephone:	+27 11 789 7170	Fax:	+27 86 571 9047
E-mail:	liam@eims.co.za		

If an EAP has not been appointed please ensure that an independent EAP is appointed as stipulated by the NEMA Regulations, prior to the commencement of the process.
The declaration of independence and the Curriculum Vitae (indicating the experience with environmental impact assessment and relevant application processes) of the EAP must also be attached as **Appendix 1**.

4. PROJECT DESCRIPTION

Farm Name:	Offshore Exploration
Application area (Ha)	Approximately 5 740 000 ha
Magisterial district:	Adjacent to the Namaqualand and West Coast District Municipalities
Distance and direction from nearest town	The proposed project area is located between approximately 120 km offshore of St Helena Bay, extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay over a number of petroleum licence blocks
21 digit Surveyor General Code for each farm portion	Not applicable – offshore,
Locality map	Attach a locality map at a scale not smaller than 1:250000 and attach as **Appendix 2**
Description of the overall activity. **(Indicate Mining Right, Mining Permit, Prospecting right, Bulk Sampling, Production Right, Exploration Right, Reconnaisance permit, Technical co-operation permit, Additional listed activity)**	Hydrocarbon deposits occur in reservoirs in sedimentary rock layers. Being lighter than water they accumulate in traps where the sedimentary layers are arched or tilted by folding or faulting of the geological layers. Marine seismic surveys are the primary tool for locating such deposits and are thus an indispensable component of offshore oil or gas exploration. 3D seismic surveys are conducted on a tight survey grid and provide an image of the seafloor geology along each survey track–line. The area of interest for the proposed 3D seismic survey is approximately 57 400 km^2 in extent. The proposed project area is located between approximately 120 km offshore of St Helena Bay, extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay. The 3D survey will take in the order of 70 days including downtime. It is proposed that a single survey vessel equipped with seismic sources and streamers be used. The proposed 3D survey would be supported by up to 2 escort vessels. The escort vessel will assist in monitoring for and alerting other vessels (e.g. fishing, transport, etc.) about the survey and the lack of manoeuvrability of the survey vessel. At a minimum, one Fisheries Liaison Officer (FLO) person speaking English and Afrikaans will be on board either the survey or the escort vessel to facilitate communication in the local language with the fishing (or other) vessels that are in the area. Additionally, there will be Marine Mammal Observers and Passive Acoustic Monitoring on board the survey vessel to monitor for marine mammals and fauna visually and ensure that the survey is conducted in compliance with the specified guidelines as stated in the Environmental Management Programme. Crew changes will occur by support or survey vessel calling to port. The onshore logistics base will be in either the Port of Cape Town or the Port of Saldanha Bay. Actual survey commencement would ultimately depend on the authorization award date and the availability of a survey vessel.

5. ACTIVITIES TO BE AUTHORISED

(Please provide copies of Environmental Authorisations obtained for the same property as **Appendix 3)**.
(For an application for authorisation indicated. Please note that for a project that involves more than one listed activity that, together, make up one development proposal, all the listed activities pertaining to this application must be included. Please note that any authorisation that may result from this application will only cover activities specifically applied for).(Attach a proposed site plan, drawn to a scale acceptable to the competent Authority, showing the location of all the activities to be applied for, as **Appendix 4**)

NAME OF ACTIVITY	Aerial extent of the Activity	LISTED ACTIVITY	APPLICABLE LISTING	WASTE MANAGEMENT

(E.g. For prospecting - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc...etc...etc E.g. for mining,- excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc ..etc...etc.)	Ha or m²	(Mark with an X where applicable or affected).	NOTICE (GNR 544, GNR 545 or GNR 546)	AUTHORISATION (Indicate whether an authorisation is required in terms of the Waste Management Act) (Mark with an X)
3D Seismic survey	Approximately 5 740 000 ha	X	Listed Activity 21(b) (GNR 983)	N/A

6. PUBLIC PARTICIPATION

(Provide details of the public participation process proposed for the application as required by Regulation.

Details of the Public Participation process to be followed.

6.1.1. IDENTIFICATION OF INTERESTED AND AFFECTED PARTIES TO BE CONSULTED

IDENTIFICATION CRITERIA	Mark with an X where applicable	
	YES	NO
Will the landowner be specifically consulted?		X – offshore (no landowner)
Will the lawful occupier on the property other than the Landowner be consulted?	X	
Will a tribal authority or host community that may be affected be consulted?	X	
Will recipients of land claims in respect of the area be consulted?		X - offshore
Will the landowners or lawful occupiers of neighbouring properties been identified?	X	
Will the local municipality be consulted?	X	
Will the Authority responsible for power lines within 100 metres of the area be consulted?	X	
Will Authorities responsible for public roads or railway lines within 100 metres of the area applied for be consulted?	X	
Will authorities responsible for any other infrastructure within 100 metres of the area applied for be consulted? (Specify)	X	
Will the Provincial Department responsible for the environment be consulted?	X	
Will all of the parties identified above be provided with a description of the proposed mining /prospecting operation as referred above?	X	
Will all the parties identified above be requested in writing to provide information as to how their interests (whether it be socio-economic, cultural, heritage or environmental) will be affected by the proposed mining project?	X	
Other, Specify		

6.1.2. DETAILS OF THE ENGAGEMENT PROCESS TO BE FOLLOWED

Steps to be taken to notify interested and affected parties(Describe the process to be undertaken to consult interested and affected parties including public meetings and one on one consultations. NB the affected parties must be specifically consulted regardless of whether or not they attended public meetings. Photographs of notice boards, and copies of advertisements and notices notifying potentially interested and affected parties of the proposed application must be attached as Appendix)	PROVIDE DESCRIPTION HERE
	Interested and Affected Parties (I&AP's) have been notified of the proposed Reconnaissance Permit application via registered letters, emails and facsimiles. Site notices were placed on shore adjacent to the proposed survey area and other key towns, with a key focus on targeting areas where fisheries may be affected by the project. In addition, separate newspaper advertisements were placed in four local newspapers widely distributed in the area as well as a provincial newspaper which covers both affected

5003

	provinces. Adverts were placed in English, Afrikaans and isXhosa. A notice was also placed in the National Gazette. Radio adverts were also placed at several radio stations in the area. The Public Participation Process is being undertaken in accordance with the National Environmental Management Act (Act No. 107 of 1998 - NEMA) process and the Environmental Impact Assessment (EIA) Regulations, 2014. A minimum of 30 days was provided to the public to register as I&AP's. A further 30 days will be provided to review and comment on the BA Report.
Information to be provided to Interested and Affected Parties.	**Compulsory:** • The site plan. • List of activities to be authorised • Scale and extent of activities to be authorised • Typical impacts of activities to be authorised • The duration of the activity. • Sufficient detail of the intended operation to enable them to assess what impact the activities will have on them)
	Other, specify • The purpose of the proposed project; • The methods to be used; • Details of the NEMA Regulations that must be adhered to; • Date by which comment, concerns and objections must be forwarded through to EIMS; • Contact details of the Environmental Assessment Practitioner (EAP).
Information to be required from Interested and Affected Parties.	**Compulsory** • To provide information on how they consider that the proposed activities will impact on them or their socio-economic conditions • To provide written responses stating their suggestions to mitigate the anticipated impacts of each activity • To provide information on current land uses and their location within the area under consideration • To provide information on the location of environmental features on site to make proposals as to how and to what standard the impacts can be remedied. • To mitigate the potential impacts on their socio economic conditions to make proposals as to how the potential impacts can be managed, avoided or remedied).
	Other, Specify • Details of the landowner and information on lawful occupiers; • Details of any communities existing within the area; • Details of any Tribal Authorities within the area; • Details of any other I&AP's that need to be notified; • Details on any land developments proposed; • Details of any perceived impacts to the environment that should be considered in the EIA; and • Any specific comments, concerns or objections to the proposed prospecting operation.

7. DESCRIPTION OF THE ASSESSMENT PROCESS TO BE UNDERTAKEN

ITEM	DESCRIPTION
Environmental attributes. Describe how the Environmental attributes associated with the development footprint will be determined.	The description of the existing status of the current receiving environment will be compiled through remote sensing data such as aerial photographs as well as onsite inspections undertaken during a site visit. In addition, all I&AP's both landowners and Key Stakeholders will be provided with a questionnaire to complete as part of the consultation process in which they are asked to describe the receiving environment in terms of current land uses, vegetation, sensitive features, fauna, flora, infrastructure and features of cultural or heritage significance. As such, the description of the existing status of environment that will be provided in the Basic Assessment (BA) Report will be compiled in consultation with I&AP's. During the Basic Assessment process the proposed project activities will be described and the environmental attributes which are likely to be affected by these activities identified.
Identification of impacts and risks. (Describe the process that will be used to identify impacts and risks.	The identification of potential impacts and risks for assessment will be undertaken through I&AP consultation and the development of an in depth understanding of the activities, actions and processes to be undertaken on site based on the EAP's experience with similar projects. As such, the potential impacts and risks on broad environmental aspects, in respect of each of the main project actions, activities and processes will be assessed during the BA Process. It should be noted that the identification and assessment of impacts will be restricted to the planned activity and that the impacts associated with any future exploration activities and or production are excluded.
Consideration of alternatives. Describe how alternatives, and in particular the alternatives to the proposed site layout and possible alternative methods or technology to be applied will be determined.	The identification and assessment of alternatives is a key component to the success of any BA Process. Essentially, alternatives represent different means of meeting the general purpose and need of the proposed project through the identification of the most appropriate method of development. Two levels of alternative screening will be investigated and considered which culminates into the identification of the feasible development alternative. The first level alternatives include land use, location, survey method, and site access alternatives. These alternatives will determine the optimal process for the proposed activities. After these viable alternatives have been assessed (if any), the level two alternatives including technology and phasing alternatives will be considered in order to ensure the best practicable option is proposed for the activity.
Process to assess and rank impacts. Describe the process to be undertaken to identify, assess and rank the impacts and risks each individual activity.	Please refer to Appendix 6 for a detailed description of the EIMS Impact Assessment Methodology.
Contribution of specialist reports Describe how specialist reports, if required, will be taken into consideration and inform the impact identification, assessment and remediation process.	In addition to the desktop assessments that will be undertaken by the EAP, an Acoustic Specialist, Heritage Specialist, Marine Ecologist, Social Specialist and Fisheries Specialist will undertake specialist studies that will comply with the requirements of the EIA Regulations, 2014. These specialists will conduct assessments for sensitive features within the application area. The specialist reports will be incorporated into the BA report.
Determination of impact management objectives and outcomes. Describe how impact management objectives will be determined for each activity to address the potential impact at source, and how the impact management outcomes will be aligned with standards.	The objectives of the impact management measures shall be to firstly **anticipate and avoid** risks and impacts where practically possible. This shall be accomplished through the adoption of a risk and impact assessment process which aims to identify **all** relevant environmental and social risks and impacts of the project and those who are likely to be affected by such risks and impacts, including the issues identified by Interested and Affected parties during the consultation process and any sensitive features identified by the specialist team. The impact and risk identification process shall take into consideration each activity its associated potential impacts. The EMPr developed for the project shall include mechanisms whereby social and environmental risk and

	impacts shall be avoided and mitigated. The objectives of this environmental management framework shall be: • To anticipate potential risks and impacts associated with each activity pre-emptively through the implementation of risk assessment techniques and early warning systems such as environmental monitoring and inspections; • To develop and implement preventative measures to ensure known risks and impacts are addressed at source wherever possible (e.g. spill prevention procedures); • To implement detailed management measures to ensure that where avoidance of impacts is not possible, mitigation measures are in place to minimize impacts to workers, affected communities, and the environment; • To provide a framework for adaptive environmental management within the EMPr whereby impacts from unplanned events or incidents caused by the project may be effectively controlled to minimise impacts to workers, affected communities, and the environment. The management and mitigation measures shall be developed in accordance with applicable standards and guidelines, which shall include, but is not limited to: • Legislated Standards (e.g. air quality guidelines and standards); • South African National Standards (SANS)(e.g. SANS water quality standards); • Where Applicable, International Standards and Guidelines; • Applicable National and Regional Frameworks (e.g. Bioregional Plans; Spatial Development Frameworks, National Protected Area Expansion Strategy Focus Areas, Environmental Management Frameworks etc); • Applicable Guidelines developed by authorities (e.g. DMRE guidelines, NEMA EIA guidelines); • Other Applicable guidelines (e.g. Mining and Biodiversity Guidelines).

8. OTHER AUTHORISATIONS REQUIRED

LEGISLATION	Mark with an X where applicable			
	AUTHORISATION REQUIRED		APPLICATION SUBMITTED	
	YES	NO	YES	NO
SEMAs				
National Environmental Management: Air Quality Act		X		X
National Environmental Management: Biodiversity Act		X		X
National Environmental Management: Integrated Coastal Management Act		X		X
National Environmental Management: Protected Areas Act		X		X
National Environmental Management: Waste Act		X		X
National legislation				
Mineral Petroleum Development Resources Act	X		X	
National Water Act		X		X
National Heritage Resources Act		X		X
Others: Please specify		X		X

Please provide proof of submission of applications in **Appendix 5**.

In the event that an authorization in terms of the National Environmental Waste Management Act is required for any of the activities applied for please state so clearly in order for such an authorisation to be considered as part of this application.

9. DRAFT EMPr

For consultation purposes, provide a high level approach to the management of the potential environmental impacts of each of the activities applied for.

ACTIVITIES (E.g. For prospecting - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc…etc…etc E.g. for mining,- excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc…etc…etc.)	PHASE (of operation in which activity will take place). State, Planning and design, Pre-Construction' Construction, Operational, Rehabilitation, Closure, Post closure.	SIZE AND SCALE (of Disturbance) (volumes, tonnages and hectares or m²)	TYPICAL MITIGATION MEASURES (Eg, storm water control, dust control, noise control, access control, rehabilitation etc…., etc…..)	COMPLIANCE WITH STANDARDS (A description of how each of the recommendations herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities)
Interference with existing uses	Operational	Approximately 5 740 000 ha	• Inform other users in writing of intent and comply with reasonable request to reduce the impact. • Negotiate compensation for interference with other users where necessary	EMPr
Displacement, injury and death of marine fauna	Operational	Approximately 5 740 000 ha	• Ensure seismic activities are scheduled during appropriate times • Visual inspection by marine mammal observer (MMO) of marine mammal presence	EMPr

ACTIVITIES (E.g. **For prospecting** - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route **etc...etc...etc** **E.g. for mining**,- excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.)	PHASE (of operation in which activity will take place). State; Planning and design, Pre-Construction' Construction, Operational, Rehabilitation, Closure, Post closure.	SIZE AND SCALE **(of Disturbance)** (volumes, tonnages and hectares or m²)	TYPICAL MITIGATION MEASURES (Eg, storm water control, dust control, noise control, access control, rehabilitation etc...., etc....,)	COMPLIANCE WITH STANDARDS (A description of how each of the recommendations herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities)
			• Passive Acoustic Monitoring (PAM) inspection • On board log to be kept	
Disturbance, of potential heritage features	Operational	Approximately 5 740 000 ha	• Visual inspection of seismic exploration results • Specialist consultant required if any heritage features are discovered during exploration operations	EMPr
Water contamination and pollution	Operational	Approximately 5 740 000 ha	• No refuelling to take place at sea • All generators, engines, and equipment to be maintained in peak condition.	EMPr
Interference with Fisheries	Operational	Approximately 5 740 000 ha	• Inform fisheries and other users in writing of intent and comply with reasonable request to reduce the impact. • Liaise with other users regularly throughout the survey activities	EMPr
Waste generation and disposal	Operational	Approximately 5 740 000 ha	• Visual inspection that waste does not leave the vessel. • Waste must be securely stored. • All hazardous waste such as oil must be stored separately and disposed of at a registered facility • Proof of disposal must be kept by the Applicant.	EMPr

10. CLOSURE PLAN

In the space provided under each heading below, please provide a high level description of the plan for closure and the information that will be provided in the draft EMPr accompanying draft basic assessment report or environmental impact reports going forward.	
Baseline environment Describe how the baseline environment will be determined with the input of interested and affected parties and due cognizance of the current land uses and or existing biophysical environment	The baseline environment will be determined through the desktop assessments undertaken, utilising GIS data and available datasets such as NFEPA, CBA, and BGIS and in consultation with all I&AP's including landowners and Key I&AP's such as Government Departments, Agencies and Institutions. Potential site sensitivities will be investigated. Registered I&AP's will be provided with a questionnaire to complete in which they are asked to provide information about the existing land uses and the social and biophysical environment as well as describe how these may be affected by the proposed activity.
Closure objectives Describe the closure objectives and the extent to which they will be aligned to the baseline environment	The impacts will be further assessed and detailed in the BA Report to be completed during the EIA Process. As such, closure of the project will be limited to the conclusion of the physical 3D surveys to be undertaken in the target area. This will mainly relate to • Waste generation and disposal; and • Water contamination and pollution. Residual impacts post completion of the seismic activities are typically limited if any and therefore there will be no requirements for closure, decommissioning and rehabilitation actions. The overall closure objective will be to ensure that the post closure environment aligns with the pre-development.
Rehabilitation Plan Describe the scale and aerial extent of the prospecting or mining listed activities to be authorised, including the anticipated prospecting or mining area at the time of closure, and confirm that a site rehabilitation plan drawn to a suitable scale will be provided in the draft EMPr to be submitted together with the draft EIR or Basic Assessment Report as the case may be.	It is anticipated that the activities will have a limited impact on the receiving environment. The impacts will be further assessed and detailed in the BA Report. The impacts will be limited to the planning and operational phases and it is not anticipated that there will be any need for closure or rehabilitation once the 3D surveys have been concluded.
Rehabilitation Cost Describe how the rehabilitation cost will be determined and provide a preliminary estimate thereof	It is anticipated that the activities will have a limited impact on the receiving environment. The impacts will be further assessed and detailed in the BA Report. The impacts will be limited to the planning and operational phases and it is not anticipated that there will be any need for closure or rehabilitation once the 3D surveys have been concluded. The overall closure objective will be to ensure that the post closure environment aligns with the pre-development. No financial provisions apply to this application.
Decommissioning Considering that rehabilitation must take place upon cessation of an activity, describe when each of activities applied for will be rehabilitated in terms of either the cessation of the individual activity or the cessation of the overall prospecting or mining activity.	The impacts will be limited to the planning and operational phases and it is not anticipated that there will be any need for decommissioning once the 3D surveys have been concluded.

Signature of the applicant / Signature on behalf of the applicant:

TGS Geophysical Company (UK) Limited
Name of company (if applicable):

Date: 5 September 2022

Appendix 1

EAP Declaration and Curriculum Vitae

Appendix 2

Locality Map

Appendix 3

Environmental Authorizations Obtained

It is understood that no environmental authorizations are currently valid for the area affected by this environmental authorization application apart from the reconnaissance permit.

Appendix 4

Activities Locality Map

Appendix 5

Proof of Submission of Applications

Appendix 6

Impact Assessment Methodology

Appendix 7

Proof of Public Participation

Appendix 8

Screening Report

Appendix 9

Application Fee Proof of Payment

Appendix 10

Consent Letters from Rights Holders

APPENDIX 1
DECLARATION OF THE EAP

I, **Liam Whitlow**, declare that –

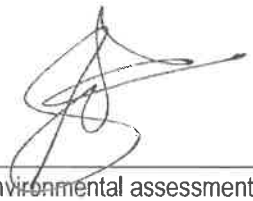
General declaration:

- I act as the independent environmental practitioner in this application
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting environmental impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I will take into account, to the extent possible, the matters listed in regulation 8 of the Regulations when preparing the application and any report relating to the application;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;
- I will ensure that the comments of all interested and affected parties are considered and recorded in reports that are submitted to the competent authority in respect of the application, provided that comments that are made by interested and affected parties in respect of a final report that will be submitted to the competent authority may be attached to the report without further amendment to the report;
- I will keep a register of all interested and affected parties that participated in a public participation process; and
- I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not
- all the particulars furnished by me in this form are true and correct;
- will perform all other obligations as expected from an environmental assessment practitioner in terms of the Regulations; and
- I realise that a false declaration is an offence in terms of regulation 71 of the Regulations and is punishable in terms of section 24F of the Act.

Disclosure of Vested Interest (delete whichever is not applicable)

- I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations;

- ~~I have a vested interest in the proposed activity proceeding, such vested interest being:~~



Signature of the environmental assessment practitioner:

Environmental Impact Management Services (Pty) Ltd
Name of company:

6 September 2022
Date:

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

CURRICULUM VITAE

Name:	Liam Michael Whitlow
Nationality:	South African
Date of Birth:	22 August 1978
Profession:	Environmental Scientist
Professional Qualification/ Training:	BSc Honours Environmental Management; Rand Afrikaans University (now University of Johannesburg), 2000
	Higher Certificate in Project Management; Damelin Business School, 2001.
	ISO 14001 Auditor Training; BVQI, 2003.
	Environmental Monitoring- Fallout Dust Training; Dustwatch, 2014.
	Aquifer Hydraulics and Groundwater Monitoring Certificate Course; North West University, 2014.
	Carbon Footprint Analyst Course; Terra Firma Academy, 2017.
Professional Membership/ Registrations:	Registered Environmental Assessment Practitioner: Number 2019/222 Registered Professional Natural Scientist (SACNASP- #400148/08). Member of Land Rehabilitation Society of Southern Africa (LaRSSA).
Current Employer:	Environmental Impact Management Services (Pty) Ltd.

KEY EXPERIENCE

Liam holds a B. Sc. Hons degree in Environmental Management and has completed an additional B. Sc. honours course in applied limnology. In addition he has completed a higher certificate in Project Management with Damelin Business School and a course on ISO14001 Auditing Principles and Environmental Management Systems Auditor Training. Liam is a registered professional natural scientist with the South African Council for Natural Scientific Professions. Liam's professional experience, gained over more than 17 years, lies mainly with environmental impact assessments including project managing significantly large EIA's in the mining and infrastructure sectors. Liam's other experience includes ISO14001, Site Assessments, Water-use licensing, Environmental monitoring, and Environmental Management Plans. Liam's experience lies mainly within South Africa but he has bene involved in projects in both Lesotho and Botswana.

CAREER SUMMARY

Period: January 2011- Current	Organisation: EIMS	Position: Director, Senior Environmental Assessment Practitioner

Key Projects/Assignments	Technical Director: Responsible for the technical management of EIMS including the following aspects: • Technical review and direction for complex projects; • Quality control and assurance; • Staff management and performance review; • Client management; and • Marketing and business development. Project Experience: • Transnet Multi-products Pipeline (~650km total length) in Gauteng, Mpumalanga and between Durban and Johannesburg, RSA. Project manager and Environmental Advisor to the New Multiproduct Pipeline (NMPP) Alliance for the monitoring of construction phase. 2009-2017. • Olifants River Water Resources Development Project, Steelpoort, Mpumalanga, RSA. EIMS was appointed to undertake the required environmental monitoring (noise, air quality, and water quality) for the construction of the Phase 1C of the bulk water pipeline. Project manager, 2012-2017. • GSW Dilokong Chrome Mine Due Diligence, Limpopo, RSA. Environmental lead to undertake an environmental due. 2017. • Tshipi é Ntle Manganese Mine Environmental Due Diligence, Kathu, Northern Cape, RSA. Project manager and senior consultant (in association with GSW) for an environmental review to inform a due diligence being undertaken. 2017. • Libra Due Diligence, Mpumalanga and Free State Province, RSA. Project manager and senior consultant to conduct a high level environmental review and due diligence study for the Anglo Libra project (incl various Anglo Coal assets) for Mindset Mining Consultants, 2016. • Sedgman Environmental Training, Pretoria, RSA. Compiled and presented a training workshop to Sedgman Engineers, focusing on the application and interpretation of the South African Environmental Laws, in relation to their operations and client profile. 2017. • EIA and EMP for the Transnet Richards Bay Coal Line: Overvaal Tunnel, Mpumalanga Province. Project manager, responsible for successful completion of the EIA. 2015-2016. • Tetra 4 Virginia Natural Gas Production, Water Monitoring, Free State, RSA. Project manager appointed to undertake surface and groundwater sampling to establish an environmental baseline and to monitor the actual impacts associated with the proposed natural gas production activities. 2015-2017. • Drafted the 2014-2019, 3rd Edition Environmental Management, Plan (compiled in terms of Section 11(2) of the National Environmental

	Management Act 1998 (act 107 of 1998), for the National Department of Energy. Project manager and report writer. 2014-2015. • Environmental Advisory to the Government Technical Advisory Centre, Public Private Partnership Unit. Environmental lead in a team of consultants providing consulting services to report to the GTAC on the lessons learn from past PPP's and to suggest means of improving the process for future PPP's. 2015. • Eskom Lambda 400-765kV Sub-station and Associated Transmission Lines, Mpumalanga, RSA. Project manager and Environmental Assessment Practitioner for EIA. 2010-2012. Mine Closure and Financial Provisioning: • Determined Financial Provisions in accordance with the 'Guideline Document for the Evaluation of the Quantum of Closure-Related Financial Provision' provided by a Mine (DMR Guideline): Mooiplaats Colliery 2018; Exxaro Paardeplaats Coal Mine- Update 2018. • Final Rehabilitation, Decommissioning and Closure Plan (FRDCP) prepared in accordance with the requirements of the NEMA Financial Provisioning Regulations (2015) (NEMA GNR 1147): Tetra 4 Virginia Natural Gas Project, 2017; Motuoane Gas Hennenman Exploration Right-2017; Motuoane Gas Ladysmith Exploration Right- 2017; Sungu Sungu Dannhauser Exploration Right- 2016; Kangala Colliery- Eloff Phase 3 Pit-2020; Anker Coal Elandsfontein Colliery-2021. • Review of closure plans and financial provisions for closure as a component of Due Diligence and/or Competent Persons Reports: Environmental Review for 5 large Coal mining operations held by Exxaro- 2018; Environmental Review for Dilokong Chrome Mine- 2017; Environmental Review for Tshipi Mine- 2017; Environmental Review on numerous large coal mines held by Anglo Coal-2016. Environmental Monitoring: • Project manager and senior environmental scientist for the construction phase environmental monitoring on the Olifants River Water Resources Project Phase 2C (bulk water pipeline). The project included monitoring of water (point and diffuse), air quality (PM10 and fallout dust), and noise to ensure and guide compliance with the environmental specifications of the construction phase EMPR. • Project manager and senior environmental scientist for the water resource monitoring of the Tetra4 Virginia Natural Gas Production Project. This includes specialist low-flow sampling od dissolved gases in the groundwater as well as general water quality parameters in both regional ground and surface water resources. • Project Director for the routine water resource (surface and groundwater) monitoring being undertaken for the United Manganese of the Kalahari

	(UMK), manganese mine in Northern Cape. Responsible for technical and quality review and oversight.	
Period: January 2002-December 2010	**Organisation: EIMS**	**Position: Senior Environmental Assessment Practitioner**
Key Projects/Assignments	Project Manager and Environmental Assessment Practitioner for the following: • Environmental applications, including EIAs, and mining permit applications, for various (7 Packages including N1, N3, N12, R21, and R24) Gauteng road upgrades as part of the Gauteng Freeway Improvement Project. EIMS was also appointed to undertake the role of Independent ECO's for certain GFIP Packages • EIA for OCGT Peaking Power Station within the Coega IDZ. • EIA for spent nuclear fuel storage facility at Pelindaba. • EIA for nuclear waste smelter at Pelindaba. • EIA and water-use licensing for an underground ash disposal facility in Mpumalanga Province. • EIA for the proposed upgrade of the effluent collection and treatment facilities at the South African Nuclear Energy Corporation, Pelindaba. • EIA for proposed Garona to Aries 400KV Transmission line. • EIA for numerous Golf Estates. • EIA for Market Street Underpass as part of the Provincial government Precinct and City Square (Johannesburg) CBD. • EIA's for numerous residential developments. • Scoping report for the Eskom Janus substation in Limpopo Province. • EIA's for low-cost housing developments in the East Rand, Ekurhuleni Metropolitan Council as part of the Regional Professional Team. • Environmental exemption process for a World Summit on Sustainable Development project, Moroka Dam, Gauteng Province. • Numerous environmental exemption applications for housing developments. • Environmental Scoping studies for Sentech telecommunication masts in Eastern Cape Province. • Environmental Studies for telecommunication facilities for Vodacom. • Environmental Studies for 150+ telecommunication facilities for Cell C and Siemens in five provinces. • Environmental Studies for Eskom Telecommunications.	

	Environmental Site Assessment and Remediation: • Participation in several Environmental Site Assessments in Gaborone (Botswana) and Mpumalanga. Strategic Environmental Assessment: • Participation in the compilation of the Strategic Environmental Assessment for the Hartbeespoort Dam area. ISO 14001 Environmental Management Systems and Auditing • Participation in the compilation of the ISO 14001 system (legal register) for Coega Development Corporation, Eastern Cape Province. • Participation in the compilation of the ISO 14001 system (legal register) for Matimba Power Station in Limpopo Province. Mining Related Permits and Rights • Environmental Management Programme and EIA for the Cranemere Gas Exploration Project in the Eastern Cape Province. • EIA and EMPR for the proposed Loopspruit Coal Mine, Mpumalanga Province. • Project Manager for in excess of 40 mining permit applications for the Transnet New Multi-products Pipeline, Inland and Trunkline (between Johannesburg and Durban). Applications submitted in 4 different provinces. • Project Manager for 5 Mining Permit Applications for the South African National Roads Agencies Gauteng Freeway Improvement Project. Numerous NEMA Section 24(G) Rectification applications for a broad spectrum of developments

LANGUAGE CAPABILITY

Language	Speak	Read	Write
English	Excellent	Excellent	Excellent
Afrikaans	Excellent	Excellent	Good

DECLARATION

I confirm that the above information contained in the CV is an accurate description of my experience and qualifications and that, at the time of signature.

Recoverable Signature

X 

Liam Whitlow
Director
Signed by: 6f6103b0-585d-4fda-855e-bdf53a161a41

Signature of Staff Member

Date

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

CURRICULUM VITAE

Name:	Gideon Petrus Kriel
Nationality:	South African
Date of Birth:	1 September 1983
Profession:	Environmental Scientist
Professional Qualification/ Training:	M.Env.Sci Water Sciences; North West University (Potchefstroom Campus), 2008
	Implementation of Environmental Management Systems (ISO 14001); Centre for Environmental Management, North-West University (Potchefstroom Campus), 2007.
	Bringing Data Into GIS (ArcGIS); GIMS (now ESRI SA), 2008.
	Tools for Wetland Assessment; Rhodes University, 2013
Professional Membership/ Registrations:	Registered Professional Natural Scientist (SACNSP- #400202/09) – Environmental Sciences
	Registered Environmental Assessment Practitioner (EAPASA- #2019/1451)
	Water Institute of Southern Africa (WISA) Member (21161)
Current Employer:	Environmental Impact Management Services (Pty) Ltd.

KEY EXPERIENCE

GP holds an M.Env.Sci (Water Sciences) Cum Laude from the North-West University (Potchefstroom Campus) and has been employed as an Environmental Consultant since 2007. GP is a Registered Professional Natural Scientist (South African Council for Natural and Scientific Professions) and a Registered Environmental Assessment Practitioner (Environmental Assessment Practitioner). He has delivered presentations locally and internationally concerning the use of bio-indicators for the determination of water quality, and has experience in a wide variety of environmental management projects including: Environmental Impact Assessments, Basic Assessments, Geographic Information Systems (GIS), Environmental Compliance Monitoring, Environmental Awareness Training, Aquatic Ecological Assessments, Drinking and Waste Water Treatment Process Audits, Wetland Delineation and Assessments, ISO 14001 Aspect Registers, Water Use Licence Applications, Waste Management Licence Applications and Integrated Waste and Water Management Plans (IWWMP).

CAREER SUMMARY

Period: July 2007- Current	Organisation: EIMS	Position: Senior Environmental Assessment Practitioner
Key Projects/Assignments	Senior Consultant: Responsible for the following aspects: • Technical review and direction;	

	• Quality control and assurance; • Client management; and • Marketing and business development. Project Experience: • Environmental Impact Assessment for the proposed Zonk'izizwe Mixed Use Development in Midrand, Gauteng. • Basic Assessments for the road upgrades for the Johannesburg Roads Agency (JRA). • Environmental Impact Assessment for the proposed Thabeng Eco Reserve and Golf Estate, near Ohrigstad, Limpopo. • Basic Assessment for the proposed TATA Steel KZN Clean Energy Project, Richards Bay, KwaZulu-Natal. • Basic Assessment for the proposed IFM Clean Energy Project, Mooi Nooi, North-West Province. • Compilation of ISO 14001 Aspect/Impact registers for Clover (Pty) Ltd. • Basic Assessment for the proposed N17 Phase 2 project: Addition of Auxiliary Lanes Between the Rondebult Road Interchange and the Proposed Trichardts Road Interchange. • Basic Assessment for the Proposed Early Warning System for the South African Nuclear Energy Corporation of South Africa (NECSA). • Environmental Impact Assessment for the Proposed Water and Effluent Collection and Treatment Infrastructure Upgrade for the Nuclear Energy Corporation of South Africa (NECSA). • Basic Assessment for the proposed Residential Development on Portions 16 & 17 of the Farm Wilgespruit 190 IQ, Wilgeheuwel, Roodepoort. • Independent Environmental Control Officer for the Eye of Africa Golf Estate, Gauteng. • Independent Environmental Control Officer for the Department of International Relations Head Office Construction, Pretoria. • Water Use License Application for the Upgrade of the Low Level Bridge on Hyperion Drive, North Riding, Johannesburg. • Diatom Water Quality Assessments for the Upgrade of the Low Level Bridge on Hyperion Drive, North Riding, Johannesburg. • Basic Assessment for the Proposed Rand Water 1400mm diameter L17 Bulk Water Pipeline, Brakpan, Gauteng. • Wetland Delineation for Anglo Platinum Potgietersrus Platinum Limited near Mokopane, Limpopo.

	• Independent Environmental Control Officer for the Knock-down and Rebuild of the Shell Range River Service Station, Gillview, Johannesburg. • Independent Designated Environmental Officer for the Refurbishment of the South African National Roads Agency Limited (SANRAL) Dalpark Operations Centre, Brakpan. • Waste Licence Application for the Proposed Water and Effluent Collection and Treatment Infrastructure Upgrade for the Nuclear Energy Corporation of South Africa (NECSA). • Prospecting Rights Applications on behalf of the African Exploration Mining and Finance Corporation (Pty) Ltd for a variety of projects in Limpopo, Free State and North-West Provinces. • Environmental Impact Assessment and Waste Management Licence Application for the Lusikisiki Sewer and Sewer Treatment Plant, Lusikisiki, Eastern Cape. • Diatom Monitoring for the Lusikisiki Sewer and Sewer Treatment Plant, Lusikisiki, Eastern Cape. • Appointed as a Blue Water Services Inspector for the 2012 Blue Water Services Audits by the Department of Water Affairs. • Basic Assessment for the formalisation of Masibambane, Masibulele, Ilinge, Dacawa Gwentshe, Velwano, Mathemba Vuso in Mdantsane for the Buffalo City Metropolitan Municipality. • Environmental Impact Assessment for the Proposed Sunny South Housing Development for the Buffalo City Metropolitan Municipality. • Basic Assessment and Water Use Licence for the Mqonjwana Access Road for the Mbizana Local Municipality. • Independent Environmental Control Officer for the East London Industrial Development Zone (ELIDZ): Infrastructure Services for the Zone 1B West Residential Development. • Heritage Impact Assessment and Public Participation for the Proposed Reconstruction of Fleet Street, East London for the Buffalo City Metropolitan Municipality. • Environmental Monitoring (Water Quality) for Phase 2 CD of the Olifants River Water Resources Development Project for Basil Read. • Basic Assessment and Water Use Licence Application for the Proposed Sidwadeni River Access Road near Mthatha, Eastern Cape on behalf of the South African National Roads Agency (SOC) Limited. • Basic Assessment and Water Use Licence Application for the Proposed Mngazi River Access Road near Port St Johns, Eastern Cape on behalf of the South African National Roads Agency (SOC) Limited.

	• Independent Environmental Control Officer for the East London Industrial Development Zone (ELIDZ): Proposed MMOEM Facilities. • Amalinda Fairlands Feasibility Study for the Buffalo City Metropolitan Municipality (CS Consulting). • Independent Environmental Control Officer for the Lusikisiki Sewer and Sewer Treatment Plant, Lusikisiki, Eastern Cape. • Independent Environmental Control Officer for the Noblesfontein Wind Energy Facility near Victoria West, Northern Cape Province. • Independent Environmental Control Officer for the Reconstruction of Fleet Street, East London, Buffalo City Metropolitan Municipality, Eastern Cape Province. • Transnet Freight Rail NEMA Section 24G Rectification Application – Coega Station to Tankatara Level Crossing, Coega, Eastern Cape. • Independent Environmental Control Officer for the Sunny South Housing Development for the Buffalo City Metropolitan Municipality. • Vincent-Berea Local Spatial Development Framework, CS Consulting (Buffalo City Metropolitan Municipality), East London, Eastern Cape. • Participatory Based Planning Support to Informal Settlements Upgrading Projects In Buffalo City Metropolitan Municipality, CS Consulting, Eastern Cape. • Molopo Free State Wetland Delineations, Virginia, Free State. • Puma Energy Fuel Depot Wetland Delineation, Nelspuit, Mpumalanga. • Mdantsane Roads Cluster 2 Environmental Control Officer, Buffalo City Metropolitan Municipality. • Giuricich Chemical Removal at Vodacom Site, East London. • Internal Environmental Management System Audits (ISO 14001) for the East London Distribution Centre and Ladismith Plant for Parmalat South Africa. • Environmental Control Officer for the Eskom Albany-Mimosa 66KV Distribution Line near Alicedale, Eastern Cape. • Environmental Impact Assessment for the Proposed Algoa Basin Oil & Gas Production Project for Aberdeen Offshore Engineering. • Basic Assessment for the Proposed Ablution Facilities Along the Coast for Nyandeni Local Municipality. • Environmental Control Officer for the Eskom Wittekleibosch-Dieprivier 132kV Power Line and Switching Station, Tsitsikamma, Eastern Cape. • Specialist Walkdown and Site Specific EMPR for the Eskom Ankerlig-Omega Power line, Western Cape.

	• Wetland Assessment for the Lichtenburg Hospital Basic Assessment Process for PH Bagale (on behalf of the Department of Health). • Update of the Integrated Waste and Water Management Plan Eskom Lethabo Power Station, Free State. • Basic Assessment for the Upgrade of the Loop 16 (Gariep) Road for ACWA Power, Groblershoop, Northern Cape. • Prospecting Rights Application and Basic Assessment for Black Mountain Mining, Aggeneys, Northern Cape. • Basic Asessment for the Eskom Riverbank IPP Projects, Eastern Cape. • Environmental Control Officer for the SANRAL N2 Section 15 from Buffalo River (km 2,94) to Breidbach Intersection (km 9,8) and the R63 from Alexandra Road (km 0) to Bhisho, Eastern Cape. • Environmental Control Officer for the Greenfields section of the SANRAL N2 Wild Coast Toll Highway (Southern Section), Eastern Cape. • Basic Assessment for the Upgrading to a Surface Standard Portion of Road DR08606 +1-12KM, Eastern Cape Department of Roads and Public Works, Eastern Cape. • Transnet TM2 Aquatic Monitoring Programme. • Prospecting Right Applications and Basic Assessment Processes for Black Mountain Mining near Aggeneys, Northern Cape. • Eskom Amathole Stormwater Environmental Control Officer, Eastern Cape. • Update of the ACWA Bokpoort Consentrated Solar Plant Integrated Waste and Water Management Plan, Northern Cape. • Update of the Rirhanzdu Rehabilitation Strategy and Implementation Plan, Mpumalanga. • Basic Assessment and Water Use Licence Application for the Proposed Megamor Park Extension, Meisieshalt, East London for Umbra Trading 11. • Creation of the Ekurhuleni Metropolitan Municipality Parks GIS Layer. • Enviro-legal review for Bax Kaplan Russel for a Waste Processing Facility in Wilsonia, East London. • Enviro-Legal Review: Demonstration of On-Site Faecal Sludge Treatment In East London, Impilo Yabantu Services (Pty) Ltd. • Umgeni Raw Water Management Audit for SizweNtsalubaGobodo, Pietermaritzburg. • Umgeni Waste Water Management Audit for SizweNtsalubaGobodo, Pietermaritzburg.

	• Competent Persons Report (Environmental) for the Ntshovelo Mining Resources (Pty) Ltd Welgemeend Colliery. • Umgeni Potable Water Management Audit for SizweNtsalubaGobodo, Pietermaritzburg. • Cambridge Pedestrian Bridge Enviro-legal Interpretation for CBM Consulting Engineers. • Komati Power Station Legal Audit for Eskom. • Beaconhurst Drive Enviro-legal Interpretation for CBM Consulting Engineers. • Port of Ngqura Tank Farm Infrastructure Specialists Services for Transnet Group Capital. • Prospecting Rights Application and Basic Assessment for Black Mountain Mining, Northern Cape. • Independent Environmental Control Officer for the East London Industrial Development Zone (ELIDZ): GW1 Facilities in Zone 1A. • Basic Assessment and Water Use Licence Application for the Proposed Summerpride Erf 107 Residential Development, East London. • Harmony Target 1 & 2 Performance Assessment Audits, Welkom • Harmony President Steyn North (Steyn 3_ 7 & 9) Performance Assessment Audits, Welkom. • City of Ekurhuleni Tsakane Sewer Pump Station Basic Assessment, Ekurhuleni. • Eskom Duvha Power Station Legal Compliance Audit. • Buffalo City Metropolitan Municipality Eastern Beach Sewer Upgrade Environmental Officer, East London. • Transnet Group Capital Coega Kop Quarry Water Use Licence Application. • SCAW Dimbaza Foundry Groundwater Monitoring, Dimbaza. • Mulilo Struisbult PV2 Grid Connection Basic Assessment, Copperton. • Mulilo Struisbult PV2 EMPr Amendment, Copperton. • Tosaco Offshore Exploration Environmental Impact Assessment. • Azinam Offshore Block 2B Stakeholder Engagement. • TGS Orange Basin Offshore Reconnaissance Basic Assessment. • GIS work for a large amount of projects from 2007 - Present including the following: the identification and mapping of sensitivities and interested and affected parties, the delineation of site boundaries, the identification of alternative development sites, geo-referencing of old maps and technical drawings, production of informative maps for Basic Assessments,

	Environmental Impact Assessments and Environmental Compliance Monitoring.

LANGUAGE CAPABILITY

Language	Speak	Read	Write
English	Excellent	Excellent	Excellent
Afrikaans	Excellent	Excellent	Excellent

DECLARATION

I confirm that the above information contained in the CV is an accurate description of my experience and qualifications at the time of signature.



Signature of Staff Member

17 October 2022

Date

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

I, Liam Michael Whitlow (Full Name and Surname) declare that –

General declaration:

- I act as the independent environmental practitioner in this application.
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant.
- I declare that there are no circumstances that may compromise my objectivity in performing such work.
- I have expertise in conducting environmental impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity.
- I will comply with the Act, Regulations, and all other applicable legislation.
- I will take int account, to the extent possible, the matters listed in Regulation 8 of the Regulations when preparing the application and any reporting relating to the application.
- I have no, and will not engage in, conflicting interest in the undertaking of the activity.
- I understand to disclose to the applicant and competent authority all material information in my possession that reasonably has or may have the potential of influencing- any decision to be taken with respect to the application by the competent authority; and the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority.
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and the participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with reasonable opportunity to participate and to provide comments on documents that are produced to support the application.
- I will ensure that the comments of all interested and affected parties are considered and recorded in reports that are submitted to the competent authority in respect of the application, provided that comments are made by interested and affected parties in respect of a final report that will be submitted to the competent authority may be attached to the report without further amendment to the report.
- I will a register of all interested and affected parties that participated in public participation process.
- I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not.
- All the particulars furnished by me this form are true and correct.
- I will perform all other obligations as expected from an environmental assessment practitioner in terms of the Regulations.
- I am aware of what constitutes an offence in terms of Regulation 48 and that a person convicted of an offence in terms of Regulation 48(1) is liable to the penalties as contemplated in Section 49B of the Act.

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

Disclosure of Vested Interest (delete whichever is not applicable)

I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remunerative for work performed in terms of the Regulations.

Signature of the Environmental Assessment Practitioner:

Name of Company: Environmental Impact Management Services (Pty) Ltd

Date: 6/12/2022

UNDERTAKING UNDER OATH/AFFIRMATION

I, **Liam Michael Whitlow** swear under oath/affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.

Signature of the Environmental Assessment Practitioner

Name of Company: Environmental Impact Management Services (Pty) Ltd

Date: 6/12/2022

Signature of the Commissioner of Oaths:

Date:

Official Stamp below

SOUTH AFRICAN POLICE SER...
COMMUNITY SERVICE CENTRE
2022 -12- 06
LINDEN
SUID-AFRIKAANSE POLISIEDIENS

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

I, Gideon Petrus Kriel (Full Name and Surname) declare that –

General declaration:

- I act as the independent environmental practitioner in this application.
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant.
- I declare that there are no circumstances that may compromise my objectivity in performing such work.
- I have expertise in conducting environmental impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity.
- I will comply with the Act, Regulations, and all other applicable legislation.
- I will take int account, to the extent possible, the matters listed in Regulation 8 of the Regulations when preparing the application and any reporting relating to the application.
- I have no, and will not engage in, conflicting interest in the undertaking of the activity.
- I understand to disclose to the applicant and competent authority all material information in my possession that reasonably has or may have the potential of influencing- any decision to be taken with respect to the application by the competent authority; and the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority.
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and the participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with reasonable opportunity to participate and to provide comments on documents that are produced to support the application.
- I will ensure that the comments of all interested and affected parties are considered and recorded in reports that are submitted to the competent authority in respect of the application, provided that comments are made by interested and affected parties in respect of a final report that will be submitted to the competent authority may be attached to the report without further amendment to the report.
- I will a register of all interested and affected parties that participated in public participation process.
- I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not.
- All the particulars furnished by me this form are true and correct.
- I will perform all other obligations as expected from an environmental assessment practitioner in terms of the Regulations.
- I am aware of what constitutes an offence in terms of Regulation 48 and that a person convicted of an offence in terms of Regulation 48(1) is liable to the penalties as contemplated in Section 49B of the Act.

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

Disclosure of Vested Interest (delete whichever is not applicable)

I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remunerative for work performed in terms of the Regulations.

Signature of the Environmental Assessment Practitioner:

Name of Company: Environmental Impact Management Services (Pty) Ltd

Date: 2 December 2022

UNDERTAKING UNDER OATH/AFFIRMATION

I, **Gideon Petrus Kriel** swear under oath/affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.

Signature of the Environmental Assessment Practitioner

Name of Company: Environmental Impact Management Services (Pty) Ltd

Date: 2 December 2022

Signature of the Commissioner of Oaths:

Date:

Official Stamp below

COMMISSIONER OF OATHS
Lizelle Conway
Commissioner of Oaths (RSA)
9/1/8/2 East London 07 October 2022
Copyworld Chamberlain Road
Berea East London

2 December 2022

Title	Name	Surname	Company	Department	Property	Postal Address	Cellphone	Telephone	Fax	Email
Pre-identified										
			REIGER VISSERYE CC				227142199			ulrich@iafrica.com
			QUAYSIDE FISH SUPPLIERS CAPE (PTY) LTD				213721100			kay@selectafish.co.za
			PREMIER FISHING SA (PTY) LTD				214190124			rushaan@premfish.co.za
			National Department of Environmental Affairs, Forestry and Fisheries.							EIAAdmin@environment.gov.za
			MOUNT PLEASANT FISHING (PTY) LTD				214024200			gavinb@lusitaniafishing.co.za
			MARINATA VISSERSVROUE ORGANIESASIE BK				227831240			compassfishing@mweb.co.za
			MANETRADE 2094				227830031			manetrade@telkomsa.net
			TIRADE PROPS 153 (PTY) LTD				227144111			hasiet@mweb.co.za
			Tuna Hake Association	Admin						admin@tunahake.co.za
			AMAWANDLE PELAGIC (PTY) LTD				227831103			marthin.potgieter@luckystar.co.za
			Amawandle Hake (PTY) LTD							
			82 BOUNDARY ROAD BK				229721648			brendapieterson1967@gmail.com
			COMBINED FISHING ENTERPRISES CC				834599959			bianca@comfish.co.za
			Cochoqua Tribal Authority	Admin						admin-saldanha@cochoqua.org.za
			IMPALA FISHING (PTY) LTD				217062858			impalaf@iafrica.com
			KHULANI FISHING (PTY) LTD				214216325			mdofishing@hotmail.com
			LUCKY STAR LIMITED				214155860			PhillipC@luckystar.co.za
			Legal Resource Centre					218792398		wilmien@lrc.org.za
			KOMICX PRODUCTS (PTY) LTD				217835016			michelle@komicx.com
			JAFFA'S BAY FISHING CC				216961410			tahir@jaffasbay.co.za

Title	Name	Surname	Company	Department	Property	Postal Address	Cellphone	Telephone	Fax	Email
			HENBASE 2655 CC				739681037			henbase2655cc@gmail.com
			Dargle Conservancy				828537815			development@dargleconservancy.org.za
			EIGELAARS BOTE (EDMS) BPK				227831125			carel@eigevis.com
			GANSBAAI MARINE (PTY) LTD				283840311			ajcoetzee@mweb.co.za
			Fresh Tuna Exporters Association							ftea@telkomsa.net; 'sfadmin@seafreeze.co.za
			FishSA							liaison@fishsa.org
			FishSA							jeremy@fishsa.org
			EYETHU FISHING (PTY) LTD				415855683			siphiwo@eyethufishing.co.za
			EDWARDS FISHING CC				214215368			arainbow@mweb.co.za
			IRASA KhoiSan							irasa169@gmail.com
			Matzikama Municipality	The Municipal Manager						matzikamacollab@phoenixmail.co.za
			Observatory Civic Association							chair@obs.org.za
			Chochoqua Khoisan Community				824276686			vanreenen87@gmail.com
	Annemarie		Richtersveld GEV/CPA					278311013		rgevcpa@gmail.com
	Budwalk						834410084			
Mr	Mark		Amahlubi Traditional Council	Mcleod&Associates Attorneys				397373117		mark@mcleods.co.za
	Violenti		Hout Bay Public Library							capetown@houtbay.gov.za
	Wahlid						733615105			
	Danab !Huni !na	!Gukhoeb	!Khora||guallaes	Chief						
Mr	Brandon	Abdinor	Centre for Environmental Rights							babdinor@cer.org.za
	Cilla	Abrahams					739948156			
Mr	Shaun	Abrahams	Namakwa District Local Economic Development	LED Practitioner						shauna@namakwa-dm.gov.za
Mr	Shaun	Abrahams	Namakwa District Local Economic Development	LED Practitioner						shauna@namakwa-dm.gov.za
Mr	Uzair	Adam								
	A	Adams					840309672			
Mr	Boy	Adams					760346173			boyadams1965@gmail.com
	Christian John	Adams					604175882			cjadams1976@gmail.com

2528

Title	Name	Surname	Company	Designation	Property	Postal Address	Cellphone	Telephone	Fax	Email
Mr	Enrico	Adams					768696168			enricoa@jokwamarine.com
Mr	Ismat	Adams	CapeNature	Land-Use Scientist – Landscape West			726640698	870873188		iadams@capenature.co.za
Mr	John C	Adams	Longtime Hondeklipbaai Fishing Primary Co – Operative				760346173			boyadams1965@gmail.com
	Hlengani	Alexia	DHSWS NC							hlengania@dws.gov.za
	Nicky	Alfel								
Mr	Nicky	Alfred	Fishermans Cor Limited			Die Korf No.6, Lambertsbaai, 8130				
	Sean	Amor	Hooked on Africa				834603963			sean@hookedonafrica.co.za
Mr	Devon	Andrews								devoninked100@gmail.com
	Malcolm	Andridge					83693574			
	Peter	Bacon	Viking Fishing							peter@vikingfishing.co.za
	Mogammud Allie	Baderoen	Port Nolloth Abalone			Po Box 79, Bergvliet, Bergvliet, Western Cape, 7800	837033882	217624337		
	Marcus	Banga	Northern Cape Protech and Agri Revolution (Pty) Ltd			17A Hull Street De Beers Kimberley 8301	744633225	538326689		mbanga777@gmail.com
	Marcos	Barbery	Hondeklipbaai Visserye Bpk.			Posbus 53, Hondeklipbaai, 8222				
Ms	Charika	Barnes								wcacouncil@gmail.com
	Allan	Basajjasubi	Natural Justice							allan@naturaljustice.org
Mr	Willem	Basson	Fisheries Control	Manager						willemb@daff.gov.za
Ms	Judy	Beaumont	DEFF: Oceans and Coast	Deputy Director General				218192410		jbeaumont@environment.gov.za
	Judy	Bell	FrackFree SA							judybell@mweb.co.za
	Cheslyn	Benjamin	Chapmans Peak Fisheries					217902731		cheslynb@premfish.co.za
Mr	Desmond	Bertoni	Port Lobster Fisheries				633235131			
	Lynweth	Bhana	Bhana Coastal/Compass Trawling							lynweth@polka.co.za
Dr	Wendy	Black	Iziko Museums of South Africa	Chief Curator. Social History and Art			824524081	214813883		wblack@iziko.org.za
	Johann	Bo	Irvin & Johnson Limited							johannBo@IJ.co.za
	Teresa	Boois	Alexander Bay Community Works Programme				604856807			
Mr	Rudolph	Botha					836110494			rudolphfbotha@gmail.com
	Rihann	Brand					732842780			rihannbrand404@gmail.com

Title	Name	Surname	Company	D[illegible]me	Property	Postal Address	[illegible]hone	Telephone	Fax	Email
	Neville	Brink	Namaqua Fishing Company Ltd							aletd@oceana.co.za
Mr	Neville	Brink	Ikamva Lethu Fishing Company (Pty) Ltd							aletd@oceana.co.za
	Neville	Brink	Ikamva Lethu Fishing Company (Pty) Ltd							aletd@oceana.co.za
Mr	Neville	Brink	Hicksons Fishing Company Ltd							nevilleb@oceana.co.za
	Neville	Brink	Hicksons Fishing Company Ltd							nevilleb@oceana.co.za
Mr	Sinclair	Broadhurst	Namasan Oil & Gas							nusum@new.co.za
Mr	Paul	Burkhardt	Bloomberg News				716888292			pburkhardt@bloomberg.net
Ms	Louise C	Calvin	Ward 66 – Environmental & Coastal Conservation				812460350			louise.colvin@telkomsa.net
	Kent	Cavanagh	Perma Culture Trust							
Mr	Adrian Ace	Charles					724513058			aceding1@gmail.com
	Bryan	Chennells				49 Newlands Ave, Newlands, Cape Town	828880782			
Ms	Marshadevi	Chetty	De Beers Group Services			Private Bag X01 Southdale, Southdale, Gauteng,2135	827232344	314033895		Nvrooyen@Mweb.co.za
	Adeleen	Cloete	Department of Agriculture, Environmental Affairs, Land Reform and Rural Development	Environmental Officer-Coastal Management				277188800	227188814	adeleen.denc@gmail.com
	Karin	Cloete					637884504			
	M	Cloete								
	Sarah	Cloete	Kamiesberg Municipality	Senior LED Officer						sarahc@kamiesberg.gov.za
	Charmain	Coetzee					633523333			
	Mike	Copeland	Oceana Group Limited	Operations Manager						mike.copeland@luckystar.co.za
	BW	Cornellisen	DAERLD					277188800		bronwen.dtec@gmail.com
Mr	Randall	Cullen	Diamond Fields South Africa (Pty) Ltd	Programme Manager		P O Box 7425, Roggebaai, 8012				
	Meryn	Cydal	Botoko Brading e Investments				723267504			cystermevyn1969@gmail.com
	Gogill	Daibe	Hondeklip BAy				710110424			
	Lewis	Dampies	Katz Royal House							
	Louie	De Freitas	Lusitania Trawling Services							luis@livefishtanksec.co.za
	Manual	de Olim	Rainbow Nation							mfishing@mweb.co.za

Title	Name	Surname	Company	Designation	Property	Postal Address	Cellphone	Telephone	Fax	Email
	Pierre	de Villiers	CapeNature	Senior Manager: Marine and Coasts, Marine and Coasts Operations, Conservation Operations						estuaries@capenature.co.za
Mr	Darryn	de Vries	Port Nolloth Sea Farm Ranching				716720968			darryndevries@gmail.com
	Moddie	de Wet					780787764			
Mr	Michael	Debesai	Premier Fishing (SA) (Pty) Ltd	Operations Manager						michaeld@premfish.co.za
	Richard	Dewee					627216114			
Ms	Shana	Diergaardt		Department of Environment Forestry and Fisheries			610984064			sdieegaardt@gmail.com
	David	Dirk					604934965			
	Arshad	Dolan	Oceana Group Limited							arshad.dolan@oceana.co.za
	N	Dowries					603411315			
	Monique	Doyle	West Point Processors (Pty) Ltd							monique@slipperbay.co.za
	Darryl	Dreyer								
	Davin	du Plessis	Katz Royal House				634109952			
	Kirsten	Du Plessis	Irvin & Johnson Limited	Oceanographer - Business Intelligence/Assistant Business Insights Manager						kirstend@ij.co.za
Mr	Francois	Du Toit	African Conservation Trust				828526466			ceo@projectafrica.com
	Errol	Duckett					65596584			
	Innocent	Dwayi	Irvin & Johnson Limited							innocentdw@ij.co.za
	Peter	Edwards	Dawsons							peter@dawsons.co.za
Mr	Bakkies	Eksteen	Western Cape Commercial Linefish Association							Bakkies52@gmail.com
Mr	Joos	Engelbrecht					834157610			
Mr	Neville	Ephraim	iGas	Senior Project Manager						nevillee@cefgroup.co.za
	Mellisa	Esau					739620432			melissaesau321@gmail.com
	Paolo	Esposito	IMDHGroup							pe@imdhgroup.com
Mr	Nico	Esterhuyse	Dupwest Inc.							nico@dupwest.co.za
	Tiana	Fataar	Oceana Group							Tiana.Fataar@oceana.co.za
	Gaston	Fernandez	Lusitania Fishing							gaston@lusitaniafishing.co.za
	Jeandre	Fiks								
	Adela	Fortune	Oceana Group	Group Company Secretary		PO Box 7206, Roggebaai, 8012				companysecretary@oceana.co.za

Title	Name	Surname	Company	Designation	Property	Postal Address	Cellphone	Telephone	Fax	Email
Ms	Adele	Fourie	Port Splendour Pty Ltd			PO Box 13456, Noordstad, Port Elizabeth, Eastern Cape, 6018	828200062	514361657		liesel.n@raubex.com
Ms	Elma	Fourie					748351001			fourie.elma@gmail.com
	Lindiwe	Franks	DHSWS- office of the Provincial Head	NC Region		28 Central Road Beaconsfield Kimberley 8300	665866712	538308804	538367692	abrahamsa@dws.gov.za
	Hermanus	Frederick	Coastal Links				783135525			
	Rubin	Gallant					615423676			rubingallant@gmail.com
	Louise	Geldenhuys	Northern Cape Department of Agriculture, Environmental Affairs, Land Reform and Rural Development							geldenhuys.louise1@gmail.com
Mr	Bradley	Gibbons	Endangered Wildlife							eia@ewt.org.za
	Annette	Gibbs	Centre for Environmenatal Rights							agibbs@cer.org.za
	Judy	Goldman								jgoldman@internext.co.za
Mr	C	Goliath	Masakhane Fishing			St Markstraat 47, Lambertsbaai, 8130				
Mr	Renato	Gonsalves	Japan Marine Supplies & Services	General Manager			832652042			rgonsalves@jmss.co.za
	Cassi	Goodman					832767596			cassi@icon.co.za
	Shannon	Goouk	Extinction Rebellion				735857819			shannondkyo@gmail.com
	Wiliam	Gqeke	Ingwe Emnayama Fishing Enterprises (Pty) Ltd							william@balobi.com
Mr	Richard	Gray	De Beers Consolidated Diamond Mines							richard.gray@debeersgroup.com
	Pieter	Griffith	Aikonese Tribal Council	Chief				223305100		
	Mellisa	Groenink	Natural Justice							melissa@naturaljustice.org
	Chris	Hamel	African Tuna Traders cc							chris@africantuna.com
	Keely	Harris	Impact Oil and Gas							kharris@impactoilandgas.com; AssetMgmt@impactoilandgas.com
	Davice	Heese					631180777			Nielanc@gmail.com
	H.A.	Hornimann	Alexander Bay High School				607798560	278311771	278311596	alexhighschool@gmail.com

Title	Name	Surname	Company	Designation	Property	Postal Address	Cellphone	Telephone	Fax	Email
	Karen	Humby	Striker Fishing Enterprises (Pty) Ltd							karen@komicx.com
	Rolf	J					826741407			
	Natasha	James	Katz Korana Royal House				783984585			natashac.visagie@gmail.com
	Regan	James	Katz Korana Royal House	Chief			735416487			13katzkorana.royalhouse@gmail.com
	Jonty	Jankovich	Irvin & Johnson Limited							jontyj@ij.co.za
	Nico	Jano	Namaqua Integrated Development Agency (NIDA)	Chairperson			685043306			nico.jano69@gmail.com
Mr	Willem	Julies								willemjulies7@gmail.com
	Andrew	Kaye	Kaytrad							andrew@kaytrad.co.za
Mr	Daryl Charles	Kerspuy	De Beers Group Services			Private Bag X01, Southdale, Southdale, Gauteng, 2135	714840775	118049373		
	Thato	Kgari	Council of Geo Science							tkgari@geoscience.org.za
Mr	Chris	Kimber	Kernel Marine Pty Ltd			P.O. Box 31, Stellenbosch, 7600	832682818			cdk@lor.co.za
Mr	J	Klaase	Fishermen Development Organisation			Posbus 125, Doringbaai, 8151				
	Elizabeth	Klasse					721353974			
Mr	Johannes Gerhardus	Knoesen	Isinda Tient Pty Ltd			8 Debra Street, Bellevue, Upington, 881	825762183	543312211		lcupt@intekom.co.za
	Gert	Koegelenberg	Port Nolloth Fish Factory			P O Box 24, Port Nolloth, 8280				
Mr	L	Kopa	Northern Cape Department of Cooperative Governance, Human Settlement and Traditional Affairs	Traditional Affairs				538392135		lkopa@ncpg.gov.za
Mr	Jaco	Kotze	Langebaan Residents and Ratepayers Association							info@langebaanratepayers.co.za
	Niall	Kramer					825340296			niall.kramer@gmail.com
	Niall	Kramer					825340296			niall.kramer@gmail.com
	Ilze	Kruger	Independent				845939373			
Ms	Michele	Kruse	De Beers Marine (Pty) Ltd							michele.kruse@debeersgroup.com
	Willem P	Labuschagne	Balobi Fishing Enterprises							marinemanager@balobi.com

Title	Name	Surname	Company	Designation	Property	Postal Address	Cellphone	Telephone	Fax	Email
	Robert	Landman	Irvin & Johnson Limited	I&J Operations						RobertLa@ij.co.za
	Jacques	Le Roux	Balobi Group							legal@balobi.com
	Ohentse Reginald	Leeuw	Mabour Ink Energy (Pty) Ltd			P.O. Box 102, Mothibistad Kuruman, 8474	843455387			wealth@mabourink.co.za
Mr	BS	Lenkoe	Northern Cape Department of Cooperative Governance, Human Settlement and Traditional Affairs	Head of Department				538382600	538382600	bslenkoe@ncpg.gov.za
Mr	Johan	Leo	Kobush				797307175			leojohan557@gmail.com
	Solomon	Lephoto	Alectrona				79029132			solomon@alectrona.co.za
	Mokhoantle	Lerato	DHSWS NC							MokhoantleL@dws.gov.za
	Marilyn	Lilley								marilyn@rsaweb.co.za
Mr	Cederick	Links								cljobs96@gmail.com
	Elinor	Lipschitz								onlyelinor@gmail.com
	C	Louw					733974712			
Ms	Mapaseka	Lukhele	Transnet Soc Ltd	General Manager: Sustainability			605729811			
	Nonhle	Luthuli						214321601		nluthuli@gmail.com
	Andries	Maarman					822834227			
	Korasie	Maarman					822834227			
	Ikhaesen	Maart	Aikonese Tribal Council	Chief			839559777	223305100		chief.maart@cochoqua.org.za
Mr	Kevin	Maart	Cochoqua Tribal Authority	Chief						chief.maart@cochoqua.org.za
Ms	Thandi	Mabena	De Beers Marine (Pty) Ltd	Mineral Resource Management						thandi.mabena@debeersgroup.com
	James	Malgas	Local Reference Committee				798402364			jamesmalgas21@gmail.com
	Marcia	Manes					712319953			
Mr	Peter	Mann								plmann@mweb.co.za
	Shannon	Marcoux	Natural Justice							shannon@naturaljustice.org
	Dawid	Markus		Councilor						dawidmarkus@gmail.com
	Lee	Markus					634281525			
Mr	Lwazi	Mase	Port Engineering and Mosiac				710416877	278517090		lwazi.maze@gmail.com
	Sheldon	Mathys					681952755			
	Bongani	Mavume	Nalitha							bongam@nalitha.co.za
		Maxxus					719757170			

Title	Name	Surname	Company	Designation	Property	Postal Address	Cellphone	Telephone	Fax	Email
	Thandeka	Mbambo	Department of Forestry, Fisheries and Environment							TMbambo@dffe.gov.za
	Sibahle	Mbatha	Council of Geoscience							smbatha@geoscience.org.za
	Liziwe	McDaid	Green Connection							Liziwe@mweb.co.za
	Tebogo	Mello	Council of Geoscience							tmello@geoscience.org.za
	Diana	Mentoor	Hondeklipbaai NPRC				766880414			dianamentoor96@gmail.com
Mr	John	Mentoor					837702166			
Mr	Anton	Meyer	De Beers Group of Companies	Namaqualand Mines		Private Bag X01 Kleinsee, 8282		118870048	113745418	Anton.Meyer@debeersgroup.com
	Thabisile	Mhlana	Department of Forestry, Fisheries and Environment							tmhlana@dffe.gov.za
Mr	Lionel	Michel	CSIR					128413603		ljeanMichel@csir.co.za
	Elaine	Mills	Argus Media	Chief correspondent, southern and eastern Africa			664859785			elaine.mills@argusmedia.com
	Nozipho	Mkhabela	Irvin & Johnson Limited	GIS Technician – Business Intelligence						NoziphoM@ij.co.za
	Makwarela	Mnwana	Department of Forestry, Fisheries and Environment							MMnwana@dffe.gov.za
	Simon	Moganetsi	DEFF	Chief Directorate: Integrated Environmental Authorisations						SMoganetsi@environment.gov.za
	Dino	Moodaley	Dazzalle Traders (Pty) Ltd							charmaine@talhado.co.za; dino@talhado.co.za
	Camilla	Mostert	Coastal Links				847562203			cjmostertpuppie@gmail.com
	Edward	Mostert	North Western Cape Mining Forum	Program Coordinator			0638061277/0728095007			nwcminingforum@gmail.com
	Fidelis	Moudeen					749635034			
	Beeza	Mtamzeli	CSIR					128413887		bmtamzeli@csir.co.za
	Mike	Muzzroll	Hout Bay Boat Owners (Pty) Ltd				828506514			Houtbayboatowners@gmail.com
	Nolwazi	Mwabi	CSIR							nmwabi@csir.co.za
	George	N					715187434			
	Rose	Nalon					729129396			
	Christine	Naneville					780527937			
	Maia	Nangle	Masifundise Development Trust				763140961	763140961		maia@masifundise.org.za
	G	Nassar	Irvin & Johnson Limited	I&J Ops						nassarg@ij.co.za

Title	Name	Surname	Company	D[illegible]ng	Property	Postal Address	C[illegible]hone	Telephone	Fax	Email
	Insaat	Neale					735612593			
	Onke	Ngcuka	Daily Maverick	Our Burning Planet reporter			796284177			onke@dailymaverick.co.za
	George	Nicolaai	Fishing & Diving							gnicol@live.com
	Feni	Ntombizanele	DHSWS NC							FeniN2@dws.gov.za
	Daniswa	Nyondo	Elwandle				661687330			
	Patrick	Obies	Richtersveld Environmental Care				810658880			pobies36@gmail.com
Ms	Jennifer	Olbers								JenniferO@wildtrust.co.za
	Phillip	Oliphant								
		Oregus					788855441			
	Orion	Pak	iAfrica							orionpak@iafrica.com
	Lina	Papier					795453563			
Mr	Clinton	Payne	GCL Inv Pty Ltd			7 Amstel Road, Bothsig	845147637	123479146		clintonpayne@gmail.com
Mr	Laurence	Pearce	Impact Oil and Gas	Asset Compliance Manager – Asset Team						info@impactoilandgas.com
	Gabeebah	Petersen								
Mr	Richard	Petrus	Longtime Hondeklipbaai Fishing Primary Co – Operative	Chairperson			735102477			lthfcoop18@gmail.com
	Johillen	Philander					760346173			
	David	Phillips					834197720			
Mr	Andy	Pienaar	Kobush							kobushontwikkelings@outlook.com; kobushontwikkel@outlook.com; andypienaar9@gmail.com
	Colleen	Plower				PO Box 13534, Hout Bay, 7806	823484315			
	W	Poggenloet					730814298			
Mr	Rudolph	Raath	Kernel Resources/West Coast Resources	Mine Manager			823734883			Rudolphr@westcoastresources.co.za
		Ramsauer	Dyer Eiland Visserye (Pty) Ltd							Lramsauer@dyereiland.com
	Sharashini	Reddy	Irvin & Johnson Limited							SharashiniR@ij.co.za
Mr	Christo	Reeders	Northern Free State Mineral Resources Stakeholder Forum	Christo Reeders Attorneys			828820826	878090406		hcr@crattorneys.co.za
	Michele	Rivarola					829007514			mikeriv@carifro.com
	Kim	Roberts	!Khora||quallaes							
	Ernshaw	Robertson								ernshaw.robertson@gmail.com

Title	Name	Surname	Company	Designation	Property	Postal Address	Cellphone	Telephone	Fax	Email
Mr	Atmore	Rodgers								atmorerodgers123@gmail.com;
Mr	Toppi	Roman								toppiroman@gmail.com
	Francois	Roos	Northern Cape Protech and Agri Revolution (Pty) Ltd							francois.roos@vepcm.com
Ms	Lesley	Roos	De Beers Marine (Pty) Ltd	Environmental Manager						lesley.roos@debeersgroup.com
	D	Samuels					642401921			
	Mable	Samuels	Coastal Links				783252675			
	Bonnie	Schumann	Endangered Wildlife Trust	Doringbaai			721224232			bonnies@ewt.org.za
	Elizabeth	Schwellinas								
	Blythe	Scorge								
Mr	Mooshin	Seedat	iGas			P.O. Box 786141, Sandton, 2146				
Mr	John	Selby	Langebaan Residents and Ratepayers Association							johnselby@worldonline.co.za
Ms	Ray	September								September.ray2@gmail.com
	Tsalong	Sethathi	DHSWS NC							TsalongS@dws.gov.za
	Refilwe	Shelembe	Council of Geoscience							rshelembe@geoscience.org.za
	Rosey	Shoshola	Coastal Links				664944764			shosholarosey23@gmail.com
	Elza	Singels								elzasingels@outlook.com
	Anthony	Sloet					608244713			
Mr	Frikkie	Smit	Imbiza				643668832			
	Solene	Smith	Coastal Links					227722622		smithsolene6@gmail.com
	Quiyn	Snethlage	Port Nolloth Sea Farms Ranching And Strandvelt Conservation Club.							qsnethlage@mweb.co.za
Ms	Nomathemba	Sotomela	Imizamo Yethu Fishiing Community				835178197			
Ms	Carisa J.	Soudens	Hondeklip Bay Women's Group			P. O. Box 60, Hondeklipbaai	693955580			carisasoudens76@gmail.com
	Honaas	Soudens								soudensrs@gmail.com
Prof.	Merle	Sowman	University of Cape Town	Department of Environmental and Geographical Science				216502866		Merle.Sowman@uct.ac.za
	Johannes Walter	Steenkamp	Coastal Links				840875199			
	Lesley Ann	Steer	Irvin & Johnson Limited							lesleyanns@ij.co.za
Mr		Stern	Namasan Oil & Gas							martsternlaw@mweb.co.za

Title	Name	Surname	Company	Designation	Property	Postal Address	Cellphone	Telephone	Fax	Email
Mr	Hymie	Steyn	Western Cape Marine Conservation Society							hymie_sadsaa@absamail.co.za
	Jill	Stopforth	Irvin & Johnson Limited							jills@ij.co.za
	Felicity	Strange	Friends of Verlorenvlei	Secretary						vleiratdesign@gmail.com
Mr	Salie	Suleiman	FishSA	Chairman						suleimans@bluecon.co.za
	Jenifer	Swartz					787713228			
	Ragel	Telling								
	Elise	Tempelhoff	Environmental Specialist Journalist				833091192			eliset@24.com
	Angelina	Thana					787468627			
		The Manager	Lucky Star							franse@luckystar.co.za
		The Managing Director	Premier Fishing (SA) (Pty) Ltd			P O Box 24, Port Nolloth, 8280				
Mr	Tertius	Traut	Marine Products Cape Town							tpstraut@marpro.co.za
	Richard	Tsholoba	Namaqua Integrated Development Agency (NIDA)							tsholoba3richard@gmail.com
	Jay	Tucker	Jayfish cc							jayfish1@gmail.com
	Dorothy Louise	Tweedale		Resident of St Helena Bay			836778872			accounts@tweedales.co.za
Mr	Toivo	Uahengo	Nambian Government	Ministry of Environment and Tourism, Directorate Scientific Services (DSS), Research and Permit Control		Private Bag 13306, Windhoek, Namibia		26461263131	26461263131	tuahengo@met.na
	Rimon	van Bala				Flat BB9, Hout Bay, Salmander Str, 7806				
	Chris	van den Heever	NamaquaRIGHTS	Executive Director						chris@namaquarights.org
	Denice	van der Heever	Maverick Traders SA (Pty) Ltd				631180777			nielanc@gmail.com
	John	Van der Heever					823995134			johnvdheever@gmail.com
Mr	AS	Van der Merwe	Moneyline 344 (Pty) Ltd			P O Box 35, Saldanha, 7395				
	Jonathan	van der Westhuizen	Natural Justice							jonathan@naturaljustice.org
	Gawie	van Dyk	DWS NC							VanDykG@dws.gov.za
	Eugene	van Niekerk	Aquarius Fishing (Pty) Ltd	Chairperson						aqfishing@mweb.co.za
Ms	Martie Janse	Van Rensburg	Council of geoscience							mjanse@geoscience.org.za
Mr	Neville	Van Rooy	Green Connection				664796411			neville@thegreenconnection.org.za
	Deon	Van Zyl	Afro Fishing (Pty) Ltd	CEO						deon@afrofishing.co.za

Title	Name	Surname	Company	Department	Property	Postal Address	Cellphone	Telephone	Fax	Email
Mrs	Thesmé	van Zyl	Matzikama Municipality	Tourism Development and Environmental Coördinator				272013302	866279835	thesme@matzikama.gov.za
	Mongezi	Vika	Knysna Fishing Company (Pty) Ltd							mongezi@ukuloba.co.za
	Bertie	Visser								bertiev70@gmail.com
	Carla	Visser								carlavssr@gmail.com
	Gustav	von Mollendorf	Kamiesberg LM			PO Box X200 , Garies , 8220	825694116		276528001	gustav@kamiesberg.gov.za
	Kate	Vraagom					661306348			
Mr	Nico	Waldeck	Abalobi							nico@abalobi.org
	Lyle	Warner	Block U8							
Ms	Beulah	Williams	Richtersveld Local Municipality				721437303			
Ms	Avril	Williamson	National Department of Cooperative Governance and Traditional Affairs			Private Bag X804, Pretoria, 0001		123340518	862934966	ZandileZ@cogta.gov.za
	Ilze	Worner					731197988			
	Sydney	Yon					834508753			
	Rudi	Young					635249200			
			BALOBI PROCESSORS (PTY) LTD				422940148			mark@balobi.com
Mr	Serge	Raemaekers	Abalobi							serge@abalobi.org
Ms	Clair	Attwood	South African Commercial Fisherman Corp							cattwood@mweb.co.za
Mr	Wally	Croome	South African Commercial Line Fishing Association							ladymfishing@telkomsa.net
	Madoda	Khumalo	Sea Harvest Corporation Ltd							MadodaK@SeaHarvest.co.za
	Felix	Ratheb	Sea Harvest Corporation Ltd							FelixR@seaharvest.co.za
	Tim	Reddell	Sea Harvest Corporation Ltd							timr@seaharvest.co.za
	Cindy	Roodt	Sea Harvest Corporation Ltd							cindyr@seaharvest.co.za
	Kenton	Smith	Sea Harvest Corporation Ltd							kentons@seaharvest.co.za
Dr	Simon	Elwen	Sea Search Africa							simon.elwen@gmail.com
	Andrew	Hendricks	Sea Vuna Fishing Company (Pty) Ltd							corneld@seaharvest.co.za
Mr	Andrew	Hendricks	Sea Vuna Fishing Company (Pty) Ltd							corneld@seaharvest.co.za

Title	Name	Surname	Company	Designation	Property	Postal Address	Cellphone	Telephone	Fax	Email
Mr	Kobus	Maritz	Sea Vuna Fishing Company (Pty) Ltd							kobusm@seaharvest.co.za
	Raymond	Williams	Seavuna							raymondWI@seavuna.co.za
Ms	Nicole	Lomberg	Shell South Africa Upstream B.V.	Environmental Planner						nicole.lomberg@shell.com
Mr	Marius	Rademeyer	Sigma Coatings (Pty) Ltd	National Projects and Approval Manager						marius.rademeyer@sigmacoatings.co.za
Ms	Pinky	Matshaka	Sipho Shipping							pinky@siphoshipping.co.za
Mr	Samuel		Sisonke Environmental Justice Network(SEIJN); Siyanqoba Rural Transformation Forum; Siyaphambili Emajuba Farmdwellers Association (SEFA); Rural Network; Landless People's Movement (LPM); Bothas Pass Community, Bosworth Community	Groundwork				333425662		samuel@groundwork.org.za
Ms	Clare	Gomes	SMIT Amandla Marine (Pty) Ltd							c.gomes@smit.com
Mr	Dave	Murray	SMIT Amandla Marine (Pty) Ltd							d.murray@smit.com
			SOUNDPROPS 1167 INVESTMENTS (PTY) LTD				227142027			sdbconsultingsa@gmail.com
Mr	Sean	Fennessy	South African Association for Marine Biological Research (SAAMBR)					313288173		seanf@ori.org.za
		The Manager	South African Commercial Line Fishing Association							boating@telkomsa.net
Mr	Craig	Hagan	South African Deep Sea Angling Association							craig@hdpbrokers.co.za
Mr	Clyde	Bodenham	South African Hake Longline Association	Secretary						clyde@molimoman.co.za
Mr	John	Gribble	South African Heritage Resources Agency	Maritime Archaeologist						jgribble@sahra.org.za

Title	Name	Surname	Company	Designation	Property	Postal Address	Cellphone	Telephone	Fax	Email
	Ravi	Naicker	South African Maritime Safety Authority (SAMSA)	National Operations Manager						rnaicker@samsa.org.za
			South African Tuna Long Line Assocaition							secretary@satla.co.za
	Johann	Augustym	South African Deep Sea Trading Industry Association				828293911	214252727		johann@sadstia.co.za
Dr	Johann	Augustyn	South African Deep Sea Trawling Industry Ass.							chairman@sadstia.co.za
Mr	Nigel	Campbell	South African Maritime Safety Authority (SAMSA)	Manager						ncampbell@samsa.org.za
Mr	James	Collocott	South African Maritime Safety Authority (SAMSA)	Senior Mananger: Centre for Sea Watch & Response						jcollocott@samsa.org.za
	Marco		South African Tuna Long Line Association							limarco@mweb.co.za
	Trevor	Wilson	South African Tuna Long Line Association	Chairman			823212985			chairman@satla.co.za
Mr	Don	Lucas	South African Tuna Longline Association							don@comfish.co.za
	Desmond	Mathew	South Durban Community Environmental Alliance	Coordinator		18 Major Calvert Austerville Durban 4052	839826939	314611991	314681257	desmond@sdceango.co.za
	Sherelee	Odayar	South Durban Community Environmental Alliance			18 Major Calvert Austerville Wentworth 4052	718589339	314611991		sherelee@sdceango.co.za
Mrs	Hilda	Jordaan	Southern Sea Fishing	Manager						johildaj@premfish.co.za
	Gregory	Don Christy	St Francis Sea Products (Pty) Ltd							gregchristy@intekom.co.za
			STAMATIS FISHING CC				399761907			stim@adcan.co.za
Ms	Natalie	Weyers	Strandveld Conservation Club				735474948			Nats.weyers@gmail.com
	Douglas	Kramer	Suid Kaap Fisheries	Manager						stilbaai@southprincessfishing.co.za
Mr		Sakino	Taiyo Fishing							taiyoct@mweb.co.za
			TERRASAN PELAGIC FISHERY (PTY) LTD				219305023			neil@terrasan.co.za
Mr			The Tuna Hake Fishing Corp Ltd	Business Operations Logistics Manager						sahlla@mweb.co.za
			TRAKPROPS 22 PTY LTD				227522616			annelize@paternostergroep.co.za

Title	Name	Surname	Company	Department	Property	Postal Address	Cellphone	Telephone	Fax	Email
	Mapaseka	Lukhele	Transnet Corporate JHB							mapaseka.lukhele@transnet.net
Ms	Nonkululeko Sylvia	Dlamini	Transnet Ltd			P O Box 72501, Parkview, Gauteng,2122	837426342	112693138		Nonku@Gmail.Com
Ms	Nokuthula	Khumalo	Transnet Soc Ltd	GM: Governance and Support						nokuthulae.khumalo@transnet.net
Mr	Antonio	Marino	Tunacor							antonio@tunacor.com.na
			UKLOBA FISHING (PTY) LTD				213866578			jonathan@africantuna.com
Mr	Richard	Montjoie	Umbono Capital							rmontjoie@umbono.co.za
			UMZAMANI FISHING CC				866647728			umzamani@telkomsa.net
Ms	Nicky	McLeod	Umzimvubu Catchment Partnership Programme(UCPP)	Mcleod&Associates Attorneys			827826067	397374849		nicky@enviros.co.za
Ms	Virginia	MacKenny	University of Cape Town							virginia.mackenny@uct.ac.za
	Jayesh	Jaga	Oceana Group Limited							jayesh.jaga@oceana.co.za
	Karen - Dawn	Koen	Oceana Group Limited	Environmental Sustainability Manager						karenk@oceana.co.za
	Francois	Cloete	Richtersveld Municipality				278511112			francois@richtersveld.gov.za
Ms	Alta	Kotze	Richtersveld Municipality			Private Bag x113, Port Nolloth, 8280	721941947	278518929		alta@richtersveld.gov.za
	Mariam	Peters	Oceana Group Limited							mpeters@oceana.co.za
	Marthin	Potgieter	Oceana Group Limited							mpotgieter@ob.co.za
	Janet	Solomon	Oceans Not Oil				837891067			correspond@janetsolomon.com
	Titania	Stefanus-Zincke	Oceana Group Limited							titanias@oceana.co.za
	Suleiman	Salie	Oceana Group Limited	Chairman						suleiman.salie@oceana.co.za; s.salie@telkomsa.net
	Mike	Sands	Oceana Group Limited							mike.sands@oceana.co.za
Mr	Redah	de Maine	Risar Fishing							redahdemainef@msn.com
			SA Deepsea Trawling Industry Association							johann@sadstia.co.za
	Lindiwe	Franks	Office of the Provincial Head: Northern Cape Region	DHSWS						AbrahamsA@dws.gov.za

Title	Name	Surname	Company	D[illegible]m	Property	Postal Address	[illegible]hone	Telephone	Fax	Email
		Rabe	Oranjevis St Helena Bay							hr@oranjevis.co.za
			SA Fisheries Museum Velddrif				828499251	227832531	866724183	seaquiz@mweb.co.za
			SA Hake Longline Association							clyde@molimoman.co.za
			SA Tuna Association							sata@mweb.co.za
Mr	Joseph Glenn	Losper	ORXY Mining			P.O. Box 95, Alexander Bay, 8290	664560910	765241978		glennlosper@gmail.com
Mr		van Wyk	Pakamani Fishing (Pty) Ltd			P O Box 41, Saldanha, 7395				
			PIONEER FISHING (WEST COAST) (PTY) LTD				214215368			mvdh@pioneerfishing.co.za
Mr		Van Noordwyk	Pioneer Fishing (Pty) Ltd			P O Box 25, St Helena Bay, 7390				
			PHAKAMISA FISHING (PTY) LTD				414847297			magobiyane.kulukazi@gmail.com
	Mike	van den Heever	Pioneer Fishing (Pty) Ltd							mvdh@pioneerfishing.co.za
			PATERNOSTER VISSERY BPK				227522616			jaco@paternostergroep.co.za
Ms	Sinazo	Mnyaka	Petroleum Agency of South Africa							MnyakaS@petroleumagencysa.com
			SA Tuna Longline Association							chairman@satla.co.za
	Ruan	Brand	SAHRA							rbrand@sahra.org.za
Mr	Simphiwe	Mome	SAHRA							smome@sahra.org.za
			SAMSA Port Nolloth					278577695	278517699	SAMSA@portnolloth.co.za
Ms	Leana	Synders	San Council							leanacloete@ymail.com
	Deon	Van Antwerpen	Sailors Joy Fishing (Pty) Ltd							vanantwerpendeon@gmail.com
	Briege	Williams	SAHRA							bwilliams@sahra.org.za
Ms	Ingrid	Nanni	SANBI							I.nanni@sanbi.org.za
	Willem	Louw	SANParks	Park Planning and Development			836405298			Willem.louw@sanparks.org
			Scotia Inn Hotel					278518553	278518847	info@scotiainn.co.za
Mr	Russell	Hall	Sea Harvest Corporation Ltd	Fleet Operations Manager						russellh@seaharvest.co.za
			SA Tuna Longline Association							secretary@satla.co.za
Mr	Chris	Hamel	African Tuna Traders cc							chris@africantuna.com
Mr	Marcus Pawson		AfriForum					861020030		marcus@afriforum.co.za

Title	Name	Surname	Company	[illegible]	Property	Postal Address	[illegible]phone	Telephone	Fax	Email
Mr	Derek	Light	Agri South Africa	Derek Light Attoneys			832271922			dlight@telkom.co.za
	Leilani	Swartbooi	Alexkor			1 Orange Road, Alexander Bay, 8290	724600495	278318383		leilanis@alexkor.co.za
	Lemgang Alvin	Pitsoe	Alexkor Soc Ltd			2nd Floor Building, 15 Woodlands Off, 20 Woodlands Drive, Woodmead, Gauteng, 2191	826529137	118803383		
	Mtutuzeli	Tyalimpi	Alexkor Soc Ltd				793977081	114658468		COLLATERAL001@GMAIL.COM
Mr	Christiaan	Mackenzie	Aukotowa Fisheries Primary co-op Ltd	Chairman			712262617			aukotowafisheries@gmail.com
	Mark		Bakoena Traditional Council	Mcleod&Associates Attorneys						mark@mcleods.co.za
	Paolo	Esposito	Belton Park Trading 127 (Pty) Ltd							pe@imdhgroup.com
	Thandiwe		Benguela Current Commission	Executive Secretary		Private Bag 5031 Swakopmund Namibia		464406901	464406902	thandiwe@benguelacc.org
	Reason	Nyengera	Birdlife Africa							reason.nyengera@birdlife.org.za
	Pierre	Rocher	Blue Continent Products (Pty) Ltd	Managing Director						procher@bluecon.co.za
	Mike	Sands	Blue Continent Products (Pty) Ltd							msands@bluecon.co.za
	Sean	Walker	Breakwater Products							swalker@breakwaterproducts.com
	Neville	Brink	Calamari Fishing (Pty) Ltd							neville.brink@oceana.co.za; aletd@oceana.co.za
Mr	Willem	Louw	Cape Nature							Willem.Louw@sanparks.org
			CAPE PILCHARD PIONEER CC				216919916			nsafe@worldonline.co.za
			Coastal Links South Africa							info@masifundise.org.za
			COMMUNITY PROCESSORS AND DISTRIBUTORS (PTY) LTD				827896161			santivpd@gmail.com
			Cooperative Governance and Traditional Affairs			Private Bag X804, PRETORIA, 0001		123340600	123340603	info@cogta.gov.za
Dr	Jackie	Sundae	University of Cape Town							jackiesunde25@gmail.com
	Obakeng	Molelu	University of Cape Town -Research Assistant				839881196			Obakeng.M@live.co.za
	Mike		Viking Aquaculture							mike@vikingaquaculture.co.za
Mr	Peter	Bacon	Viking Fishing							peter@vikingfishing.co.za

Title	Name	Surname	Company	Director	Property	Postal Address	Cellphone	Telephone	Fax	Email
Mr	Nico	Bacon	Viking Fishing							info@vikingfishing.co.za
Mr	William	Villet	Viking Fishing							rory@vikingfishing.co.za
			VIKING INSHORE FISHING (PTY) LTD				214194140			kay@selectafish.co.za
		Walters	Visko							visko@mweb.co.za
			VISKO SEEPRODUKTE (PTY) LTD				227361104			visco@mweb.co.za
	Vincent	Young	VM Young Visserye Bk							buyoung@telkomsa.net
Mr	Jan	van Niekerk	Vryheidsfront Plus				837432042	514071104		Janvn220@gmail.com; volk@global.com
		Donaggi	Weskus Vissers KO-OP Bpk							compassfishing@mweb.co.za
	Patrick	Dowing	WESSA		Climate Change and Energy		849661249			patrick@tops.org.za
Mr	Patrick	Norman	WESSA							paddyn@telkomsa.net
	Roland	Burke	West Ship							wrburke@quali.co.za
Mr	Adrian	Pole	WILDOCEANS		Adrian Pole Attorneys		823408534	317656011		adrian@adrianpole.co.za
			ZWM FISHING (PTY) LTD				227361104			zwm@wildocean.biz
	Johnny	Josias	Pescaluna					217917060		johnny@pescaluna.co.za
	Cherith	Regye	Premier Fishing					214241400		cheri@epremfish.com
	Camila	Budden	Protect The West Coast (NGO)							chairperson@protectthewestcoast.org
	Mike	Schlebach	Protect The West Coast (NGO)							md@protectthewestcoast.org
	Patrick	Forbes	Protect the West Coast (NGO)							legal@protectthewestcoast.org
	Marietta	Hopley	Protect The West Coast (NGO)							hopleym@protectthewestcoast.org
	Rona	vd Merwe	Protect the West Coast (PTWC) NGO							ronavdm@gmail.com
	Pippa	Dickson	Protect The Wild Coast (NGO)							operations@protectthewestcoast.org
	Anestachia	Ambresini	Richtersveld Municipality					278511111		reception@richtersveld.gov.za
	Luzonne	Julie	Richtersveld Municipality							luzonne@richtersveld.gov.za
			SAPFIA							sapfia@inshore.co.za
	Mike	Copeland	SAPFIA		Chairperson	1st Floor Harbour Place; 7 Martin Hammerschlag Way; Cape Town	825721852	214252727		copeland.fishconsult@gmail.com

Title	Name	Surname	Company	Designation	Property	Postal Address	Cellphone	Telephone	Fax	Email
	David	Harper	Save Langebaan Lagoon Afriforum env afffling West Coast				768088839			
	Gobani	Tshangela	Sea Point Library					214004184		
	Nicholas	Arnott	SLR Consulting	Associate Environmental Consultant			0723764809			narnott@slrconsulting.com
	Laueren	Staats	South African Underwater Fishing Federetation (SAUFF)	Administration						admin@sauff.co.za
	Pedro	Garcia	South African United Fishing Front (SAUFF)	Chairperson / Founder			0739799951/0781030685/0767742709			sauff@yahoo.com
Mr	Micheal	Meyer	South African Whale Disentanglement Network (SAWDN)							michaelmeyer0@gmail.com
	Desmond	D'Sa	South Durban Community Environmental Alliance							desmond@sdceango.co.za
	Tanica	Naidoo	South Durban Community Environmental Alliance							tanica@sdceango.co.za
	Cassandra	Schnoor	South Durban Community Environmental Alliance							cassandra@sdceango.co.za
	Charles	Lakay	SSF				795661332			
	Brendin Robert	Tweedale	St Helena Bay Resident				836754919			accounts@tweedales.co.za
Ms	Lisa	Makaula	The Green Connection				718820846			
	Nandipha	Masango	The Green Connection							vuyelwamasangoo@gmail.com
Mr	Kholwani	Simelane	The Green Connection							kholwani@thegreenconnection.org.za
Mr	Eduard	Groenewald	Total E&P South Africa B.V.	HSE Manager			799951915			eduard.groenevald@total.com
Mr	Khuliso	Mudau	Total Energies	Exploration & Production				210034067		khuliso.mudau@totalenergies.com
	Wilma	Fisher	Transnet National Ports Authority	Port of Cape Town						Wilma.Fisher@transnet.net
	Thabile	Majozi	Transnet National Ports Authority	Port of Cape Town				214493408		Thabile.Majozi@Transnet.net
	Sinalo	Sodela	Transnet National Ports Authority	Port of Cape Town						Sinalo.Sodela@transnet.net

Title	Name	Surname	Company	D[illegible]n	Property	Postal Address	[illegible]phone	Telephone	Fax	Email
Mr	Cecil	Le Fleru	Vredendal Khoi Leadership							lefleurcecil@gmail.com
	Jeff	van Neel	VVVT				630513903			vanneeljeff458@gmail.com
	Nicolaas	Booysen	Weskus Guriqua San Raad	Senior Chief			0827304534,0737 728425			wc.gariquacouncil@gmail.com
Mr	Steve	Kretzmann	West Cape News							westcapenews@gmail.com
Ms	Adri	La Meyer	Western Cape Government	Department of Environmental Affairs and Development Planning | Directorate: Development Facilitation				214832887		Adri.LaMeyer@westerncape.gov.za
	Anthony	Stoffloers	WFC				839559777			
	Budget	Wods	XR				8325522134			
Pre-Identified - Registered										
	Monica	Stassen	SANCCOB	Preparedness and Response Manager				215576155		monica@sanccob.co.za
Pre-identified: Competent Authority										
Mrs	L	Mekwe	Petroleum Agenc SA	RSA Rights and Permits		PO Box 5111, Tygervalley, 7536		219283500	219383520	plu@petroleumagencysa.com
Ms	Phumla	Ngesi	Petroleum Agency of South Africa	Environmental Compliance			828500274	219383570		ngesip@petroleumagencysa.com
Pre-identified: District Municipality										
	Jodine	Cloete	Namakwa District Municipality	Communications Manager		Private Bag X20, SPRINGBOK, 8240	839458667	277128000	277128040	jodinec@namakwa-dm.gov.za
Mr	Chris	Fortuin	Namakwa District Municipality	Municipal Manager		Private Bag X20, SPRINGBOK, 8240		277128000	277128040	chrisf@namakwa-dm.gov.za
Mr	Denver	Smith	Namakwa District Municipality	Environmental Manager		Private Bag X20, Springbok, 8240	842159911	277121124	277128041	denvers@namakwa-dm.gov.za
	W	Markus	West Coast District Municipality							wmarkus@wcdm.co.za
Ms	Vic	Kabelin	West Coast Marine Conservation Society			39 Highway Road, Fish Hoek, 7975				
Mr	Nthabiseng Patricia	Bopape	West Coast National Park							pat.bopape@sanparks.org
Ms	Deborah	Winterton	West Coast National Park	Science Liason Officer						deborah.winterton@sanparks.org
Pre-identified: Local Municipality										
			Richtersveld Local Municipality						275272556	info@richtersveld.gov.za
			Richtersveld Local Municipality			Private Bag X113, Port Nolloth, 8280		278511111	278511101	postmaster@richtersveld.gov.za
	Swartland Muni		Swartland Local Municipality	Development Services		Private Bag X52, Malmesbury 7299				swartlandmun@swartland.org.za

Title	Name	Surname	Company	D[illegible]	Property	Postal Address	[illegible]phone	Telephone	Fax	Email
Ms	Gloria	Beukes	Richtersveld Local Municipality	Ward 3		Private Bag X113, Port Nolloth, 8280	621026932			gloriabeukes6@gmail.com
Cllr	Anna	Bock	Richtersveld Local Municipality	Ward 4			632865440			bockana1963@gmail.com
Ms	Ethel	Cloete	Richtersveld Local Municipality	Head of Communications		Private Bag X113, Port Nolloth, 8280		278511111	275272556	ethel@richtersveld.gov.za
Mr	Gareth	Cloete	Namakwa District Municipality	Corporate and Municipal Health Services		Private Bag X20, SPRINGBOK, 8240				
Mr	Moeketsi	Dichaba	Nama Khoi Local Municipality	Municipal Manager		Private Bag X1012, De Aar, 7001		277188101	277121635	michelle.magerman@namakhoi.gov.za
	Nazeema	Duarte	Saldanha Bay Local Municipality	Economic Development and Strategic Services: Environment and Heritage				227017166		Nazeema.Duarte@sbm.gov.za
Ms	Danele	Farmer	Richtersveld Local Municipality			Private Bag X113, Port Nolloth, 8280		278511111	275272556	dalane@richtersveld.gov.za
	Russel	Hartley	Nama Khoi Local Municipality	Local Economic Development Officer						Russel.hartley@namakhoi.gov.za
	Marius	Hermanus	Saldanha Bay Local Municipality	Economic Development and Strategic Services: Risk Management						Marius.Hermanus@sbm.gov.za
Cllr	Authur	Jasen	Richtersveld Local Municipality	Executive Mayor		Private Bag X113, Port Nolloth, 8280	837232510	278512510	275272556	martinette@richtersveld.gov.za
	Angila	Joubert	Bergrivier Local Municipality	Town Planning and Environmental Management: Environmental Officer						JoubertA@bergmun.org.za
	Danne	Joubert	Cederberg Local Municipality	Town Planning and Building Control / Environmental Management: Environmental Officer						dannej@cederbergmun.gov.za
Mr	Marais	Kobus	Swartland Local Municipality	Occupational and Environmental Health Services		Private Bag X52, Malmesbury 7300				maraisk@swartland.org.za
Mr	John	Koninisi	Richtersveld Local Municipality	Infrastructure Manager		Private Bag X113, Port Nolloth, 8280		278511111		john@richtersveld.gov.za
	Jannie	Loubser	Namakwa District Municipality	Senior Management IDP		Private Bag X20, SPRINGBOK, 8240	832523136	277128000	277128040	janniel@namakwa-dm.gov.za
	Thabisile	Mkhize	Saldanha Bay Local Municipality	Economic Development and Strategic Services: Local Economic Development						Thabisile.mkhize@sbm.gov.za
Ms	Susanna	S	Richtersveld Local Municipality	Land Use Zoning		Private Bag X113, Port Nolloth, 8280		278511111		susannas@richtersveld.gov.za
Cllr	Charlton James	Stuurman	Richtersveld Local Municipality				780992780			charliej250466@yahoo.com

Title	Name	Surname	Company	Designation	Property	Postal Address	Telephone	Telephone	Fax	Email
	Asanda	Tolbadi	Saldanha Bay Local Municipality	Economic Development and Strategic Services: Local Economic Development: Integrated Development Planning / Performance Management System / Intergovernmental						Asanda.Tolbadi@sbm.gov.za
Cllr	Jan	van Wyk	Nama Khoi Local Municipality	Mayor		Private Bag X1012, De Aar, 7000		277188121	277121635	alethea.magerman@namakhoi.gov.za
	Adriaan	Neethling	Cederberg Local Municipality	Town Planning and Building Control / Environmental Management: Manager		Private Bag X2, Clanwilliam, 8135				adriaann@cederbergraad.co.za; boubeheer@cederbergraad.co.za
	Janet	Bodenstein	City of Cape Town							Janet.Bodenstein@capetown.gov.za
	Magdalena	van Zyl	City of Cape Town							Magdalena.VanZyl@capetown.gov.za
	Damphne	Beukes	Kamiesberg Local Municipality	Head of Communications		Private Bag X200, Garies, 8220		276528017	276528001	
Cllr	Mervine	Cloete	Kamiesberg Local Municipality	Executive Mayor		Private Bag X200, Garies, 8220		276528010	276528001	
Mr	Joseph	Cloete	Kamiesberg Local Municipality	Municipal Manager		Private Bag X200, Garies, 8220		276528011	276528001	
			Matzikama Local Municipality	Infrastructure Services				272013401		
Mr	Lionel	Phillips	Matzikama Local Municipality	Community Developmement Sevices		PO Box 98, Vredendal, 8160		272013350		lionelp@matzikama.gov.za
Mr	G	Seas	Matzikama Local Municipality	Municipal Manager		PO Box 98, Vredendal, 8160		272013301		munman@matzikama.gov.za
			Nama Khoi Local Municipality							
	Dominic	Bugan	Nama Khoi Local Municipality	CDW: Co-operative governance human settlements and Tranditional affairs			744224205			dbugan55@gmail.com; Dominic.bugan@namakhoi.gov.za
	Jacques	Cloete	Nama Khoi Local Municipality	HOD: Technical Services			836456565			Jacques.cloete@namakhoi.gov.za
Pre-identified: Metropolitan Municipality										
Mr	Eduaan	Albertyn	City of Cape Town							eduaan.albertyn@capetown.gov.za
Mr	David	Allpass	City of Cape Town	Head Operations: Bulk Water						David.Allpass@capetown.gov.za
Mr	Kevin	Balfour	City of Cape Town	Head: Infrastructure & Project implementation						kevin.balfour@capetown.gov.za
Mr	Mark	Brodovicky	City of Cape Town							mark.brodovcky@capetown.gov.za

Title	Name	Surname	Company	Department	Property	Postal Address	Cellphone	Telephone	Fax	Email
Mr	Angus	Burns	World Wildlife Fund					333431464		aburns@wwf.org.za
	Darryl	Colenbrander	City of Cape Town	Head: Coastal Policy Development and Management Programmes			724959715			Darryl.colenbrander@capetown.gov.za
Mr	Japp	Dave	Capricon Marine Environment (CapMarine)	Director						dave@capfish.co.za
Mr	Jaco	De Bruyn	City of Cape Town							water.info@capetown.gov.za
Mr	Aldre	De Goede	City of Cape Town							aldre.degoede@capetown.gov.za
Cllr	Stuart	Diamond	City of Cape Town	Finance Portfolio Committee Chairperson						stuart.diamond@capetown.gov.za
Mr	C	Dorse	City of Cape Town	Nature Conservation Division						cliff.dorse@capetown.gov.za
Mr	Joe	Esau	City of Cape Town	Area Manager - Sports Recreation & Amenities						joe.esau@yahoo.com
Mr	Jan	Fourie	City of Cape Town							jan.fourie@capetown.gov.za
Dr	Patricia	Holmes	City of Cape Town	Environmental Resource Management						patricia.holmes@capetown.gov.za
Mr	Edward	Knott	City of Cape Town	Coastal Coordination						Edward.knott@capetown.gov.za
Mr	Ricky	Lenders	City of Cape Town							Ricky.lenders@capetown.gov.za
Mr	Johan	Massyn	City of Cape Town	District Manager: Roads and Stormwater						Johan.Massyn@capetown.gov.za
Ms	Charline	Mckie	City of Cape Town	Reserve Manager						charline.mckie@capetown.gov.za
Mr	Joe	Olivier	City of Cape Town	Sports and Recreation						joe.olivier@capetown.gov.za
Mr	Kuttel	Peter	CB&I							ppkuttel@iafrica.com
Mr	Paul	Rhode	City of Cape Town	Head: Resource & Infrastructure Planning						Paul.Rhode@capetown.gov.za
Mr	Andre	Rossouw	City of Cape Town	Professional Officer: Bionet Implementation						andre.rossouw@capetown.gov.za
Mr	Michael	Schmidt	City of Cape Town	Distribution System Development - Area North						michael.schmidt@capetown.gov.za
Mr	Pieter	Strümpher	City of Cape Town	Section Head:Property Management						pieter.strumpher@capetown.gov.za
Mr	Morne	Theron	City of Cape Town	Environmental Resource Management Department						morne.theron@capetown.gov.za
Ms	Pat	Titmuss	City of Cape Town	Environmental Resource Management Department						Pat.Titmuss@capetown.gov.za
Ms	Amina	Varachia	City of Cape Town							amina.varachia@capetown.gov.za
Ms	Sonja	Warnich-Stemmet	City of Cape Town							Sonja.WarnichStemmet@capetown.gov.za

Title	Name	Surname	Company	Designation	Property	Postal Address	Telephone	Telephone	Fax	Email
Ms	Sarah	Wilkinson	Capricon Marine Environment (CapMarine)							sarah@capfish.co.za
Pre-identified: NGO										
Ms	Hilda	Adams	The Collective South Africa							hildadms3@gmail.com
	Kirsten	Day	Birdlife	Advocacy Officer						kirsten.day@birdlife.org.za
	Deon	de Jager	Afriforum							deon.dejager@afriforum.co.za
	Lambert	de Klerk	Afriforum							lambert.deklerk@afriforum.co.za
Mr	Simon	Gear	Birdlife South Africa			PO Box 515		117891122	117895188	advocacy@birdlife.org.za
Mr	Martin	Gilbert	We Are South Africans	Founder						news@wearesouthafricans.com; info@@wearesouthafricans.com; gilbert@wearesouthafricans.com
Ms	Shelly	Lizzio	Endangered Wildlife Trust	National Biodiversity and Business Network		Private Bag X11, Modderfontein, 1645		113723600	123423948	shelleyl@ewt.org.za
Ms	Rosie	Malan	Aukotowa Fishing Co-Op				729129396			
Dr	Alistair	McInnes	Birdlife	Seabird Conservation Programme Manager						alistair.mcinnes@birdlife.org.za
	Alister	McInnes	Birdlife South Africa							advocacy@birdlife.org.za
Mr	Thomas	Mnguni	GroundWork			PO Box 2375, Pietermaritzburg, 320		333425662	333425665	thomas@groundwork.org.za
Mr	Rudzani	Nemajuka	Wildlife and Environment Society of South Africa (WESSA)	Environmental Officer		PO Box 435		114625663	212500098	rudzani.memukula@wessa.co.za
	Adrian	Pole	Adrian Pole Attorneys on behalf of Green Connection			P O Box 671 · Hillcrest · 3650	823408534			adrian@adrianpole.co.za
Ms	Johanne	Russouw	Agri Westcape							johanne@awk.co.za
Ms	Hanneline	Smit-Robinson	Birdlife South Africa	CEO		PO Box 515, Randburg, 2125		117891122	117895188	conservation@birdlife.org.za
	Walter	Steenkamp	Aukotowa Fisheries				0840875199/0631465634			
	Walter	Steenkamp	Aukotowa Fisheries				631465634			aukotowafisheries@gmail.com
Ms	Venessa	Strauss	SA Foundation for the Conservation of Coastal Bird							venessa@sanccob.co.za
	Werner	Strauss	Afriforum	District Coordinator: Kalahari Community Structures		P. O. Box 17216, Lyttelton, 0140	812171752	861020030		werner.strauss@afriforum.co.za

Title	Name	Surname	Company	Directorate	Property	Postal Address	Cellphone	Telephone	Fax	Email
Mr	Martin	Taylor	Birdlife South Africa	Special Projects		PO Box 515, Ranburg, 2125		117891122	117895188	martin.taylor@birdlife.org.za
Pre-identified: Offshore Exploration										
Mr	Thabang	Komo	Sungu Sungu Petroleum (Pty) Ltd	Offshore: Mid Orange			829644662	110215397	866460663	ungusungu@mweb.co.za
Mr	Jan	Maier	Thombo Petroleum/ Africa Energy Corp	Offshore: Block 2B				21003550	865950676	jan.maier@africaenergycorp.com
Mr	Kerwin	Rana	Sunbird Energy (Ibhubesi) (Pty) Ltd	Offshore: Block 2A			838702889	114845005	114845004	krana@sunbirdenergy.com
Mr	Saleem	Soobader	PetroSA	Offshore: Block 2A				219284715	219293104	saleem.soobader@petrosa.co.za
Pre-identified: Onshore Exploration										
	Stefano	Marani	Tetra4 (Pty) Ltd			Private Bag X10030, Randburg, 2125	813743488	117924601	117924599	stefano.marani@tetra4.com
Mrs	Carol-Ann	Mocke	Anglo America			PO Box 62179, Marshalltown, 2107		116383658	114833040	carol-ann.mocke@angloamerican.com
Ms	Fiona	Moir	Inert Fas Industries			P.O. Box 650555		878205910		iona@ntenergy.co.za
	Moshe	More	Maarifa Resources (Pty) Ltd			P.O. Box 78138, Sandton, 7536		118838605	118838576	kribane@gmail.com
Mr	Chris	Mumby	Inert Fas Industries					878205910		chris@ntenergy.co.za
Mr	Don	Ncube	Afro Energy (Pty) Ltd				826012444	117924601	114833040	ndcube@mweb.com
	Peter	Phindulo- Booi	Booi Brothers					116123188	866915580	booihs@gmail.com
Pre-identified: Organ of State										
			National Department of Environmental Affairs	Directorate: Coastal Conservation Strategies		PO Box 52126, V&A Waterfront, Cape Town, 8002				Oceia@environment.gov.za
			National Department of Environmental Affairs	EIA Admin						EIAadmin@environment.gov.za
Mr	Abe	Abrahams	Northern Cape Department of Water and Sanitation	Chief Director		Private Bag X602, Kimberly, 8300	828836741	0538308800/67600	538314535	abrahamsa@dws.gov.za
	A	Ashley	National Department of Environmental Affairs	Director: Oceans & Coasts						Ajohnson@environment.gov.za
Mr	Lorato	Banda	Northern Cape Department of Agriculture, Land Reform and Rural Development	Senior Management					538313635	
Mr	Lorato	Banda	Northern Cape Department of Agriculture, Land Reform and Rural Development	Senior Management		Private Bag X5018, Kimberly, 8300		538389100	538314685	

2552

Title	Name	Surname	Company	Designation	Property	Postal Address	Cellphone	Telephone	Fax	Email
Ms	Stephanie	Barnardt	Heritage Western Cape	Heritage Officer						stephanie.barnardt@westerncape.gov.za
Ms	R.L.	Bosoga	National Department of Agriculture, Forestry and Fisheries	Land Use and Soil Management		Private Bag X120, Pretoria, 0001		123197685	123197607	lydiab@daff.gov.za
Ms	Answa	De Lange	PetroSA (SOC) Limited							answa.delange@petrosa.co.za
Mr	Deon	Durholtz	Department of Environment, Forestry and Fisheries							DeonD@daff.gov.za
Mr	J.	Fortuin	Northern Cape Department of Environment and Conservation			Private Bag X16, Springbok, 8240		277188800	277188814	jfortuin@ncpg.gov.za
Mr	John	Geeringh	Eskom	Senior Environmental Advisor Eskom GC - Land Development		PO Box 1091, Johannesburg, 2001		118002465	866606092	john.geeringh@eskom.co.za
Mr	Riaan	Hendricks	National Department of Forestry, Fisheries, and Environment				717546754	227142226		rhendricks@dffe.gov.za; riaanh101@gmail.com
Ms	Noluthando	Jukuda	PetroSA (SOC) Limited							noluthando.jukuda@petrosa.co.za
Ms	Jeanine	Julies	National Department of Water and Sanitation	Chief Director: Communication Services		Private Bag X313, Pretoria, 0001		123367908		jnalej@dwf.gov.za
Mr	N	Latsky	Paternoster Fishery Group			Posbus 3859, Tygervallei, 7536				
Mr	G	Mabilo	Northern Cape Department of Economic Development and Tourism	Acting Head of Department		Privte Bag X6108, Kimberly, 8300		538394000	538313668	ungomame@ncpg.gov.za
	Busisiwe	Magazi	Department of Mineral Resources and Energy	Western Cape Region Secretary						busisiwe.magazi@dmr.gov.za
Mr	Kgothatso	Magongwa	Department of Forestry, Fisheries and the Environment	Project Coordinator: Oceans Economy						kmagongwa@dffe.gov.za
Ms	Nelisiwe	Magubane	Department of Energy	Director General: Energy Planning & Hydrocarbons						dineo.moraile@energy.gov.za
Mr	Moses	Mahunonyane	Department of Water and Sanitation	Director IE Northern Cape		Private Bag X601, Kimberly, 8300	828057553		538314534	mahunonyanem@dws.gov.za
Dr	Nozizwe	Makgalemele	National Department of Rural Development and Land Affairs	DDG: Spatial Planning and Land Use Management		Private Bag X833, Pretoria, 0001		123129834	123234516	nozizwe.makgalemele@drdlr.gov.za

8728

Title	Name	Surname	Company	Designation	Property	Postal Address	Telephone	Telephone	Fax	Email
Mr	Ernst	Meissenheimer	Northern Cape Department of Agriculture			Posbus 18, Springbok, 8240		277121315	277122270	meissenheimer.ernst@gmail.com
Ms	Sue	Middleton	National Department of Forestry, Fisheries, and Environment	Chief Director: Fisheries Operations Support						Smiddleton@environment.gov.za
Adv.	Vela	Mngwengwe	National Department of Rural Development and Land Affairs	CD: Property Management and Advisory Services		Private Bag X833, Pretoria, 0001		123129862		vela.mngwengwe@drdlr.gov.za
Mr	Herman	Mooketsi	Northern Cape Department of Social Development	Executive Manager of Social Welfare Services		Private Bag X5042, Kimberly, 8300		538749100	538711062	
Mr	Ramakulukusha	Moses	National Department of Environmental Affairs	Coastal Conservation Strategies		P.O. Box 52126, V&A Waterfront, Cape Town, 8002		218192494	218192425	Ramakulukusha@environment.gov.za
Mr	WVD	Mothibi	Northern Cape Department of Agriculture, Land Reform and Rural Development	Head of Department					538313635	
Mr	WVD	Mothibi	Northern Cape Department of Agriculture, Land Reform and Rural Development	Head of Department		Private Bag X5018, Kimberly, 8300		538389100	538314685	
	Lebogang	Motlhaping	Northern Cape: Department of Transport, Safety and Liason	MEC's Office		Private Bag X1368, Kimberley, 8300		538304900	538391773	
Mr	Tebogo	Motloung	Petroleum Agency SA	Manager: Licensing and legal compliance						motloungt@petroleumagencysa.com
Mr	Lindelani	Mudau	National Department of Forestry, Fisheries, and Environment	Director: Coastal Conservation Strategies						lmudau2@environment.gov.za
Ms	Bernacia	Mullins	National Department of Forestry, Fisheries, and Environment	Small Scale Fisheries						BernaciaM@daff.gov.za
Mr	Arno	Munro	National Department of Forestry, Fisheries, and Environment	Communication Officer						ArnoM@nda.agric.za; amunro@environment.gov.za
Mr	Stet	Mushwana	Petroleum Agency SA	Environmental Compliance Coordinator						mushwanas@petroleumagencysa.com
	Ashley	Naidoo	National Department of Environmental Affairs							Anaidoo@environment.gov.za

Title	Name	Surname	Company	Designation	Property	Postal Address	Cellphone	Telephone	Fax	Email
Mr	Peter	Nelson	PetroSA (SOC) Limited							peter.nelson@petrosa.co.za
Ms	Phumla	Ngesi	Petroleum Agency SA	Manager: Environmental Compliance						ngesip@petroleumagencysa.com
	Abongile	Ngqongwa	National Department of Forestry, Fisheries, and Environment	Aquaculture						AbongileN@daff.gov.za
	Jasper	Nieuwoudt	Department of Mineral Resources and Energy	Northern Cape (Springbok) Regional Manager						Jasper.Nieuwoudt@dmr.gov.za
Mr	Kholekile	Nogwili	Northern Cape Department of Roads and Public Works	Head of Department		PO Box 3132, Kimberly, 8300		538392100	538392291	tmbetha@ncpg.gov.za
Mr	Ryan	Olivier	Commission on Restitution of Land Right (Northern Cape)	Department of Rural Development and Land Reform				538075707		ryan.oliver@drdlr.gov.za
	Loren	Pavitt	CapeNature			Private Bag X29, Gatesville, 7766				lpavitt@capenature.co.za
Ms	Vhonani	Ramugondo	Northern Cape Department of Water and Sanitation	Environmental Officer		Private Bag X6101, Kimberly, 8301	787588969	538367648	538420461	ramugondov@dws.gov.za
Mr	Herold	Roberts	Northern Cape Department of Roads and Public Works	District Manager: Namakwa		PO Box 3132, Kimberly, 8300		538392100	538392291	tabbie@vodamail.co.za
Ms	H.	Samson	Northern Cape Department of Social Development	Head of Department		Private Bag X5042, Kimberly, 8300		538749100	538711062	
	Megan	Simons	CapeNature							msimons@capenature.co.za
Mrs	Annette	Stoltz	National Department of Agriculture, Forestry and Fisheries			Private Bag X120, Pretoria, 0001		123197402	123295938	annettes@daff.gov.za
Ms	Mulalo	Sundani	National Department of Agriculture, Forestry and Fisheries			Private Bag X120, Pretoria, 0001		123095865		mulalosu@daff.gov.za
Mr	Pieter	Swart	Department of Mineral Resources and Energy	Western Cape Regional Manager						Pieter.swart@dmr.gov.za
Mr	Temba	Tanci	Department of Forestry, Fisheries and Environment	Acting Chief Director: Oceans Economy			768122920			ttanci@dffe.gov.za
Mr	R.	Timothy	Northern Cape Provincial Heritage Resource Agency			Private Bag X5004, Kimberly, 8300		538074793	538074600	rtimothy@nbkb.org.za

Title	Name	Surname	Company	D[illegible]	Property	Postal Address	[illegible]phone	Telephone	Fax	Email
Mr	Mike	van den Heever	Pioneer Fishing (Pty) Ltd							mvdh@pioneerfishing.co.za
Mr	Toinette	Van Der Merwe	National Department of Environmental Affairs	Integrated Environmental Authorisations		Private Bag X447, Pretoria, 0001		123998630		tvandermerwe@environment.gov.za
Mr	Dave	van der Spuy	Petroleum Agency SA	Manager: Resource Evaluation						vanderspuyd@petroleumagencysa.com
Ms	Jean	Wilson	Northern Cape Department of Economic Development and Tourism	Acting Executive Manager: Tourism		Private Bag X6108, Kimberly, 8300		538394000	538313668	jwilson@ncpg.gov.za
Mr	Thando	Zingange	Heritage Western Cape	Heritage Officer						thando.zingange@westerncape.gov.za
Ms	Natasha	Higgitt	SAHRA	Heritage Officer		PO Box 4637, Cape Town, 8000		214624502	214624509	nhiggitt@sahra.org.za
Mr	Brent	Whittington	SANPARKS	Park Manager		PO Box 787, Pretoria, 0001		278311506	278311175	brent.whittington@sanparks.org
Mr	M	Mokonoto	South African National Biodiversity Institute					128435000		m.mokonoto@sanbi.org.za
	Megan	van der Bank	South African National Biodiversity Institute							m.vanderbank@sanbi.org.za
	Lipuo	Lebakeng	Transnet	Port Terminal: Cape Town		PO Box 10124, O. R. Tanbo Parade, Durban, 4056		313088000	113082528	lipuo.lebakeng@transnet.net
	Harold	Cleophas	West Coast District Municipality	Executive Mayor						mayor@wcdm.co.za
	DC	Joubert	West Coast District Municipality	Municipal Manager						mm@wcdm.co.za
	Doretha	Kotze	West Coast District Municipality							dkotze@wcdm.co.za
	Charles	Malherbe	West Coast District Municipality	Environmental Officer						cjmalherbe@wcdm.co.za
	Henk	Matthee	West Coast District Municipality	Director: Technical Services						hjmatthee@wcdm.co.za
	Dana	van der Westhuizen	West Coast District Municipality							dlvdwesthuizen@wcdm.co.za
	Marlene	Laros	Western Cape Department of Environmental Affairs and Development Planning	Biodiversity and Coastal Management						Marlene.Laros@westerncape.gov.za

Pre-identified: Provincial Environmental Authority

2556

Title	Name	Surname	Company	Department	Property	Postal Address	Cellphone	Telephone	Fax	Email
Ms	Onwabile	Ndzumo	Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform					277188880	277188814	onyndzumo@gmail.com
Ms	Thea	Jordan	Western Cape Government	Department of Environmental Affairs and Development Planning		11th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000		214834093		Thea.Jordan@westerncape gov.za
Mr	Lorretta	Osborne	Western Cape Government	Directorate: Development Management (Region 1)				214833696		Loretta.Osborne@westerncape.gov.za
Mr	Ryan	Apolles	Western Cape Government	Directorate: Biodiversity and Coastal Management				214832817		Ryan.Apolles@westerncape.gov.za
Pre-identified: Ward Councillor										
Cllr	Wilherm Joriaas	America	Saldanha Bay Local Municipality	Ward 14			825646603			wimpie.america@sbm.gov.za
Cllr	Stephanus Petrus	Cornelissen	Matzikama Local Municipality	Ward 5			836308953			spcornelissen@gmail.com
Cllr	Marlene Cathlene	Fredericks	Richtersveld Local Municipality	Ward 2		Private Bag X113, PORT NOLLOTH, 8280				
Cllr	Amelia	Job	Matzikama Local Municipality	Ward 2 (strandfontein, Papendorp)			737510107			ameliajob01@gmail.com
Cllr	Amelia	Job	Matzikama Local Municipality	Ward 2						ameliajob01@gmail.com
Cllr	Charmaine	Laubscher	Saldanha Bay Local Municipality	Ward 6			828963593			Charmaine.laubscher@sbm.gov.za
Cllr	Siyabulela	Liwani	Saldanha Bay Local Municipality	Ward 1			737778866			Siyabulela.Liwani@sbm.gov.za
Cllr	Lelethu	Mbane	Saldanha Bay Local Municipality	Ward 12			736379312			Lelethu.Mbane@sbm.gov.za
Cllr	Maria Lovina	Obies	Richtersveld Local Municipality	Ward 4		Private Bag X113, PORT NOLLOTH, 8280				
Cllr	Leonard	Peterson	Kamiesberg Local Municipality	Ward 1			691125664			leonardpetersen8@gmail.com; lionelpieterson177@gmail.com
Cllr	Katlholo	Polori	Nama Khoi Local Municipality	Ward 8 (Kleinzee, Komaggas, Swartkop)		PO BOX 335, KOMMAGAS, KOMMAGAS, NORTHERN CAPE, 8242	735018378	278517383		kathloloamospolori@gmail.com
Cllr	Albertus Johannes	Pool	Matzikama Local Municipality	Ward 8			784590950			kameel@kingsleymail.co.za
Cllr	Michael Adolph	Rangasamy	Swartland Local Municipality	Ward 5			834536060			michael.bin2bin@telkomsa.ne
Cllr	Patrick	Rulph	Kamiesberg Local Municipality							rulphpati@gmail.com

2557

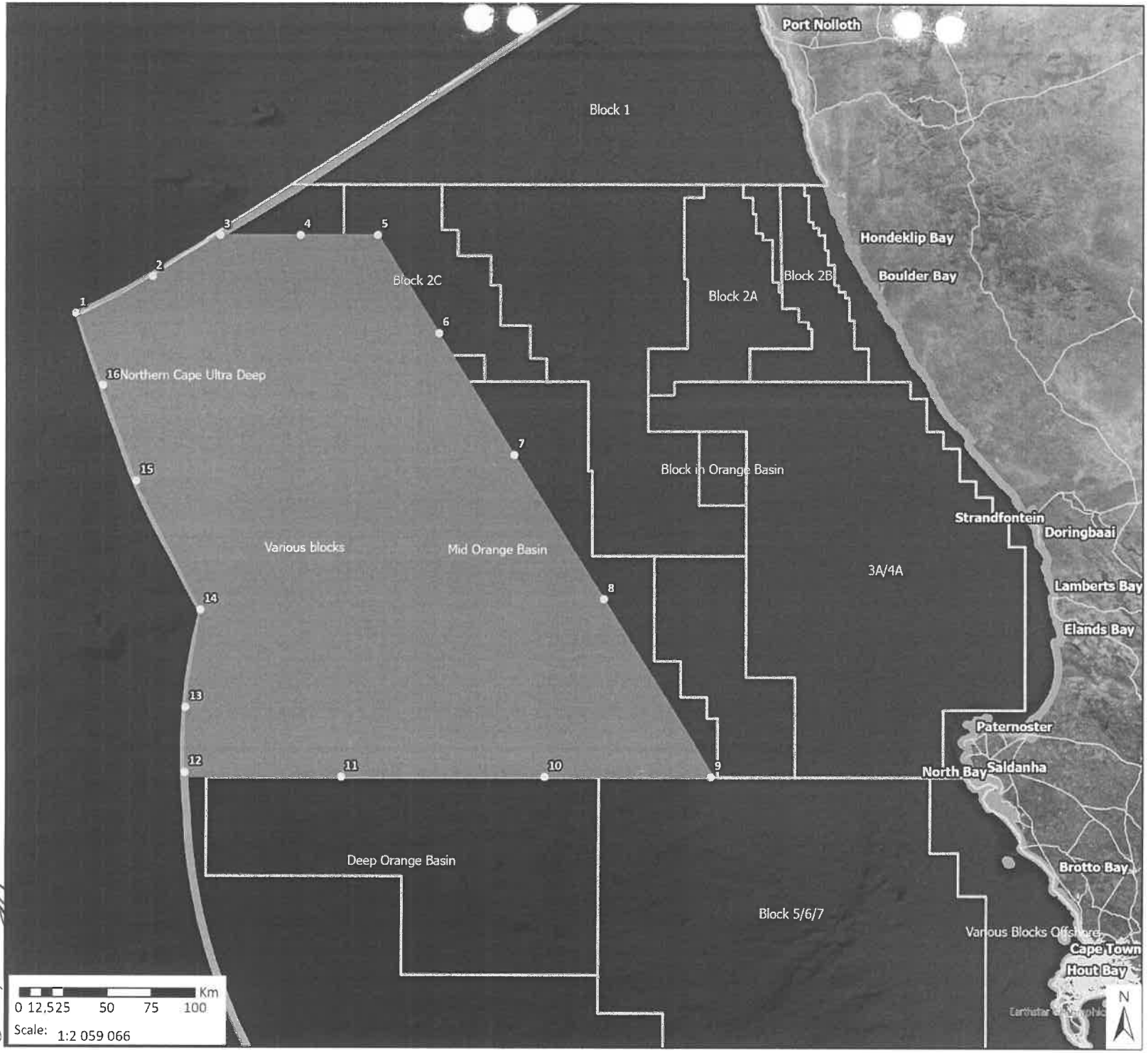
Title	Name	Surname	Company	[illegible]rter	Property	Postal Address	[illegible]phone	Telephone	Fax	Email
Cllr	Sharon Marionette	Scholtz	Saldanha Bay Local Municipality	Ward 11			656180827			Sharon.Scholtz@sbm.gov.za
Cllr	Caretas	Sonamzi	Richtersveld Local Municipality	Ward 3		Private Bag X113, PORT NOLLOTH, 8280				
Cllr	Carisa	Soudens	Kamiesberg Local Municipality	Ward committee			608650958			carisasou22@gmail.com
Cllr	Paul Stephanus	Swart	City of Cape Town	Ward 23			720638359			Paul.Swart@capetown.gov.za
Cllr	Delana	Titus	Kamiesberg Local Municipality	CDW Hondeklip Bay		Dept of Coghsta P.O.Box 46 Hondeklipbaai 8222	664057488			titusdelana@gmail.com
Cllr	Andre Brahm	Truter	Saldanha Bay Local Municipality	Ward 5			722419157			Andre.Truter@sbm.gov.za
Cllr	Charleen Claudette	van Nooi	Saldanha Bay Local Municipality	Ward 3			634830653			Charleen.vanNooi@sbm.gov.za
Cllr	Nicollete	Rheeder	City of Cape Town	Ward 107			727294282			Nicky.Rheeder@capetown.gov.za
Cllr	Joy	Solomon	City of Cape Town	Ward 113			732379775			Joy.Solomon@capetown.gov.za
Cllr	Johannes Jogemes	Moolman	Bergrivier Local Municipality	Ward 7			781002058			moolmanj@begmun.org.za
Cllr	Audrey	Small	Bergrivier Local Municipality	Ward 6			810739918			smalla@bergmun.org.za
Cllr	William Josef	Farmer	Cederberg Local Municipality	Ward 5			795117431			joseffarmer76@gmail.com
Cllr	Fabian Kevin	Ah-sing	City of Cape Town	Ward 55			840502315			Fabian.AhSing@capetown.gov.za
Cllr	Anthony Maximilian	Benadie	City of Cape Town	Ward 4			834008554			Anthony.benadie@capetown.gov.za
Cllr	Patricia	francke	City of Cape Town	Ward 69			795882305			Patricia.Francke@capetown.gov.za
Cllr	Nicola	Joel	City of Cape Town	Ward 54			726535763			Nicola.Jowell@capetown.gov.za
Cllr	Simon Pratrick	Leill-Cock	City of Cape Town	Ward 61			825517230			Simon.Liell-Cock@capetown.gov.za
Cllr	Allister Gerome	Lightburn	City of Cape Town	Ward 29			737233193			Allister.Lightburn@capetown.gov.za
Cllr	Ian Patrick	Mc Mahon	City of Cape Town	Ward 115			832743579			ian.mcmahon@capetown.gov.za
Cllr	Roberto Miguel	Quintas	City of Cape Town	Ward 74			820423502			Roberto.Quintas@capetown.gov.za
Cllr	Moosa Hendrik	Raise	City of Cape Town	Ward 32			817319659			Moosa.Raise@capetown.gov.za
Mr	Lionel	Pietersen	Kamiesberg Municipality	Ward Committee			0799063081			lionelpietersen177@gmail.com

Title	Name	Surname	Company	Department	Property	Postal Address	Cellphone	Telephone	Fax	Email
Dr	Jackie	Sunde	University of Cape Town	Dept of Environmental and Geographical Science						jackiesunde25@gmail.com
Ms	Priscilla	Abrahams	St Helena Bay Small Scale Fisher				739948156			
Mr	Dean	Palmer	Natural Justice							dean@naturaljustice.org
Mr	Ricardo	Jaars	Cederburg				604295450			cardojaars187@gmail.com
Mr	Vorster	Van Zyl								awevorster@gmail.com
Ms	Janeira	Reddy					780386007			tanica@sdceango.co.za
Mr	Thandisile	Mjadu					784001086			sk.installers18@gmail.com
Ms	Thulisile	Poni								thulisileponi02@gmail.com
Mr	Mziyanda	Jiba					660981535			
Mr	Majubase Bonisile	Mtati					792591510			
Ms	Lize-Marie	Wiese								l-m-w@hotmail.com
Mr	D	Weise								dwiese@octoplace.co.za
Mr	Grootvlei	Plaas								grootvleigasteplaas@gmail.com
Ms	Thandile	Chinyavanhu	Greenpeace Africa					011 482 4696		tchinyav@greenpeace.org
Mr	Christopher	Hamel	ADR Fishing				082 3333100	027 386 6578		chris@africantuna.com
Mr	Mike	Boon	Diamond Coast Aquaculture							Mike@vikingaquaculture.co.za
										quarantine@slipperbay.co.za
Mr	Gerhard	Oosthuizen	Pioneer Fishing							SHEOfficer@pioneerfishing.co.za
Ms	Maria	Papier								mariapapier7@gmail.com
Ms	Vivienne	Solomons								vsolomons@umbono.co.za
Mr	Richard	Montjoie	Umbono Energy Partners							rmontjoie@umbono.co.za
Prof.	Patrick	Bond	University of Johannesburg							pbond@mail.ngo.za
Mr	Rhulani	Kubayi	Department of Environmental Affairs	Chief Directorate: Integrated Environmental Authorisations						RKubayi@environment.gov.za
Mr	E. Adin	Harmer								info@plumrus.co.za
Mr	Judian	Bruk	HACKY FISHING (PTY) LTD							judianbruk@gmail.com
			HACKY FISHING (PTY) LTD							longline@mweb.co.za
Ms	Christina	Schild								christinaschild21@gmail.com
Mr	Masonwabe	Zwelifile					630912970			Reception@cpworld.co.za
	DFFE		Department of Forestry, Fisheries & the Environment	Oceans & Coasts (O&C) Branch						OCEIA@dffe.gov.za

2559

Title	Name	Surname	Company	Property	Postal Address	Telephone	Telephone	Fax	Email
Mr	Chester	Van Der Heever				743364149			vanderheevered@gmail.com
	Tribal Authority	Lamberts Bay				743364149			
Ms	Camelita	Mostert	Coastal Links (Diazville)			847562203			cjmostertpoppie@gmail.com
Mr	Andre	Hector	Hacky Fishing (Pty) Ltd						office@oceanquest.co.za
Mr	Conrad	Nel							cnel0884@gmail.com
	Rio	Button				769166921			riobutton@gmail.com
Ms	Katy	Harries	UKZN						Harriesk@ukzn.ac.za
Ms	Margo	Naude							margonaude@gmail.com
Mr	John Alexander	Cloete				870502052			
Ms	Michelle	Roffe	Seiche			837702166			m.roffe@seiche.com
	Hondeklipbaai Vroue Groep								
Mr	Rudian	Daily				787992545			rudiand@gmail.com
Mr	Sydney	Schalk	Nearshore Subsistence Farmers			832565305			sydneyschalk40@gmail.com
Mr	Chris	Heinecken	CapFish			828798611			chris@capfish.co.za
Mr	Jeff	Heinecken	K2CO			609712488			jeffrey,heinecken@gmail.com
Mr	Peter	Griffiths	Khoi						
Mr	Gloria	Girimane		Ward Committee		632127099			girimanenonkululeko@gmail.com
Ms	Grezelda	Samuels	SBM			799274131			grezeldasamuels@gmail.com
Mr	Nico	Bezuidenhout				832293861			nico.bezt@ gmail.com
Mr	Callen	Clockie				620742115			
Mr	Jacques	Burgers				834604260			
Mr	Siyabulelo	Mafuneko	Ward Councillor			738777274			
Mr	Thobeka	Gxakaza	Ward committee			604174618			thobekagxakaza74@gmail.com
Ms	Georga	Lenee				626739894			sandralenee2@gmail.com
Mr	William	Jaap	Fisherman Lambertsbay			719949546			
Mr	Mario	Andrews				834216196			marioandrews@gmail.com
	Schalk					634585327			
Mr	Desmond	Simon							
Ms	Beverly	v/d Heever Schalk				710901290			beverlyschalk5@gmail.com
Mr	Martin	Cook				836497104			
Mrs	Elizabeth	Basson				822918052			naninefilton@gmail.com
Ms	Menka	Vansent	UCT			663492092			
Mr	Sarah	Wilkinson				827289673			
Mr	Mnqobi	Ngubane				682845286			ngubanemnqobi@gmail.com

Title	Name	Surname	Company	Property	Postal Address	Cellphone	Telephone	Fax	Email
Ms	Rosina	Klaase				658708983			rosieklaase9@gmail.com
Mr	Derian	Rooi				791116342			rooiderian@mail.com
Mr	Derick	Maarman				761676221	276528010		rubenm@kamiesberg.gov.za
Mr	Collin	Cloete				761659936			colincloeteb@gmail.com
Mr	Morgen	Dila	Aukotowa Fisheries			734877040			
Mr	D.E	Moyser		MBS (SMME)		842511875	278517172		moyser@telkomsa.net
Ms	C	Lombard				633190161			chirelda12@gmail.com
Mr	Sheldon	Mattheys				681952755			matthyssheldon@gmail.com
Mr	William	Samnisidy							
Mrs	Sarah	Koordan				760346173			
Mrs	Louisa	Cloete							
Mr	Patrick	Rulph	Hondeklipbaai			827489322			
Mr	C	Larence							
Mr	John	Ellis	Kamiesberg Municipality		Private Bag X200, Garies, 8220	632147674	276528000		johnhe@kamiesberg.co.za
Ms	Catrim	Stationway	Kamiesberg Municipality		Private Bag X200, Garies, 8220	723616038			catrimstationway@gmail.com
Mr	Aaron	Larkens	Transhex			078 108 8196			aaronl@transhex.co.za
Ms	Paulita	Mostert							cjmostertpoppie@gmail.com
Ms	Lisa	Starr							lisa_starr@yahoo.com
Ms	Natalie	Van Wyk							nataliejanevanwyk@gmail.com
Mr	Anthony	Andrews	West Coast Guriqua San Council			827304534			wc.guriquacouncil@gmail.com
Ms	Melisa	Pulen							neville@thegreenconnection.org.za



2562

Locality Map

1520 TGS Reconnaissance BA

Legend

- Coastal Towns
- Roads
- Offshore Permits Rights
- South African Exclusive Economic Zone
- Proposed 3D Seismic Survey Area

Proposed Project Area Coordinates:
Point: Latitude, Longitude
1: 30°39'18,094"S, 13°19'57,691"E
2: 30°28'1,697"S, 13°43'15,892"E
3: 30°15'25,924"S, 14°3'58,572"E
4: 30°15'24,84"S, 14°28'39,619"E
5: 30°15'27,745"S, 14°52'18,296"E
6: 30°45'15,898"S, 15°11'4,074"E
7: 31°22'4,228"S, 15°34'1,603"E
8: 32°6'8,856"S, 16°1'31,289"E
9: 32°59'53,488"S, 16°34'10,585"E
10: 32°59'54,895"S, 15°43'26,378"E
11: 32°59'56,623"S, 14°41'8,974"E
12: 32°58'29,485"S, 13°53'17,887"E
13: 32°38'57,055"S, 13°53'27,668"E
14: 32°9'15,206"S, 13°57'57,305"E
15: 31°29'51,529"S, 13°38'20,731"E
16: 31°1'0,005"S,13°28'2,381"E

Data Sources:
CSG; ESRI
Coord System: GCS WGS 1984
Datum: WGS 1984
Units: Degree
Ref: Locality Map

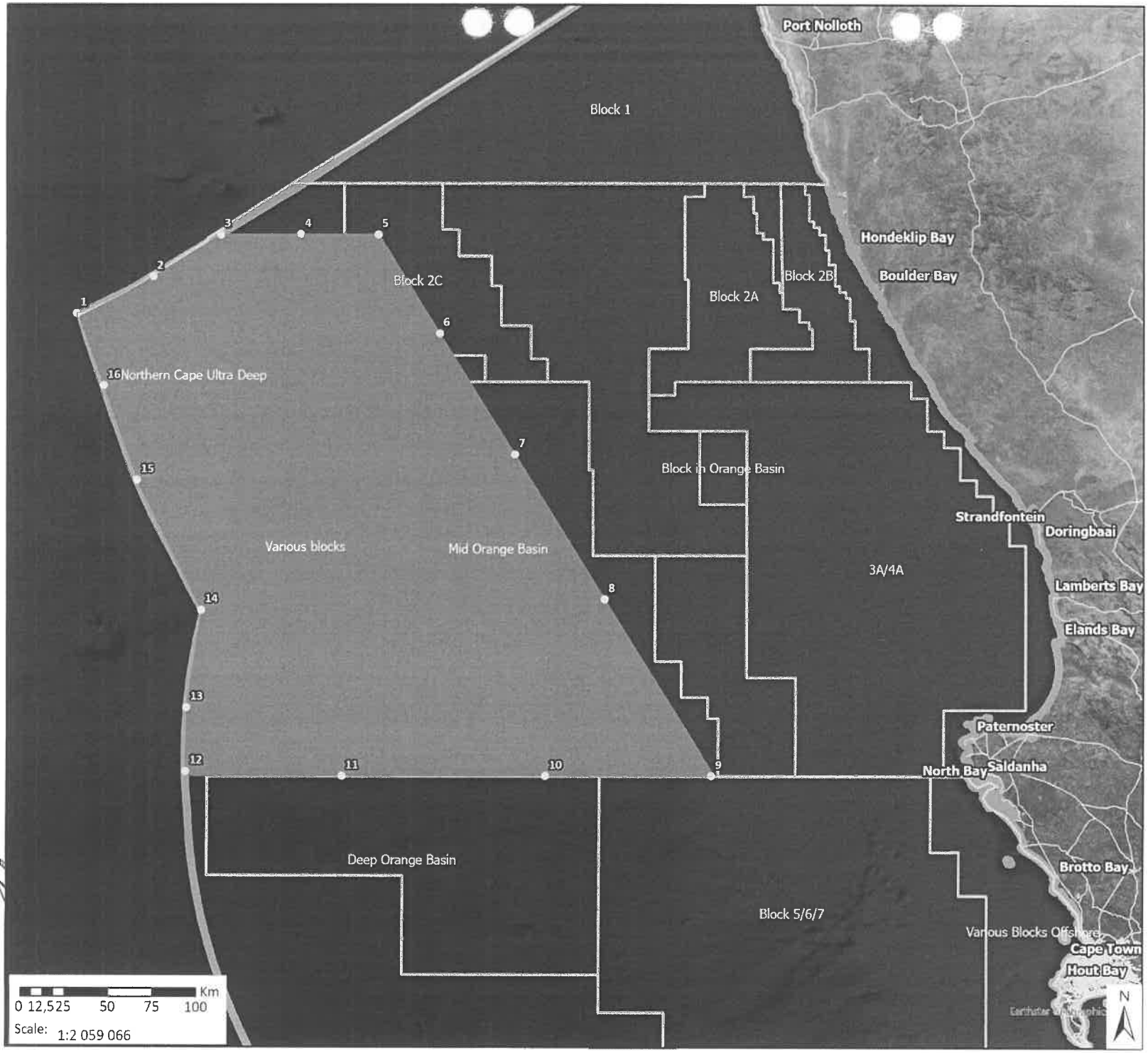
Date: 2022/07/21
EIMS Ref: 1520 Locality Map
Compiled: CM
Reviewed: GP
Approved: LW

EIMS

Appendix 3

Environmental Authorizations Obtained

It is understood that no environmental authorizations are currently valid for the area affected by this environmental authorization application apart from the reconnaissance permit.



2564

Locality Map

1520 TGS Reconnaissance BA

Legend

- Coastal Towns
- Roads
- Offshore Permits Rights
- South African Exclusive Economic Zone
- Proposed 3D Seismic Survey Area

Proposed Project Area Coordinates:
Point: Latitude, Longitude

1: 30°39'18,094"S, 13°19'57,691"E
2: 30°28'1,697"S, 13°43'15,892"E
3: 30°15'25,924"S, 14°3'58,572"E
4: 30°15'24,84"S, 14°28'39,619"E
5: 30°15'27,745"S, 14°52'18,296"E
6: 30°45'15,898"S, 15°11'4,074"E
7: 31°22'4,228"S, 15°34'1,603"E
8: 32°6'8,856"S, 16°1'31,289"E
9: 32°59'53,488"S, 16°34'10,585"E
10: 32°59'54,895"S, 15°43'26,378"E
11: 32°59'56,623"S, 14°41'8,974"E
12: 32°58'29,485"S, 13°53'17,887"E
13: 32°38'57,055"S, 13°53'27,668"E
14: 32°9'15,206"S, 13°57'57,305"E
15: 31°29'51,529"S, 13°38'20,731"E
16: 31°1'0,005"S,13°28'2,381"E

Data Sources:
CSG; ESRI
Coord System: GCS WGS 1984
Datum: WGS 1984
Units: Degree
Ref: Locality Map

Date: 2022/07/21
EIMS Ref: 1520 Locality Map
Compiled: CM
Reviewed: GP
Approved: LW

EIMS

Petroleum Agency SA

Tygerpoort Building · 7 Mispel Street · Bellville 7530 · P.O. Box 5111 Tygervalley 7536 · South Africa
Tel: +27 21 938 3500 · Fax: +27 21 938 3520
E-mail: plu@petroleumagencysa.com

Ref: 12/1/040

19 May 2022

Enquiries: Sharon Adams
sharona@petroleumagencysa.com

Attention: Mr. Jevon Hilder
TGS Geophysical (UK) Limited
Dukes Court
Dukes Street
Woking
Surrey
GU21 5BH
United Kingdom

Email: Jevon.hilder@tgs.com

Dear Mr Hilder

ACCEPTANCE CONDITIONS FOR RECONNAISSANCE PERMIT 12/1/040: REQUEST FOR EXTENSION OF DEADLINE

Your letter dated 16 May 2022 refers.

You are hereby advised that your request to extend the deadline for the submission of the application for Environmental Authorisation is granted. You are therefore required to submit the application for Environmental Authorisation on or before the 6th of September 2022.

Should you require further clarity on this matter, please do not hesitate to contact us.

Yours Sincerely,

Mr Bongani Sayidini
Chief Operations Officer

APPENDIX 6

IMPACT ASSESSMENT METHODOLOGY

The impact significance rating methodology, as provided by EIMS, is guided by the requirements of the NEMA EIA Regulations, 2014. The broad approach to the significance rating methodology is to determine the environmental risk (ER) by considering the consequence (C) of each impact (comprising Nature, Extent, Duration, Magnitude, and Reversibility) and relate this to the probability/ likelihood (P) of the impact occurring. This determines the environmental risk. In addition other factors, including cumulative impacts, public concern, and potential for irreplaceable loss of resources, are used to determine a prioritisation factor (PF) which is applied to the ER to determine the overall significance (S).

The significance (S) of an impact is determined by applying a prioritisation factor (PF) to the environmental risk (ER). The environmental risk is dependent on the consequence (C) of the particular impact and the probability (P) of the impact occurring. Consequence is determined through the consideration of the Nature (N), Extent (E), Duration (D), Magnitude (M), and reversibility (R) applicable to the specific impact.

For the purpose of this methodology the consequence of the impact is represented by:

$$C = \frac{(E + D + M + R) * N}{4}$$

Each individual aspect in the determination of the consequence is represented by a rating scale as defined in Table 1.

Table 1: Criteria for determination of impact consequence

Aspect	Score	Definition
Nature	- 1	Likely to result in a negative/ detrimental impact
	+1	Likely to result in a positive/ beneficial impact
Extent	1	Activity (i.e. limited to the area applicable to the specific activity)
	2	Site (i.e. within the development property boundary),
	3	Local (i.e. the area within 5 km of the site),
	4	Regional (i.e. extends between 5 and 50 km from the site
	5	Provincial / National (i.e. extends beyond 50 km from the site)
Duration	1	Immediate (<1 year)
	2	Short term (1-5 years),
	3	Medium term (6-15 years),
	4	Long term (the impact will cease after the operational life span of the project),
	5	Permanent (no mitigation measure of natural process will reduce the impact after construction).

Magnitude/ Intensity	1	Minor (where the impact affects the environment in such a way that natural, cultural and social functions and processes are not affected),
	2	Low (where the impact affects the environment in such a way that natural, cultural and social functions and processes are slightly affected),
	3	Moderate (where the affected environment is altered but natural, cultural and social functions and processes continue albeit in a modified way),
	4	High (where natural, cultural or social functions or processes are altered to the extent that it will temporarily cease), or
	5	Very high / don't know (where natural, cultural or social functions or processes are altered to the extent that it will permanently cease).
Reversibility	1	Impact is reversible without any time and cost.
	2	Impact is reversible without incurring significant time and cost.
	3	Impact is reversible only by incurring significant time and cost.
	4	Impact is reversible only by incurring prohibitively high time and cost.
	5	Irreversible Impact

Once the C has been determined the ER is determined in accordance with the standard risk assessment relationship by multiplying the C and the P. Probability is rated/scored as per Table 2.

Table 2: Probability scoring

Probability	1	Improbable (the possibility of the impact materialising is very low as a result of design, historic experience, or implementation of adequate corrective actions; <25%),
	2	Low probability (there is a possibility that the impact will occur; >25% and <50%),
	3	Medium probability (the impact may occur; >50% and <75%),
	4	High probability (it is most likely that the impact will occur- > 75% probability), or
	5	Definite (the impact will occur),

The result is a qualitative representation of relative ER associated with the impact. ER is therefore calculated as follows:

ER= C x P

Table 3: Determination of environmental risk

Consequence					
5	5	10	15	20	25
4	4	8	12	16	20
3	3	6	9	12	15
2	2	4	6	8	10
1	1	2	3	4	5
	1	2	3	4	5
	Probability				

The outcome of the environmental risk assessment will result in a range of scores, ranging from 1 through to 25. These ER scores are then grouped into respective classes as described in Table 4.

Table 4: Significance classes

Risk Score	Description
< 10	Low (i.e. where this impact is unlikely to be a significant environmental risk),
≥ 10; < 20	Medium (i.e. where the impact could have a significant environmental risk),
≥ 20	High (i.e. where the impact will have a significant environmental risk).

The impact ER will be determined for each impact without relevant management and mitigation measures (pre-mitigation), as well as post implementation of relevant management and mitigation measures (post-mitigation). This allows for a prediction in the degree to which the impact can be managed/ mitigated.

Further to the assessment criteria presented above it is necessary to assess each potentially significant impact in terms of:

- Cumulative impacts; and
- The degree to which the impact may cause irreplaceable loss of resources.

To ensure that these factors are considered, an impact prioritisation factor (PF) will be applied to each impact ER (post-mitigation). This prioritisation factor does not aim to detract from the risk ratings but rather to focus the attention of the decision-making authority on the higher priority / significance issues and impacts. The PF will be applied to the ER score based on the assumption that relevant suggested management/ mitigation impacts are implemented.

Table 5: Criteria for the determination of prioritisation

Cumulative Impact (CI)	Low (1)	Considering the potential incremental, interactive, sequential, and synergistic cumulative impacts, it is unlikely that the impact will result in spatial and temporal cumulative change.
	Medium (2)	Considering the potential incremental, interactive, sequential, and synergistic cumulative impacts, it is probable that the impact will result in spatial and temporal cumulative change.

	High (3)	Considering the potential incremental, interactive, sequential, and synergistic cumulative impacts, it is highly probable/definite that the impact will result in spatial and temporal cumulative change.
Irreplaceable loss of resources (LR)	Low (1)	Where the impact is unlikely to result in irreplaceable loss of resources.
	Medium (2)	Where the impact may result in the irreplaceable loss (cannot be replaced or substituted) of resources but the value (services and/or functions) of these resources is limited.
	High (3)	Where the impact may result in the irreplaceable loss of resources of high value (services and/or functions).

The value for the final impact priority is represented as a single consolidated priority, determined as the sum of each individual criteria represented in Table 5. The impact priority is therefore determined as follows:

Priority = CI + LR

The result is a priority score which ranges from 3 to 9 and a consequent PF ranging from 1 to 1.5 (refer to Table 6).

Table 6: Determination of prioritisation factor

Priority	Prioritisation Factor
2	1
3	1.125
4	1.25
5	1.375
6	1.5

In order to determine the final impact significance the PF is multiplied by the ER of the post mitigation scoring. The ultimate aim of the PF is to be able to increase the post mitigation environmental risk rating by a factor of 0.5, if all the priority attributes are high (i.e. if an impact comes out with a medium environmental risk after the conventional impact rating, but there is significant cumulative impact potential and significant potential for irreplaceable loss of resources, then the net result would be to upscale the impact to a high significance).

Table 7: Environmental Significance Rating

Value	Description
< -10	Low negative (i.e. where this impact would not have a direct influence on the decision to develop in the area).
≥ -10 < -20	Medium negative (i.e. where the impact could influence the decision to develop in the area).
≥ -20	High negative (i.e. where the impact must have an influence on the decision process to develop in the area).
0	No impact

5003

Value	Description
< 10	Low positive (i.e. where this impact would not have a direct influence on the decision to develop in the area).
≥ 10 < 20	Medium positive (i.e. where the impact could influence the decision to develop in the area).
≥ 20	High positive (i.e. where the impact must have an influence on the decision process to develop in the area).

The significance ratings and additional considerations applied to each impact will be used to provide a quantitative comparative assessment of the alternatives being considered. In addition, professional expertise and opinion of the specialists and the environmental consultants will be applied to provide a qualitative comparison of the alternatives under consideration. This process will identify the best alternative for the proposed project.

GP Kriel

From: TGS Reconnaissance Basic Assessment <tgs@eims.co.za>
Sent: Monday, 22 August 2022 14:24
Subject: 1520 - TGS Reconnaissance Basic Assessment - Call to Register
Attachments: 1520_Initial Notification.pdf

Bcc: 13katzkorana.royalhouse@gmail.com; AbongileN@daff.gov.za; abrahamsa@dws.gov.za; AbrahamsA@dws.gov.za; abrahamsa@dws.gov.za; aburns@wwf.org.za; accounts@tweedales.co.za; accounts@tweedales.co.za; aceding1@gmail.com; adams.enricocane@yahoo.com; adeleen.denc@gmail.com; admin@sauff.co.za; admin@tunahake.co.za; admin-saldanha@cochoqua.org.za; Adri.LaMeyer@westerncape.gov.za; adriaann@cederbergraad.co.za; boubeheer@cederbergraad.co.za; adrian@adrianpole.co.za; adrian@adrianpole.co.za; advocacy@birdlife.org.za; advocacy@birdlife.org.za; agibbs@cer.org.za; ajcoetzee@mweb.co.za; Ajohnson@environment.gov.za; aldre.degoede@capetown.gov.za; aletd@oceana.co.za; aletd@oceana.co.za; aletd@oceana.co.za; alethea.magerman@namakhoi.gov.za; alexhighschool@gmail.com; alistair.mcinnes@birdlife.org.za; allan@naturaljustice.org; Allister.Lightburn@capetown.gov.za; alta@richtersveld.gov.za; ameliajob01@gmail.com; ameliajob01@gmail.com; amina.varachia@capetown.gov.za; Anaidoo@environment.gov.za; andre.rossouw@capetown.gov.za; Andre.Truter@sbm.gov.za; andrew@kaytrad.co.za; annelize@paternostergroep.co.za; annettes@daff.gov.za; answa.delange@petrosa.co.za; Anthony.benadie@capetown.gov.za; Anton.Meyer@debeersgroup.com; antonio@tunacor.com.na; aqfishing@mweb.co.za; arainbow@mweb.co.za; ArnoM@nda.agric.za; amunro@environment.gov.za; arshad.dolan@oceana.co.za; Asanda.Tolbadi@sbm.gov.za; atmorerodgers123@gmail.com; aukotowafisheries@gmail.com; aukotowafisheries@gmail.com; babdinor@cer.org.za; Bakkies52@gmail.com; BernaciaM@daff.gov.za; bertiev70 @gmail.com; bianca@comfish.co.za; bmtamzeli@csir.co.za; boating@telkomsa.net; bockana1963@gmail.com; bongam@nalitha.co.za; bonnies@ewt.org.za; booihs@gmail.com; boyadams1965@gmail.com; brendapieterson1967@gmail.com; brent.whittington@sanparks.org; bronwen.dtec@gmail.com; bslenkoe@ncpg.gov.za; busisiwe.magazi@dmr.gov.za; buyoung@telkomsa.net; bwilliams@sahra.org.za; c.gomes@smit.com; capetown@houtbay.gov.za; carel@eigevis.com; carisasou22@gmail.com; carlavssr@gmail.com; carol-ann.mocke@angloamerican.com; cassandra@sdceango.co.za; cassi@icon.co.za; cattwood@mweb.co.za; cdk@lor.co.za; ceo@projectafrica.com; chair@obs.org.za; chairman@sadstia.co.za; chairman@satla.co.za; chairman@satla.co.za; chairperson@protectthewestcoast.org; Charleen.vanNooi@sbm.gov.za; charliej250466@yahoo.com; charline.mckie@capetown.gov.za; Charmaine.laubscher@sbm.gov.za; charmaine@talhado.co.za; dino@talhado.co.za; cheri@epremfish.com; cheslynb@premfish.co.za; chief.maart@cochoqua.org.za; chief.maartt@cochoqua.org.za; chris@africantuna.com

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards,

ANDISIWE XUMA

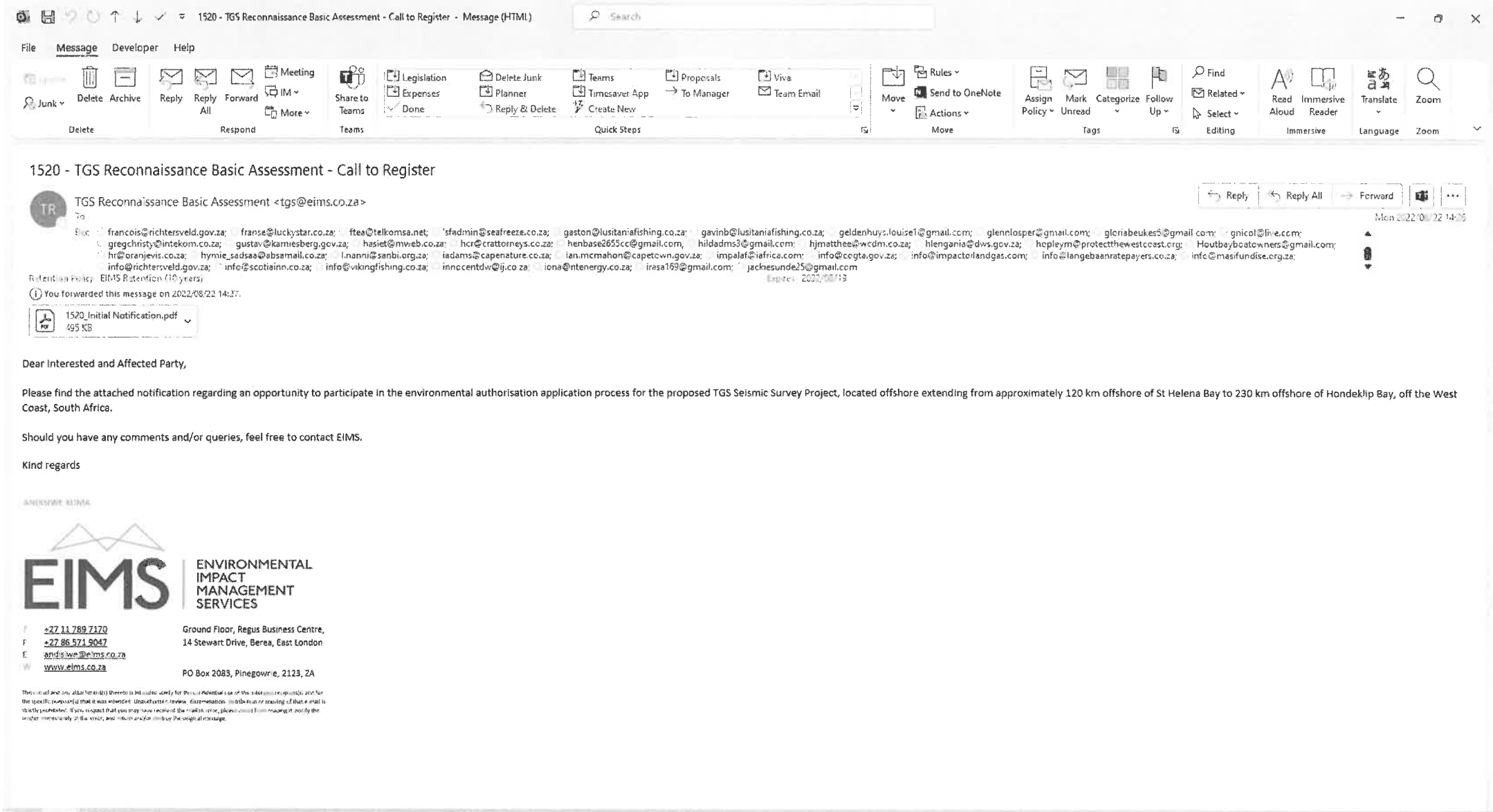
EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T +27 11 789 7170
F +27 86 571 9047
E andisiwe@eims.co.za
W www.eims.co.za

Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

PO Box 2083, Pinegowrie, 2123, ZA

This e-mail and any attachment(s) thereto is intended solely for the confidential use of the intended recipient(s) and for the specific purpose(s) that it was intended. Unauthorised review, dissemination, distribution or copying of that e-mail is strictly prohibited. If you suspect that you may have received the mail in error, please desist from reading it, notify the sender immediately of the error, and return and/or destroy the original message.



1520 - TGS Reconnaissance Basic Assessment - Call to Register - Message (HTML)

File Message Developer Help

Junk Delete Archive | Reply Reply All Forward Meeting IM More | Share to Teams | Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email | Move Rules Send to OneNote Actions | Assign Policy Mark Unread Categorize Follow Up | Find Related Select | Read Aloud Immersive Reader | Translate | Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 - TGS Reconnaissance Basic Assessment - Call to Register

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Bcc: francois@richtersveld.gov.za; franse@luckystar.co.za; ftea@telkomsa.net; 'sfadmin@seafreeze.co.za; gaston@lusitaniafishing.co.za; gavinb@lusitaniafishing.co.za; geldenhuys.louise1@gmail.com; glennlosper@gmail.com; gloriabeukes5@gmail.com; gnicol@live.com; gregchristy@intekom.co.za; gustav@kamiesberg.gov.za; hasiet@mweb.co.za; hcr@crattorneys.co.za; henbase2655cc@gmail.com; hildadms3@gmail.com; hjmatthee@wcdm.co.za; hlengania@dws.gov.za; hopleym@protectthewestcoast.org; Houtbayboatowners@gmail.com; hr@oranjevis.co.za; hymie_sadsaa@absamail.co.za; i.nanni@sanbi.org.za; iadams@capenature.co.za; ian.mcmahon@capetown.gov.za; impalaf@iafrica.com; info@ccgta.gov.za; info@impactoilandgas.com; info@langebaanratepayers.co.za; info@masifundise.org.za; info@richtersveld.gov.za; info@scotiainn.co.za; info@vikingfishing.co.za; innocentdw@ij.co.za; iona@ntenergy.co.za; iresa169@gmail.com; jackiesunde25@gmail.com

Reply Reply All Forward

Mon 2022/08/22 14:26

Retention Policy: EIMS Retention (10 years) Expires: 2032/08/19

You forwarded this message on 2022/08/22 14:27.

1520_Initial Notification.pdf
495 KB

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards

ANDISIWE KUMA

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T +27 11 789 7170
F +27 86 571 9047
E andisiwe@eims.co.za
W www.eims.co.za

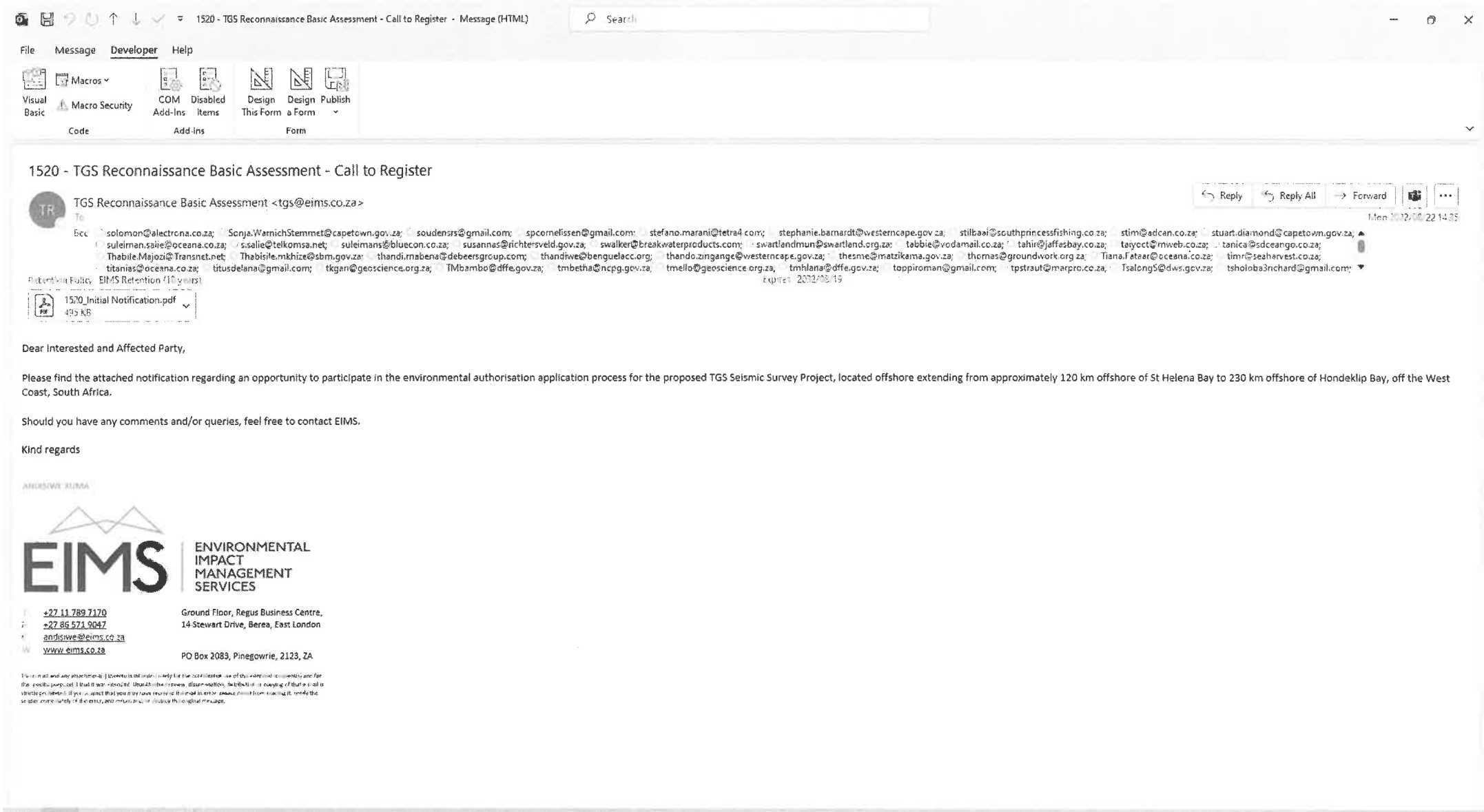
Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

PO Box 2083, Pinegowrie, 2123, ZA

This e-mail and any attachment(s) thereto is intended solely for the addressee(s) and for the specific purpose(s) that it was intended. Unauthorised review, dissemination, distribution or copying of that e-mail is strictly prohibited. If you suspect that you may have received the e-mail in error, please refrain from reading it, notify the sender immediately of the error, and return and/or destroy the original message.

ENG 15:25 2022/09/16

2573



1520 - TGS Reconnaissance Basic Assessment - Call to Register - Message (HTML)

Search

File Message Developer Help

Visual Basic | Macros | Macro Security | COM Add-Ins | Disabled Items | Design This Form | Design a Form | Publish

Code | Add-Ins | Form

1520 - TGS Reconnaissance Basic Assessment - Call to Register

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

Reply | Reply All | Forward

To

Mon 2022/08/22 14:35

Bcc: solomon@alectrona.co.za; Sonja.WarnichStemmet@capetown.gov.za; soudensrs@gmail.com; spcornelissen@gmail.com; stefano.marani@tetra4.com; stephanie.barnardt@westerncape.gov.za; stilbaai@southprincessfishing.co.za; stim@adcan.co.za; stuart.diamond@capetown.gov.za; suleiman.salie@oceana.co.za; s.salie@telkomsa.net; suleimans@bluecon.co.za; susannas@richtersveld.gov.za; swalker@breakwaterproducts.com; swartlandmun@swartland.org.za; tabbie@vodamail.co.za; tahir@jaffasbay.co.za; taiyoct@mweb.co.za; tanica@sdceango.co.za; Thabile.Majozi@Transnet.net; Thabisile.mkhize@sbm.gov.za; thandi.mabena@debeersgroup.com; thandiwe@benguelacc.org; thando.zingange@westerncape.gov.za; thesme@matzikama.gov.za; thomas@groundwork.org.za; Tiana.Fataar@oceana.co.za; timr@seaharvest.co.za; titanias@oceana.co.za; titusdelana@gmail.com; tkgari@geoscience.org.za; TMbambo@dffe.gov.za; tmbetha@ncpg.gov.za; tmello@geoscience.org.za; tmhlana@dffe.gov.za; toppiroman@gmail.com; tpstraut@marpro.co.za; TsalongS@dws.gov.za; tsholoba3richard@gmail.com;

Retention Policy: EIMS Retention (10 years) Expires 2032/08/19

1570_Initial Notification.pdf
495 KB

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards

ANDISIWE XUMA

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T +27 11 789 7170
F +27 86 571 9047
E andisiwe@eims.co.za
W www.eims.co.za

Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

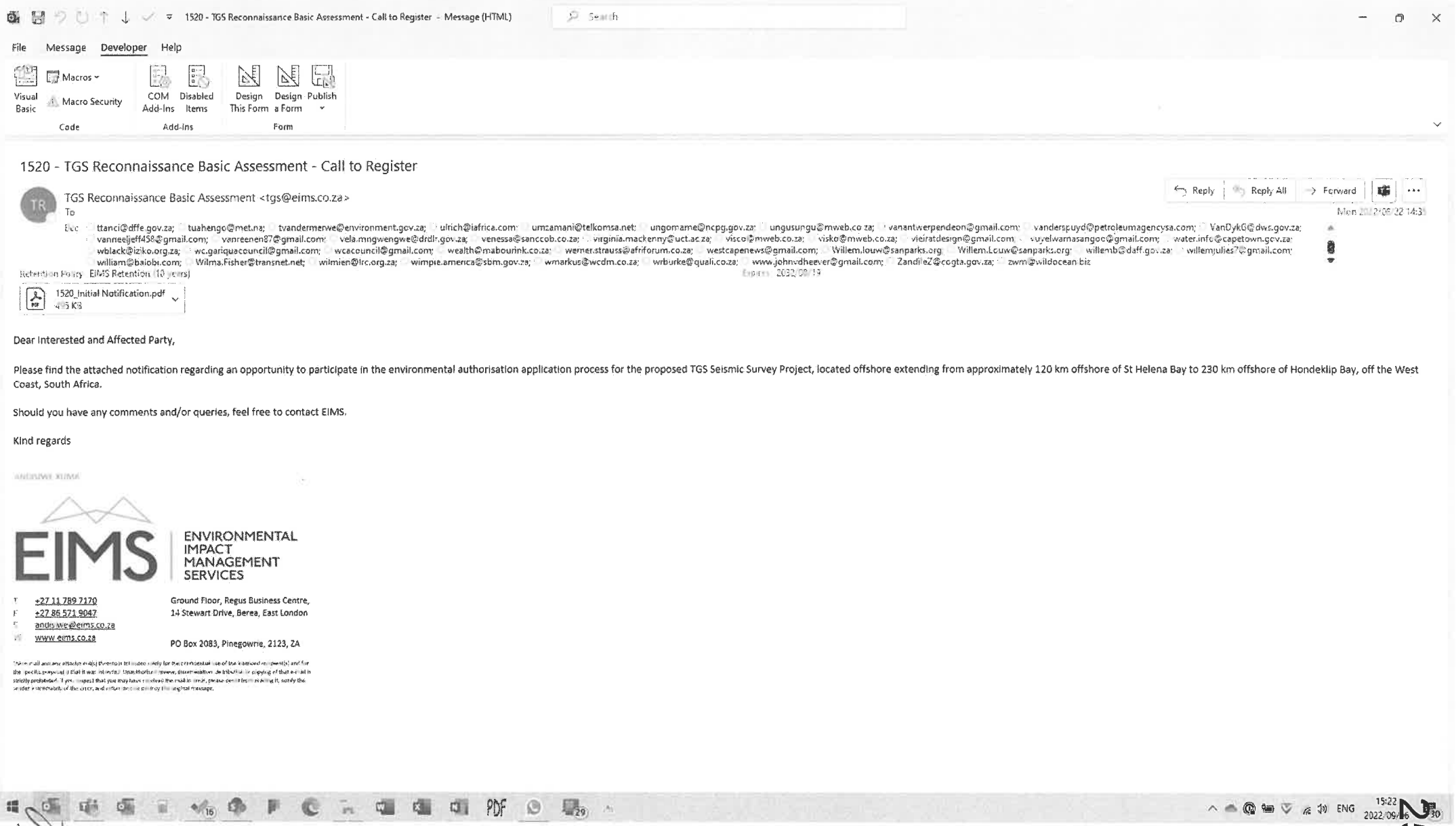
PO Box 2083, Pinegowrie, 2123, ZA

This e-mail and any attachment(s) is intended solely for the addressee. Use of this e-mail or its contents are for the specific purpose that it was intended. Unauthorised review, dissemination, distribution or copying of this e-mail is strictly prohibited. If you are aware that you may have received this e-mail in error, please refrain from reading it, notify the sender immediately of the error, and refrain from reading or further disseminating the original message.

ENG 15:22 2022/09/06

2574

2574



1520 - TGS Reconnaissance Basic Assessment - Call to Register - Message (HTML)

File Message Developer Help

Visual Basic | Macros | Macro Security | COM Add-Ins | Disabled Items | Design This Form | Design a Form | Publish

Code | Add-Ins | Form

1520 - TGS Reconnaissance Basic Assessment - Call to Register

TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Reply | Reply All | Forward

Mon 2022/09/12 14:31

Bcc: ttanci@dffe.gov.za; tuahengo@met.na; tvandermerwe@environment.gov.za; ulrich@iafrica.com; umzamani@telkomsa.net; ungomame@ncpg.gov.za; ungusungu@mweb.co.za; vanantwerpendeon@gmail.com; vanderspuyd@petroleumagencysa.com; VanDykG@dws.gov.za; vanneeljeff458@gmail.com; vanreenen87@gmail.com; vela.mngwengwe@drdlr.gov.za; venessa@sanccob.co.za; virginia.mackenny@uct.ac.za; visco@mweb.co.za; visko@mweb.co.za; vieiradesign@gmail.com; vuyelwamasango@gmail.com; water.info@capetown.gov.za; wblack@iziko.org.za; wc.gariquacouncil@gmail.com; wcacouncil@gmail.com; wealth@mabourink.co.za; werner.strauss@afriforum.co.za; westcapenews@gmail.com; Willem.louw@sanparks.org; Willem.Louw@sanparks.org; willemb@daff.gov.za; willemjulies7@gmail.com; william@baiobi.com; Wilma.Fisher@transnet.net; wilmien@lrc.org.za; wimpie.america@sbm.gov.za; wmarkus@wcdm.co.za; wrburke@quali.co.za; www.johnvdheever@gmail.com; Zandile2@cogta.gov.za; zwm@wildocean.biz

Retention Policy: EIMS Retention (10 years) Expires: 2032/09/19

1520_Initial Notification.pdf
495 KB

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards

ANDISWE XIMA

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T +27 11 789 7170
F +27 86 571 9047
E andiswe@eims.co.za
W www.eims.co.za

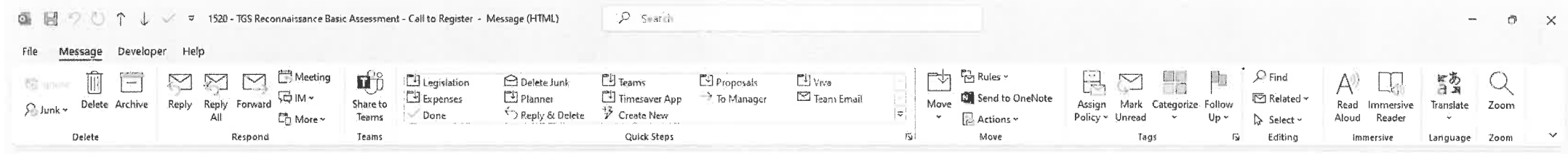
Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

PO Box 2083, Pinegowrie, 2123, ZA

"Note: mail and any attachment(s) thereto is intended solely for the confidential use of the addressed recipient(s) and for the specific purpose(s) that it was intended. Unauthorised review, dissemination, distribution or copying of that e-mail is strictly prohibited. If you suspect that you may have received the mail in error, please notify us in writing by reply e-mail to the sender immediately of the error, and return and destroy the original message.

ENG 15:22 2022/09/16

2575



1520 - TGS Reconnaissance Basic Assessment - Call to Register

TGS Reconnaissance Basic Assessment <tgs@eims.co.za>
To
Bcc onke@dailymaverick.co.za; onlyelinor@gmail.com; onyndzumo@gmail.com; operations@protectthewestcoast.org; orionpak@iafrica.com; paddyn@telkomsa.net; pat.bopape@sanparks.org; Pat.Titmuss@capetown.gov.za; Patricia.Francke@capetown.gov.za; patricia.holmes@capetown.gov.za; patrick@tops.org.za; Paul.Rhode@capetown.gov.za; Paul.Swart@capetown.gov.za; pburkhardt@bloomberg.net; pe@imdhgroup.com; pe@imdhgroup.com; peter.nelson@petrosa.co.za; peter@dawsons.co.za; peter@vikingfishing.co.za; peter@vikingfishing.co.za; PhilipC@luckystar.co.za; pieter.strumpher@capetown.gov.za; Pieter.swart@dmr.gov.za; pinky@siphoshipping.co.za; plmann@mweb.co.za; plu@petroleumagencysa.com; pobies36@gmail.com; postmaster@richtersveld.gov.za; ppkuttel@iafrica.com; procher@bluecon.co.za; qsnethlage@mweb.co.za; Ramakulukusha@environment.gov.za; ramugondov@dws.gov.za; raymondWI@seavuna.co.za; rbrand@sahra.org.za; reason.nyengera@birdlife.org.za; reception@richtersveld.gov.za; redahdemainef@msn.com

Reply | Reply All | Forward

Mon 2022/08/22 14:[illegible]

Retention Policy: EIMS Retention (10 years) Expires: 2032/08/19

1520_Initial Notification.pdf
445 KB

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards

ANDISIWE XIMA

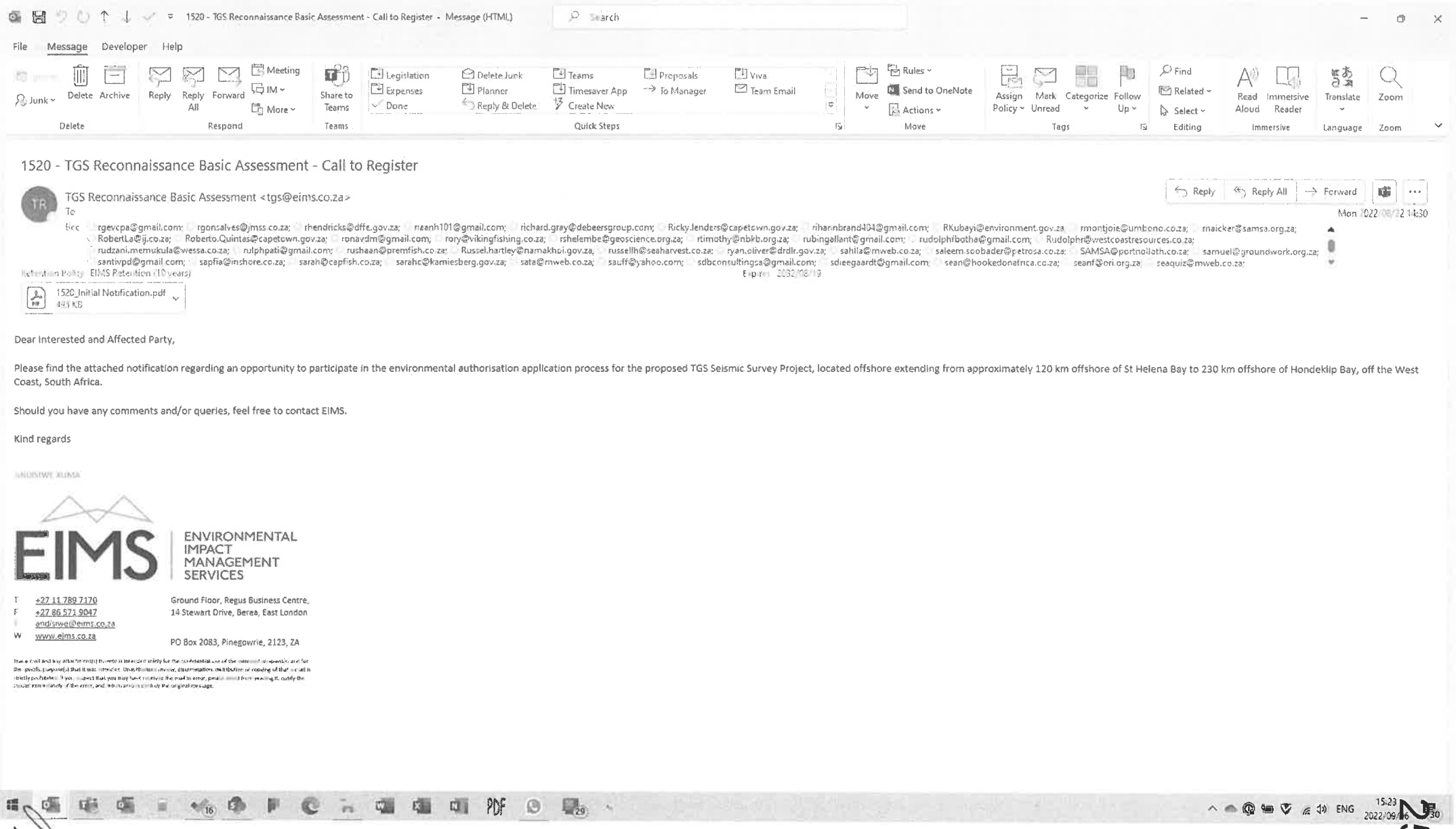
EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T +27 11 789 7170
F +27 86 571 9047
E andisiwe@eims.co.za
W www.eims.co.za

Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

PO Box 2083, Pinegowrie, 2123, ZA

[illegible] e-mail and any attachment(s) thereto is intended solely for the confidential use of the named recipient(s) and for the specific purpose(s) that it was intended. Unauthorised retrieval, dissemination, distribution or copying of this e-mail is strictly prohibited. If you suspect that you may have received this e-mail in error, please refrain from reading it, notify the sender immediately of this error, and refrain from further use of the original message.


1520 - TGS Reconnaissance Basic Assessment - Call to Register - Message (HTML)
Search
File
Message
Developer
Help
Junk
Delete
Archive
Reply
Reply All
Forward
Meeting
IM
More
Share to Teams
Legislation
Expenses
Done
Delete Junk
Planner
Reply & Delete
Teams
Timesaver App
Create New
Proposals
To Manager
Viva
Team Email
Move
Rules
Send to OneNote
Actions
Assign Policy
Mark Unread
Categorize
Follow Up
Find
Related
Select
Read Aloud
Immersive Reader
Translate
Zoom
Delete
Respond
Teams
Quick Steps
Move
Tags
Editing
Immersive
Language
Zoom
1520 - TGS Reconnaissance Basic Assessment - Call to Register
TR
TGS Reconnaissance Basic Assessment <tgs@eims.co.za>
To
Reply
Reply All
Forward
Mon 2022/08/22 14:30
Bcc
rgevcpa@gmail.com; rgoncalves@jmss.co.za; rhendricks@dffe.gov.za; rizanh101@gmail.com; richard.gray@debeersgroup.com; Ricky.lenders@capetown.gov.za; riharnbrand404@gmail.com; RKubayi@environment.gov.za; rmontjoie@umbono.co.za; rnaicker@samsa.org.za; RobertLa@ij.co.za; Roberto.Quintas@capetown.gov.za; ronavdm@gmail.com; rory@vikingfishing.co.za; rshelembe@geoscience.org.za; rtimothy@nbkb.org.za; rubingallant@gmail.com; rudolphfbotha@gmail.com; Rudolphr@westcoastresources.co.za; rudzani.memukula@wessa.co.za; rulphpati@gmail.com; rushaan@premfish.co.za; Russel.hartley@namakhoi.gov.za; russellh@seaharvest.co.za; ryan.oliver@drdlr.gov.za; sahila@mweb.co.za; saleem.soobader@petrosa.co.za; SAMSA@portnoloth.co.za; samuel@groundwork.org.za; santivpd@gmail.com; sapfia@inshore.co.za; sarah@capfish.co.za; sarahc@karniesberg.gov.za; sata@mweb.co.za; sauff@yahoo.com; sdbconsultingsa@gmail.com; sdieegaardt@gmail.com; sean@hookedonafrica.co.za; seanf@ori.org.za; seaquiz@mweb.co.za;
Retention Policy: EIMS Retention (10 years)
Expires 2032/08/18
1520_Initial Notification.pdf
485 KB
Dear Interested and Affected Party,
Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.
Should you have any comments and/or queries, feel free to contact EIMS.
Kind regards
ENVIRONMENTAL IMPACT MANAGEMENT SERVICES
T +27 11 789 7170
F +27 86 571 9047
E andisnwe@eims.co.za
W www.eims.co.za
Ground Floor, Regus Business Centre, 14 Stewart Drive, Berea, East London
PO Box 2083, Pinegowrie, 2123, ZA
ENG
15:23
2022/09/16

2577

1520 - TGS Reconnaissance Basic Assessment - Call to Register - Message (HTML)

Search

File Message Developer Help

Junk | Delete | Archive | Reply | Reply All | Forward | Meeting | IM | More | Share to Teams | Legislation | Expenses | Done | Delete Junk | Planner | Reply & Delete | Teams | Timesaver App | Create New | Proposals | To Manager | Viva | Team Email | Move | Rules | Send to OneNote | Actions | Assign Policy | Mark Unread | Categorize | Follow Up | Find | Related | Select | Read Aloud | Immersive Reader | Translate | Zoom

Delete | Respond | Teams | Quick Steps | Move | Tags | Editing | Immersive | Language | Zoom

1520 - TGS Reconnaissance Basic Assessment - Call to Register

TR

TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To:

Bcc: santivpd@gmail.com; sapfia@inshore.co.za; sarah@capfish.co.za; sarahc@kamiesberg.gov.za; sata@mweb.co.za; sauff@yahoo.com; sdbconsultingsa@gmail.com; sdleegaardt@gmail.com; seari@hookedonafrica.co.za; searf@ori.org.za; seaquiz@mweb.co.za; secretary@satla.co.za; secretary@satla.co.za; September.ray2@gmail.com; serge@abalobi.org; shannon@naturaljustice.org; shannondkyo@gmail.com; SharashniR@tj.co.za; Sharon.Scholtz@sbm.gov.za; shauna@namakwa-dm.gov.za; shauna@namakwa-dm.gov.za; shelleyl@ewt.org.za; sherelee@sdceango.co.za; shosholarosey@gmail.com; simon.elwen@gmail.com; Simon.Liell-Cock@capetown.gov.za; Sinalo.Sodela@transnet.net; siphiwo@eyethufishing.co.za; Siyabulelo.Liwani@sbm.gov.za; smalla@bergmun.org.za; smbatha@geoscience.org.za; Smiddleton@environment.gov.za; smithsolene6@gmail.com; smome@sahra.org.za

Reply | Reply All | Forward

Mon 2022/09/12 14:29

Retention Policy: EIMS Retention (10 years) Expires: 2032/09/19

1520_Initial Notification.pdf
495 KB

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards

ANDISIWE XUMA

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T +27 11 789 7170
F +27 86 571 9047
E andisiwe@eims.co.za
W www.eims.co.za

Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

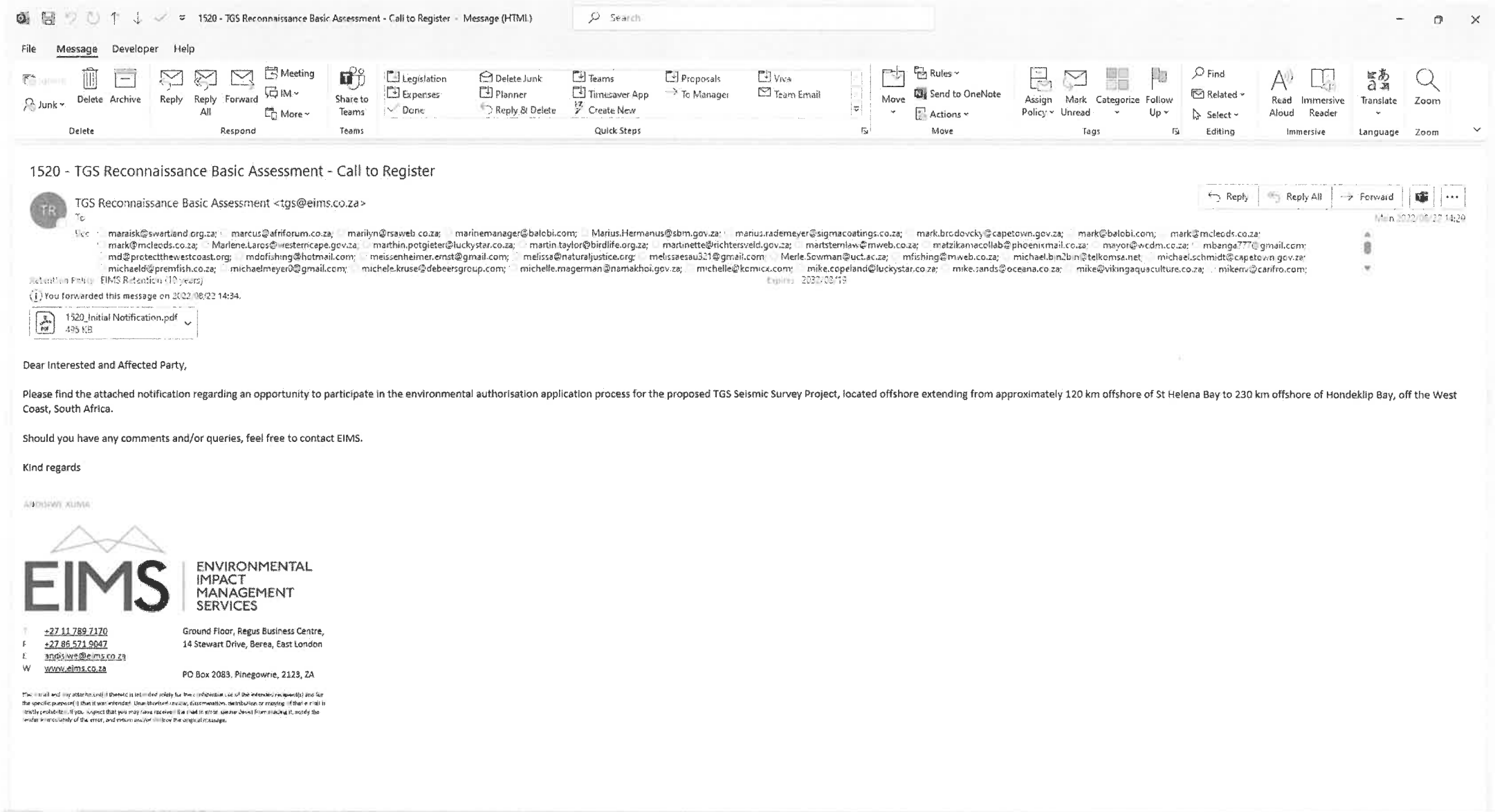
PO Box 2083, Pinegowrie, 2123, ZA

The e-mail and any attachment(s) thereto is intended solely for the confidential use of the intended recipient(s) and for the specific purpose(s) that it was intended. Unauthorised review, dissemination, distribution or copying of that e-mail is strictly prohibited. If you, a agent that you may have received the e-mail in error, please assist by reading it, notify the author immediately of the error, and return/delete it/all/or the original message.

15:23 2022/09/16 ENG

2578

2578



1520 - TGS Reconnaissance Basic Assessment - Call to Register - Message (HTML)

File Message Developer Help

Junk | Delete | Archive | Reply | Reply All | Forward | Meeting | IM | More | Share to Teams | Legislation | Expenses | Done | Delete Junk | Planner | Reply & Delete | Teams | Timesaver App | Create New | Proposals | To Manager | Viva | Team Email | Move | Rules | Send to OneNote | Actions | Assign Policy | Mark Unread | Categorize | Follow Up | Find | Related | Select | Read Aloud | Immersive Reader | Translate | Zoom

Delete | Respond | Teams | Quick Steps | Move | Tags | Editing | Immersive | Language | Zoom

1520 - TGS Reconnaissance Basic Assessment - Call to Register

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Reply | Reply All | Forward

Mon 2022/09/12 14:29

Cc: maraisk@swartland.org.za; marcus@afriforum.co.za; marilyn@rsaweb.co.za; marinemanager@balobi.com; Marius.Hermanus@sbm.gov.za; marius.rademeyer@sigmacoatings.co.za; mark.brodovsky@capetown.gov.za; mark@balobi.com; mark@mcleods.co.za; mark@mcleods.co.za; Marlene.Laros@westerncape.gov.za; marthin.potgieter@luckystar.co.za; martin.taylor@birdlife.org.za; martinette@richtersveld.gov.za; martsternlaw@mweb.co.za; matzikamacollab@phoenixmail.co.za; mayor@wcdm.co.za; mbanga777@gmail.com; md@protectthewestcoast.org; mdofishing@hotmail.com; meissenheimer.ernst@gmail.com; melissa@naturaljustice.org; melissaesau321@gmail.com; Merle.Sowman@uct.ac.za; mfishing@mweb.co.za; michael.bin2bin@telkomsa.net; michael.schmidt@capetown.gov.za; michaeld@premfish.co.za; michaelmeyer0@gmail.com; michele.kruse@debeersgroup.com; michelle.magerman@namakhoi.gov.za; michelle@kcmicx.com; mike.copeland@luckystar.co.za; mike.sands@oceana.co.za; mike@vikingaquaculture.co.za; mikerv@carifro.com;

Retention Policy: EIMS Retention (10 years) Expires: 2032/03/13

You forwarded this message on 2022/09/22 14:34.

1520_Initial Notification.pdf
495 KB

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards

ANDISWA XUMA

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T +27 11 789 7170
F +27 86 571 9047
E andiswa@eims.co.za
W www.eims.co.za

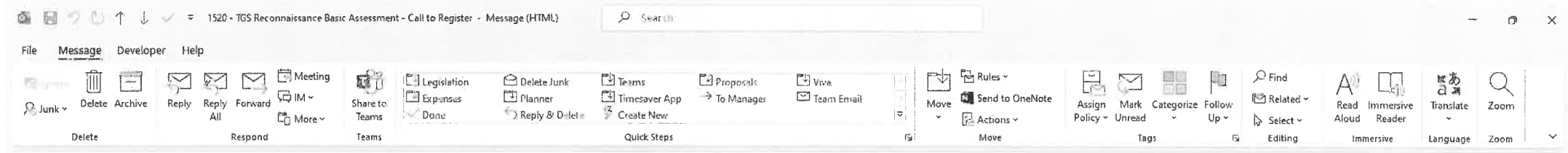
Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

PO Box 2083, Pinegowrie, 2123, ZA

The e-mail and any attachment(s) thereto is intended solely for the confidential use of the intended recipient(s) and for the specific purpose(s) that it was intended. Unauthorised review, dissemination, distribution or copying of that e-mail is strictly prohibited. If you suspect that you may have received the e-mail in error, sever Sent from attaching it, notify the sender immediately of the error, and return and/or delete the original message.

ENG 15:24 2022/09/16

2579



1520 - TGS Reconnaissance Basic Assessment - Call to Register

TR

TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To:

Reply | Reply All | Forward

Mon 2022/08/22 14:29

Bcc: mjanse@geoscience.org.za; mm@wcdm.co.za; MMnwana@dffe.gov.za; MnyakaS@petroleumagencysa.com; MokhoantleL@dws.gov.za; mongezi@ukuloba.co.za; monica@sanccob.co.za; monique@slipperbay.co.za; mooimanj@begmun.org.za; Moosa.Raise@capetown.gov.za; morne.theron@capetown.gov.za; motloungt@petroleumagencysa.com; mpeters@oceana.co.za; mpotgieter@ob.co.za; msands@bluecon.co.za; msimons@capenature.co.za; mulalosu@daff.gov.za; munman@matzikama.gov.za; mushwanas@petroleumagencysa.com; mvdh@pioneerfishing.co.za; mvdh@pioneerfishing.co.za; mvdh@pioneerfishing.co.za; mwheeler@capenature.co.za; narnott@slrconsulting.com; nassarg@ij.co.za; natashac.visagie@gmail.com; Nats.weyers@gmail.com; Nazeema.Duarte@sbm.gov.za; ncampbell@samsa.org.za; ndcube@mweb.com; neil@terrasan.co.za; neville.brink@oceana.co.za; aletd@oceana.co.za; nevilie@thegreenconnection.org.za; nevilleb@oceana.co.za; nevilleb@oceana.co.za; nevillee@cefgroup.co.za; news@wearesouthafricans.com; Phumla Ngesi; Phumla Ngesi;

Retention Policy: EIMS Retention (10 years)

Expires: 2032/08/19

You forwarded this message on 2022/08/22 14:34.

1520_Initial Notification.pdf
89 kB

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards

ANDISWE XUMA

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T +27 11 789 7170
F +27 86 571 9047
E andiswe@eims.co.za
W www.eims.co.za

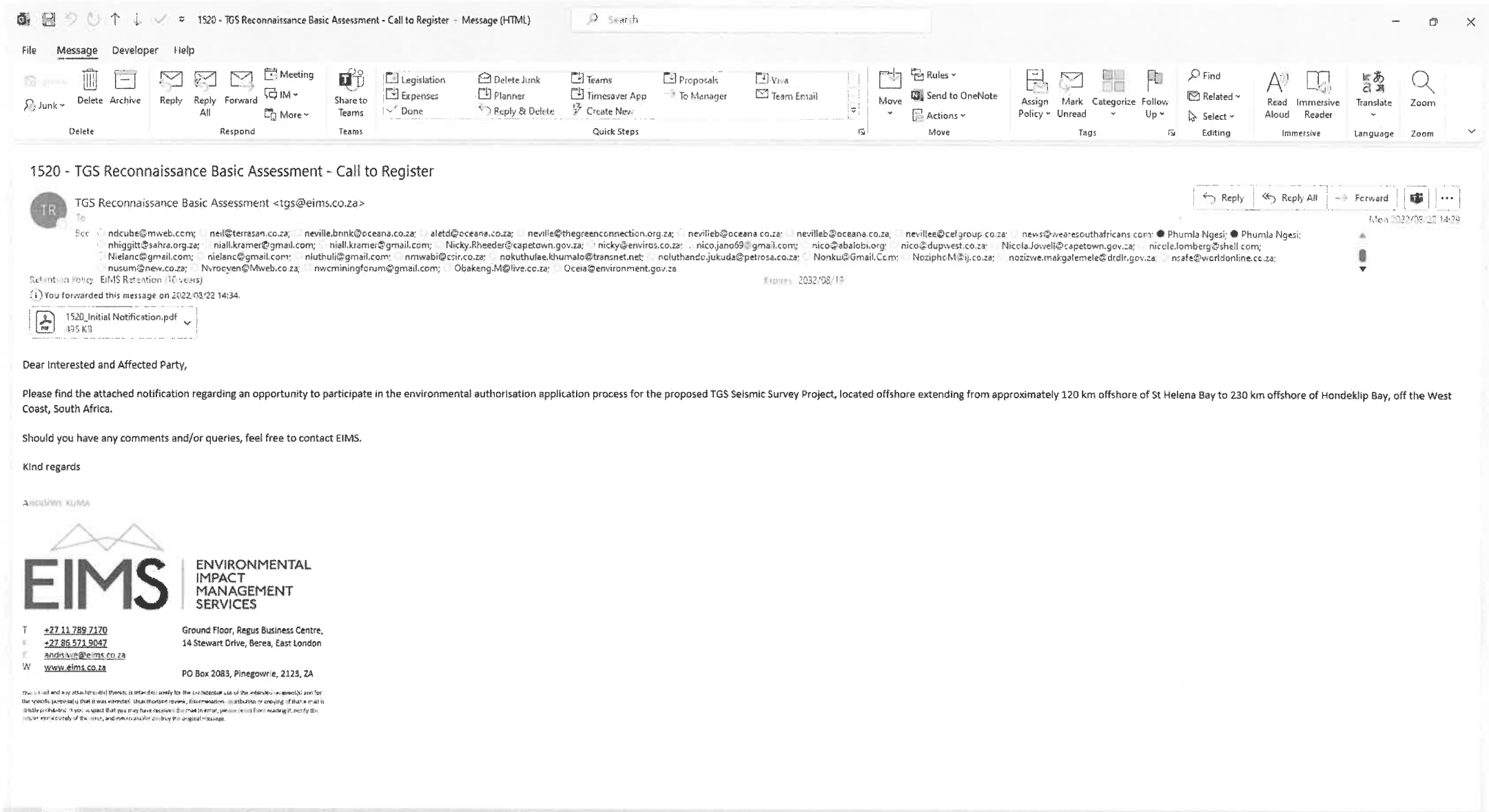
Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

PO Box 2083, Pinegowrie, 2123, ZA

This e-mail and any attachment(s) thereto is intended solely for the confidential use of the intended recipient(s) and for the specific purpose(s) that it was intended. Unauthorised review, dissemination, distribution or copying of that e-mail is strictly prohibited. If you suspect that you may have received the mail in error, please refrain from reading it, notify the sender immediately of the error, and return and/or destroy the original message.



2580



1520 - TGS Reconnaissance Basic Assessment - Call to Register - Message (HTML)

File Message Developer Help

Delete Archive Reply Reply All Forward Meeting IM More Share to Teams Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email Move Rules Send to OneNote Actions Assign Policy Mark Unread Categorize Follow Up Find Related Select Read Aloud Immersive Reader Translate Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 - TGS Reconnaissance Basic Assessment - Call to Register

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Reply Reply All Forward

Mon 2022/09/12 14:29

Bcc: ndcube@mweb.com; neil@terrasan.co.za; neville.bnnk@oceana.co.za; aletd@oceana.co.za; nevilie@thegreenconnection.org.za; nevilieb@oceana.co.za; nevilleb@oceana.co.za; nevillee@cefgroup.co.za; news@wearesouthafricans.com; Phumla Ngesi; Phumla Ngesi; nhiggitt@sahra.org.za; niall.kramer@gmail.com; niall.kramer@gmail.com; Nicky.Rheeder@capetown.gov.za; nicky@enviros.co.za; nico.jano69@gmail.com; nico@abalobi.org; nico@dupwest.co.za; Nicola.Jowell@capetown.gov.za; nicole.lomberg@shell.com; Nielanc@gmail.com; nielanc@gmail.com; nluthuli@gmail.com; nmwabi@csir.co.za; nokuthulae.khumalo@transnet.net; noluthando.jukuda@petrosa.co.za; Nonku@Gmail.Com; NoziphoM@ij.co.za; nozizwe.makgalemele@drdlr.gov.za; nsafe@worldonline.co.za; nusum@new.co.za; Nvrocyen@Mweb.co.za; nwcminingforum@gmail.com; Obakeng.M@live.co.za; Oceia@environment.gov.za

Retention Policy: EIMS Retention (10 years) Expires: 2032/08/19

You forwarded this message on 2022/09/22 14:34.

1520_Initial Notification.pdf 495 KB

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards

ANDISWE KUMA

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T +27 11 789 7170
F +27 86 571 9047
E andiswe@eims.co.za
W www.eims.co.za

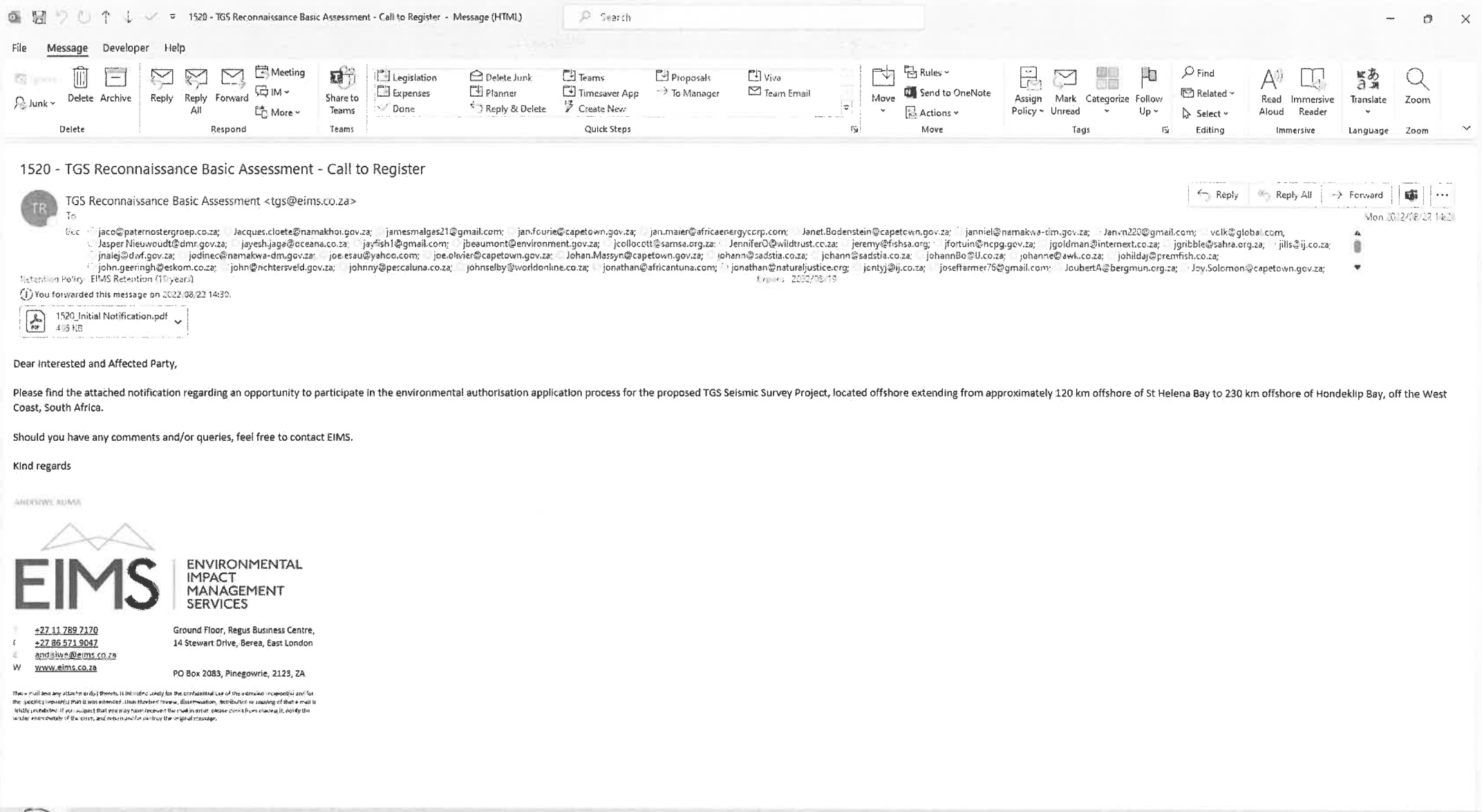
Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

PO Box 2083, Pinegowrie, 2123, ZA

This e-mail and any attachment(s) thereto is intended only for the confidential use of the addressee(s) named for the specific purpose(s) that it was intended. Unauthorised review, dissemination, distribution or copying of that e-mail is strictly prohibited. If you suspect that you may have received the mail in error, please refrain from reading it, notify the sender immediately of the error, and permanently destroy the original message.

ENG 15:24 2022/09/16

2581



1520 - TGS Reconnaissance Basic Assessment - Call to Register

TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

Reply | Reply All | Forward

To

Mon 2022/08/22 14:2

Cc jaco@paternostergroep.co.za; Jacques.cloete@namakhoi.gov.za; jamesmalges21@gmail.com; jan.fourie@capetown.gov.za; jan.maier@africaenergycorp.com; Janet.Bodenstein@capetown.gov.za; janniel@namakwa-dm.gov.za; Janvn220@gmail.com; volk@global.com; Jasper.Nieuwoudt@dmr.gov.za; jayesh.jaga@oceana.co.za; jayfish1@gmail.com; jbeaumont@environment.gov.za; jcollocott@samsa.org.za; JenniferO@wildtrust.co.za; jeremy@fishsa.org; jfortuin@ncpg.gov.za; jgoldman@internext.co.za; jgribble@sahra.org.za; jills@ij.co.za; jnalej@dwf.gov.za; jodinec@namakwa-dm.gov.za; joe.esau@yahoo.com; joe.olivier@capetown.gov.za; Johan.Massyn@capetown.gov.za; johann@sadstia.co.za; johann@sadstia.co.za; johannBo@U.co.za; johanne@awk.co.za; johildaj@premfish.co.za; john.geeringh@eskom.co.za; john@nchtersveld.gov.za; johnny@pescaluna.co.za; johnselby@worldonline.co.za; jonathan@africantuna.com; jonathan@naturaljustice.org; jontyj@ij.co.za; joseftarmer75@gmail.com; JoubertA@bergmun.org.za; Joy.Solomon@capetown.gov.za;

Retention Policy EIMS Retention (10 years) Expires 2032/08/18

You forwarded this message on 2022/08/22 14:30.

1520_Initial Notification.pdf
465 KB

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards

ANDISIWE XUMA

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

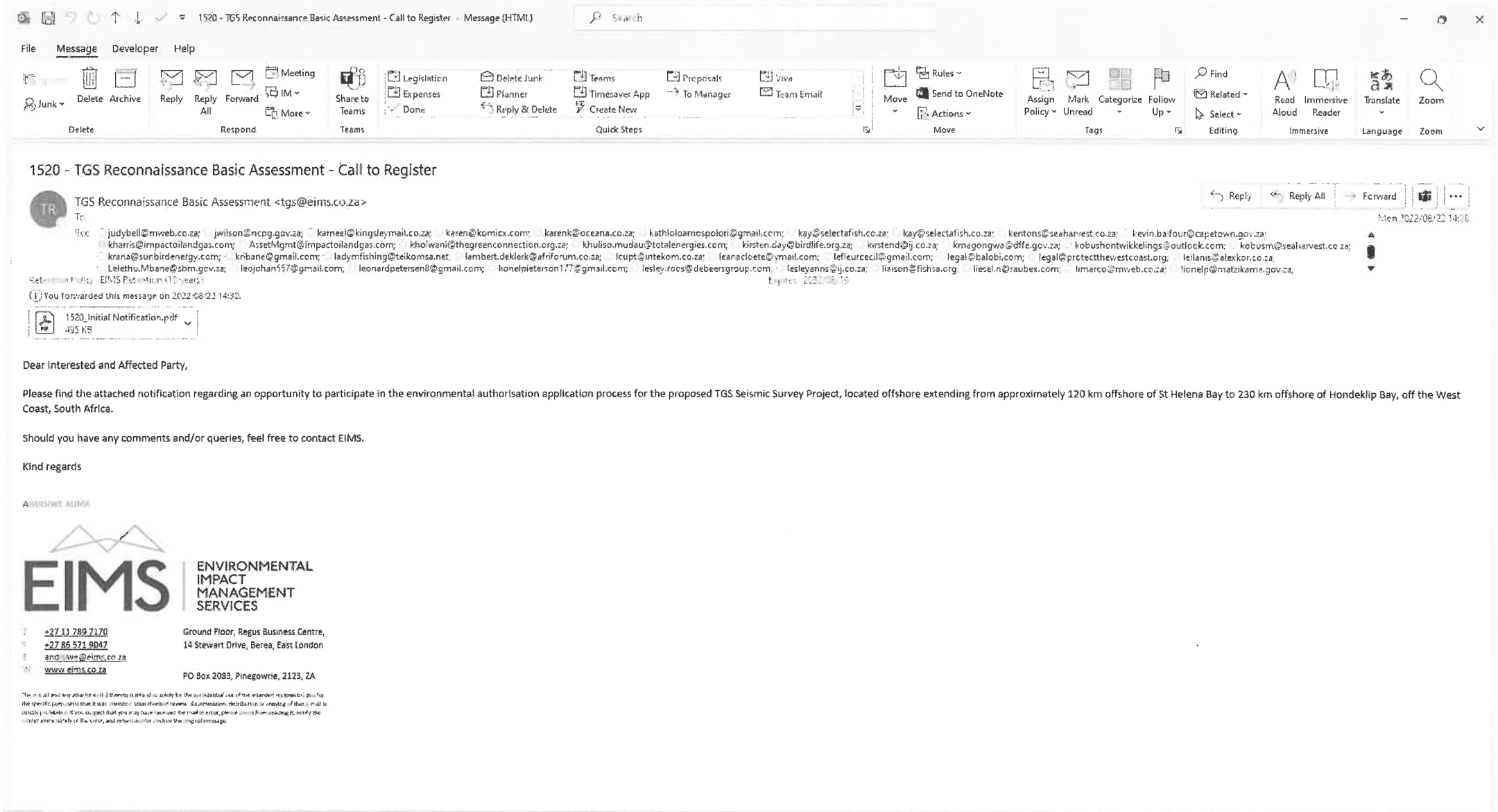
T +27 11 789 7170
F +27 86 571 9047
E andisiwe@eims.co.za
W www.eims.co.za

Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

PO Box 2083, Pinegowrie, 2123, ZA

This e-mail and any attachment(s) thereto is intended only for the confidential use of the addressee(s) named above and for the specific purpose(s) that it was intended. Unauthorised review, dissemination, distribution or copying of this e-mail is strictly prohibited. If you suspect that you may have received the e-mail in error, please contact the sender immediately by the direct, and return and/or destroy the original message.





1520 - TGS Reconnaissance Basic Assessment - Call to Register - Message (HTML)

File Message Developer Help

Junk Delete Archive | Reply Reply All Forward Meeting IM More | Share to Teams | Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email | Move Rules Send to OneNote Actions | Assign Policy Mark Unread Categorize Follow Up | Find Related Select | Read Aloud Immersive Reader | Translate | Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 - TGS Reconnaissance Basic Assessment - Call to Register

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To:

Cc: judybell@mweb.co.za; jwilson@ncpg.gov.za; kameel@kingsleymail.co.za; karen@komicx.com; karenk@oceana.co.za; kathloloamospolori@gmail.com; kay@selectafish.co.za; kay@selectafish.co.za; kentons@seaharvest.co.za; kevin.balfour@capetown.gov.za; kharris@impactoilandgas.com; AssetMgmt@impactoilandgas.com; kholwani@thegreenconnection.org.za; khuliso.mudau@totalenergies.com; kirsten.day@birdlife.org.za; kirstend@ij.co.za; kmagongwa@dffe.gov.za; kobushontwikkelings@outlook.com; kobusm@seaharvest.co.za; krana@sunbirdenergy.com; kribane@gmail.com; ladymfishing@telkomsa.net; lambert.deklerk@afriforum.co.za; lcupt@intekom.co.za; leanacloete@ymail.com; lefleurcecil@gmail.com; legal@balobi.com; legal@protectthewestcoast.org; leilanis@alexkor.co.za; Lelethu.Mbane@sbm.gov.za; leojohan557@gmail.com; leonardpetersen8@gmail.com; lionelpieterson177@gmail.com; lesley.roos@debeersgroup.com; lesleyanns@ij.co.za; liaison@fishsa.org; liesel.n@raubex.com; limarco@mweb.co.za; lionelp@matzikama.gov.za;

Reply Reply All Forward

Mon 2022/08/22 14:28

Retention Policy: EIMS Retention (10 years) Expires: 2032/08/19

You forwarded this message on 2022/08/22 14:30.

1520_Initial Notification.pdf
495 KB

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards

ANDISWE KUMA

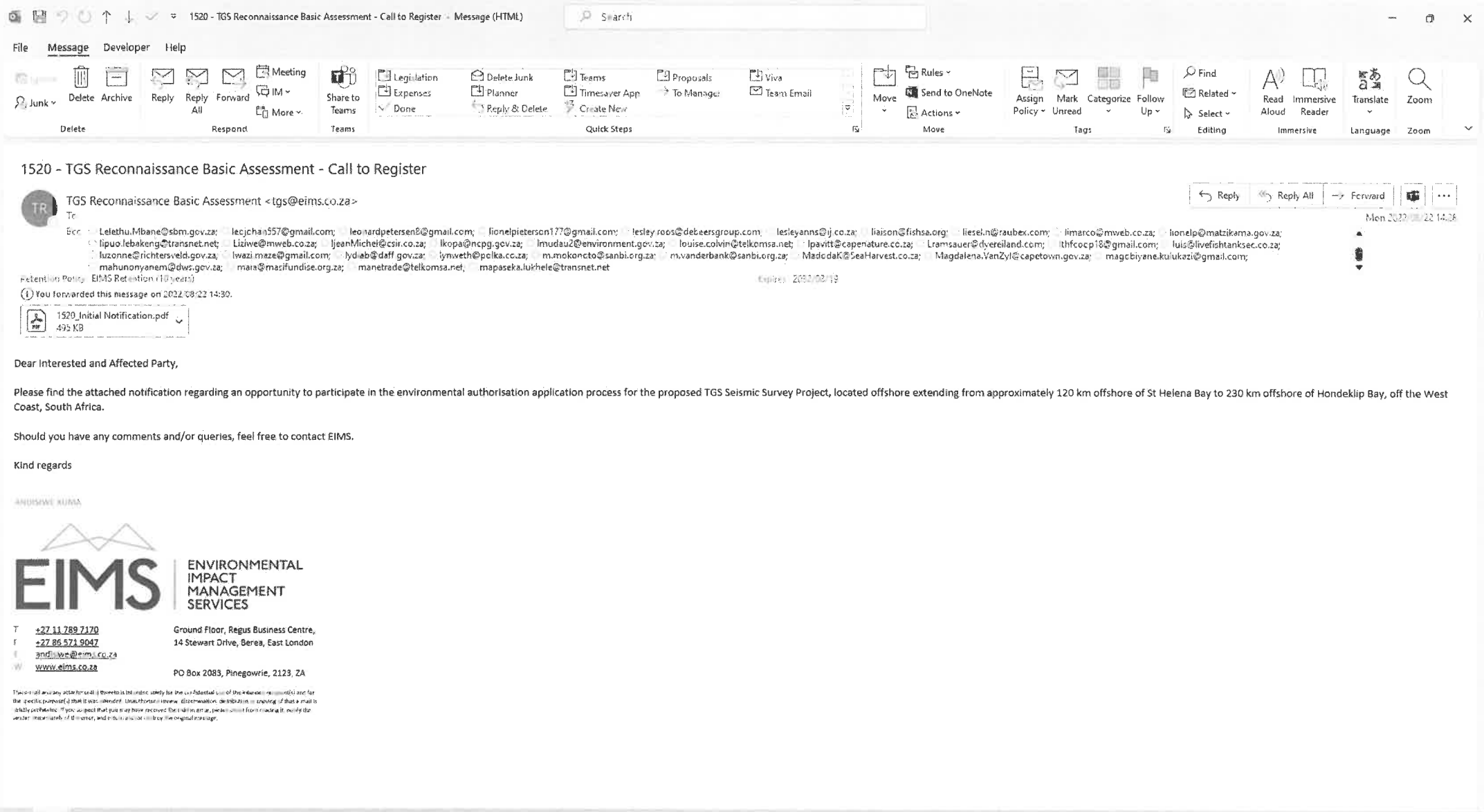
EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T +27 11 789 7170
F +27 86 571 9047
E andiswe@eims.co.za
W www.eims.co.za

Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

PO Box 2083, Pinegowrie, 2123, ZA

The e-mail and any attachment thereto is intended solely for the confidential use of the intended recipient(s) only for the specific purpose that it was intended. Unauthorised review, dissemination, distribution or copying of this e-mail is strictly prohibited. If you, as addressee, have received the e-mail in error, please refrain from reading it, notify the sender immediately of the error, and return and/or destroy the original message.



1520 - TGS Reconnaissance Basic Assessment - Call to Register - Message (HTML)

File Message Developer Help

Delete Archive Reply Reply All Forward Meeting IM More Share to Teams Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email Move Rules Send to OneNote Actions Assign Policy Mark Unread Categorize Follow Up Find Related Select Read Aloud Immersive Reader Translate Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 - TGS Reconnaissance Basic Assessment - Call to Register

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Bcc: Lelethu.Mbane@sbm.gov.za; lecjchan557@gmail.com; leonardpetersen8@gmail.com; lionelpieterson177@gmail.com; lesley.roos@debeersgroup.com; lesleyanns@ij.co.za; liaison@fishsa.org; liesel.n@raubex.com; limarco@mweb.co.za; lionelp@matzikama.gov.za; lipuo.lebakeng@transnet.net; Liziwe@mweb.co.za; ljeanMichel@csir.co.za; lkopa@ncpg.gov.za; lmudau2@environment.gov.za; louise.colvin@telkomsa.net; lpavitt@capenature.co.za; Lramsauer@dvereiland.com; lthfcocp18@gmail.com; luis@livefishtanksec.co.za; luzonne@richtersveld.gov.za; lwazi.maze@gmail.com; lydiab@daff.gov.za; lynweth@pelka.co.za; m.mokoncto@sanbi.org.za; m.vanderbank@sanbi.org.za; MadcdaK@SeaHarvest.co.za; Magdalena.VanZyl@capetown.gov.za; magcbiyane.kulukazi@gmail.com; mahunonyanem@dws.gov.za; maria@masifundise.org.za; manetrade@telkomsa.net; mapaseka.lukhele@transnet.net

Reply Reply All Forward

Mon 2022/08/22 14:28

Retention Policy: EIMS Retention (10 years) Expires: 2032/08/19

You forwarded this message on 2022/08/22 14:30.

1520_Initial Notification.pdf 495 KB

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards

ANDISIWE KUMA

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T +27 11 789 7170
F +27 86 571 9047
E andisiwe@eims.co.za
W www.eims.co.za

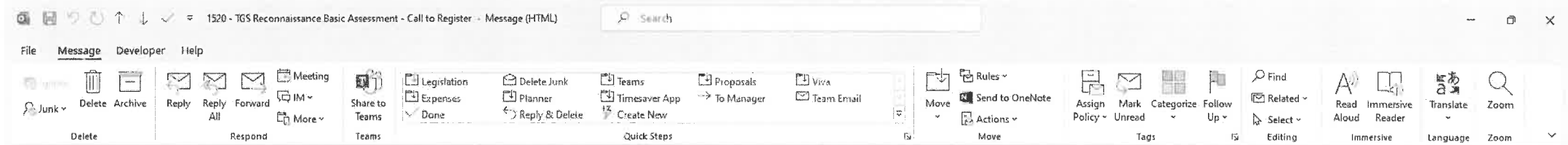
Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

PO Box 2083, Pinegowrie, 2123, ZA

This e-mail and any attachment(s) thereto is intended solely for the confidential use of the addressee(s) and for the specific purpose(s) that it was intended. Unauthorised review, dissemination, distribution or copying of this e-mail is strictly prohibited. If you suspect that you may have received this e-mail in error, please refrain from reading it, notify the sender immediately of the error, and refrain at all times from the original message.

ENG 15:24 2022/09/16

2584



1520 - TGS Reconnaissance Basic Assessment - Call to Register

TR

TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To:

Reply | Reply All | Forward

Mon 2022/08/22 14:26

Exc: chris@africantuna.com; chris@namaquarights.org; chris@ntenergy.co.za; chrisf@namakwa-dm.gov.za; cindyr@seaharvest.co.za; cjadams1976@gmail.com; cjmalherbe@wcdm.co.za; cjmostertpuppie@gmail.com; cliff.dorse@capetown.gov.za; clintonpayne@gmail.com; cljobs96@gmail.com; clyde@molimoman.co.za; clyde@molimoman.co.za; COLLATERAL001@GMAIL.COM; companysecretary@oceana.co.za; compassfishing@mweb.co.za; compassfishing@mweb.co.za; conservation@birdlife.org.za; copeland.fishconsult@gmail.com; corneld@seaharvest.co.za; corneld@seaharvest.co.za; correspond@janetsolomon.com; craig@hdpbrokers.co.za; cystermevyn1969@gmail.com; d.murray@smit.com; dalane@richtersveld.gov.za; dannej@cederbergmun.gov.za; Darryl.colenbrander@capetown.gov.za; darryndevries@gmail.com; dave@capfish.co.za; David.Allpass@capetown.gov.za; dawidmarkus@gmail.com; dbugan55@gmail.com; Dominic.bugan@namakhoi.gov.za; deborah.winterton@sanparks.org; denvers@namakwa-dm.gov.za; deon.dejager@afriforum.co.za;

Retention Policy: EIMS Retention (10 years)

Expires: 2032/08/15

You forwarded this message on 2022/08/23 14:27.

1520_Initial Notification.pdf
405 KB

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards

ANDISIWE XUMA

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T +27 11 789 7170
C +27 86 571 9047
E andisiwe@eims.co.za
W www.eims.co.za

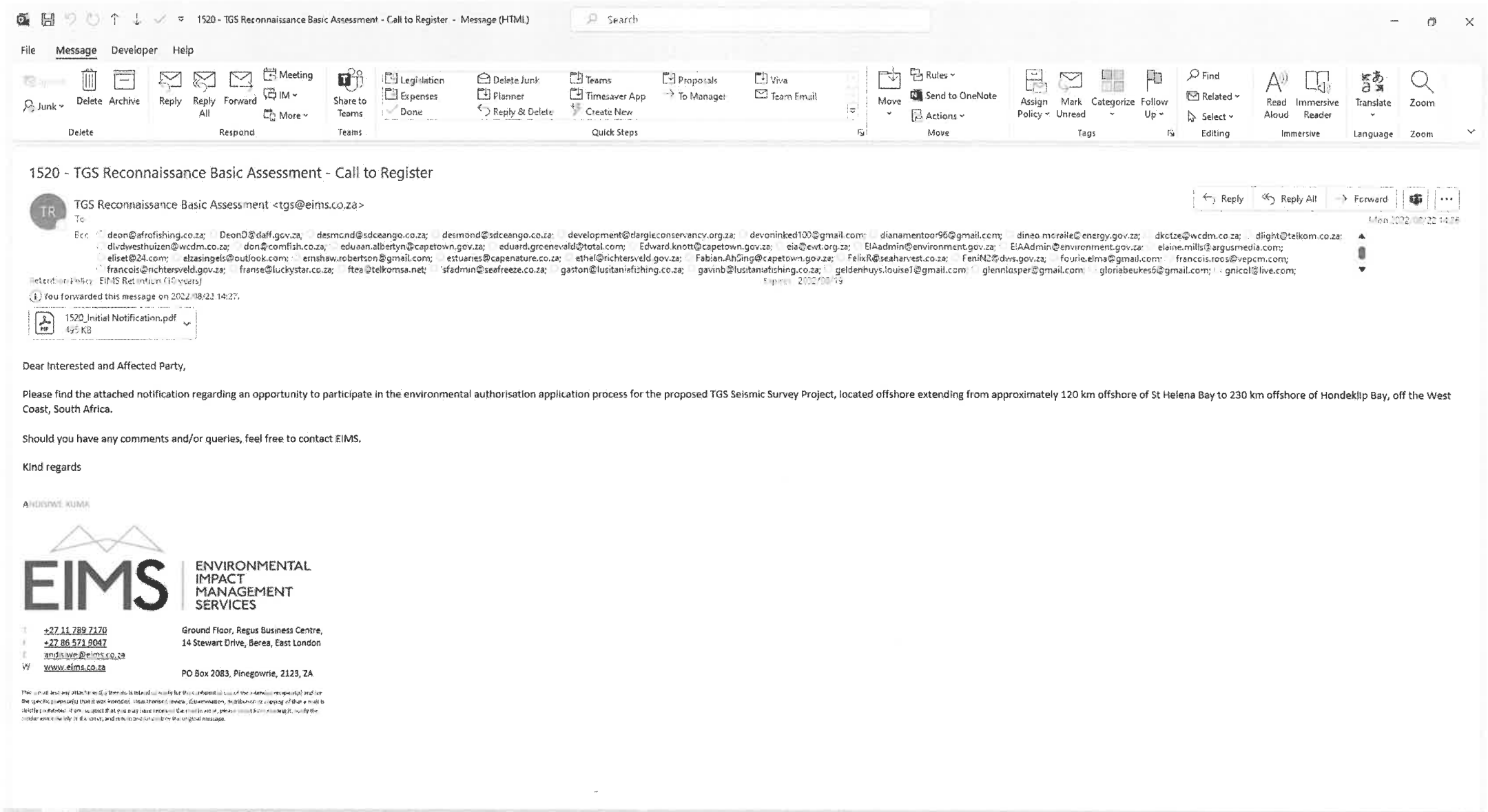
Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

PO Box 2083, Pinegowrie, 2123, ZA

This e-mail and any attachment(s) thereto is intended solely for the confidential use of the intended recipient(s) and for the specific purpose that it was transmitted. Unauthorised review, dissemination, redistribution or copying of this e-mail is strictly prohibited. If you suspect that you may have received this e-mail in error, please advise the sender immediately of the error, and return and/or destroy this original message.



2585



1520 - TGS Reconnaissance Basic Assessment - Call to Register - Message (HTML)

Search

File Message Developer Help

Junk Delete Archive | Reply Reply All Forward Meeting IM More | Share to Teams | Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email | Move Rules Send to OneNote Actions | Assign Policy Mark Unread Categorize Follow Up | Find Related Select | Read Aloud Immersive Reader | Translate | Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 - TGS Reconnaissance Basic Assessment - Call to Register

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Reply Reply All Forward

Mon 2022/08/22 14:26

Bcc: deon@afrofishing.co.za; DeonD@daff.gov.za; desmond@sdceango.co.za; desmond@sdceango.co.za; development@dargleconservancy.org.za; devoninked100@gmail.com; dianamentoor96@gmail.com; dineo.moraile@energy.gov.za; dkotze@wcdm.co.za; dlight@telkom.co.za; dlvdwesthuizen@wcdm.co.za; don@comfish.co.za; eduaan.albertyn@capetown.gov.za; eduard.groenewald@total.com; Edward.knott@capetown.gov.za; eia@ewt.org.za; EIAadmin@environment.gov.za; EIAadmin@environment.gov.za; elaine.mills@argusmedia.com; eliset@24.com; elzasingels@outlook.com; emshaw.robertson@gmail.com; estuaries@capenature.co.za; ethel@richtersveld.gov.za; Fabian.Ah3ing@capetown.gov.za; FelixR@seaharvest.co.za; FeniN2@dws.gov.za; fourie.elma@gmail.com; francois.roos@vepcm.com; francois@richtersveld.gov.za; franse@luckystar.co.za; ftea@telkomsa.net; sfadmin@seafreeze.co.za; gaston@lusitaniafishing.co.za; gavinb@lusitaniafishing.co.za; geldenhuys.louise1@gmail.com; glennlasper@gmail.com; gloriabeukes6@gmail.com; gnicol@live.com;

Retention Policy: EIMS Retention (10 years) Expires: 2032/08/19

You forwarded this message on 2022/08/23 14:27.

1520_Initial Notification.pdf 495 KB

Dear Interested and Affected Party,

Please find the attached notification regarding an opportunity to participate in the environmental authorisation application process for the proposed TGS Seismic Survey Project, located offshore extending from approximately 120 km offshore of St Helena Bay to 230 km offshore of Hondeklip Bay, off the West Coast, South Africa.

Should you have any comments and/or queries, feel free to contact EIMS.

Kind regards

ANDISWE KUMA

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T +27 11 789 7170
F +27 86 571 9047
E andiswe@eims.co.za
W www.eims.co.za

Ground Floor, Regus Business Centre,
14 Stewart Drive, Berea, East London

PO Box 2083, Pinegowrie, 2123, ZA

The content and any attachments to this email is intended solely for the addressee(s) and for the specific purpose(s) that it was intended. Unauthorised review, dissemination, distribution or copying of this e-mail is strictly prohibited. If you suspect that you may have received this email in error, please notify the sender immediately at the email, and return and/or destroy the original message.



TEN people were injured when their taxi rolled over on Nelson Mandela Boulevard in the city centre yesterday morning. | ARMAND HOUGH African News Agency (ANA)

CRIME

Khayelitsha tavern owners set for GBV dialogue

ODWA MKENTANE
odwa.mkentane@inl.co.za

TAVERN owners in Khayelitsha are set to meet to discuss how they can contribute to ending the scourge of GBV.

The Liquor Traders Association, Distell and Police Minister Bheki Cele held a dialogue with residents yesterday on the role men needed to play in ending violence against women.

Local businessman Simo Vananda said traders would meet and discuss ways of educating their consumers about GBV.

"Such events which deal with the abuse of women and children are very important and it includes the whole community.

"Most of the time women are being abused by drunk people and that is where we come in as traders. because this affects us too.

"As traders we need to work together with anti-GBV NGOs and also with the government. Our role is to engage our customers and we need to have strict rules and regulations and also abide by the rules of the Liquor Board. Our customers need to be educated about the responsibilities and how to behave when or after consuming alcohol," said Vananda.

Liquor Traders Association spokesperson Lucky Mtimane urged residents, local traders and SAPS to work closely together.

"We will keep fighting to make sure that they are part of the conversations so that we can be able to make difference in our society," said Mtimane

Cele said: "We have met the leadership of the alcohol industry and there are a few things that we believe can be done rather than spending time fighting.

"One thing that we call for is the proper education on how to use alcohol socially. Tavern owners should use at least 30 minutes of their time to educate people and tell them about the danger of illegal weapons at taverns.

"Women are human beings and they too have human rights. This thing of men thinking that it is their responsibility to protect women must come to an end.

"(This is) because once you think that you need to protect her, you end up regarding her as your pet; and women are not pets. Women need to be allowed to grow and fly high and most of them fly high better than men when it comes to leadership.

"Women are not commodities. Men should stop the mentality of thinking that because you bought her something to drink, she must go and sleep with you," said Cele.

CRIME

Two more join city's 'most wanted' man

OKUHLE HLATI
okhule.hlati@inl.co.za

TWO more people have been included in cases involving the Western Cape's most wanted man, Yanga "Bara" Nyalara.

Nyalara returned to the Cape Town Magistrate's Court yesterday, this time along with co-accused Wandile Tofile.

Initially Nyalara was charged alone with 12 counts of murder, four counts of attempted murder, a count of illegal possession of a firearm and illegal possession of ammunition.

The State alleged Nyalara and Tofile went on a shooting spree in May 2021 in Site B, Khayelitsha.

The court heard that Tofile was also abandoning his bail bid.

National Prosecuting Authority (NPA) spokesperson Eric Ntabazalila said: "Nyalara and Tofile are also charged under the Prevention of Organised Crime Act (Poca), as they were prominent members of a gang that engaged in a range of criminal activities which include extortion of informal businesses around Khayelitsha and committing violent criminal acts, by instilling fear among the owners of the informal businesses to induce them to pay money to the gang.

"They also eliminated competing gangs who are also engaging in extortion in the area."

Their case was postponed until October 4.

State advocate Mervyn Menigo said the investigation was extensive, comprising forensic reports, fingerprint comparison, cellphone analysis, drug analysis and ballistic reports.



YANGA Endrey Nyalara (30), also known as Bara.

Then the court heard there was another co-accused, Manelisi Ngumla, who later also appeared in relation to some of the charges.

Nyalara and Ngumla are charged with attempted murder and six counts of murder that happened this year on May 8 in Site C, Khayelitsha.

Ntabazalila said the two were also charged with illegal possession of firearms and illegal possession of ammunition and dealing in drugs.

Nyalara's family, joined by some Khayelitsha residents, yesterday staged a protest outside the court calling for him to be released, claiming he was "innocent and crime is out of control now that he has been unlawfully arrested."

EDUCATION

Cops watch as teaching resumes at volatile Heathfield High School

OKUHLE HLATI
okhule.hlati@inl.co.za

WHILE teaching has resumed at Heathfield High School, it has not returned to normal as law enforcement continues to keep watch following volatile disruptions.

The school has also halted the traditional attendance model and reintroduced the rotational system, which is expected to be in place for about two weeks with the exception of matrics.

Teaching and learning had to be suspended on Wednesday following alarming scenes on Tuesday when pupils who disrupted classes allegedly stoned law enforcement vehicles.

The officers conducted searches which the pupils were unhappy about, with illegal substances and weapons allegedly confiscated.

The school has been unstable after former principal Wesley Neumann was dismissed by the Western Cape Education Department (WCED) in May.

This resulted from his refusal to reopen the school amid the Covid-19 infection peak in 2020.

According to Education MEC David Maynier grades 9, 11 and 12 returned to class without incident yesterday.

"The safety of our learners and staff at school is a priority, and teaching and learning must be allowed to continue without disruption.

"Parents at the school are rightfully concerned about the situation and want their children to be able to learn in a peaceful, safe environment, which is why all stakeholders are working together to stabilise the situation at the school, and ensure that discipline and order are instilled. We appeal to parents to play their role in ensuring that their children take their education and safety seriously, and that they do not engage in the disruption we saw earlier this week."

The South African Human Rights Education Commission's education commissioner André Gaum said: "People can voice their grievances in a peaceful manner. The right to protest cannot be exercised by violating the right to basic education of other learners or threatening the safety of other people. The commissioner is very concerned about the quality of education that might be impacted and the loss of teaching time because learners have already been impacted by Covid-19 learning disruptions. The department needs to take all necessary steps to urgently resolve this."

NOTIFICATION REGARDING OPPORTUNITY TO PARTICIPATE IN ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS GEOPHYSICAL SURVEY BASIC ASSESSMENT PROJECT, LOCATED OFFSHORE EXTENDING FROM APPROXIMATELY 120 KM OFFSHORE OF ST HELENA BAY TO 230 KM OFFSHORE OF HONDEKLIP BAY, OFF THE WEST COAST, SOUTH AFRICA.

TGS Geophysical Company (UK) Limited (hereafter referred to as the applicant - TGS) has appointed Environmental Impact Management Services (Pty) Ltd (EIMS) as the Environmental Assessment Practitioner (EAP) to assist with undertaking the required authorisation processes (including the statutory public participation), and to compile and submit the required documentation in support of application for:

Environmental Authorisation (EA) in accordance with the Environmental Impact Assessment (EIA) Regulations (GRN982 of 2014, as amended)- Listed Activity 21(b) (GNR 983):

Any activity including the operation of that activity which requires a reconnaissance permit in terms of section 74 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity as contained in this Listing Notice or in Listing Notice 3 of 2014, required to exercise the reconnaissance permission, excluding- (a) any desktop study; and (b) any arial survey.

TGS proposes to undertake a 3D seismic survey off the West Coast of South Africa. The proposed project area is located between approximately 120 km offshore of Saldanha Bay, extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay. The survey area main corner coordinate points are as follows:

Point	Latitude	Longitude	Point	Latitude	Longitude
1	32°59'53.46"S	16°35'02.75"E	6	30°40'16.36"S	13°20'38.26"E
2	32°59'57.95"S	13°53'17.25"E	7	30°32'53.92"S	13°35'15.39"E
3	32°39'06.43"S	13°53'26.20"E	8	30°15'21.82"S	14°04'05.31"E
4	32°09'29.22"S	13°58'04.38"E	9	30°15'27.76"S	14°52'28.65"E
5	31°31'44.64"S	13°39'01.12"E			

EIMS will be following the procedures defined in the EIA Regulations (GRN982 of 2014, as amended) for undertaking a Basic Assessment (BA) process. In accordance with Chapter 6 of the EIA Regulations, a public participation process will be undertaken. You are hereby invited to register and comment on the proposed project and application/s.

In order to ensure that you are identified and registered as an Interested and Affected Party and that your comments are captured, please submit your name, contact details, the reason for your interest or any comments, in writing or telephonically, to EIMS. Please note that only registered I&AP's will be directly informed of future project information and opportunities for participation.

Public Meetings: An initial round of public meetings will be held at the following venues in order to capture the initial comments from I&APs:

City/Town	Venue	Date	Time
Hout Bay	Hout Bay Public Library	Monday 29 August 2022	16:00 - 18:00
Cape Town	Life Conference Centre (Three Anchor Bay)	Tuesday 30 August 2022	16:00 – 18:00
Saldanha Bay	Hoedjies Bay Hotel	Wednesday 31 August 2022	16:00 – 18:00
Lamberts Bay	Community Hall	Thursday 1 September 2022	16:00 – 18:00
Hondeklip Bay	Eric Baker Hall	Friday 2 September 2022	16:00 – 18:00
Port Nolloth	Port Nolloth Country Club	Saturday 3 September 2022	10:00 – 12:00

In order to avoid missing out on opportunities for public participation please submit I&AP registrations, or any queries, comments, or concerns with regards to this application, as soon as possible to EIMS at:

Contact Person: Andisiwe Xuma

EIMS Reference Number: **1520**

Postal Address: P.O. Box 2083; Pinegowrie; 2123

Telephone: (011) 789 7170/ Fax: (086) 571 9047

E-mail: tgs@eims.co.za

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

ISAZISO MALUNGA NETHUBA LOKUTHATHA INXAXHEBA KWINKQUBO YOKUFAKA ISICELO SOGUNYAZISO LWEZENDALO KWI-PROJEKTHI KA-TGS YOPHONONONGO LWEZE GEOPHYSICS ELIYAKUBA KUMGAMA WAMA-120 KM UKUSUKA KUNXWEME LWE-ST HELENA BAY NAMA-230KM UKUSUKA KUNXWEME LE-HONDEKLIP BAY, EMZANTSI AFRIKA.

I-TGS Geophysical Comapny (UK) Ltd (emva koku ekubhekiselwa kuyo njengomfaki-sicelo - TGS) iqeshe u-Environmental Impact Management Services (Pty) Ltd (EIMS) njenge-Environmental Assessment Practitioner (EAP) ukuncedisa ekwenzeni iinkqubo zogunyaziso ezifunekayo (kubandakanywa nentatho-nxaxheba yoluntu ngokusemthethweni), kunye nokuqulunqa kunye nokungenisa amaxwebhu afunekayo okuxhasa esisicelo:

uGunyaziso lwezeNdalo, i-Environmental Authorization (EA) ngokuhambelana noMthetho woLawulo woVavanyo lokuChaphazeleka kweNdalo (Environmental Impact Assessment – EIA) (GNR982 ka 2014, njengoko i-amendiwe) – Umsebenzi odwelisiweyo wama-21(b) (GNR 983) :

Nawuphi na umsebenzi oquka umsebenzi ofuna imvume yokuphinda kuqwalaselwe ngokwecandelo le-74 loMthetho woPhuhliso lweMithombo yeziMbiwa nePetroleum, kwakunye nawo nawuphi na omnye umsebenzi oqulethwe kwesi Saziso soLudwe okanye kwiSaziso soLuhlu lwesi-3 sika-2014, efunekayo kwimvume yokuphinda kuqwalaselwe, ngaphandle- (a) nasiphi na isifundo sedesktop; kwaye (b) naluphi na uphando lwe-arial.

I-TGS iceba ukwenza uphando lwe-3D seismic kuNxweme oluseNtshona loMzantsi Afrika. Indawo yeprojekthi ecetywayo iphakathi malunga nama-120 km kude nonxweme lwaseSt Helena Bay, inabela emantla kunxweme olusentshona ukuya malunga ne-230 km kude nonxweme lwaseHondeklip Bay. Iikona zesiza sendawo yovavanyo zezi zilandelayo:

Ikona	Latitude	Longitude	Ikona	Latitude	Longitude
1	32°59'53.46"S	16°35'02.75"E	6	30°40'16.36"S	13°20'38.26"E
2	32°59'57.95"S	13°53'17.25"E	7	30°32'53.92"S	13°35'15.39"E
3	32°39'06.43"S	13°53'26.20"E	8	30°15'21.82"S	14°04'05.31"E
4	32°09'29.22"S	13°58'04.38"E	9	30°15'27.76"S	14°52'28.65"E
5	31°31'44.64"S	13°39'01.12"E			

I-EIMS iza kulandela iinkqubo ezichazwe kwiMimiselo ye-EIA (GRN982 ka-2014, njengoko i-amendiwe) ukuze kuqhutywe inkqubo yoVavanyo loChaphazeleko lwezendalo (Basic Assessment - BA). Ngokuhambelana neSahluko sesi-6 seMimiselo ye-EIA, inkqubo yentatho-nxaxheba yoluntu iya kwenziwa. Uyamenywa ukuba ubhalise kwaye unike izimvo ngeprojekthi ecetywayo kunye neziceto.

Ukwenzela ukuqinisekisa ukuba uchongiwe kwaye ubhalisiwe njengeQela elinomdla (I&AP) nelichaphazelekayo nokuba izimvo zakho zifakiwe, nceda ungenise igama lakho, iinkcukacha zoqhakamshelwano, isizathu somdla wakho okanye naziphi na izimvo, ngembalelwano okanye ngomnxeba, ku-EIMS. Nceda uqaphele ukuba zii-I&APs ezibhalisiweyo kuphela eziya kwaziswa ngokuthe ngqo ngengcaciso yeprojekthi yexesha elizayo kunye namathuba okuthatha inxaxheba.

Iintlanganiso Zoluntu: Umjikelo wokuqala weentlanganiso zikawonke-wonke ziya kubanjwa kwezi ndawo zilandelayo ukuze kufunyanwe izimvo zokuqala eziveta kwii-I&Aps

Isixeko/Idolophu	Indawo	Umhla	Ixesha
Hout Bay	Hout Bay Public Library	uMvulo 29 August 2022	16:00 - 18:00
IKapa	Life Conference Centre (Three Anchor Bay)	uLwesibini 30 August 2022	16:00 – 18:00
Saldanha Bay	Hoedjies Bay Hotel	uLwesithathu 31 August 2022	16:00 – 18:00
Lamberts Bay	Community Hall	uLwesine 1 September 2022	16:00 – 18:00
Hondeklip Bay	Eric Baker Hall	uLwesihlanu 2 September 2022	16:00 – 18:00
Port Nolloth	Port Nolloth Country Club	uMgqibelo 3 September 2022	10:00 – 12:00

In order to avoid missing out on opportunities for public participation please submit I&AP registrations, or any queries, comments, or concerns with regards to this application, as soon as possible to EIMS at:

Contact Person: Andisiwe Xuma

EIMS Reference Number: **1520**

Postal Address: P.O. Box 2083; Pinegowrie; 2123

Telephone: (011) 789 7170/ Fax: (086) 571 9047

E-mail: tgs@eims.co.za

Please include the project reference number 1520 in all correspondence.

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

M METRO

CRIME

Mixed response to mayor's metro cop idea

CHEVON BOOYSEN
chevon.booysen@inl.co.za

CAPE Flats activists have rejected Cape Town Mayor Geordin Hill-Lewis' formal request for metro officers to have full crime-fighting powers, saying "City police treat our people like the dirt under their soles."

During a full Council meeting yesterday, Hill-Lewis confirmed he submitted the request to Police Minister Bheki Cele, saying the Municipality wanted its metro force to have more powers.

"This problem is compounded by the current shortage of more than 500 SAPS detectives in the province… Minister Cele has previously said that he cannot devolve power in the absence of a constitutional amendment.

"This is nonsense. Section 99 of the Constitution provides that 'a Cabinet member may assign any power or function…to a Municipal Council'," said Hill-Lewis.

However, with more than 15 years experience in advocating for peace and justice on the Cape Flats, Manenberg Safety Forum founder Roegshanda Pascoe disagreed with the request.

"Under different circumstances I would have really complimented the mayor. I will draw reference to an incident where Kashief Jacobus was beaten to death by Metro Police in Manenberg. Until today, there is no justice for his death. In the crime-related case that I testified in, the special operative team of the City came around the corner while a victim was brutally beaten and stabbed. What they did was reverse out of the road where they could have saved the victim's life that day. These are things that I have experienced.

"Both parties are deeply rooted with corruption. Both parties are not people-centred but politically-driven, wanting to score points, but it's not for the people on the Cape Flats who live in the violence 24/7 every day of our lives. City police treat our people like the dirt under their soles. They also swear at and mistreat our people. This while Saps officers watch dead buildings like parliament more than the people in communities who really need their service," said Pascoe.

Regional co-ordinator for the United Public Safety Front, Imraahn Mukaddam, said: "What the mayor should be doing is insisting on the capacitation of SAPS and continue to offer a supportive role in combating crime through joint operations between SAPS, Law Enforcement and Metro Police. What the mayor should be focussing on is the hotspots where crime is being perpetrated, such as illegal shebeens, City rental stock being used as gang bases and drug houses. Furthermore, the City must ensure that there are adequate amenities for youth to partake in alternative activities instead of crime."

Non-profit company, Action Society's director for Community Safety, Ian Cameron, voiced his support for the request by Hill-Lewis.

"Detectives in poorer communities are completely overworked and under-resourced. And on top of that they have no capacity to combat organised crime," said Cameron.

IOL
SCAN HERE
VISIT: WWW.IOL.CO.ZA/NEWS



■ Promising BMX rider, Cruz Hendry, 7, could not make it in the second round of the BMX World Championships in Nantes, France, last month but the experience will carry the young rider to even greater heights in his pursuit of being the best rider in the country. Cruz spends most of his time training in Zone 7. In his first world champs, Cruz raced in the 9-challenge boys' event where he competed with 110 other riders. Making his target of top 64 should be a confidence booster for the youngster set to take part in the international circuit in Scotland and looking to finish in the top 32.



PICTURE: FUAD ESACK

■ Zoë "Fairy" Aldridge will represent the Mother City at the Red Bull Dance Your Style national final in Pretoria, later this year after she won the crowd's approval and show of hands in her favour at the Red Bull Dance Your Style Cape Town qualifier tour.

Sentinel News Classified

TO ADVERTISE
Call: 021 488 4907
or 021 488 4754
email: info.acm@inl.co.za

Advertising booking deadline: Wednesday 1:45 pm

714 PUBLIC NOTICES | 714 PUBLIC NOTICES | 714 PUBLIC NOTICES | 714 PUBLIC NOTICES

KENNISGEWING MET BETREKKING TOT GELEENTHEID OM DEEL TE NEEM AAN OMGEWINGSMAGTIGING AANSOEKPROSES VIR DIE VOORGESTELDE TGS SEISMIESE OPNAME BASIESE ASSESSERINGSPROJEK , GELEË SEEWAARTS EN STREK VAN ONGEVEER 120 KM VANAF DIE KUS VAN ST HELENABAAI TOT ONGEVEER 230 KM VANAF DIE KUS VAN HONDEKLIPBAAI AAN DIE WESKUS VAN SUID AFRIKA.

Environmental Impact Management Services (Edms) Bpk (EIMS) is deur TGS Geophysical Company (UK) Limited (hierna na verwys as die aansoeker - TGS) aangestel om die vereiste magtigingsprosesse (insluitend die statutêre openbare deelname) te onderneem en om 'n omgewingsmagtiging (EA) aansoek te voltooi en in te dien volgens die vereistes van die Omgewingsimpakstudie (OIS) Regulasies, 2014,soos gewysig vir die volgende aktiwiteit:

Omgewingsmagtiging (EA) in ooreenstemming met die OIS Regulasies,soos gewysig-Gelyste Aktiwiteit 21(b) (GNR 983):

Enige aktiwiteit insluitend die bedryf van daardie aktiwiteit wat 'n verkenningspermit ingevolge artikel 74 van die Wet op die Ontwikkeling van Minerale en Petroleumhulpbronne vereis, asook enige ander toepaslike aktiwiteit soos vervat in hierdie Noteringskennisgewing of in Noteringskennisgewing 3 van 2014, wat vereis word om verkenningstoestemming uit te oefen, uitgesluit- (a) enige lessenaarstudie; en (b) enige lugopname.

TGS stel voor om 'n 3D seismiese opname aan die Weskus van Suid-Afrika te onderneem. Die voorgestelde projekgebied is geleë tussen ongeveer 120 km vanaf die kus van Saldanha Baai, wat noord langs die westelike kuslyn strek tot ongeveer 230 km van die kus van Hondeklipbaai . Die koördinaatpunte van die hoofhoeke van die opname area is soos volg:

Punt	Breedtegraad	Lengtegraad	Punt	Breedtegraad	Lengtegraad
1	32°59'39;53.46"S	16°35'02.75"E	6	30°40'16.36"S	13°20'38.26"E
2	32°59'39;57.95"S	13°53'17.25"E	7	30°32'53.92"S	13°35'15.39"E
3	32°39'39;06.43"S	13°53'26.20"E	8	30°15'21.82"S	14°04'05.31"E
4	32°09'39;29.22"S	13°58'04.38"E	9	30°15'27.76"S	14°52'28.65"E
5	31°31'39;44.64"S	13°39'01.12"E			

EIMS sal die prosedures volg soos voorgeskryf en vereis in die Omgewingsimpakbepaling (OIB) Regulasies (GRN982 van 2014, soos gewysig) vir die onderneming van 'n Basiese Evaluering (BA) proses. In ooreenstemming met Hoofstuk 6 van die OIB-regulasies, sal 'n openbare deelnameproses onderneem word. U word hiermee uitgenooi om te registreer en kommentaar te lewer op die voorgestelde projek en aansoek/e.

Om te verseker dat U geïdentifiseer en geregistreer is as 'n Belanghebbende & Geïntereseerde Party (B&GP)en dat U kommentaar vasgelê word, dien asseblief U naam, kontakbesonderhede, die rede vir U belangstelling of enige kommentaar, skriftelik of telefonies, by EIMS in. Neem asseblief kennis dat slegs geregistreerde B&GP's direk ingelig sal word oor toekomstige projekinligtingen geleenthede vir deelname.

Openbare Vergaderings:'n Aanvanklike rondte openbare vergaderings sal by die volgende lokale gehou word om die aanvanklike kommentaar van I&APs vas te lê:

Stad/Dorp	Plek	Datum	Tyd
Houtbaai	Hout Bay Publieke Biblioteek	Maandag 29 Augustus 2022	16:00 - 18:00
Cape Town	Life Conference Centre (Three Anchor Bay)	Dinsdag 30 Augustus 2022	16:00 – 18:00
Saldanhabaai	Hoedjiesbaai Hotel	Woensdag 31 Augustus 2022	16:00 – 18:00
Lambertsbaai	Gemeenskapsaal	Donderdag 1 September 2022	16:00 – 18:00
Hondeklipbaai	Eric Baker Saal	Vrydag 2 September 2022	16:00 – 18:00
Port Nolloth	Port Nolloth Country Club	Saterdag 3 September 2022	10:00 – 12:00

Om te verhoed dat geleenthede vir publieke deelname misgeloop word, dien asseblief B&GP-registrasies, of enige navrae, kommentaar of bekommernisse met betrekking tot hierdie aansoek, so gou as moontlik in by EIMS deur gebruik te maak van die volgende kontakbesonderhede:

Kontakpersoon: Andisiwe Xuma
EIMS-verwysingsnommer: 1520
Posadres: Posbus 2083; Pinegowrie ; 2123
Telefoon: (011) 789 7170/ Faks: (086) 571 9047
E-pos: tgs@eims.co.za
Sluit asseblief die projekverwysingsnommer 1520 by alle korrespondensie in.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

714 PUBLIC NOTICES | 714 PUBLIC NOTICES | 714 PUBLIC NOTICES | 714 PUBLIC NOTICES

NOTIFICATION REGARDING OPPORTUNITY TO PARTICIPATE IN ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS GEOPHYSICAL SURVEY BASIC ASSESSMENT PROJECT, LOCATED OFFSHORE EXTENDING FROM APPROXIMATELY 120 KM OFFSHORE OF ST HELENA BAY TO 230 KM OFFSHORE OF HONDEKLIP BAY, OFF THE WEST COAST, SOUTH AFRICA.

TGS Geophysical Company (UK) Limited (hereafter referred to as the applicant - TGS) has appointed Environmental Impact Management Services (Pty) Ltd (EIMS) as the Environmental Assessment Practitioner (EAP) to assist with undertaking the required authorisation processes (including the statutory public participation), and to compile and submit the required documentation in support of application for:

Environmental Authorisation (EA) in accordance with the Environmental Impact Assessment (EIA) Regulations (GRN982 of 2014, as amended)- Listed Activity 21(b) (GNR 983):

Any activity including the operation of that activity which requires a reconnaissance permit in terms of section 74 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity as contained in this Listing Notice or in Listing Notice 3 of 2014, required to exercise the reconnaissance permission, excluding- (a) any desktop study; and (b) any arial survey.

TGS proposes to undertake a 3D seismic survey off the West Coast of South Africa. The proposed project area is located between approximately 120 km offshore of Saldanha Bay, extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay. The survey area main corner coordinate points are as follows:

Point	Latitude	Longitude	Point	Latitude	Longitude
1	32°59'53.46"S	16°35'02.75"E	6	30°40'16.36"S	13°20'38.26"E
2	32°59'57.95"S	13°53'17.25"E	7	30°32'53.92"S	13°35'15.39"E
3	32°39'06.43"S	13°53'26.20"E	8	30°15'21.82"S	14°04'05.31"E
4	32°09'29.22"S	13°58'04.38"E	9	30°15'27.76"S	14°52'28.65"E
5	31°31'44.64"S	13°39'01.12"E			

EIMS will be following the procedures defined in the EIA Regulations (GRN982 of 2014, as amended) for undertaking a Basic Assessment (BA) process. In accordance with Chapter 6 of the EIA Regulations, a public participation process will be undertaken. You are hereby invited to register and comment on the proposed project and application/s.

In order to ensure that you are identified and registered as an Interested and Affected Party and that your comments are captured, please submit your name, contact details, the reason for your interest or any comments, in writing or telephonically, to EIMS. Please note that only registered I&AP's will be directly informed of future project information and opportunities for participation.

Public Meetings: An initial round of public meetings will be held at the following venues in order to capture the initial comments from I&APs:

City/Town	Venue	Date	Time
Hout Bay	Hout Bay Public Library	Monday 29 August 2022	16:00 – 18:00
Cape Town	Life Conference Centre (Three Anchor Bay)	Tuesday 30 August 2022	16:00 – 18:00
Saldanha Bay	Hoedjies Bay Hotel	Wednesday 31 August 2022	16:00 – 18:00
Lamberts Bay	Community Hall	Thursday 1 September 2022	16:00 – 18:00
Hondeklip Bay	Eric Baker Hall	Friday 2 September 2022	16:00 – 18:00
Port Nolloth	Port Nolloth Country Club	Saturday 3 September 2022	10:00 – 12:00

In order to avoid missing out on opportunities for public participation please submit I&AP registrations, or any queries, comments, or concerns with regards to this application, as soon as possible to EIMS at:

Contact Person: Andisiwe Xuma
EIMS Reference Number: 1520
Postal Address: P.O. Box 2083; Pinegowrie; 2123
Telephone: (011) 789 7170/ Fax: (086) 571 9047
E-mail: tgs@eims.co.za
Please include the project reference number 1520 in all correspondence.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

EIMS Ref	1520	Project Name	TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project.

Date	Name and Surname	Address	Contact Details	Signature	Property Details
16-8-2022	RUI DANTAS	84 STASIEN RD BRACKENFELL	Tel: Fax: Email: info@oceandynamo.co.za Other: 083 647 8778		JETTY SEA FREEZE
16/08/22	Schalk Bresler	Hunnewood P.E.	Tel: 0701345433 Fax: Email: breslerschalk@gmail.com Other:		
16/08/22	Langebers FSU CC	H. BAY	Tel: 084 937 6520 Fax: Email: Other:		
16/08/22	Welong PRWF (admin@breakwaterproducts.com)	H. BAY	Tel: 082 281 1324 Fax: Email: admin@breakwaterproducts.com Other:		Breakwater Products
16/08/22	Doctor Jingxi	H. BAY	Tel: Fax: Email: doctorj@nalitha.co.za Other:		NALITHA FISHING GROUP
16/08/22	Melvyn Office	116 Harbour Road Quay 4. Snoekies Hout Bay	Tel: 021 709 6677 Fax: Email: ava accounts@snoekies.co.za Other: justin@snoekies.co.za		Snoekies Hout Bay

Palmeny Road, Pine Park, Randburg
Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571-9047

E mail@eims.co.za
W www.eims.co.za

A Regus Business Centre, 14 Stewart Drive, Berea, East London
PO Box 19731, Tecoma, 5214, South Africa
T (043) 783-9826 | F (086) 571-9047

2589

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS Ref	1520	Project Name	TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project.

Date	Name and Surname	Address	Contact Details	Signature	Property Details
16-8-2022	RUI DANTAS	84 STASION RD BRACKENFELL	Tel: Fax: Email: info@oceandynamo.co.za Other: 083 647 8778		JETTY SEA FREEZE
16/08/22	Schalk Bresler	Humewood P.E.	Tel: 0701345433 Fax: Email: breslerschalk@gmail.com Other:		
16/08/22	Langebaan FSU CC	H. BAY	Tel: 084 837 6520 Fax: Email: Other:		
16/08/22	Welong PRINT (admin@breakwaterproducts.com)	H. BAY	Tel: 082 081 1324 Fax: Email: admin@breakwaterproducts.com Other:		Breakwater Products
16/08/22	Doctor Jingxi	H. BAY	Tel: Fax: Email: doctorj@nalela.co.za Other:		NALELA FISHING GROUP
16/08/22	Melvyn Office	116 Harbour Road Quarry. Smokies Hout Bay	Tel: 021 790 6677 Fax: Email: accounts@smokies.co.za Other: justin@smokies.co.za		Smokies Hout Bay

A 5 Dalmeny Road, Pine Park, Randburg
PO Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571-9047

E mail@eims.co.za
W www.eims.co.za

A Regus Business Centre, 14 Stewart Drive, Berea, East London
PO Box 19731, Tecoma, 5214, South Africa
T (043) 783-9826 | F (086) 571-9047

2590

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS Ref	1520	Project Name	TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project.

Date	Name and Surname	Address	Contact Details	Signature	Property Details
17 AUG 22	ESTELLE SEYFFERT	MAINE COSS	Tel: 0227141271 Fax: Email: Other: nad@vigevis.com	Estelle	HOEDJIES BAAI HOTEL.
17 Aug 22	Nolu Cebisa	Saldanha Lib.	Tel: 022 714 5010 Fax: Email: nolu.cebisa@ Other: sbm.gov.za		Saldanha Library
17 Aug 22	Ntombi Cekiwayo	Revenue	Tel: Fax: Email: ntombi.cekiwayo Other: @sbm.gov.za		Income Section
11	D.S. West	21/23 Main road	Tel: 022 714 0222 Fax: Email: info@diystbo Other:		Seadogs
17 Aug	V. Bell	& John's Saldanha	Tel: 021 020 7124 Fax: Email: Other:		Saldanha Seadogs
17 Aug.	E. Jordaan	19 Main Road Saldanha	Tel: 022 715 3422 Fax: Email: jea@jsp.co.za Other:	E Jordaan	

2591

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS Ref	1520	Project Name	TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project

Date	Name and Surname	Address	Contact Details	Signature	Property Details
17 AUG 22	ESTELLE SEYFFERT	MAINE COBS	Tel: 0227141271 Fax: Email: Other: nadi@vigevis.com	EStseyffert	HOEDJIESBAAI HOTEL.
17 Aug 22	Nolu Cebisa	Saldanha Lib.	Tel: 022 714 2210 Fax: Email: nolu.cebisa@ Other: sbm.gov.za		Saldanha Library
17 Aug 22	Ntombi Cetywayo	Revenue	Tel: Fax: Email: ntombi.cetywayo Other: @sbm.gov.za		Income Section
11	D.J. West	21/23 Main Road	Tel: 022 714 0222 Fax: Email: iwest@iafrica.co.za Other:		Seadogs
17 Aug	V. Bell	& Jolene Saldanha	Tel: 072 020 1124 Fax: Email: Other:		Saldanha Seadogs
17 Aug.	C. Jordaan	19 Main Road Saldanha	Tel: 022 715 3422 Fax: Email: jcor@jcp.co.za Other:		

A 8 Oalmeny Road, Pine Park, Randburg
PO Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571- 9047

Email@eims.co.za
W www.eims.co.za

A Regus Business Centre, 14 Stewart Drive, Berea, East London
PO Box 15731, Tecoma, 5214, South Africa
T (043) 783-9826 | F (086) 571 - 9047

2592

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS Ref	1520	Project Name	TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project.

Date	Name and Surname	Address	Contact Details	Signature	Property Details
17/8/22	Marizann Steyn	19 Main Road Saldanha	Tel: 083 711 7648 Fax: Email: admin@aquafoods.co.za Other:		Aqua Foods
17/8/22	W. Thurm.	1 Pepperbag. Saldanha	Tel: Fax: Email: wthurm@dffe.gov.za. Other:		DFFE
17 AUG 2022	J. DE GOEDE	"	Tel: 0834614522 Fax: Email: JdeGoede@dffe.gov.za Other:		J. DE GOEDE (AD) PHSFM - DFFE
17-08-2022	Henry Heinrich	Premier Fishing	Tel: Fax: Email: Henry@premierfishing Other: .co.za		
17/08/22	R. Pieterse	1 Kreef Ave.	Tel: Fax: Email: Carla@vikingaquaculture.co.za Other:		
17/08/22	Rodney Taylor	1 Kreef Ave	Tel: Fax: Not Available Email: ATCmatic Royal Other:		

2593

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS Ref 1520 Project Name TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project.

Date	Name and Surname	Address	Contact Details	Signature	Property Details
17/05/2022	Tsheto Masangane	21 Main Road Saldanha 7395	Tel: 073 111 8480 Fax: Email: para@blueoceanmussels.com Other:		
17/08/22	Idredo Steenkamp	CBDC	Tel: 022 3140371 Fax: Email: Other:		
17/08/22	Stephanie October	Sea Harvest	Tel: 022 7014100 Fax: Email: Allcatch@seaharvest.co.za Other:	October	
17/08/22	M. Phuland	community hall	Tel: Fax: Email: Other: 0622297447	M. Phuland	
17/08/22	RL Sparg (Eugene Smit)	42 CHURCH ST 42 Church STREET	Tel: 027432 1112 Fax: Email: [illegible] Other: [illegible] Tel: 0294521112 Fax: Email: Other:		
17/08/22					

A 8 Dalmeny Road, Pine Part, Building
PO Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571 9047

Email@eims.co.za
W www.eims.co.za

A Regus Business Centre, 14 Stewart Drive, Berea, East London
PO Box 19731, Tecoma, 5214, South Africa
T (043) 783-9826 | F (086) 571 9047

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS Ref	1520	Project Name	TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project.

Date	Name and Surname	Address	Contact Details	Signature	Property Details
17-06-2022	Eva Nxandeli	38 Church Str	Tel: 027 432 1008 Fax: 027 432 1008 Email: N/A Other: None		SAPO, Lambert's Bay
18/08/2022	E.B. Soule	PORT NOLLOTH. JOOST ENGELBRECHT STR	Tel: 021 3868234 Fax: Email: edgar.soule@debeersgroup.com Other:		DBGS SUPPLY CHAIN CENTRE, PORT NOLLOTH
19/08/2022	S. Coetse	Library. P.N.	Tel: 027 851 1108 Fax: Email: pmanager@richtersveld.gov.za Other:		
19/08/2022	J.C. Adams	H/BAY	Tel: 076 054 6173 Fax: Email: bojadams1965@gmail.com Other:		
19/08/2022	D. Elgamost	H K B	Tel: 071 561 1879 Fax: Email: romeydiergaarde D@gmail Other:		
			Tel: Fax: Email: Other:		

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS Ref	1520	Project Name	TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project.

Date	Name and Surname	Address	Contact Details	Signature	Property Details
17.08.2022	Quintin Cloete	LAMBERTS BAY	Tel: 078 582 8262 Fax: Email: Other:		
18/08/2022	Anesta Chiel Ambrosini	Richtersveld Mun Main road 167	Tel: 027 851 1111 Fax: Email: receptionR Other: richtersveld.gov.za		
18/08/2022	Pieter Sam		Tel: 08 32 304 319 Fax: Email: Other:		
18/08/2022	JEFF VAN WYK		Tel: 0630513903 Fax: Email: Other:		
18/08/22	Edmar Hoffel	Flosse Str	Tel: 080 545 3158 Fax: Email: Other:		
18.08.2022	Eleonore Roome	Kusweg	Tel: Fax: Email: Other:		

48 Dalmeny Road, Pine Park, Randburg
PO Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571- 9047

E mail@eims.co.za
W www.eims.co.za

A Regus Business Centre, 14 Stewart Drive, Berea, East London
PO Box 19731, Tecoma, 5214, South Africa
T (043) 783-9826 | F (086) 571- 9047

2596

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS Ref	1520	Project Name	TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project.

Date	Name and Surname	Address	Contact Details	Signature	Property Details
19 Aug 22	Marshall Koorlander	Bamboesslaat 120	Tel: 066 039 1881 Fax: Email: Marshallkoorlander09.gmail Other: .gmail.com	Koorlander	
"	Jane Davids	Crick baker	Tel: Fax: Email: Other:	Davids	
"	Katy Sogop	"	Tel: 071 26 5614 Fax: Email: Other:	K.M.Sogop	
"	Lang Sag	Dolphystr 78	Tel: 0791299687 Fax: Email: Other:	Sag	
"	CAGERO UYS	KLEINSEE	Tel: Fax: Email: cagerouys2018@gmail Other:		
			Tel: Fax: Email: Other:		

A 8 Dalmeny Road, Pine Park, Randburg
PO Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571-9047

E mail@eims.co.za
W www.eims.co.za

A Regus Business Centre, 14 Stewart Drive, Berea, East London
PO Box 19731, Tecoma, 5214, South Africa
T (043) 783-9826 | F (086) 571-9047

2597

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS Ref	1520	Project Name	TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project

Date	Name and Surname	Address	Contact Details	Signature	Property Details
2022/08/19	Patrick Rulph	Hondeklipbaai	Tel: 0827489322 Fax: Email: rulphpat1@gmail.com Other:		
19/08/2022	Trelli van Greune	Hondeklipbaai	Tel: 0826285430 Fax: Email: Other:		
			Tel: Fax: Email: Other:		
			Tel: Fax: Email: Other:		
			Tel: Fax: Email: Other:		
			Tel: Fax: Email: Other:		

A 8 Dalmeny Road, Pine Park, Randburg
PO Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571-5047

Email@eims.co.za
W www.eims.co.za

A Regus Business Centre, 14 Stewart Drive, Berea, East London
PO Box 19731, Tecoma, 5214, South Africa
T (043) 783-9876 | F (086) 571-9047

2598

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS Ref	1520	Project Name	TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project.

Date	Name and Surname	Address	Contact Details	Signature	Property Details
16/08/2022	M. S Da Mata		Tel: Fax: Email: Other:		
16/08/2022	L. Moniz		Tel: Fax: Email: LuisMoniz1974 Other: @gmail.com.		
16/8/2022	M DA SILVA		Tel: [illegible] Fax: [illegible] Email: Other:		
	A DE SOUZA		Tel: 0827982163 Fax: Email: [illegible] Other:		
	J. Moniz		Tel: 0619033111 Fax: Email: Other:		
16/08/22	C. Coetzee on behalf of R. Landman		Tel: Fax: Email: RobL@ij.co.za Other:	Coetzee	

A 8 Dalmeny Road, Pine Park, Randburg
PO Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571- 9047

E mail@eims.co.za
W www.eims.co.za

A Regus Business Centre, 14 Stewart Drive, Berea, East London
PO Box 19731, Tecoma, 5214, South Africa
T (043) 783-9826 | F (086) 571- 9047

2599

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS Ref	1520	Project Name	TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project.

Date	Name and Surname	Address	Contact Details	Signature	Property Details
16/08/22	Azraa Jacobs	03 South Arm Road Waterfront	Tel: Fax: Email: cherith@plenish.co.za Other:		
16/08/22	Gerard Webster	03 South Arm	Tel: 021 419 7440 Fax: Email: Other:		
16/08/22	Mandisi Gxilishe	4 South Arm Rd Woodstock Hnb	Tel: Fax: Email: Other:		
16/8/22	Andy Beech	12 South	Tel: 067 926 4149 Fax: Email: andrew.beech@cemza.co.za Other:		
16/8/22	Nardine Zwane	TNPA Building	Tel: Fax: Email: Other:	Zwanenardine@gmail.com	
16/08/22	K. Sikhosana	Procurement	Tel: Fax: Email: THABILO.MAJOZI@transnet.net Other:		

A 5 Dalmeny Road, Pine Park, Randburg
PO Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571-9047

E mail@eims.co.za
W www.eims.co.za

A Regus Business Centre, 14 Stewart Drive, Berea, East London
PO Box 19731, Tecoma, 5214, South Africa
T (043) 783-9826 | F (086) 571-9047

2600

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS Ref	1520	Project Name	TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project.

Date	Name and Surname	Address	Contact Details	Signature	Property Details
16-08-22	João Fernandes	East Quay	Tel: 0823201689 Fax: Email: jnyrkt@gmail.com Other:		
6/8/22	Clyde Badenhorst		Tel: 0824455354 Fax: Email: clyde@molimoman.co.za Other:		
16.08.2022	Tania Bligraut	Sea Point Library	Tel: Fax: Email: Seapoint.library@capetown.gov.za Other:	T Bligraut	
16.08.2022	Nokubonga Sonzi	Hout Bay Lib	Tel: Fax: Email: HoutBay.Library@capetown.gov.za Other:		
16.08.22	Captain Bradley Grantbourne	(Herbarium) Hout Bay	Tel: 0793[illegible]316 Fax: Email: Other:		
16-08-22	William MSIIA		Tel: Fax: 0712414505 Email: Other:		

A 8 Dalmeny Road, Pine Park, Randburg
PO Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571-9047

E mail@eims.co.za
W www.eims.co.za

A Regus Business Centre, 14 Stewart Drive, Berea, East London
PO Box 19731, Tecoma, 5214, South Africa
T (043) 783-9826 | F (086) 571-9047

2601

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NOTIFICATION DISTRIBUTION REGISTER

EIMS Ref 1520 Project Name TGS Orange Basin Reconnaissance Basic Assessment

EIMS wishes to advise and confirm that by completing this register, you acknowledge, understand and agree that all information provided, whether personal or otherwise, may be used by EIMS in the development of the Interested and Affected Party (I&AP) database and agree that the information provided may be placed in the public domain. Please note that EIMS will rely on the contact information provided herein to provide future project notifications, and communications. Any errors or omissions in the contact details provided may hinder EIMS's ability to communicate with you in the future. By signing the register, the undersigned persons hereby acknowledge that they have been informed of the proposed development and have had access to the notification documents associated with the project.

Date	Name and Surname	Address	Contact Details	Signature	Property Details
16.08.22	SHANDRAH LEONARD	CHAPMAN'S PEAK FISHERIES PO BOX 234	Tel: 021 427 1100 Fax: Email: [illegible] Other:		
16-08-2022	JOHN JOSIAS	ATB HARBOUR	Tel: 021-7917200 Fax: Email: [illegible] Other: 0823254316		
16 08 22	JOHANNES	NAKALA	Tel: Fax: Email: Other:		
16/8/22	BOETIE MUZUMU	ARC HOUT BAY	Tel: 0328806514 Fax: Email: [illegible] Other: [illegible]		
16/8/22	NJABULO SUNSHINE NDLOVU	FISHHOEK	Tel: Fax: Email: Other: 082 2171 639		
	GCroad	1 Mountain Rd Fishhoek	Tel: 082 JU 2752 Fax: Email: Other:		

8 Dalmeny Road, Pine Park, Randburg
PO Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571-9047
E mail@eims.co.za
W www.eims.co.za
A Regus Business Centre, 14 Stewart Drive, Berea, East London
PO Box 13731, Tecoma, 5214, South Africa
T (043) 783-9826 | F (086) 571-9047

2602

Site Notice Placement — Project: 1520

Site Notice:

NOTIFICATION REGARDING OPPORTUNITY TO PARTICIPATE IN ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS SEISMIC SURVEY BASIC ASSESSMENT PROJECT, LOCATED OFFSHORE EXTENDING FROM APPROXIMATELY 120 KM OFFSHORE OF ST HELENA BAY TO 230 KM OFFSHORE OF HONDEKLIP BAY, OFF THE WEST COAST, SOUTH AFRICA.

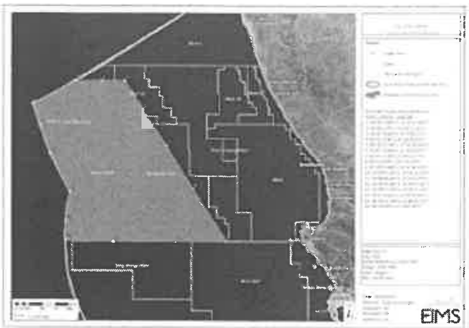
[illegible]

KENNISGEWING MET BETREKKING TOT GELEENTHEID OM DEEL TE NEEM AAN OMGEWINGSMAGTIGING AANSOEKPROSES VIR DIE VOORGESTELDE TGS SEISMIESE OPNAME BASIESE ASSESSERINGSPROJEK, GELEË SEEWAARTS EN STREK VAN ONGEVEER 120 KM VANAF DIE KUS VAN ST HELENABAAI TOT ONGEVEER 230 KM VANAF DIE KUS VAN HONDEKLIPBAAI AAN DIE WESKUS VAN SUID AFRIKA.

[illegible]

ISAZISO MALUNGA NETHUBA LOKUTHATHA INXAXHEBA KWINKQUBO YOKUFAKA ISICELO SOGUNYAZISO LWEZENDALO KWI PROJEKTHI KA TGS YOPHONONONGO LWEZE GEOPHYSICS ELIYAKUBA KUMGAMA WAMA-120 KM UKUSUKA KUNXWEME LWE ST HELENA BAY UKUYA KWI 230 KM UKUSUKA KUNXWEME LE-HONDEKLIP BAY, EMZANTSI AFRIKA

[illegible]



Point	Latitude	Longitude	Point	Latitude	Longitude
1	[illegible]	[illegible]	7	[illegible]	[illegible]
2	[illegible]	[illegible]	8	[illegible]	[illegible]
3	[illegible]	[illegible]	9	[illegible]	[illegible]
4	[illegible]	[illegible]	10	[illegible]	[illegible]
5	[illegible]	[illegible]	11	[illegible]	[illegible]
6	[illegible]	[illegible]			

Public Meetings:

City/town	Venue	Date	Time
Hout Bay	Hout Bay Public Library	Monday 29 August 2022	16:00 – 18:00
Cape Town	[illegible] Conference Centre (Three Anchor Bay)	Tuesday 30 August 2022	16:00 – 18:00
Saldanha Bay	Hoedjies Bay Hotel	Wednesday 31 August 2022	16:00 – 18:00
Lamberts Bay	Community Hall	Thursday 1 September 2022	16:00 – 18:00
Hondeklip Bay	[illegible] Hall	Friday 2 September 2022	16:00 – 18:00
Port Nolloth	Port Nolloth Country Club	Saturday 3 September 2022	10:00 – 12:00

Contact Person/ Kontak Persoon/ [illegible]

EIMS Reference Number/ EIMS Verwysingsnommer/ [illegible]: EIMS 1520

Postal Address/ Posadres/ [illegible]: P.O. Box 2083, Pinegowrie 2123

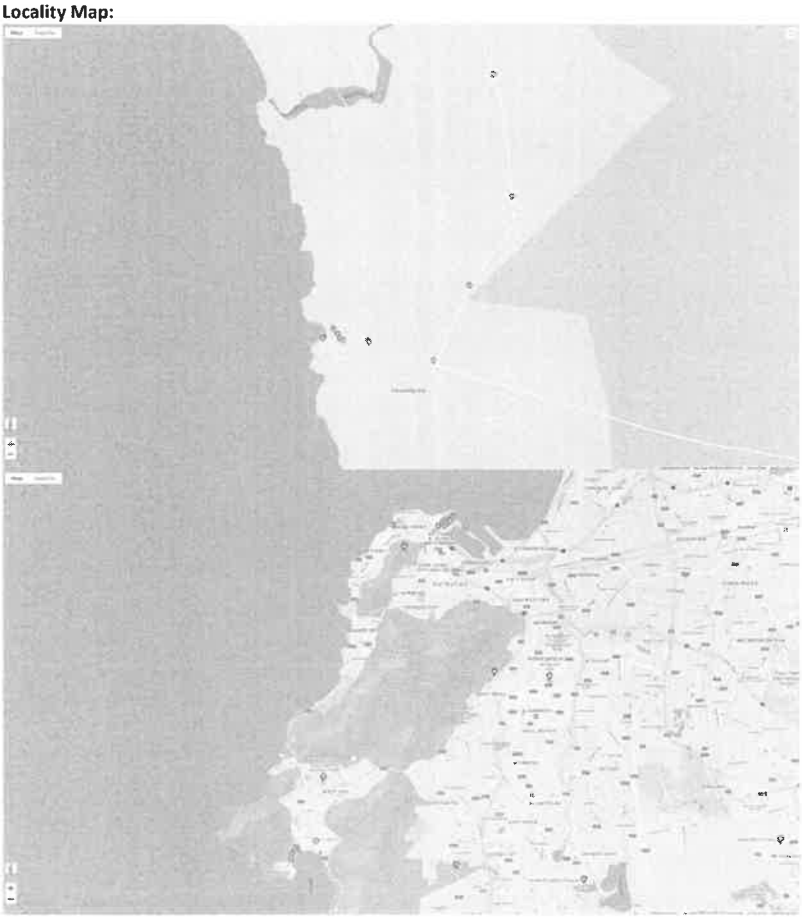
Fax/ Faks/ [illegible]: (086) 571 9047

E-mail/ E-pos/ [illegible]: tgs@eims.co.za

Telephone/ Telefoon/ [illegible]: (011) 789 7170

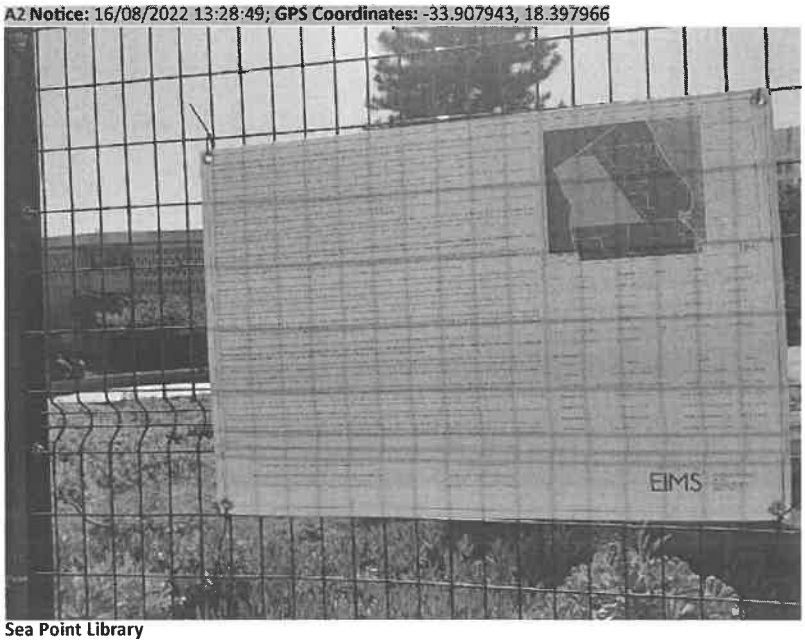
EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Locality Map:



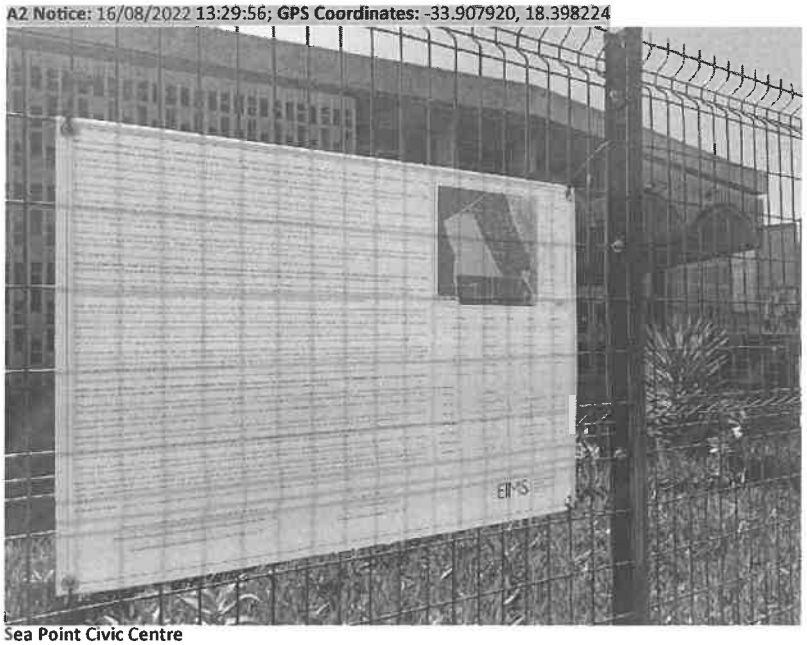


A2 **Notice:** 16/08/2022 13:28:49; **GPS Coordinates:** -33.907943, 18.397966



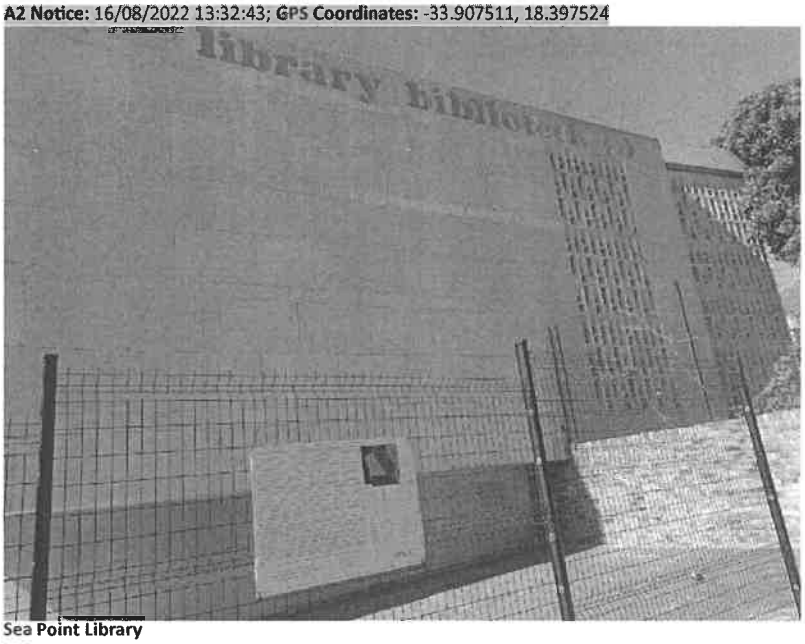
Sea Point Library

A2 Notice: 16/08/2022 13:29:56; **GPS Coordinates:** -33.907920, 18.398224



Sea Point Civic Centre

A2 Notice: 16/08/2022 13:32:43; **GPS Coordinates:** -33.907511, 18.397524



Sea Point Library

A2 Notice: 16/08/2022 14:21:19; **GPS Coordinates:** -34.044312, 18.358444



Outside Houtbay Library

A2 Notice: 16/08/2022 14:22:59; **GPS Coordinates:** -34.044132, 18.358108



Houtbay Library

A2 Notice: 16/08/2022 15:34:18; **GPS Coordinates:** -34.046884, 18.348291



Hout Bay Harbour

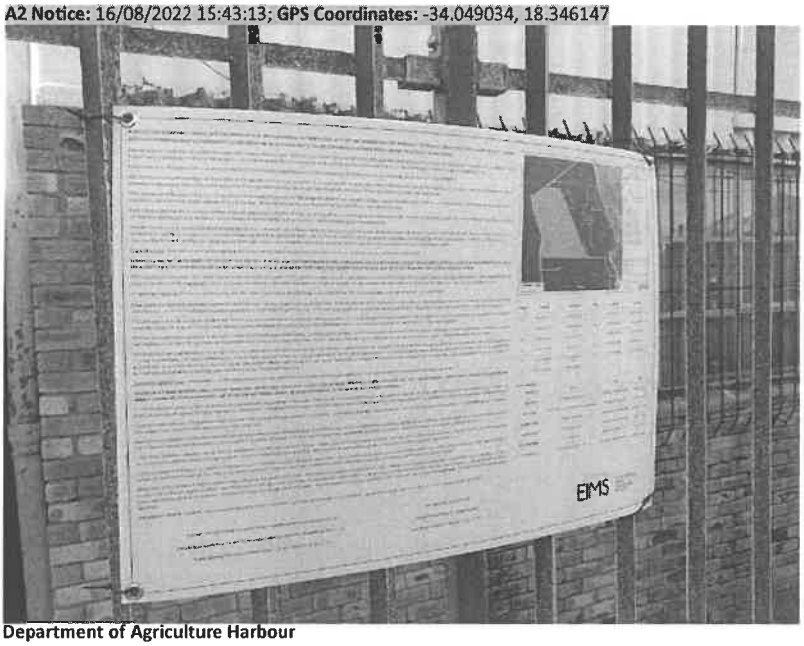
A2 Notice: 16/08/2022 15:35:28; **GPS Coordinates:** -34.046773, 18.348174



Opposite Mariners Wharf

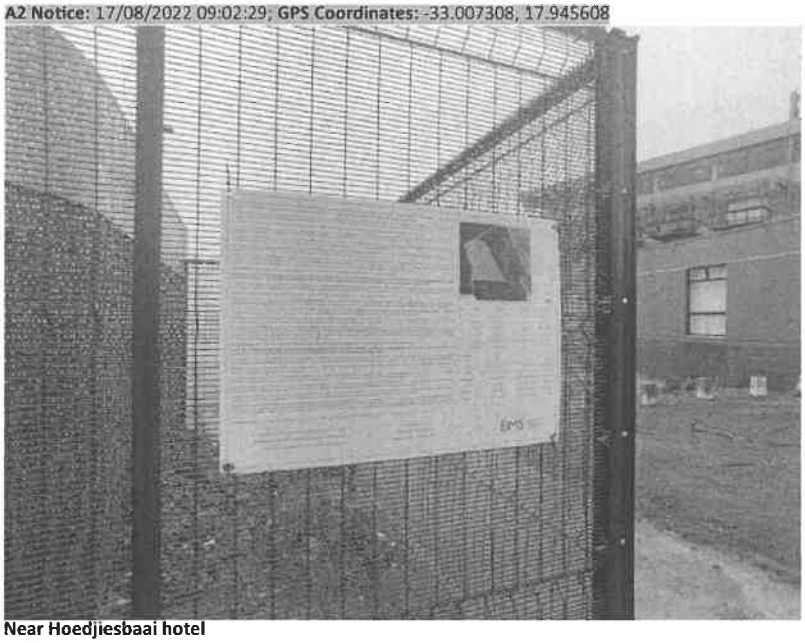
603

A2 Notice: 16/08/2022 15:43:13; **GPS Coordinates:** -34.049034, 18.346147



Department of Agriculture Harbour

A2 Notice: 17/08/2022 09:02:29; **GPS Coordinates:** -33.007308, 17.945608



Near Hoedjiesbaai hotel

A2 Notice: 17/08/2022 09:04:53; **GPS Coordinates:** -33.007646, 17.945674



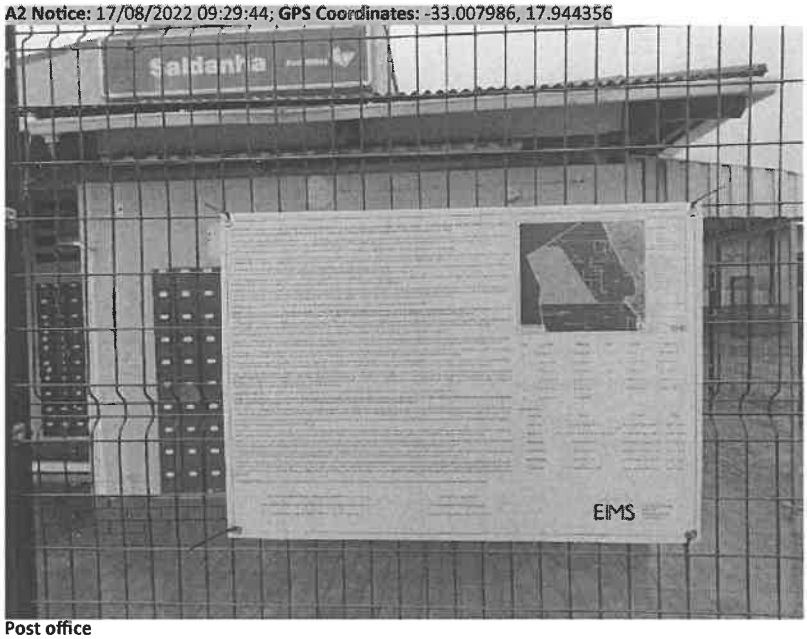
Outside Hoedjiesbaai hotel

A2 Notice: 17/08/2022 09:18:40; **GPS Coordinates:** -33.007605, 17.944364



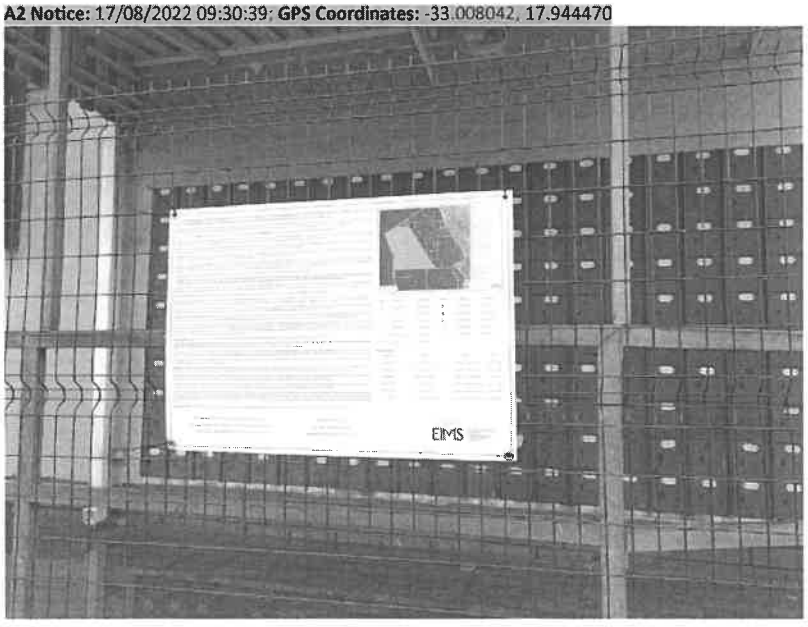
Outside Saldanha Library

A2 Notice: 17/08/2022 09:29:44; **GPS Coordinates:** -33.007986, 17.944356

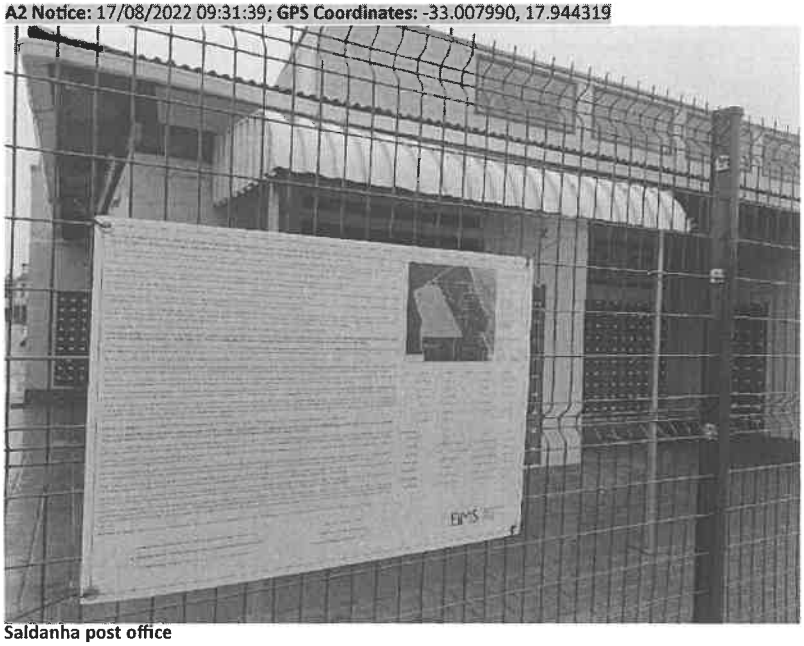


Post office

A2 Notice: 17/08/2022 09:30:39; **GPS Coordinates:** -33.008042, 17.944470

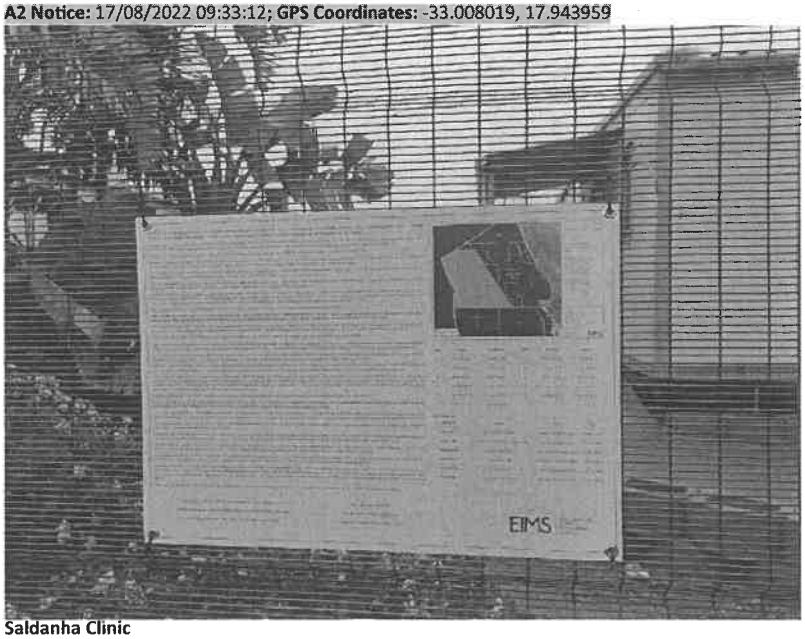


A2 Notice: 17/08/2022 09:31:39; **GPS Coordinates:** -33.007990, 17.944319



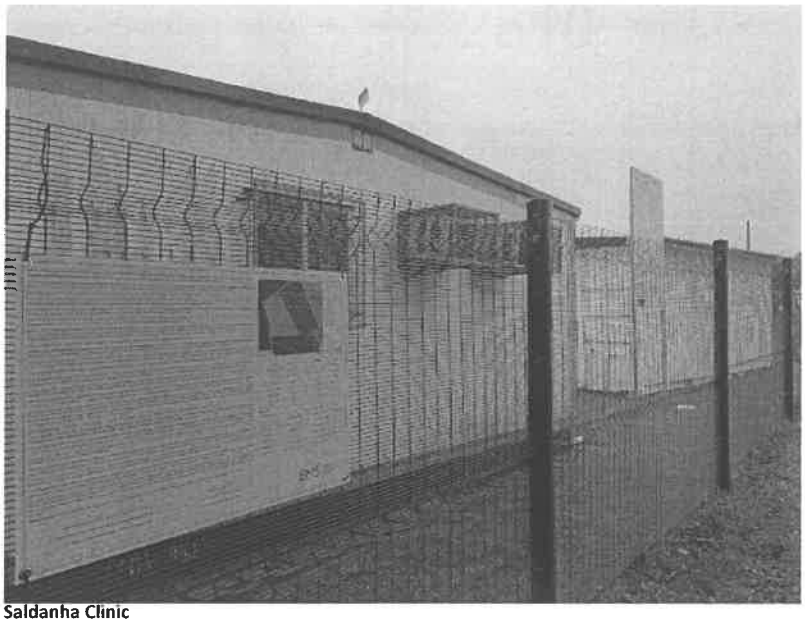
Saldanha post office

A2 Notice: 17/08/2022 09:33:12; **GPS Coordinates:** -33.008019, 17.943959



Saldanha Clinic

A2 Notice: 17/08/2022 09:36:20; **GPS Coordinates:** -33.008052, 17.943798



Saldanha Clinic

A2 Notice: 17/08/2022 09:44:37; **GPS Coordinates:** -33.007043, 17.944083



Saldanha Municipality

A2 Notice: 17/08/2022 09:49:31; **GPS Coordinates:** -33.008282, 17.944191



Near Taxi Rank

A2 Notice: 17/08/2022 10:26:16; **GPS Coordinates:** -33.005267, 17.944712



[redacted]
BP garage

A2 Notice: 17/08/2022 10:28:35; **GPS Coordinates:** -33.007210, 17.945455



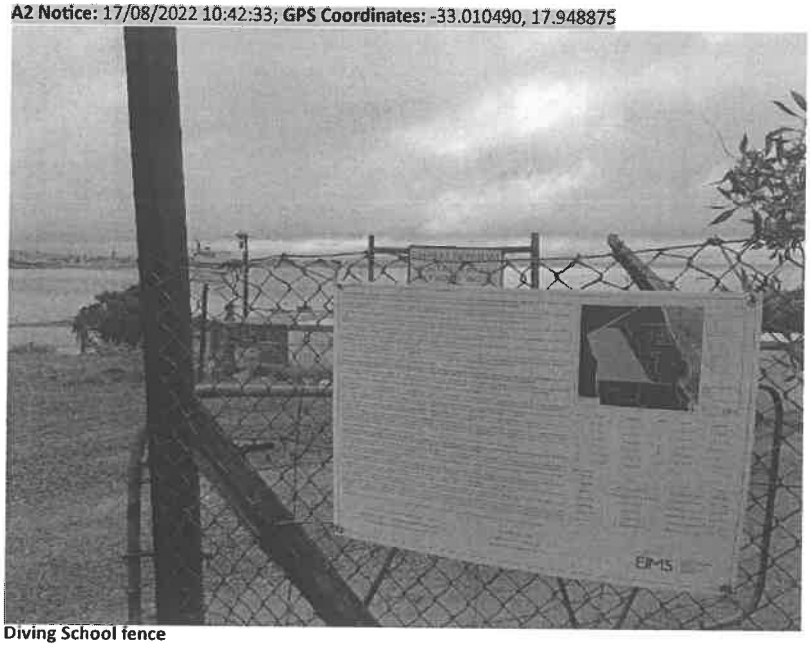
[redacted]
Near Park

A2 Notice: 17/08/2022 10:30:52; **GPS Coordinates:** -33.008185, 17.946054



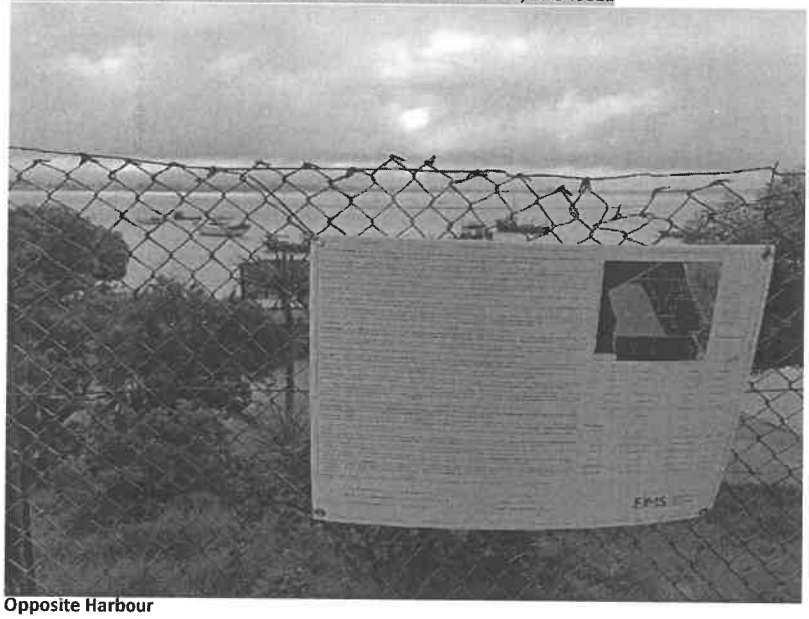
Main Road Saldanha

A2 Notice: 17/08/2022 10:42:33; **GPS Coordinates:** -33.010490, 17.948875



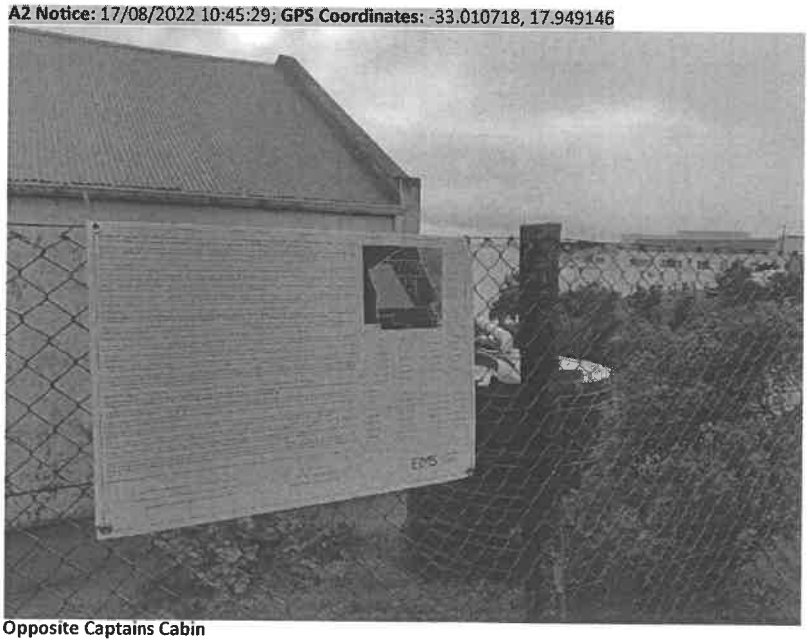
Diving School fence

A2 Notice: 17/08/2022 10:44:39; **GPS Coordinates:** -33.010392, 17.948821



Opposite Harbour

A2 Notice: 17/08/2022 10:45:29; **GPS Coordinates:** -33.010718, 17.949146



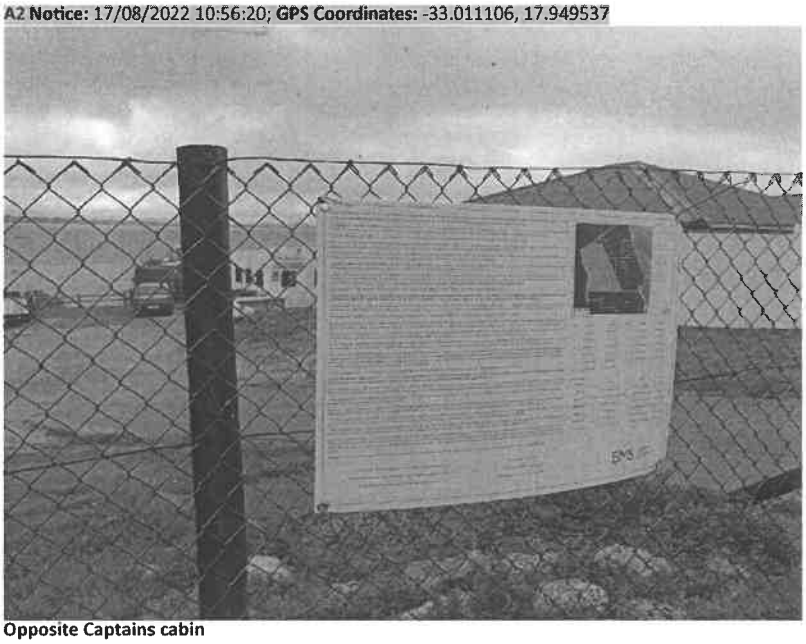
Opposite Captains Cabin

A2 Notice: 17/08/2022 10:55:07; **GPS Coordinates:** -33.011166, 17.949655



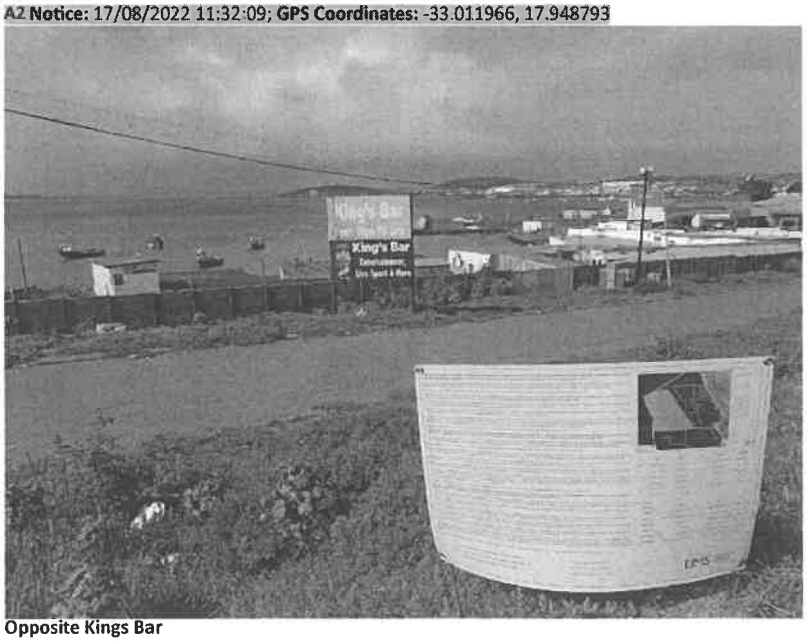
Outside diving club

A2 Notice: 17/08/2022 10:56:20; **GPS Coordinates:** -33.011106, 17.949537



Opposite Captains cabin

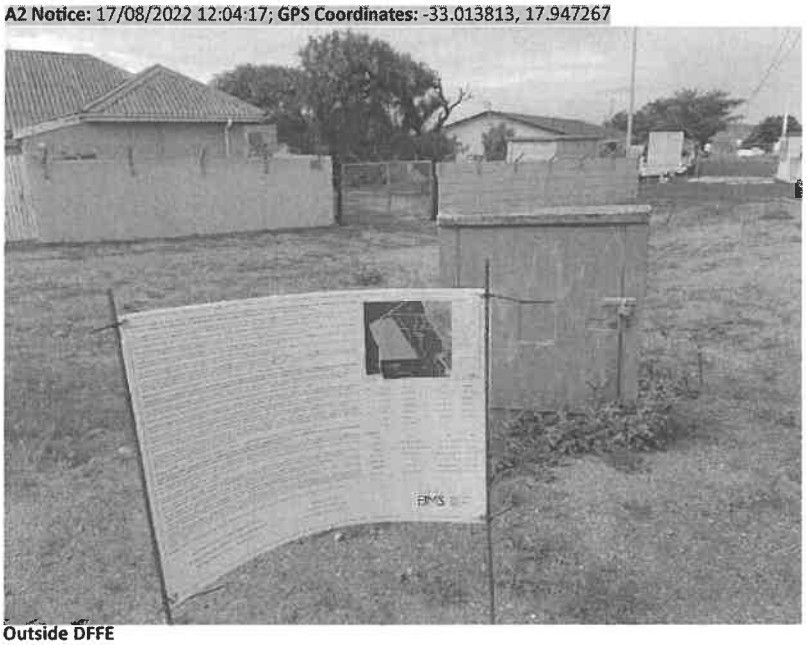
A2 Notice: 17/08/2022 11:32:09; **GPS Coordinates:** -33.011966, 17.948793



Opposite Kings Bar

8403

A2 Notice: 17/08/2022 12:04:17; **GPS Coordinates:** -33.013813, 17.947267



Outside DFFE

A2 Notice: 17/08/2022 12:07:36; **GPS Coordinates:** -33.014164, 17.947095



Near DFFE

A2 Notice: 17/08/2022 12:13:44; **GPS Coordinates:** -33.014085, 17.949959



A2 Notice: 17/08/2022 12:28:11; **GPS Coordinates:** -33.013684, 17.948448



Opposite Saldanha Bay Oyster Company

A2 Notice: 17/08/2022 12:30:47; **GPS Coordinates:** -33.014228, 17.948486



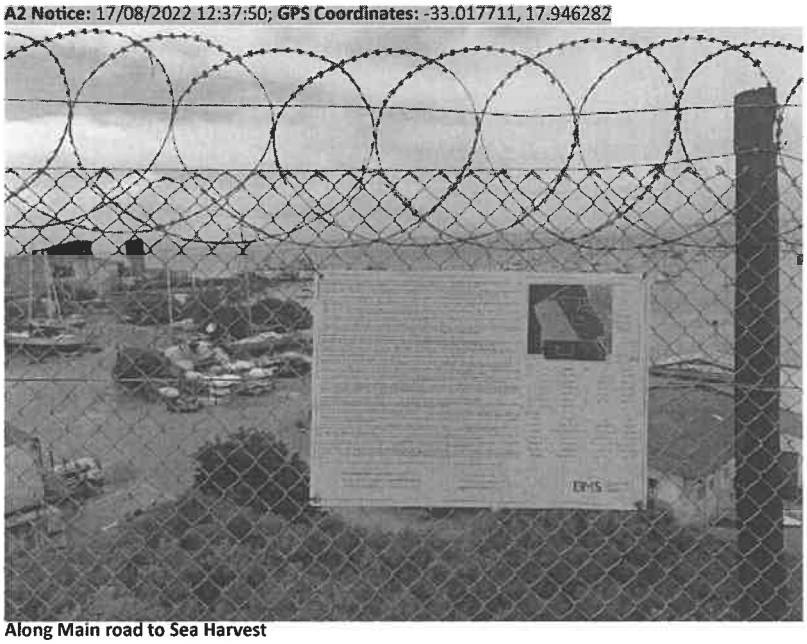
Inside Saldanha Harbour

A2 Notice: 17/08/2022 12:34:52; **GPS Coordinates:** -33.017326, 17.946120



Along Main road to Sea Harvest

A2 Notice: 17/08/2022 12:37:50; **GPS Coordinates:** -33.017711, 17.946282



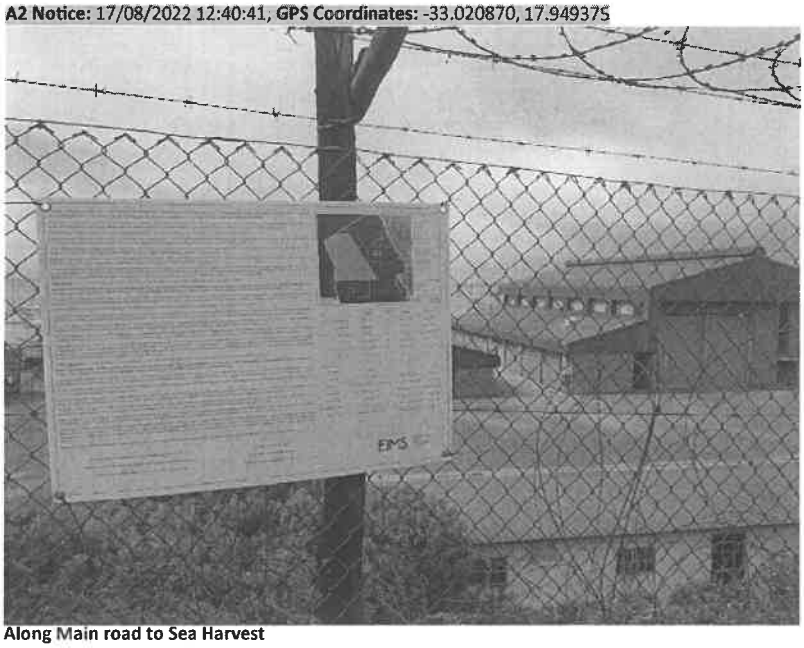
Along Main road to Sea Harvest

A2 Notice: 17/08/2022 12:39:00; **GPS Coordinates:** -33.018026, 17.946352



Along Main road to Sea Harvest

A2 Notice: 17/08/2022 12:40:41, **GPS Coordinates:** -33.020870, 17.949375



Along Main road to Sea Harvest

A2 Notice: 17/08/2022 12:42:39, **GPS Coordinates:** -33.019070, 17.946351



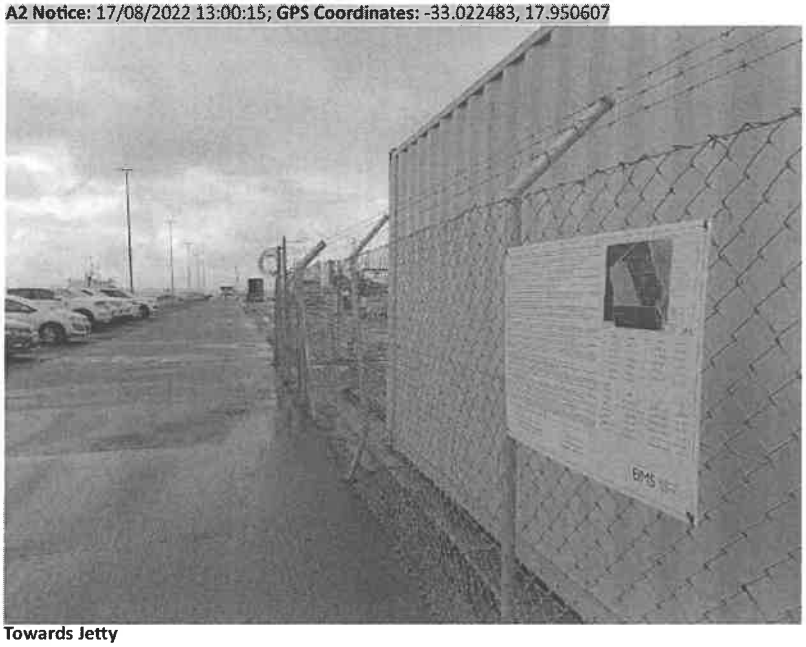
Along Main road to Sea Harvest

A2 Notice: 17/08/2022 12:44:59, **GPS Coordinates:** -33.020916, 17.946234



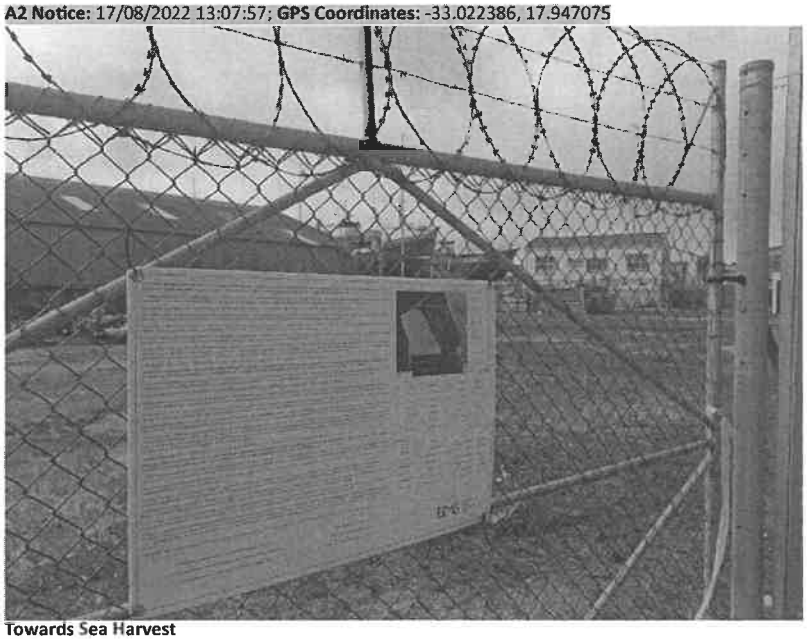
Outside DFFE harbor entrance

A2 Notice: 17/08/2022 13:00:15; **GPS Coordinates:** -33.022483, 17.950607



Towards Jetty

A2 Notice: 17/08/2022 13:07:57; **GPS Coordinates:** -33.022386, 17.947075



Towards Sea Harvest

A2 Notice: 17/08/2022 13:12:11; **GPS Coordinates:** -33.012218, 17.944689



Berg Street

A2 Notice: 17/08/2022 13:36:34; **GPS Coordinates:** -32.926476, 17.983080



Outside Builders

A2 Notice: 17/08/2022 13:55:48; **GPS Coordinates:** -32.845955, 18.073651



Towards St Helena Bay

A2 Notice: 17/08/2022 15:21:01; **GPS Coordinates:** -32.170563, 18.312623



Paul Kruger Street

A2 Notice: 17/08/2022 15:29:54; **GPS Coordinates:** -32.164962, 18.313407



Along Paul Kruger Street

A2 Notice: 17/08/2022 15:37:00; **GPS Coordinates:** -32.133350, 18.305938

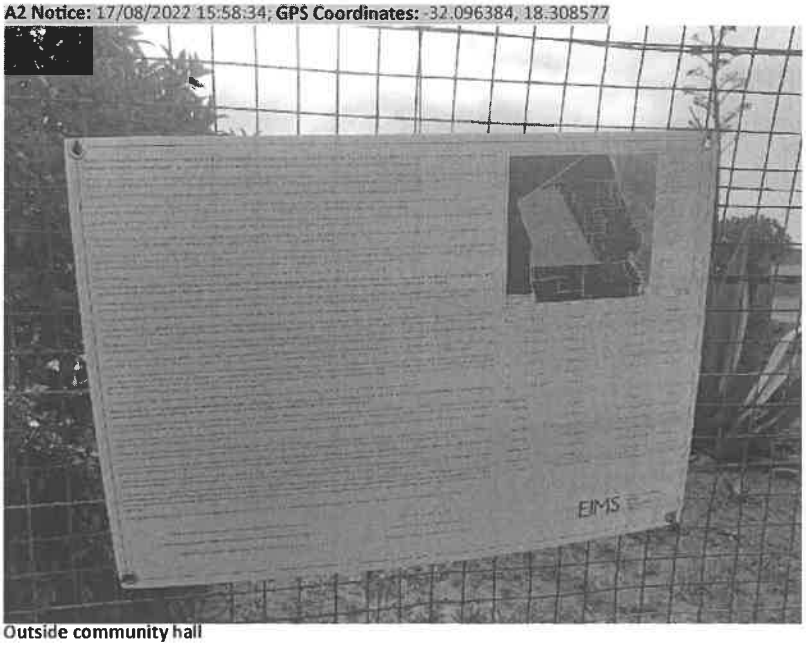


Outside Muisbosskerm Restaurant

A2 Notice: 17/08/2022 15:45:19; **GPS Coordinates:** -32.110378, 18.305410



A2 Notice: 17/08/2022 15:58:34; **GPS Coordinates:** -32.096384, 18.308577



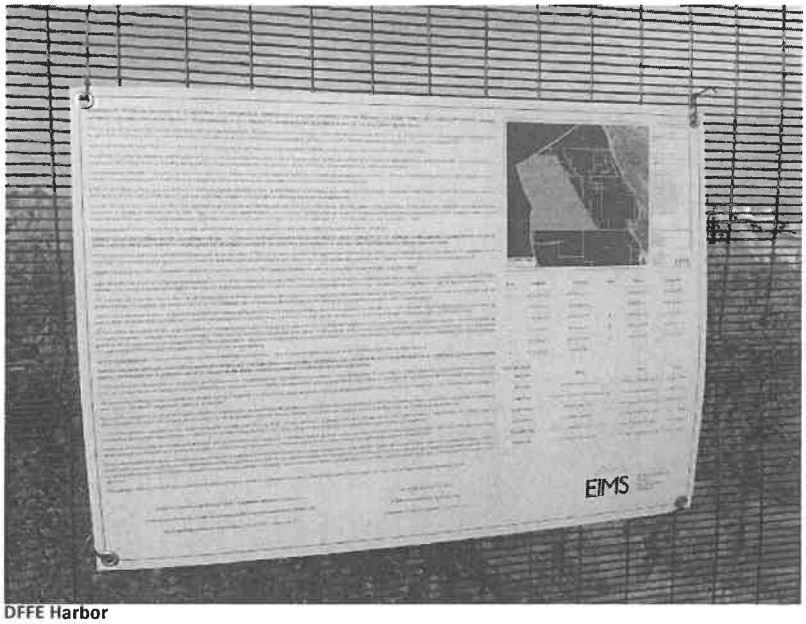
Outside community hall

A2 Notice: 17/08/2022 15:59:11; **GPS Coordinates:** -32.096390, 18.308665



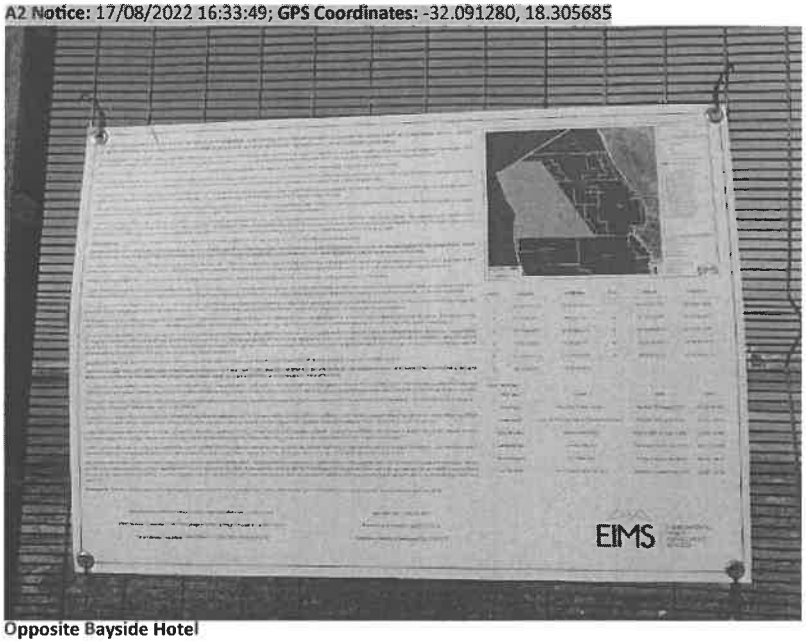
Outside community hall

A2 Notice: 17/08/2022 16:29:48; **GPS Coordinates:** -32.090515, 18.305302



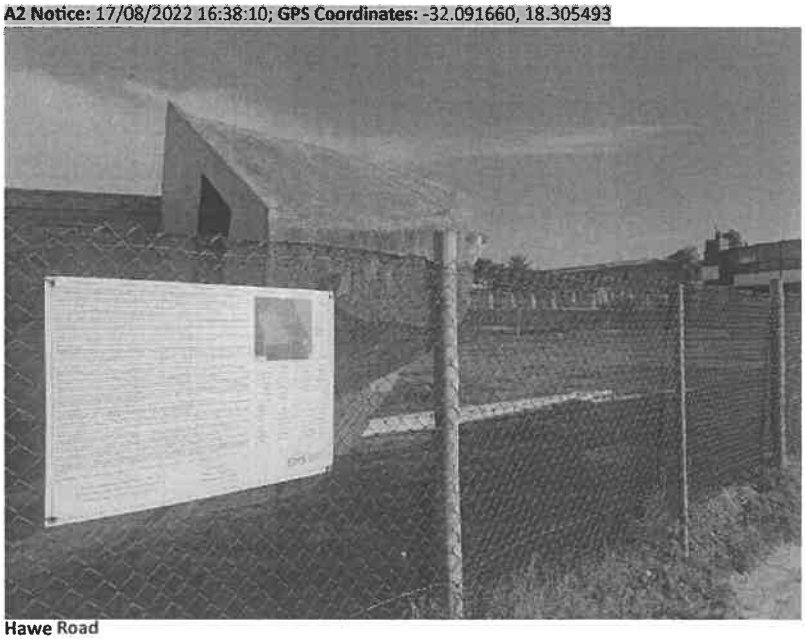
DFFE Harbor

A2 Notice: 17/08/2022 16:33:49; **GPS Coordinates:** -32.091280, 18.305685



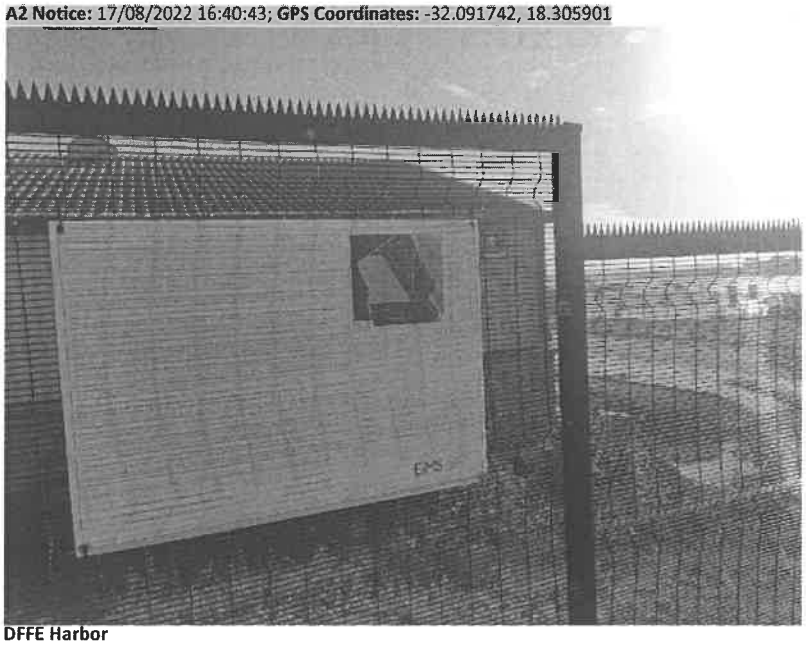
Opposite Bayside Hotel

A2 Notice: 17/08/2022 16:38:10; **GPS Coordinates:** -32.091660, 18.305493



Hawe Road

A2 Notice: 17/08/2022 16:40:43; **GPS Coordinates:** -32.091742, 18.305901



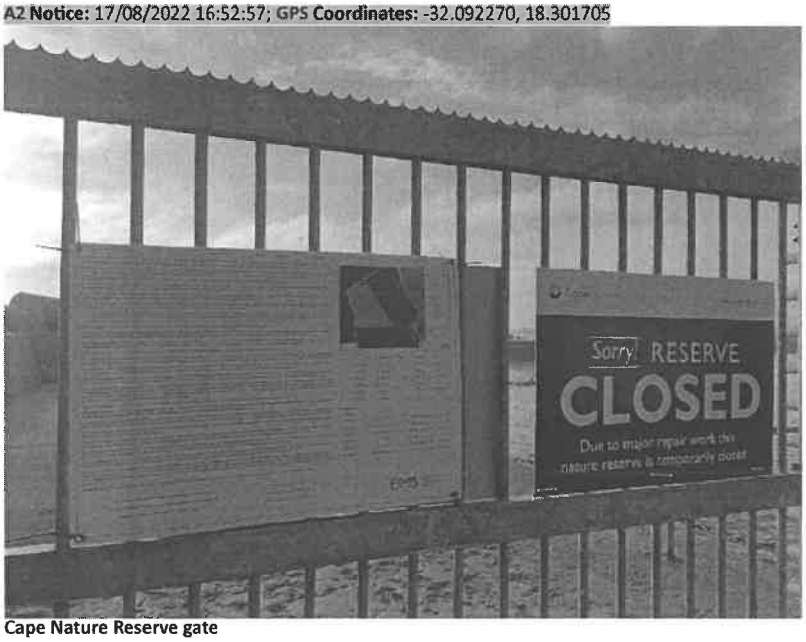
DFFE Harbor

A2 Notice: 17/08/2022 16:44:46; **GPS Coordinates:** -32.093033, 18.302399



Strand Street

A2 Notice: 17/08/2022 16:52:57; **GPS Coordinates:** -32.092270, 18.301705



Cape Nature Reserve gate

A2 Notice: 17/08/2022 17:05:32; **GPS Coordinates:** -32.091850, 18.303869



Oceana gate Lambert's Bay Foods

A2 Notice: 18/08/2022 08:41:08; **GPS Coordinates:** -32.093226, 18.311981

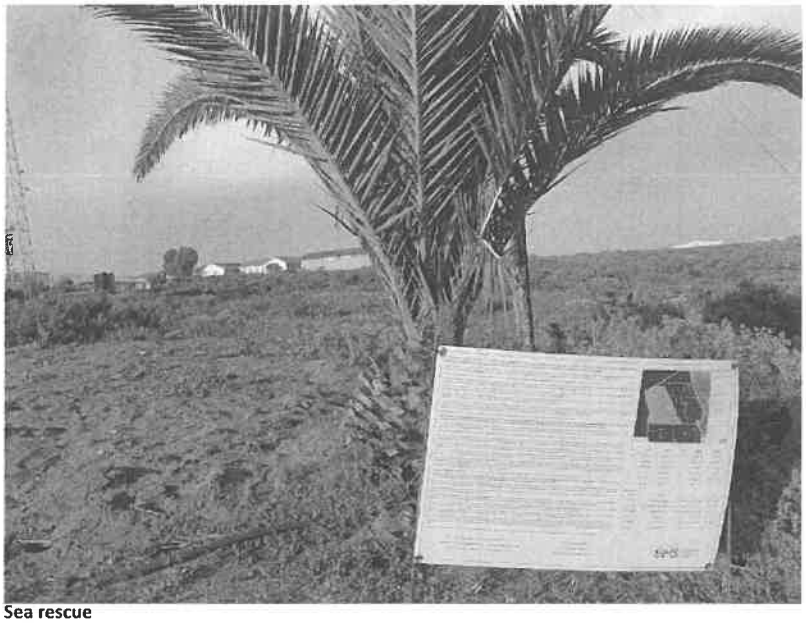


Lambert's sports ground

A2 Notice: 18/08/2022 08:44:41; **GPS Coordinates:** -32.092988, 18.309739



Near Sea Recue



Sea rescue

A2 Notice: 18/08/2022 08:52:34; **GPS Coordinates:** -32.093601, 18.306383



Lambert's Medical Center

A2 Notice: 18/08/2022 08:55:15; **GPS Coordinates:** -32.094653, 18.304951



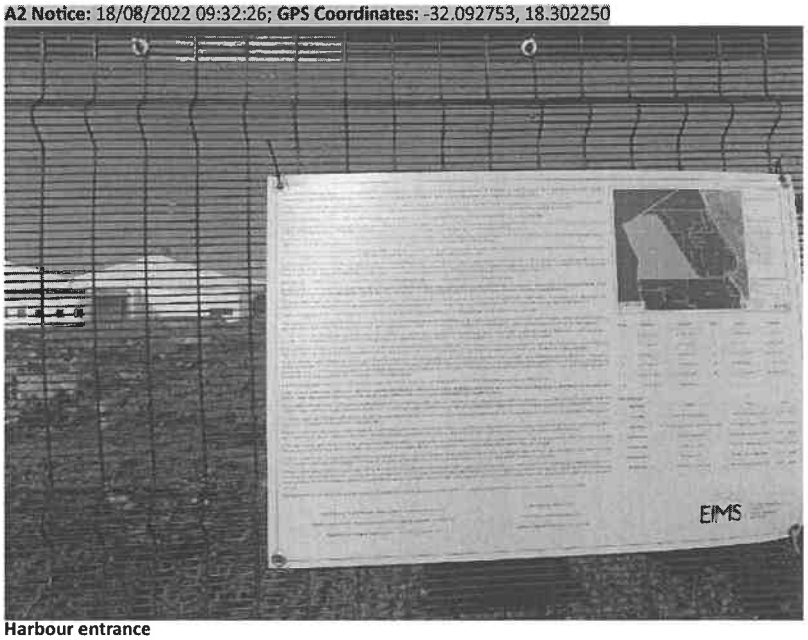
Opposite Shopping complete

A2 Notice: 18/08/2022 09:00:57; **GPS Coordinates:** -32.094107, 18 304282



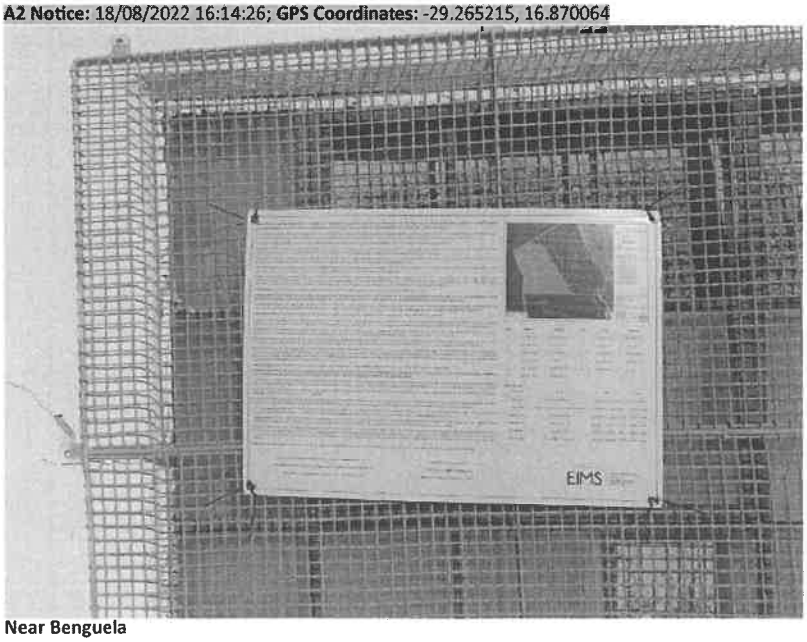
[redacted] Accross U Save

A2 Notice: 18/08/2022 09:32:26; **GPS Coordinates:** -32.092753, 18.302250



Harbour entrance

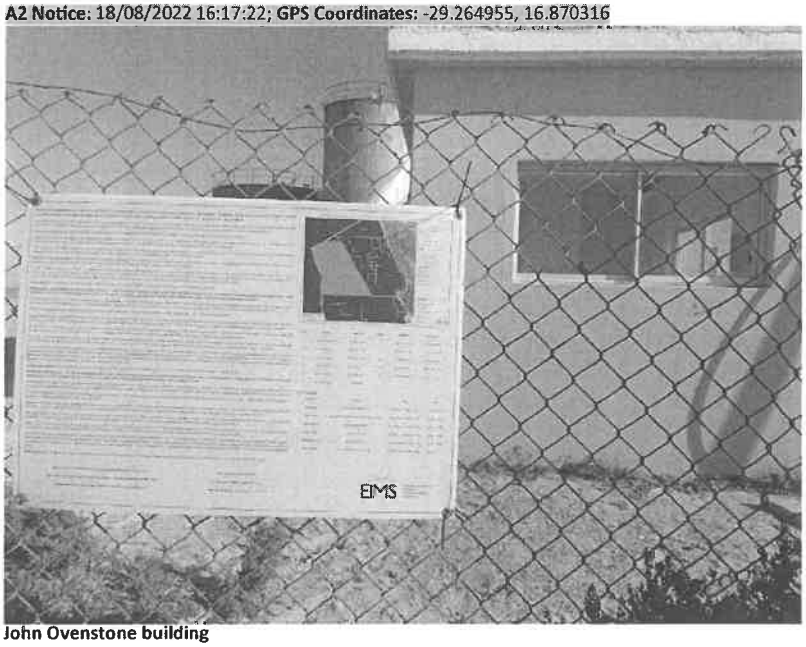
A2 Notice: 18/08/2022 16:14:26; **GPS Coordinates:** -29.265215, 16.870064



Near Benguela

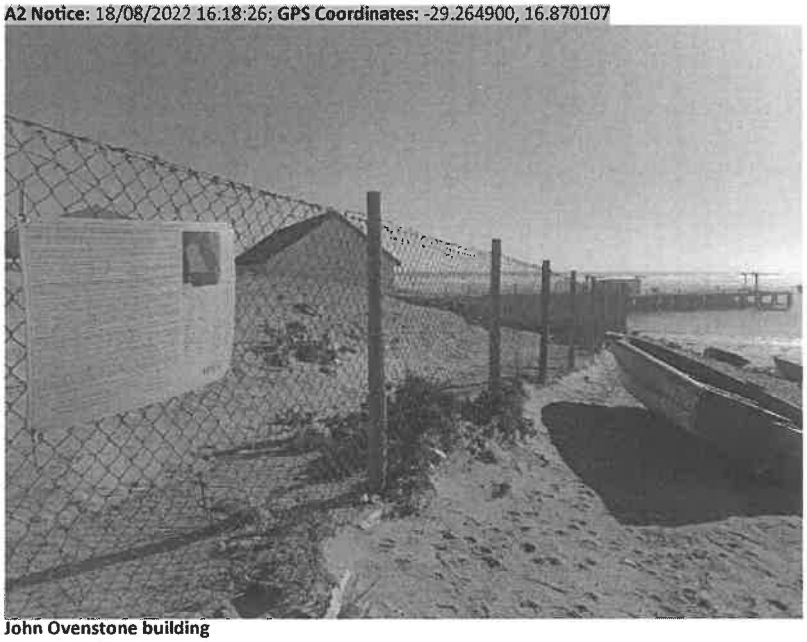
5023

A2 Notice: 18/08/2022 16:17:22; **GPS Coordinates:** -29.264955, 16.870316



John Ovenstone building

A2 Notice: 18/08/2022 16:18:26; **GPS Coordinates:** -29.264900, 16.870107

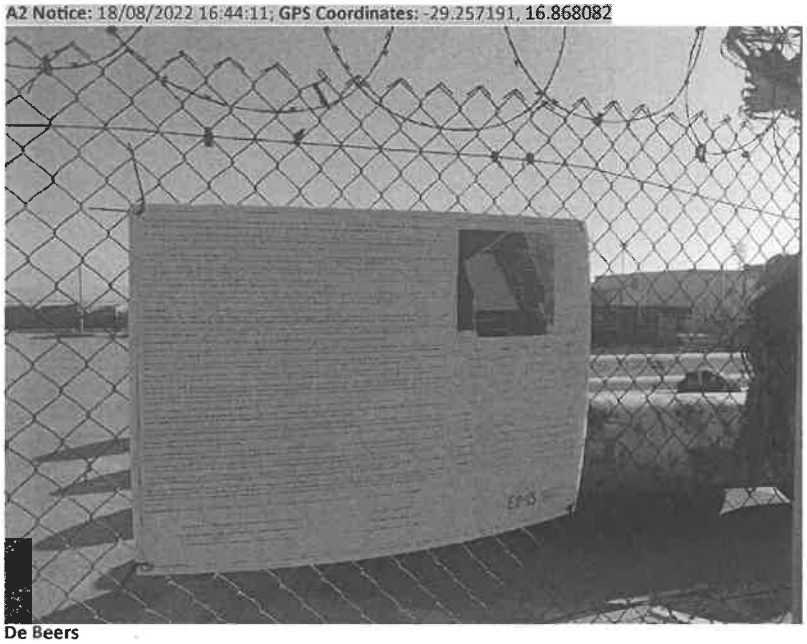


John Ovenstone building

A2 Notice: 18/08/2022 16:24:42; **GPS Coordinates:** -29.257429, 16.868105

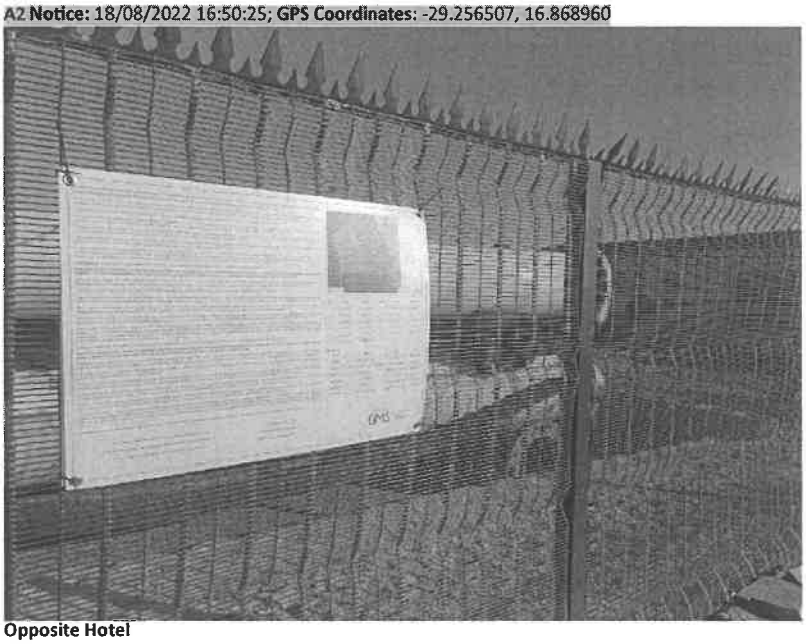


A2 Notice: 18/08/2022 16:44:11; **GPS Coordinates:** -29.257191, 16.868082



De Beers

A2 Notice: 18/08/2022 16:50:25; **GPS Coordinates:** -29.256507, 16.868960



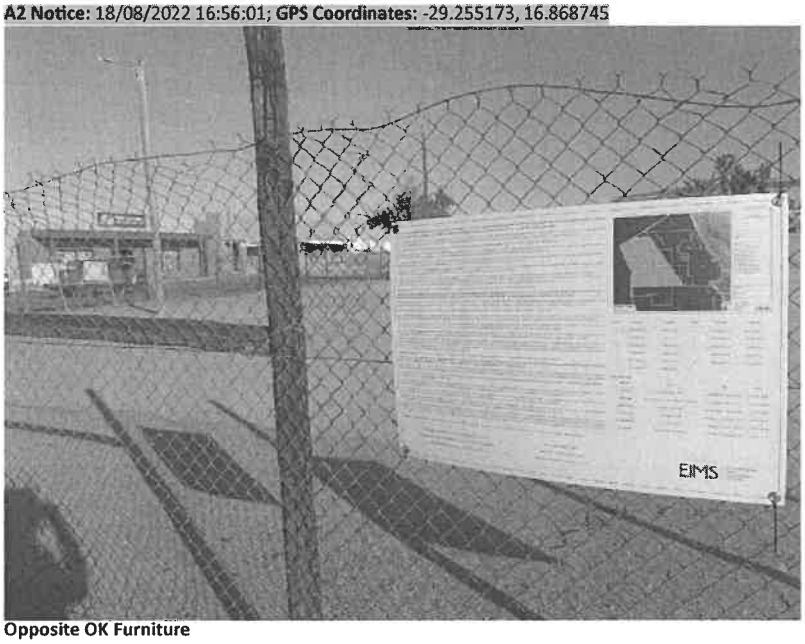
Opposite Hotel

A2 Notice: 18/08/2022 16:54:44; **GPS Coordinates:** -29.255247, 16.868915



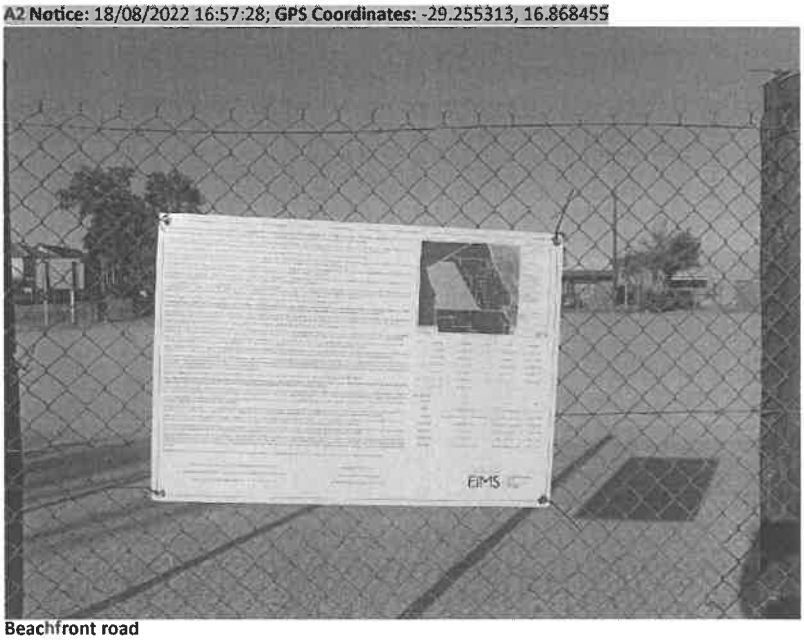
Opposite pharmacy

A2 Notice: 18/08/2022 16:56:01; **GPS Coordinates:** -29.255173, 16.868745



Opposite OK Furniture

A2 Notice: 18/08/2022 16:57:28; **GPS Coordinates:** -29.255313, 16.868455



Beachfront road

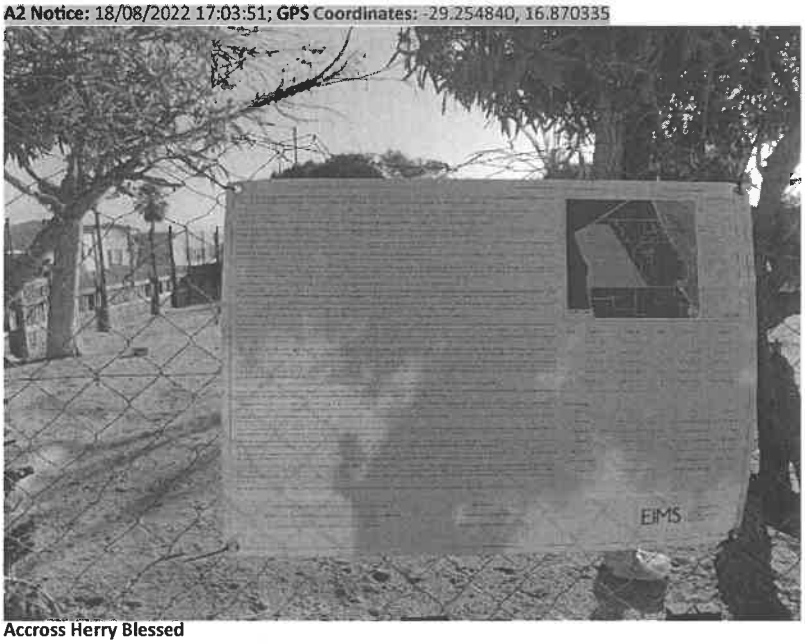
8423

A2 Notice: 18/08/2022 17:02:27; **GPS Coordinates:** -29.254891, 16.870175



Opposite super save convenience

A2 Notice: 18/08/2022 17:03:51; **GPS Coordinates:** -29.254840, 16.870335



Accross Herry Blessed

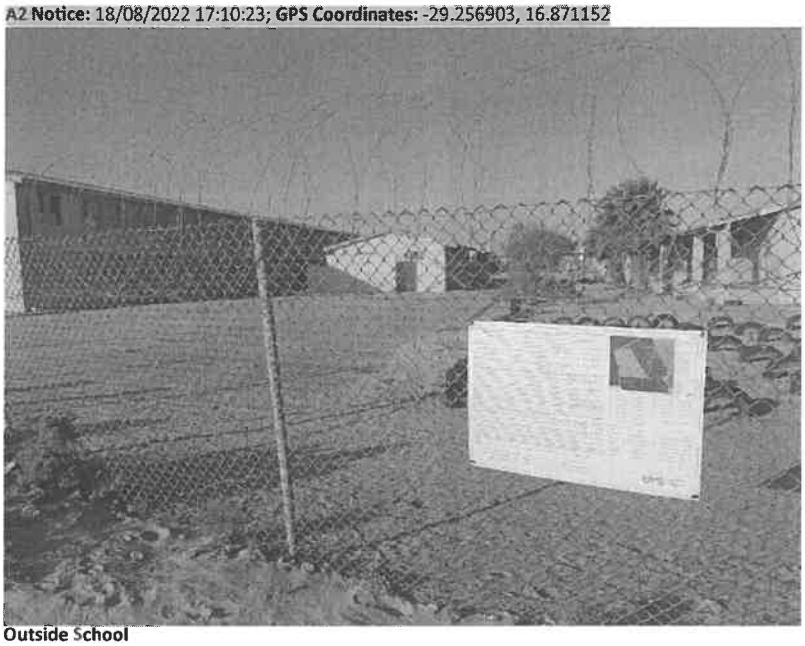
A2 Notice: 18/08/2022 17:07:47; **GPS Coordinates:** -29.257086, 16.870818



Outside public library

803

A2 Notice: 18/08/2022 17:10:23; **GPS Coordinates:** -29.256903, 16.871152



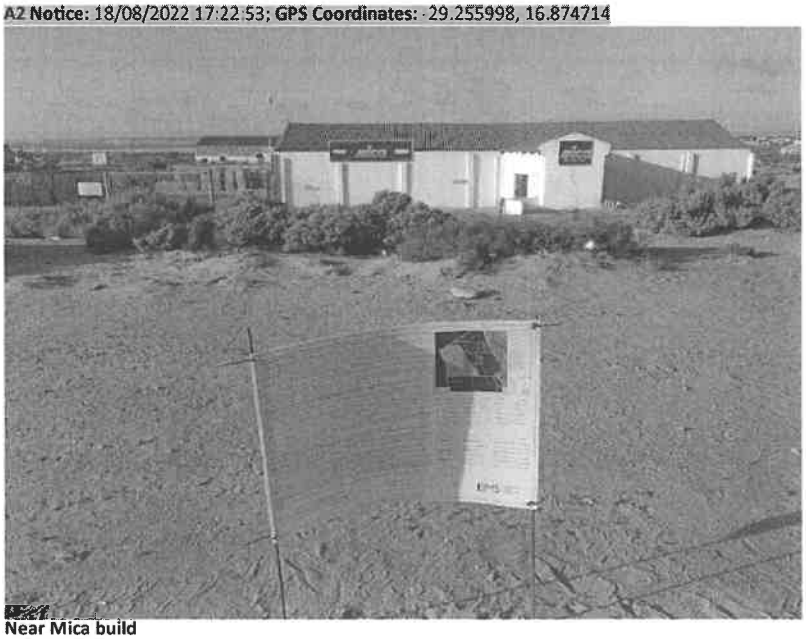
Outside School

A2 Notice: 18/08/2022 17:17:07; **GPS Coordinates:** -29.254908, 16.873371



Start of main road

A2 Notice: 18/08/2022 17:22:53; **GPS Coordinates:** -29.255998, 16.874714



Near Mica build

A2 Notice: 18/08/2022 17:28:26; **GPS Coordinates:** -29.258187, 16.878388



Opposite scrap yard

A2 Notice: 18/08/2022 17:30:49; **GPS Coordinates:** -29.258357, 16.878309



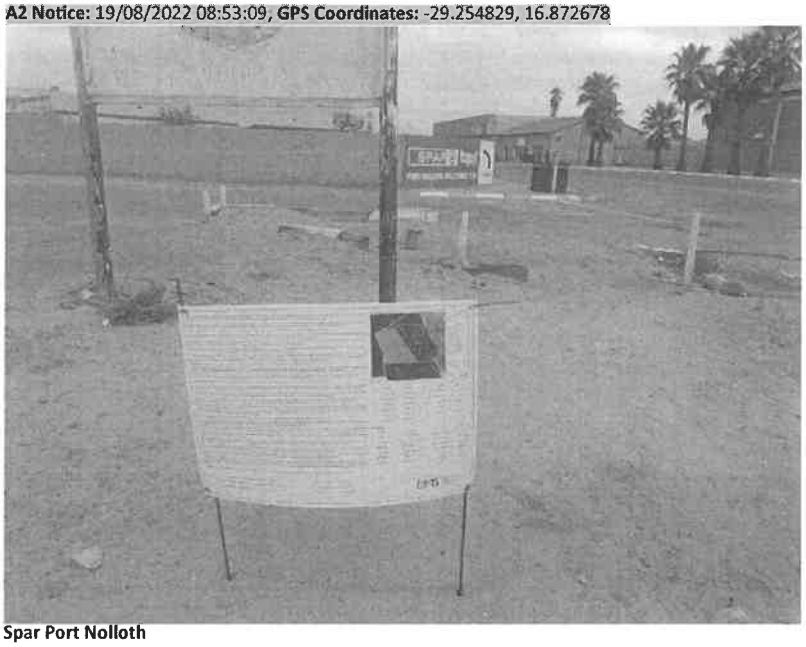
Near Gami Gaos Guesthouse

A2 Notice: 18/08/2022 17:35:55; **GPS Coordinates:** -29.260656, 16.886101



Port Nolloth entrance

A2 Notice: 19/08/2022 08:53:09; **GPS Coordinates:** -29.254829, 16.872678



Spar Port Nolloth

A2 Notice: 19/08/2022 09:09:41; **GPS Coordinates:** -29.256332, 16.868414



Near Post office

A2 Notice: 19/08/2022 11:42:12; **GPS Coordinates:** -30.258693, 17.318372



2633

A2 Notice: 19/08/2022 11:44:54; **GPS Coordinates:** -30.258758, 17.318265



Road from Hondeklip Bay

A2 Notice: 19/08/2022 11:54:58; **GPS Coordinates:** -30.286103, 17.323019



Road to Hondeklip Bay

A2 Notice: 19/08/2022 11:56:21; **GPS Coordinates:** -30.286148, 17.322914



Doad from Hondeklip Bay

A2 Notice: 19/08/2022 12:04:36; **GPS Coordinates:** -30.306048, 17.312000



Towarxs Hondeklip turnoff

A2 Notice: 19/08/2022 12:07:55; **GPS Coordinates:** -30.305964, 17.311890



Road from Hondeklip Bay

2635

A2 Notice: 19/08/2022 12:14:22; **GPS Coordinates:** -30.322961, 17.302722



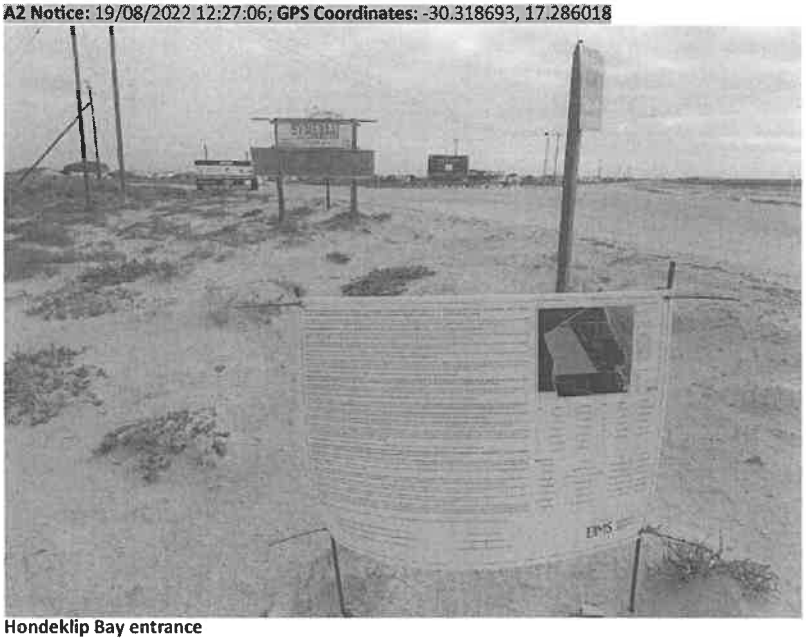
Hondeklip to Garies intersection

A2 Notice: 19/08/2022 12:18:24; **GPS Coordinates:** -30.322830, 17.302732



Hondeklip to Garies intersection

A2 Notice: 19/08/2022 12:27:06; **GPS Coordinates:** -30.318693, 17.286018



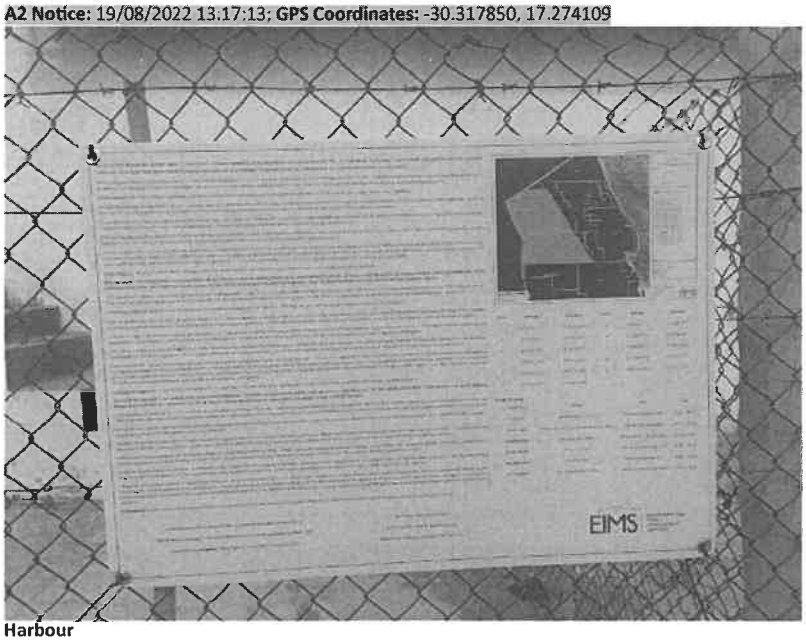
Hondeklip Bay entrance

A2 Notice: 19/08/2022 12:30:25; **GPS Coordinates:** -30.318469, 17.285876



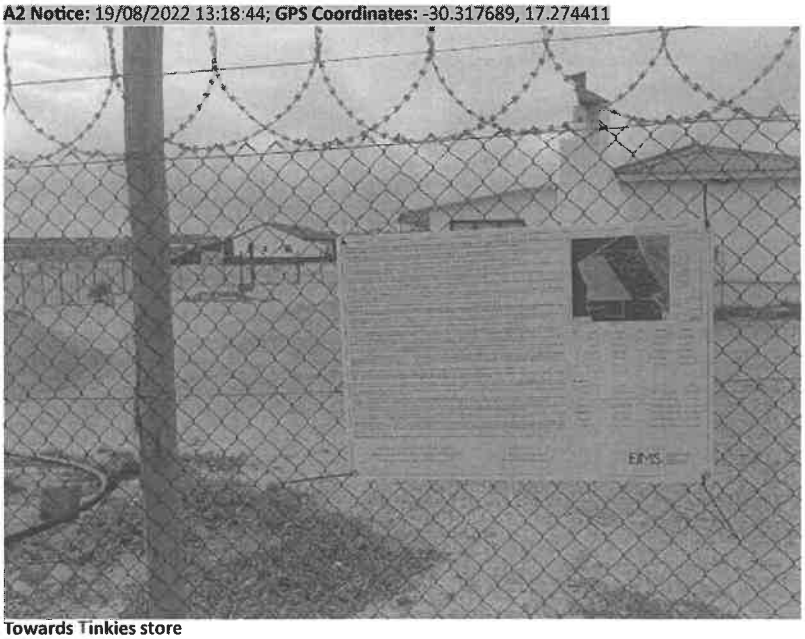
Hondeklip Bay exit to Garies

A2 Notice: 19/08/2022 13:17:13; **GPS Coordinates:** -30.317850, 17.274109



Harbour

A2 Notice: 19/08/2022 13:18:44; **GPS Coordinates:** -30.317689, 17.274411



Towards Tinkies store

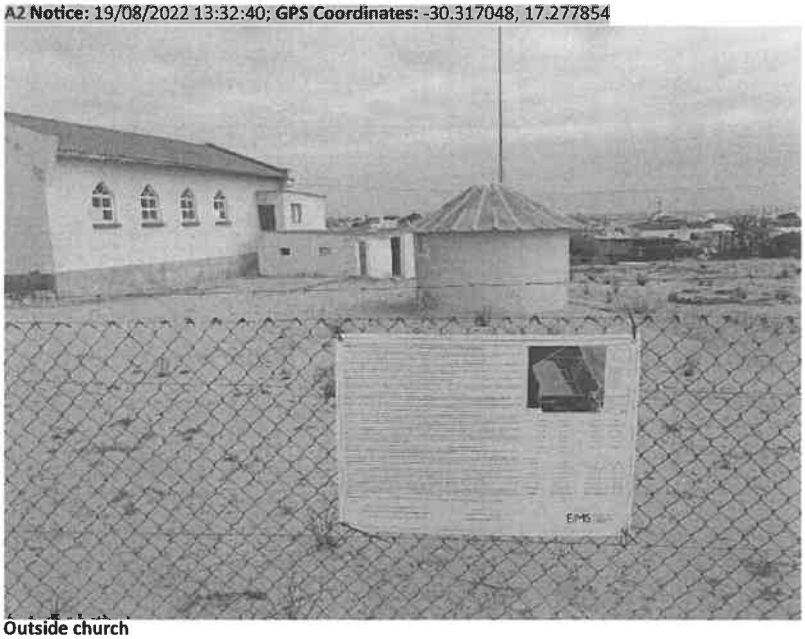
8003

A2 Notice: 19/08/2022 13:27:24; GPS Coordinates: -30.315758, 17.276806



Outside Karavan Park

A2 Notice: 19/08/2022 13:32:40; GPS Coordinates: -30.317048, 17.277854



Outside church

A2 Notice: 19/08/2022 13:33:30; GPS Coordinates: -30.316943, 17.278067



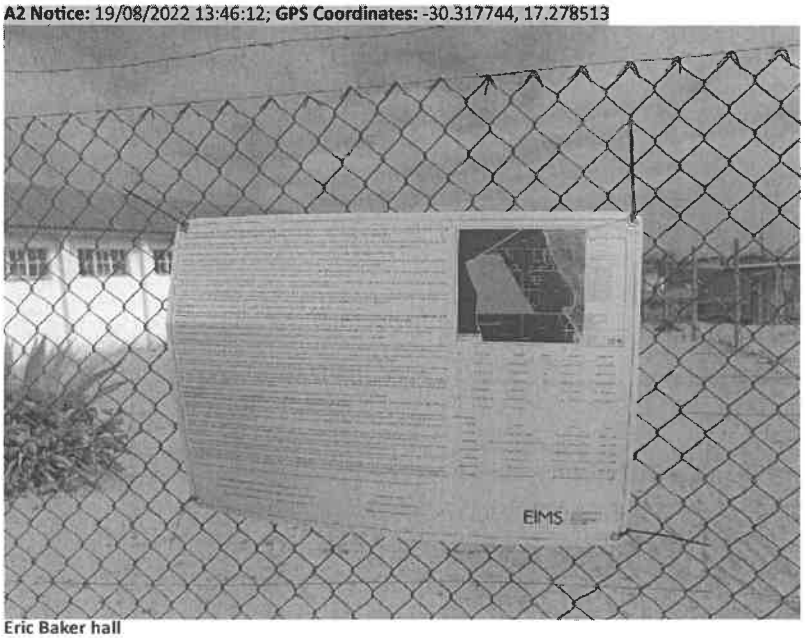
Opposite church

A2 Notice: 19/08/2022 13:45:22; **GPS Coordinates:** -30.317899, 17.278593



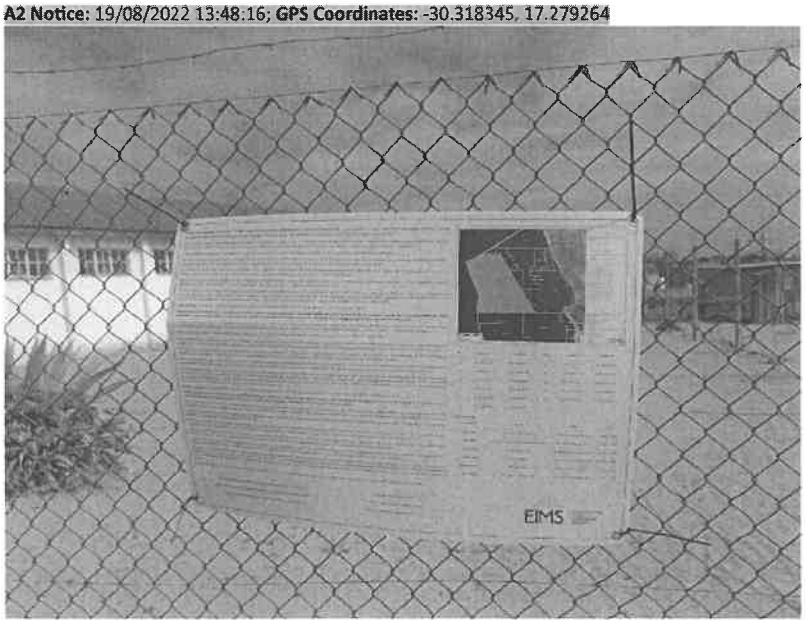
Eric Baker hall

A2 Notice: 19/08/2022 13:46:12; **GPS Coordinates:** -30.317744, 17.278513

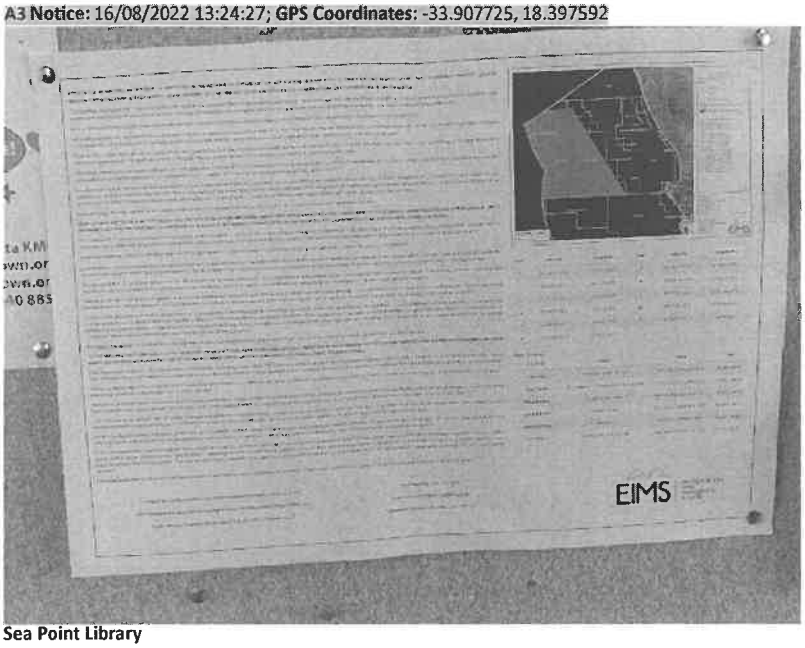


Eric Baker hall

A2 Notice: 19/08/2022 13:48:16; **GPS Coordinates:** -30.318345, 17.279264

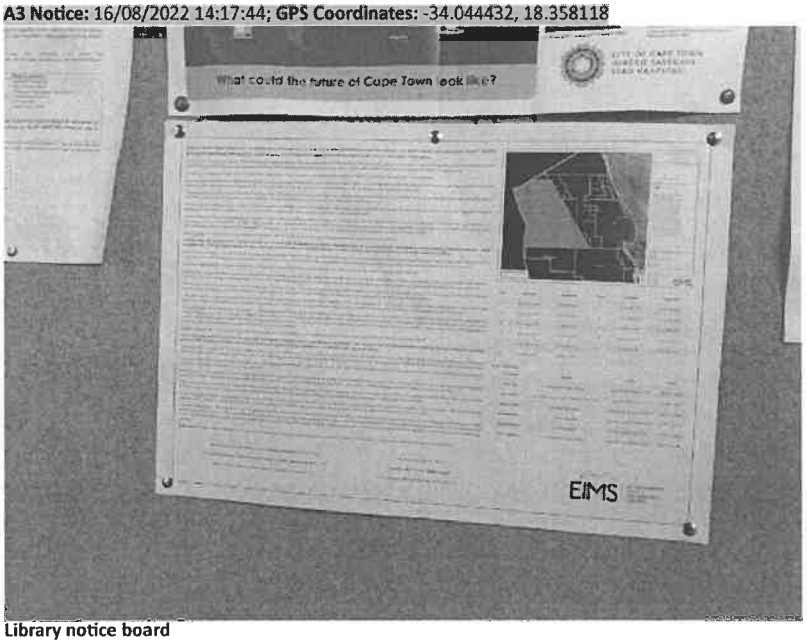


A3 Notice: 16/08/2022 13:24:27; **GPS Coordinates:** -33.907725, 18.397592



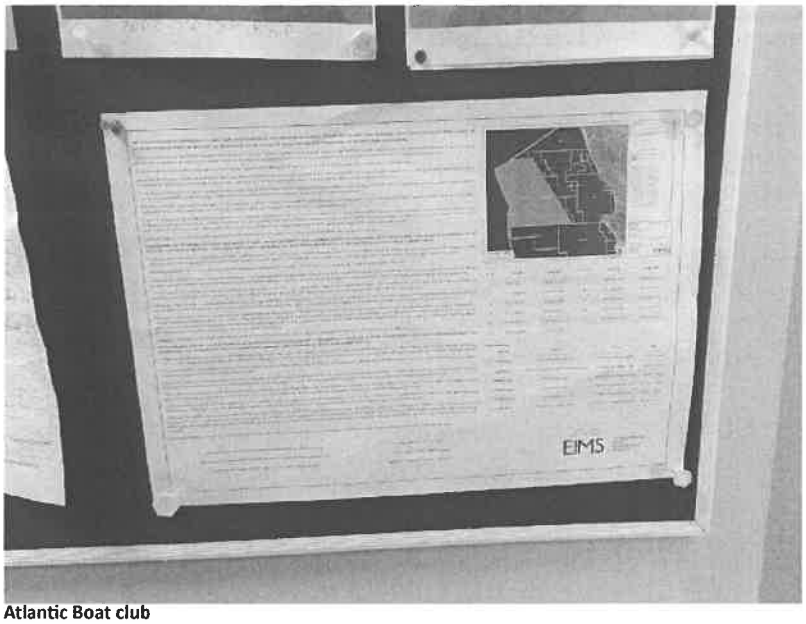
Sea Point Library

A3 Notice: 16/08/2022 14:17:44; **GPS Coordinates:** -34.044432, 18.358118



Library notice board

A3 Notice: 16/08/2022 15:13:56; **GPS Coordinates:** -34.049846, 18.345958



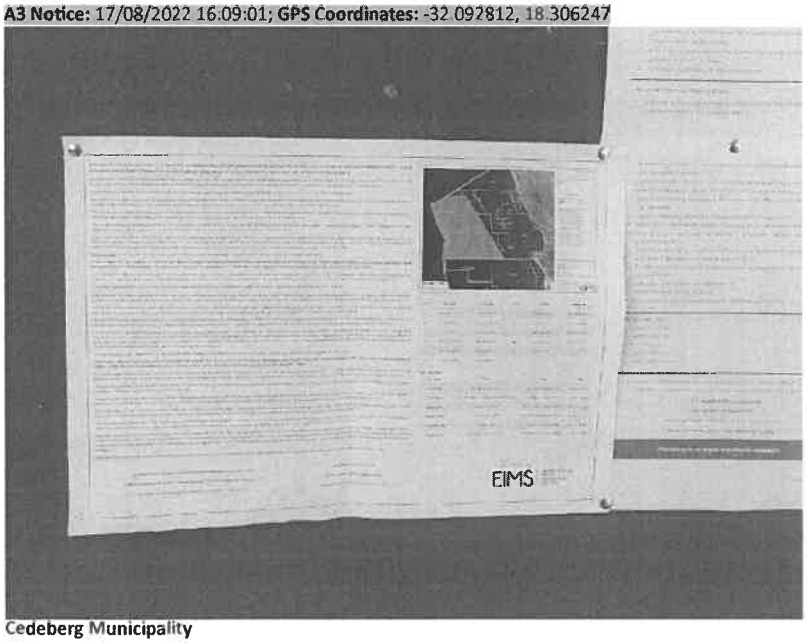
Atlantic Boat club

A3 Notice: 16/08/2022 15:33:10; **GPS Coordinates:** -34.046961, 18.347961



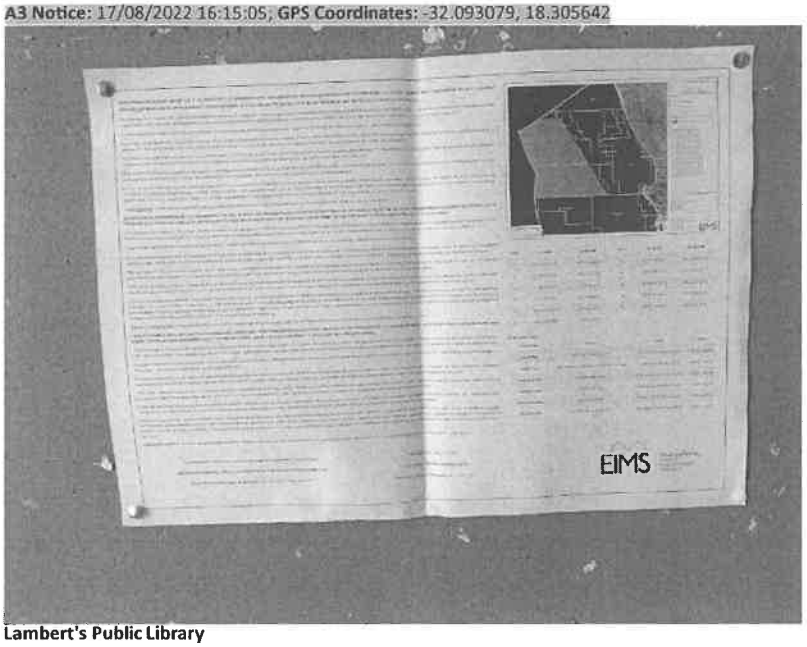
Bus stop

A3 Notice: 17/08/2022 16:09:01; **GPS Coordinates:** -32.092812, 18.306247



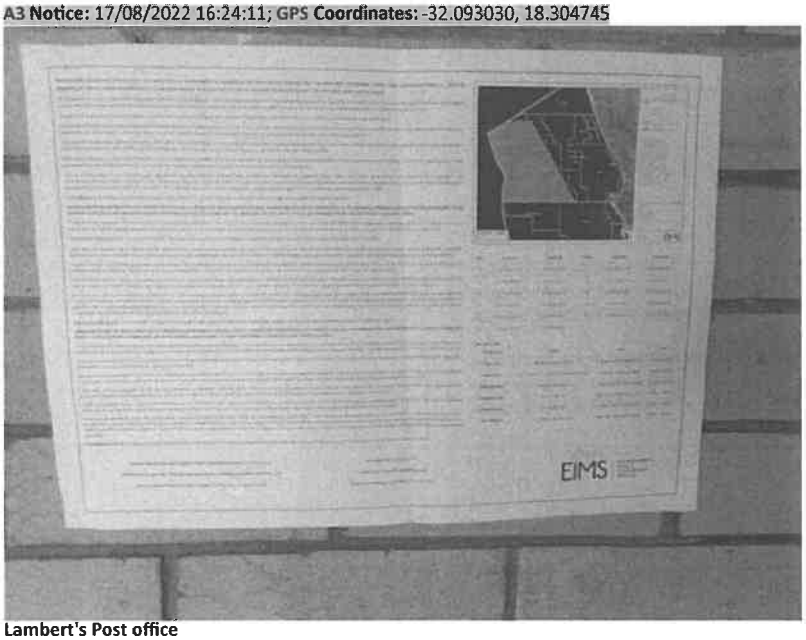
Cedeberg Municipality

A3 Notice: 17/08/2022 16:15:05; **GPS Coordinates:** -32.093079, 18.305642



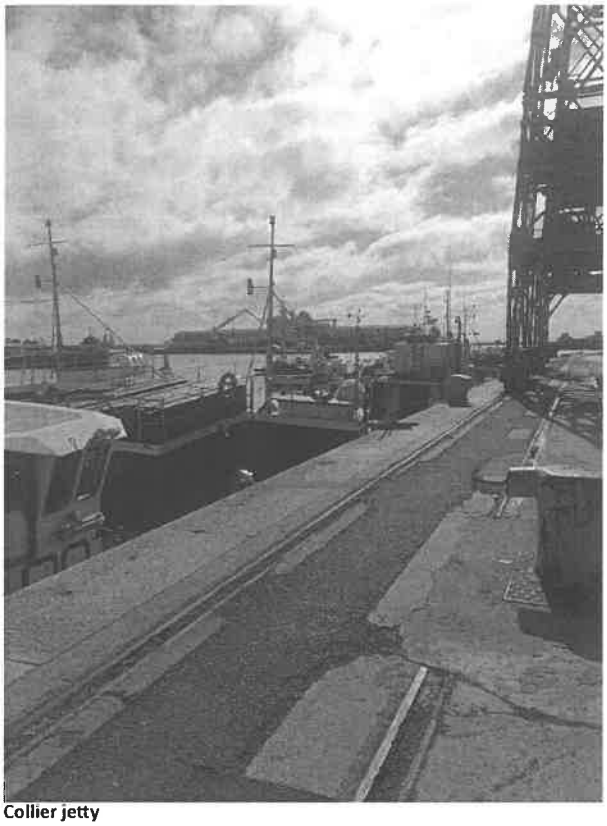
Lambert's Public Library

A3 Notice: 17/08/2022 16:24:11; **GPS Coordinates:** -32.093030, 18.304745



Lambert's Post office

Handout: 16/08/2022 10:53:24; **GPS Coordinates:** -33.906303, 18.424046



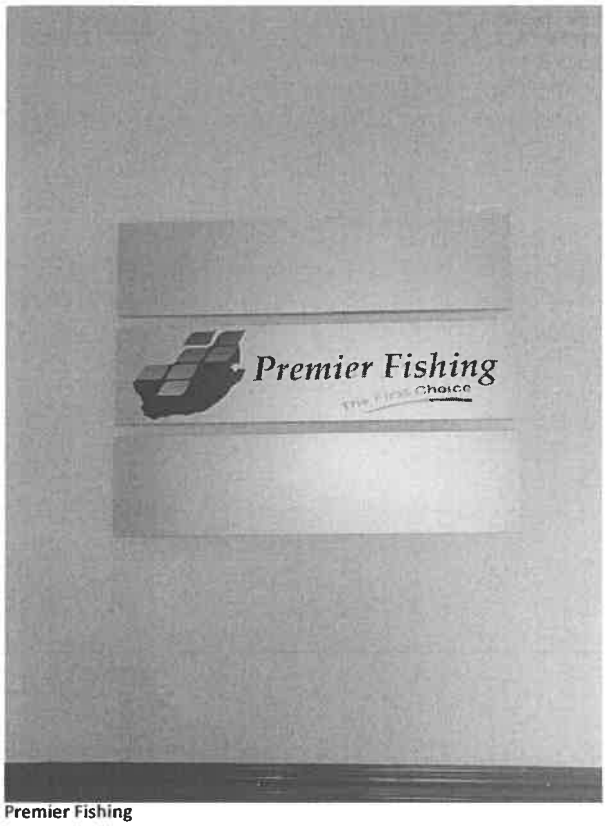
Collier jetty

Handout: 16/08/2022 11:12:26; GPS **Coordinates:** -33.908203, 18.425124



I&J

Handout: 16/08/2022 11:15:56; **GPS Coordinates:** -33.906751, 18.425778



Premier Fishing

Handout: 16/08/2022 11:31:54; **GPS Coordinates:** -33.906209, 18.427655



Sea Harvest

Handout: 16/08/2022 11:36:31; **GPS Coordinates:** -33.905684, 18.427865

SWS



Viking Fishing

Handout: 16/08/2022 11:50:04; **GPS Coordinates:** -33.904365, 18.429516



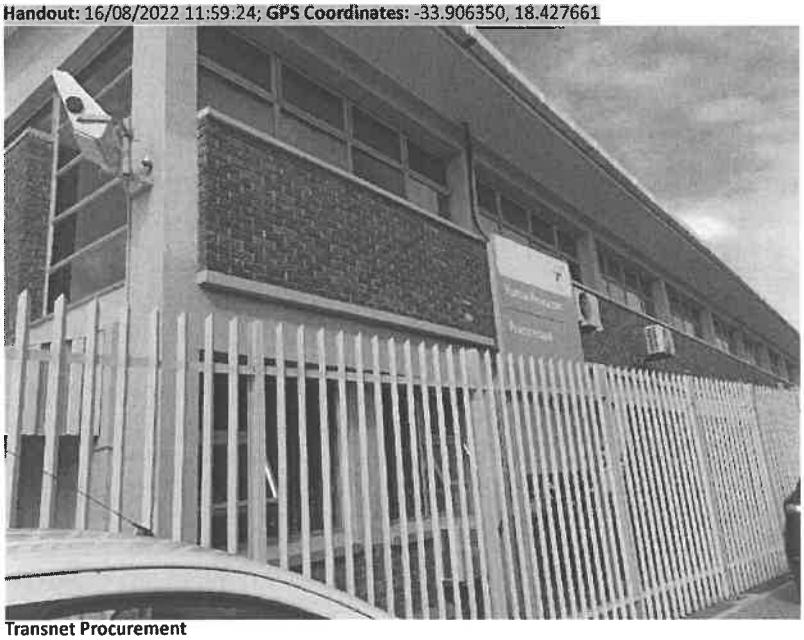
Amalwandle Hake

Handout: 16/08/2022 11:50:20; **GPS Coordinates:** -33.904363, 18.429533



Transnet

Handout: 16/08/2022 11:59:24; **GPS Coordinates:** -33.906350, 18.427661



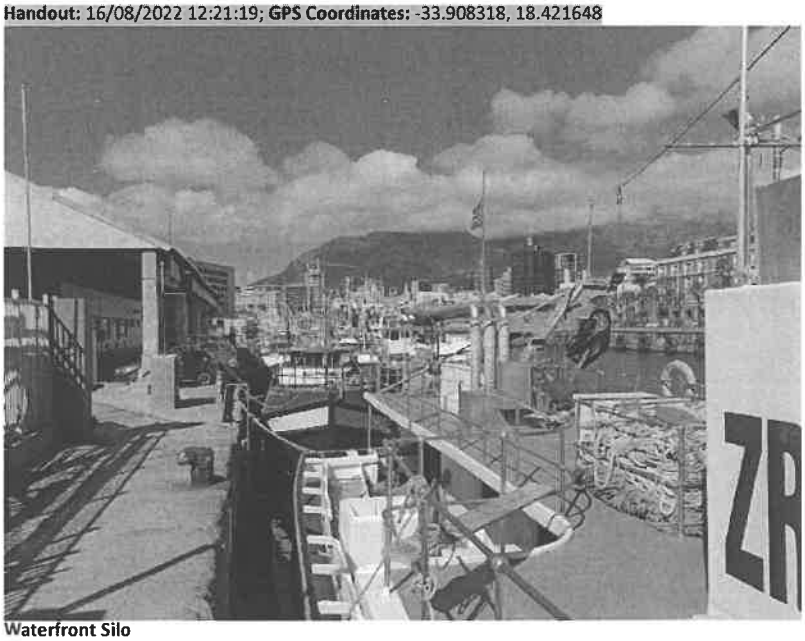
Transnet Procurement

Handout: 16/08/2022 12:05:17; **GPS Coordinates:** -33.905705, 18.426565



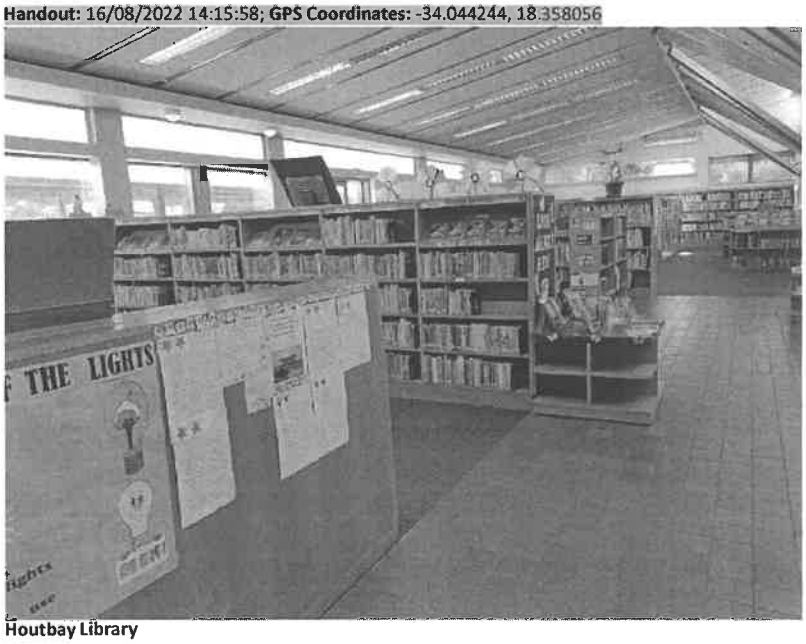
Port of Cape Town

Handout: 16/08/2022 12:21:19; **GPS Coordinates:** -33.908318, 18.421648



Waterfront Silo

Handout: 16/08/2022 14:15:58; **GPS Coordinates:** -34.044244, 18.358056



Houtbay Library

BDS

Handout: 16/08/2022 14:36:46; **GPS Coordinates:** -34.048011, 18.348918



Houtbay Har

Handout: 16/08/2022 14:58:17; **GPS Coordinates:** -34.048082, 18.347652



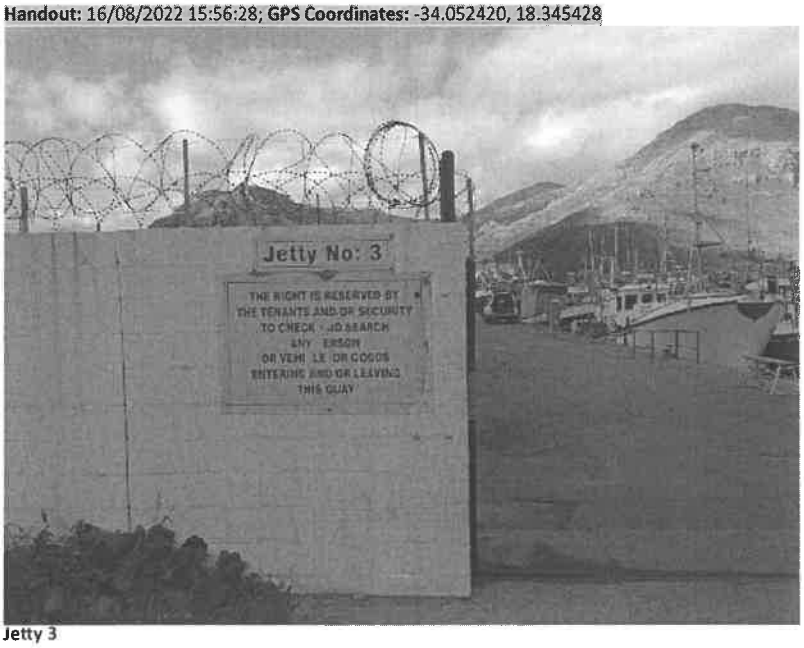
Premier Fishing

Handout: 16/08/2022 15:02:32; **GPS Coordinates:** -34.048309, 18.347464



Pescaluna Houtbay

Handout: 16/08/2022 15:56:28; **GPS Coordinates:** -34.052420, 18.345428



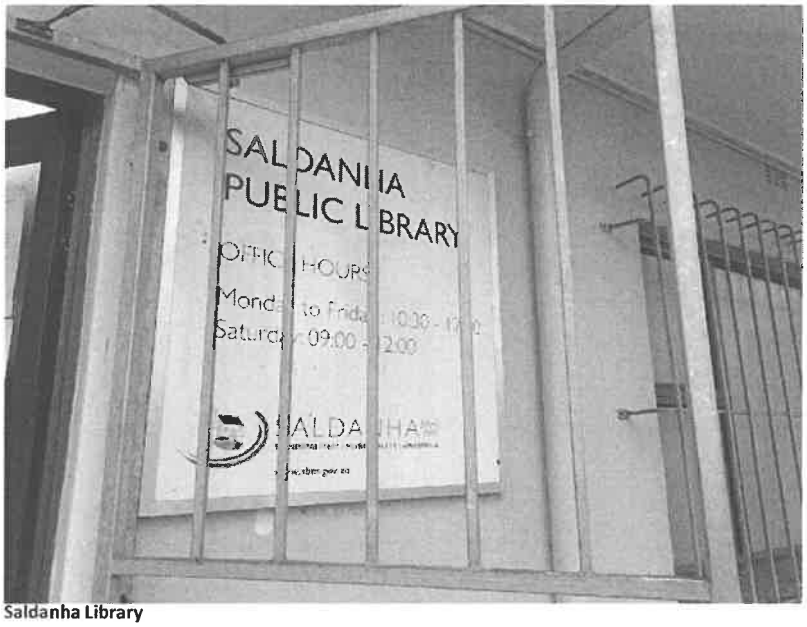
Jetty 3

Handout: 17/08/2022 08:59:52; **GPS Coordinates:** -33.007680, 17.945684



Hoedjiesbaai hotel

Handout: 17/08/2022 09:14:48; **GPS Coordinates:** -33.006167, 17.944645



Saldanha Library

Handout: 17/08/2022 09:21:43; **GPS Coordinates:** -33.006997, 17.944063



Saldanha Municipality

Handout: 17/08/2022 10:53:49; **GPS Coordinates:** -33.011000, 17.949826



Hard hat diving

5203

Handout: 17/08/2022 11:04:00; **GPS Coordinates:** -33.010891, 17.950228



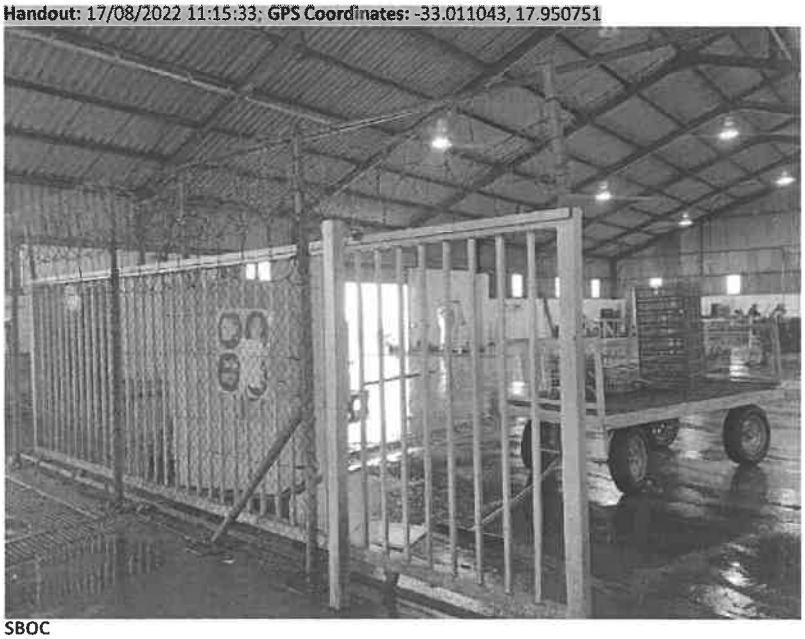
Saldanha oyster company

Handout: 17/08/2022 11:10:11; **GPS Coordinates:** -33.010738, 17.950534



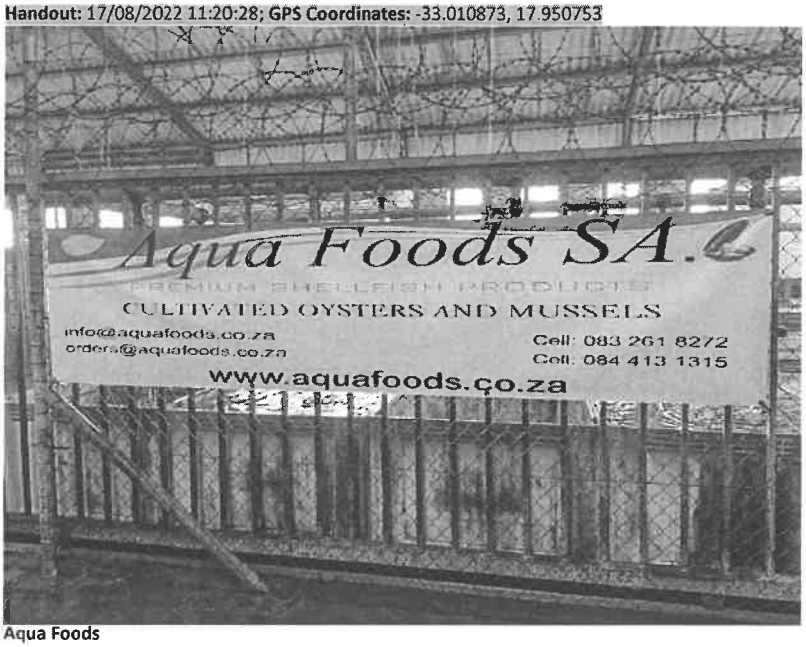
Blie Ocean Mussels

Handout: 17/08/2022 11:15:33; **GPS Coordinates:** -33.011043, 17.950751



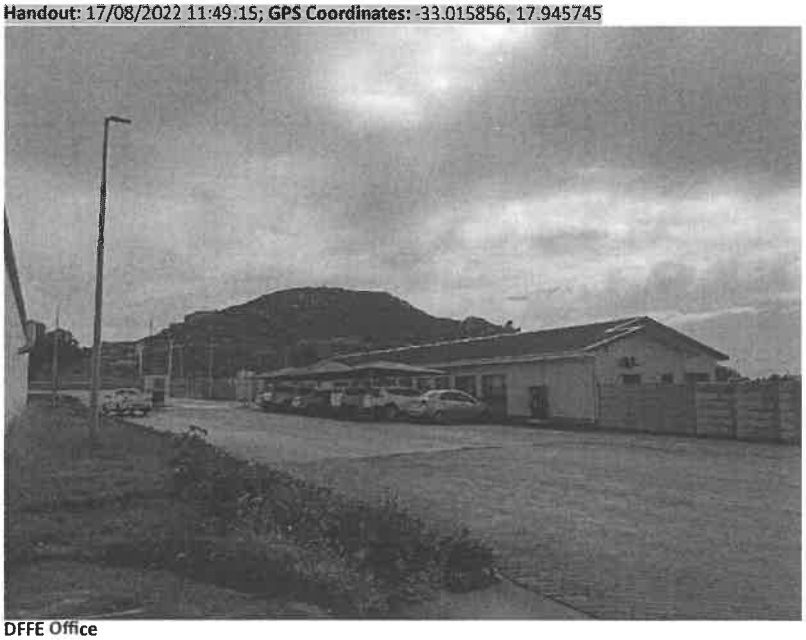
SBOC

Handout: 17/08/2022 11:20:28; **GPS Coordinates:** -33.010873, 17.950753



Aqua Foods

Handout: 17/08/2022 11:49:15; **GPS Coordinates:** -33.015856, 17.945745



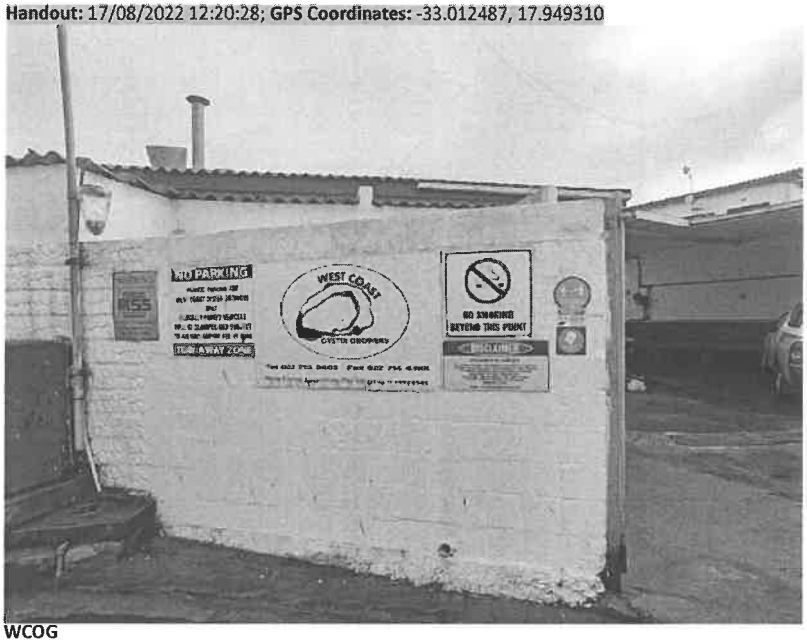
DFFE Office

Handout: 17/08/2022 12:00:12; **GPS Coordinates:** -33.015512, 17.948544



Premier foods

Handout: 17/08/2022 12:20:28; **GPS Coordinates:** -33.012487, 17.949310



WCOG

Handout: 17/08/2022 12:26:49; **GPS Coordinates:** -33.013314, 17.948506



Atlantic Royal

Handout: 17/08/2022 12:51:05; **GPS Coordinates:** -33.022507, 17.950379



Sea Harvest

Handout: 17/08/2022 12:57:53; **GPS Coordinates:** -33.021555, 17.951529



Kianga

Handout: 17/08/2022 15:57:21; **GPS Coordinates:** -32.096594, 18.308439



Community Hall

Handout: 17/08/2022 16:16:28; **GPS Coordinates:** -32.092765, 18.305956



EXOS

Handout: 17/08/2022 16:17:15; **GPS Coordinates:** -32.092812, 18.305965



Cedeberg Municipality

Handout: 17/08/2022 16:24:57; **GPS Coordinates:** -32.093068, 18.304669



Lambert's Bay post office

Handout: 17/08/2022 17:02:08; **GPS Coordinates:** -32.091856, 18.302956



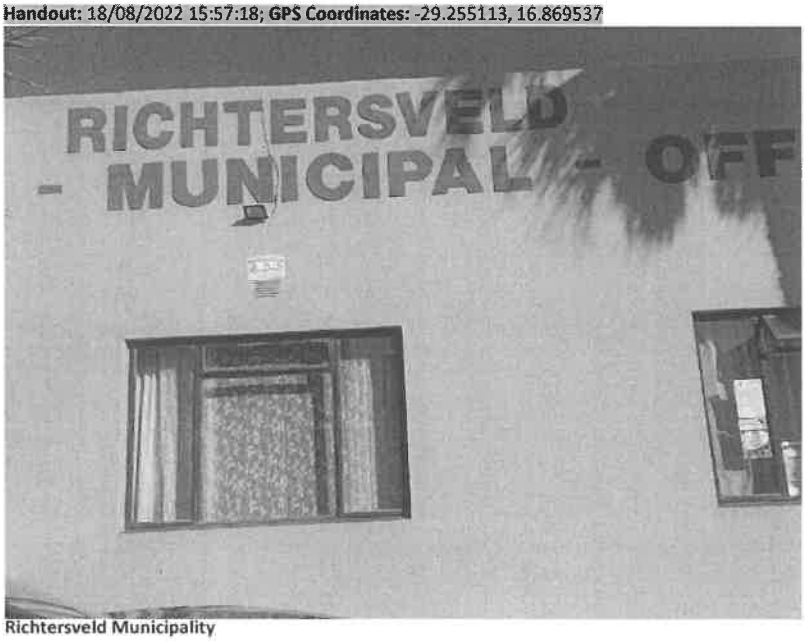
Harbour

Handout: 18/08/2022 09:27:23; **GPS Coordinates:** -32.092861, 18.302886



Lambert's Bay foods

Handout: 18/08/2022 15:57:18; **GPS Coordinates:** -29.255113, 16.869537



Richtersveld Municipality

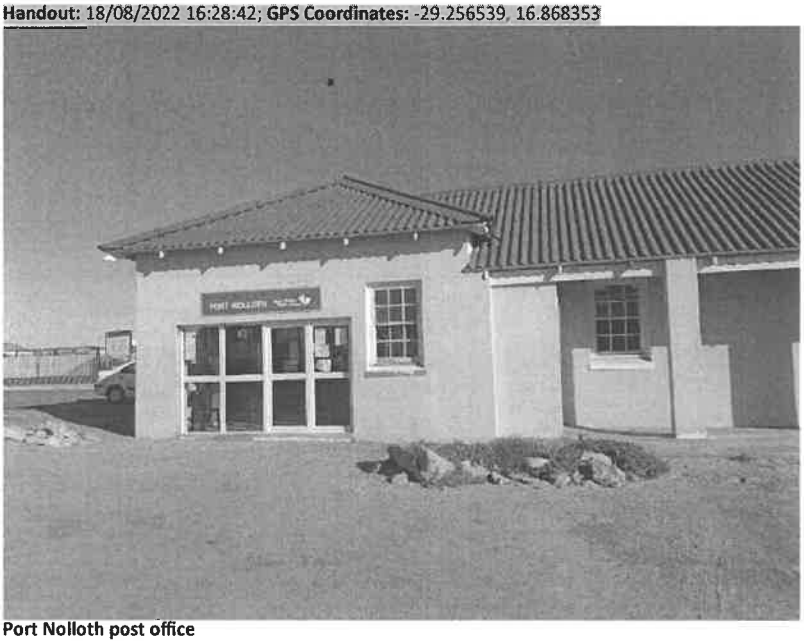
8423

Handout: 18/08/2022 16:07:41; **GPS Coordinates:** -29.265277, 16.869847



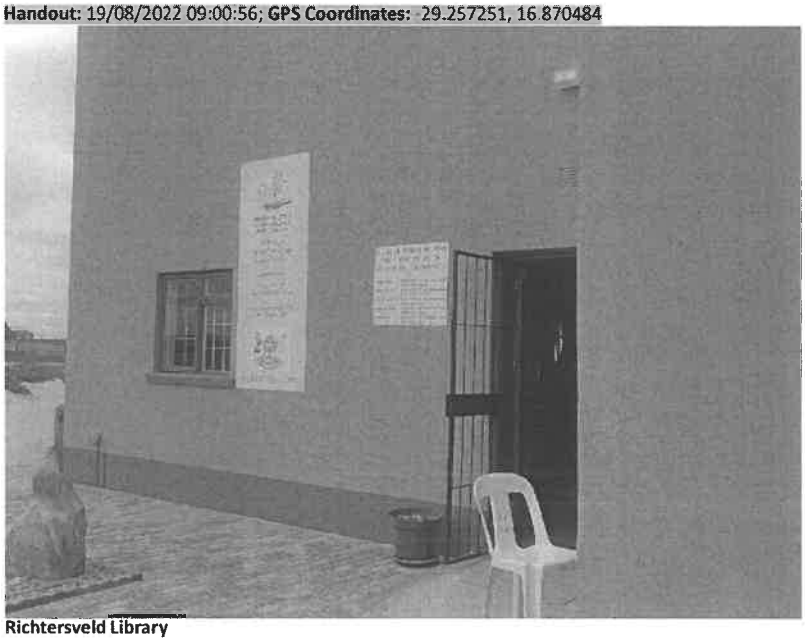
Benguela Fish Shop

Handout: 18/08/2022 16:28:42; **GPS Coordinates:** -29.256539, 16.868353



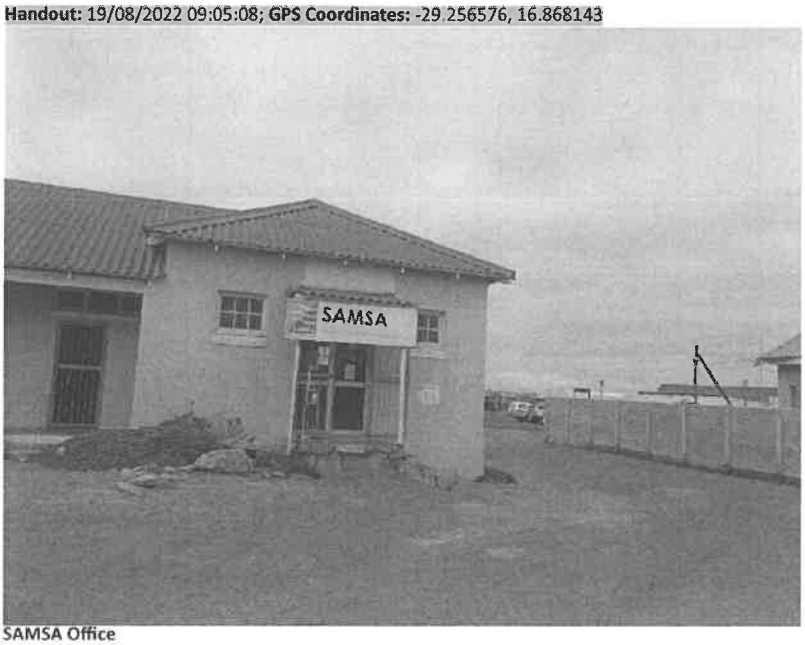
Port Nolloth post office

Handout: 19/08/2022 09:00:56; **GPS Coordinates:** -29.257251, 16.870484



Richtersveld Library

Handout: 19/08/2022 09:05:08; **GPS Coordinates:** -29.256576, 16.868143



SAMSA Office

Handout: 19/08/2022 13:39:23; **GPS Coordinates:** -30.317855, 17.278411



Eric Baker

Community: 19/08/2022 13:53:56; **GPS Coordinates:** -30.318376, 17.279330



Opposite water tank

5628

GP Kriel

From: SMSPortal <noreply@smsportal.com>
Sent: Tuesday, 23 August 2022 17:09
To: GP Kriel
Subject: Campaign Confirmation - 1520 Call to Register

smsportal

LOG IN NOW ▶

Campaign Confirmation



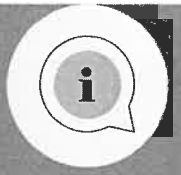
1520 Call to Register campaign is scheduled for 23 August 2022 at 17:06.

Campaign Details:

Created:	23 August 2022 @ 17:06
Sent:	23 August 2022 @ 17:06
Quantity:	204
Credits:	612

Message: Kennisgewing voorgestelde TGS-verkenningspermit Basiese Assessering: TGS het aansoek gedoen om 'n Verkenningspermit aan Weskus van Suid-Afrika. EIMS sal die Basiese Assesseringsproses vir hierdie projek onderneem. Om te registreer of vir meer besonderhede, stuur asseblief jou besonderhede aan Andiswe Xuma; Tel: 0117897170; E-pos: tgs@eims.co.za; Pos: Posbus 2083, Pinegowrie, 2123; https://www.eims.co.za/2022/08/15/1520-proposed-tgs-seismic-reconnaissance

2023



Need some help? Our comprehensive documentation and guides are here to get you started.
Click here to view our guides.



DISCLAIMER: This email contains proprietary information some or all of which may be legally privileged. It is for the intended recipient only. If an addressing or transmission error has misdirected this email please notify the author by replying to this email. If you are not the intended recipient, you must not use, disclose, copy, print, or rely on this email. We cannot accept liability for any statements made which are clearly the sender's own and not expressly made on behalf of this company or one of its agents.

508

GP Kriel

From: SMSPortal <noreply@smsportal.com>
Sent: Tuesday, 23 August 2022 17:07
To: GP Kriel
Subject: Campaign Confirmation - 1520 Call to Register

smsportal

LOG IN NOW ▶

Campaign Confirmation



1520 Call to Register campaign is scheduled for 23 August 2022 at 17:04.

Campaign Details:

Created:	23 August 2022 @ 17:05
Sent:	23 August 2022 @ 17:04
Quantity:	204
Credits:	612

Message: Notification regarding the Proposed TGS Reconnaissance Permit Basic Assessment: TGS has applied for a Reconnaissance Permit of the West Coast of South Africa. EIMS will be undertaking the Basic Assessment Process for this Project. To register or for more details, please submit your details to Andiswe Xuma; Tel: 0117897170; Email: tgs@eims.co.za; Post: PO Box 2083, Pinegowrie, 2123; https://www.eims.co.za/2022/08/15/1520-proposed-tgs-seismic-reconnaissance

Need some help? Our comprehensive documentation and guides are here to get you started.
Click here to view our guides.

1828

[redacted]



DISCLAIMER: This email contains proprietary information some or all of which may be legally privileged. It is for the intended recipient only. If an addressing or transmission error has misdirected this email please notify the author by replying to this email. If you are not the intended recipient, you must not use, disclose, copy, print, or rely on this email. We cannot accept liability for any statements made which are clearly the sender's own and not expressly made on behalf of this company or one of its agents.

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

24 Oktober 2022

Our ref: 1520/GPK/ax

To whom it may concern

Dear Registered Interested and Affected Party:

NOTIFICATION REGARDING OPPORTUNITY TO PARTICIPATE IN ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS SEISMIC SURVEY BASIC ASSESSMENT PROJECT, LOCATED OFFSHORE EXTENDING FROM APPROXIMATELY 120 KM OFFSHORE OF ST HELENA BAY TO 230 KM OFFSHORE OF HONDEKLIP BAY, OFF THE WEST COAST, SOUTH AFRICA.

As a registered Interested and Affected Party (I&AP) for the above-mentioned project, you are hereby notified of the following opportunities for public participation:

Description of event:	**Availability of Draft Basic Assessment Report (DBAR) for Public Review and Comment**
A hard copy of the report can be viewed at:	The Hout Bay Public Library (Melkhout Crescent, Hout Bay, Cape Town, Western Cape)
	The Sea Point Public Library (Civic Centre, Cnr Three Anchor Bay and Main roads, Sea Point, Cape Town, Western Cape)
	The Vredenburg Public Library (2 Academy Street (close to West Coast College), Vredenburg, West Coast, Western Cape)
	The Lamberts Bay Public Library (Church Street, Lamberts Bay, Western Cape)
	Kamiesburg Local Municipality in Hondeklip Bay (Wag Way street)
	A. J Bekeur Library (Robson St, Port Nolloth, Richtersveld, Northern Cape)
An electronic soft copy:	An electronic copy of the report can be downloaded from the EIMS website: https://www.eims.co.za/public-participation/
When:	Comments to be submitted until 25 November 2022

NB: The electronic soft copy of the report will be available on the EIMS website from 25 October 2022. Please note that in the event that you are unable to access the report due to data constraints please contact EIMS for alternative arrangements.

All hard copy documents will be made available for viewing at the various venues listed in the table above from 26 October 2022.

Public Meetings are scheduled during the review period of the draft BA report as follows:

Description of event:			**Notification of Public Meetings**
Where and When:	**Port Nolloth**	Port Nolloth Country Club	Monday 31 October 2022, 16:00-18:00
	Hondeklip Bay	Eric Baker Hall	Tuesday, 1 November 2022, 16:00-18:00
	Lamberts Bay	Community Hall	Wednesday, 2 November 2022, 16:00-18:00

A 8 Dalmeny Road, Pine Park, Randburg | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | **F** (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | **F** (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Description of event:			Notification of Public Meetings
	St Helena Bay	St Helena Bay Community Hall, Main Road	Thursday, 3 November 2022, 10:00-12:00
	Saldanha Bay	Hoedjies Bay Hotel	Thursday, 3 November 2022, 16:00-18:00
	Cape Town	Life Church, 30 Main Road, Anchor Bay, Seapoint)	Friday, 4 November 2022, 16:00-18:00
	Hout Bay	Hout Bay Public Library	Saturday, 5 November 2022, 10:00-12:00
	Virtual Meeting	Microsoft Teams Meeting Platform Virtual Meeting Registration Link	Thursday, 10 November 2022, 15:00-17:00

All inputs received by EIMS on the dBAR will be included in subsequent submissions to the competent authority for consideration in their decision-making process.

Please submit all comments or queries via letter, fax, phone call or email to the following contact details:

Contact Person: Andisiwe Xuma

EIMS Reference Number: 1520

Postal Address: P.O. Box 2083; Pinegowrie; 2123

Telephone: (011) 789 7170

Fax: (086) 571 9047

E-mail: tgs@eims.co.za

Please include the project reference number 1520 in all correspondence.

Kind Regards,

Andisiwe Xuma

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

24 Oktober 2022

Ons Verw: 1520/GPK/ax

Vir wie dit mag aangaan

Geagte Belanghebbende en Geaffekteerde Party:

KENNISGEWING MET BETREKKING TOT GELEENTHEID OM DEEL TE NEEM AAN OMGEWINGSMAGTIGING AANSOEKPROSES VIR DIE VOORGESTELDE TGS SEISMIESE OPNAME BASIESE ASSESSERINGSPROJEK, GELEË SEEWAARTS EN STREK VAN ONGEVEER 120 KM VANAF DIE KUS VAN ST HELENABAAI TOT ONGEVEER 230 KM VANAF DIE KUS VAN HONDEKLIPBAAI AAN DIE WESKUS VAN SUID AFRIKA.

As 'n Geregistreerde Belanghebbende en Geaffekteerde Party (I&AP) vir die bogenoemde projek, word U verder ook in kennis gestel van die volgende geleentheid vir publieke deelname:

Beskrywing van gebeurtenis:	**Beskikbaarheid van konsep Basiese Assesseringsverslag (dBAR) vir publieke hersiening en kommentaar**
'n Harde kopie van die verslag kan besigtig word by:	Die Houtbaai Publieke Biblioteek (Melkhout Crescent, Houtbaai, Kaapstad, Weskaap)
	Die See Punt Publieke Biblioteek (Civic Centre, HV Three Anchor Bay en Main Straat, Seepunt, Kaapstad, Wes Kaap)
	Die Vredenburg Publieke Biblioteek (2 Academy Straat, (Naby West Coast College), Vredenburg, Wes Kus, Wes Kaap)
	Die Lambertsbaai Publieke Biblioteek (Kerkstraat, Lambertsbaai, Weskaap)
	Kamiesburg Plaaslike Biblioteek in Hondeklipbaai (Wag Weg straat)
	A. J Bekeur Biblioteek (Robson St, Port Nolloth, Richtersveld, Noordkaap)
'n Elektroniese sagte kopie:	'n Elektroniese kopiee van die verslag kan van die EIMS-webwerf afgelaai word: https://www.eims.co.za/public-participation/
Wanneer:	Kommentaar moet teen 25 November 2022 ingedien word

NB: Die elektroniese sagte kopie van die verslag sal vanaf 25 Oktober 2022 op die EIMS-webwerf beskikbaar wees. Neem asseblief kennis dat in die geval dat jy weens databeperkings nie toegang tot die verslag kan kry nie, kontak asseblief EIMS vir alternatiewe reëlings.

Alle hardekopie-dokumente sal vanaf 26 Oktober 2022 beskikbaar gestel word vir besigtiging by die verskillende lokale gelys in die tabel hierbo.

Openbare Vergaderings word soos volg geskeduleer gedurende die oorsigtydperk van die konsep BA-verslag:

Beskrywing van geleentheid:		**Openbare vergaderings**	
Waar en wanneer:	**Port Nolloth**	Port Nolloth Country Club	Maandag 31 Oktober 2022, 16:00-18:00

A 8 Dalmeny Road, Pine Park, Randburg | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | **F** (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | **F** (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Beskrywing van geleentheid:		Openbare vergaderings	
	Hondeklipbaai	Eric Baker Saal	Dinsdag, 1 November 2022, 16:00-18:00
	Lambertsbaai	Gemeenskapsaal	Woensdag, 2 November 2022, 16:00-18:00
	St Helena Baai	St Helena Baai Gemmenskapsaal Hoofweg	Donderdag, 3 November 2022, 10:00-12:00
	Saldanhabaai	Hoedjies Baai Hotel	Donderdag, 3 November 2022, 16:00-18:00
	Kaapstad	Life Church, 30 Hoofweg, Anchor Bay, Seepunt)	Vrydag, 4 November 2022, 16:00-18:00
	Houtbaai	Hout Bay Publieke Biblioteek	Saterdag, 5 November 2022, 10:00-12:00
	Viruele Vergardering	Microsoft Teams Vergadering Platform Virtuele Vergadering Registrasie Skakel	Donderdag, 10 November 2022, 15:00-17:00

Alle insette wat deur EIMS oor die dBAR ontvang word, sal ingesluit word in daaropvolgende voorleggings aan die bevoegde owerheid vir oorweging in hul besluitnemingsproses.

Stuur asseblief alle kommentaar of navrae per brief, faks, telefoonoproep of e-pos na die volgende kontakbesonderhede:

Kontakpersoon: Andisiwe Xuma

EIMS Verwysingsnommer: 1520

Posadres: Posbus 2083; Pinegowrie ; 2123

Telefoon: (011) 789 7170/ Faks: (086) 571 9047

E-pos: tgs@eims.co.za

Sluit asseblief die projekverwysingsnommer 1520 by alle korrespondensie in.

Vriendelike groete,

Andisiwe Xuma

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

24 October 2022

Inombolo yesalathisi yethu: 1520/GP/ax

Kulowo inokuthi ibhekise kuye,

Iqela labantu abaNomdla nabaChaphazelekayo:

ISAZISO MALUNGA NETHUBA LOKUTHATHA INXAXHEBA KWINKQUBO YOKUFAKA ISICELO SOGUNYAZISO LWEZENDALO KWI-PROJEKTHI KA-TGS YOHLOLO OLUSISEKO YOPHANDO LWE-SEISMIC ELIQWALASELA UKWAKHEKA KOMHLABA, KWI NXWEME LASENTSHONA YOMZANTSI AFRIKA, KUMMANDLA OMALUNGA NE-120 KM UKUSUKA KUNXWEME LWASE-ST HELENA BAY, INABE IGUDLE UMDA WONXWEME OLUSENTSHONA OMALUNGA NE-230 KM UKUSUKA ELUNXWEMENI LWASE-HONDEKLIP BAY.

Nje ngokuba ubhalisiwe kuluhlu labanomdla nabachaphezelekayo (I&AP) ku le-projekthi ingentla, uyaziswa ngama thuba angezantsi okuthatha inxaxheba ko luntu:

Inkcazelo yesiganeko:	**Ukufumaneka kweNgxelo eyiDrafti yoVavanyo olusiseko lwezeNdalo (Draft Basic Assessment Report - DBAR) ukuze iphononongwe luluntu lunikeze izimvo**
Iqweqwe lale ngxelo liyafumaneka kwezindawo zilandelayo	Kwithala lee ncwadi loluntu lase-Hout Bay (eMelkhout Crescent, Hout Bay, eKapa, eNtshona Koloni)
	Kwithala lee ncwadi loluntu lase-Sea Point (Civic Centre, Cnr Three Anchor Bay and Main roads, e-Sea Point, eKapa, eNtshona Koloni)
	Kwithala lee ncwadi loluntu lase-Vredenburg, (2 Academy Street, (kufuphi neKholeji yaseWest Coast), eVredenburg, kuNxweme oluseNtshona, eNtshona Koloni)
	Kwithala lee ncwadi loluntu lase-Lambert's Bay (Church Street, e-Lamberts Bay, eNtshona Koloni)
	Kamiesburg Local Municipality in Hondeklip Bay (Wag Way street)
	Kwithala leencwadi i-A. J Bekeur (Robson St, ePort Nolloth, Richtersveld, uMntla Koloni)
Ikopi ye-elektroniki:	Ingxelo yezendalo yohlolo olusiseko ingafumaneka ngokucofa kwi website ka EIMS: https://www.eims.co.za/public-participation/
Kude kube nini:	Uluntu lunganikeza amaxwebhu ezimvo kude kube yi 25 November 2022

QAPHELA: Ikopi ye-elektroniki yengxelo iya kufumaneka website ka EIMS ukususela ngomhla we 25 October 2022. Kucelwa uqaphele ukuba kwimeko apho ungakwazi ukufikelela kule ngxelo ngenxa yeengxaki zedatha, nceda uqhagamshelane ne-EIMS ukuze kwenziwe amanye amalungiselelo.

Onke amaqweqwe aprintiweyo ale ngxelo yezendalo aya kufumaneka ukuze ajongwe kwiindawo ngeendawo ezidwelisiweyo kule tafile ingentla ukususela ngomhla we26 October 2022.

A 8 Dalmeny Road, Pine Park, Randburg | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | **F** (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | **F** (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

IiNtlanganiso zoluntu zicwangcisiwe ngexesha lophononongo lwengxelo yeBA eyidrafti ngolu hlobo lulandelayo:

Inkcazelo yesiganeko	**Isaziso nge Ntlanganiso Zoluntu**		
Indawo neXesha	Port Nolloth	Port Nolloth Country Club	Ngo Mvulo, 31 October 2022, 16:00-18:00
	Hondeklip Bay	Eric Baker Hall	Ngo Lwesibini, 1 November 2022, 16:00-18:00
	Lamberts Bay	Community Hall	Ngo Lwesithathu, 2 November 2022, 16:00-18:00
	St Helena Bay	St Helena Bay Community Hall, Main Road	Ngo Lwesine, 3 November 2022, 10:00-12:00
	Saldanha Bay	Hoedjies Bay Hotel	Ngo Lwesine, 3 November 2022, 16:00-18:00
	Cape Town	Life Church, 30 Main Road, Anchor Bay, Seapoint)	Ngo Lwesihlanu, 4 November 2022, 16:00-18:00
	Hout Bay	Hout Bay Public Library	Ngo Mgqibelo, 5 November 2022, 10:00-12:00
	Intlanganiso yoluntu eyakubanjwa kiqonga lonxebelelwano i-Microsoft Teams	Ubhaliso lwe-ntlanganiso yoluntu eyakubanjwa kwiqonga lonxebelelwano lwe intanethi m (Virtual Meeting Registration Link)	Ngo Lwesine, 10 November 2022, 15:00-17:00

Zonke izimvo ezifunyenwe yi-EIMS kwi-dBAR ziya kubandakanywa kwiingeniso ezilandelayo kwiPetroleum Agency SA (PASA) ukuze ziqwalaselwe kwinkqubo yabo yokuthatha izigqibo.

Nceda ungenise zonke izimvo okanye imibuzo ngeleta, ifeksi, umnxeba okanye i-imeyile kwezi nkcukacha zoqhagamshelwano zilandelayo:

Umntu woQhakamshelwano: Andisiwe Xuma

Inombolo yesalathisi ye-EIMS: 1520

Idilesi Yeposi: PO Box 2083; Pinegowrie ; 2123

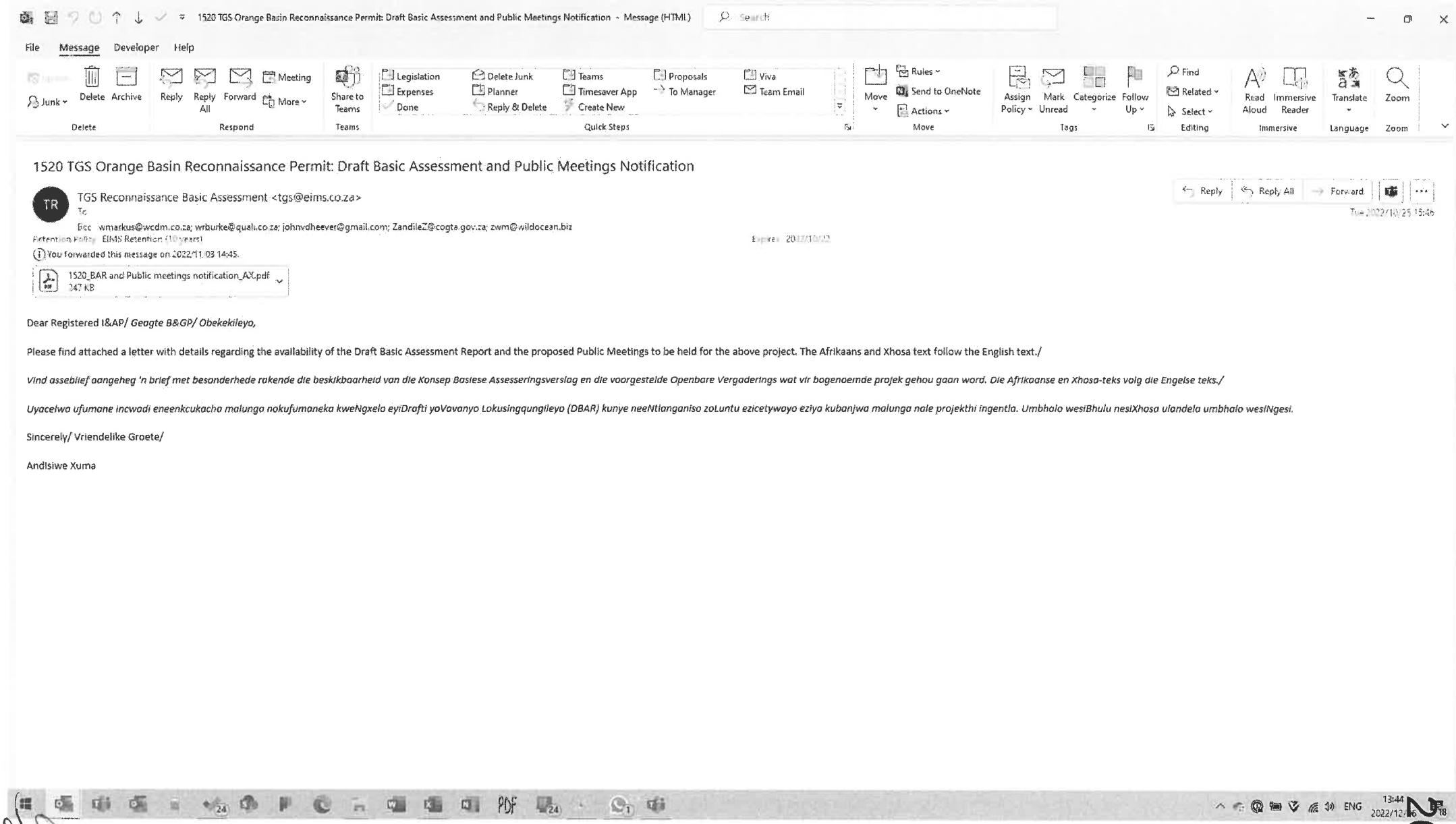
Umnxeba: (011) 789 7170/ Ifeksi: (086) 571 9047

I-imeyile: tgs@eims.co.za

Nceda ufake inombolo yesalathiso yeprojekthi engu-1520 kuyo yonke imbalelwano.

Ozithobileyo,

Andisiwe Xuma



1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)

File Message Developer Help

Junk Delete Archive | Reply Reply All Forward Meeting More | Share to Teams | Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email | Move Rules Send to OneNote Actions | Assign Policy Mark Unread Categorize Follow Up | Find Related Select | Read Aloud Immersive Reader | Translate | Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Bcc wmarkus@wcdm.co.za; wrburke@quali.co.za; johnvdheever@gmail.com; ZandileZ@cogta.gov.za; zwm@wildocean.biz

Retention Policy EIMS Retention (10 years) Expires 2032/10/22

You forwarded this message on 2022/11/03 14:45.

1520_BAR and Public meetings notification_AX.pdf 347 KB

Reply Reply All Forward

Tue 2022/10/25 15:46

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

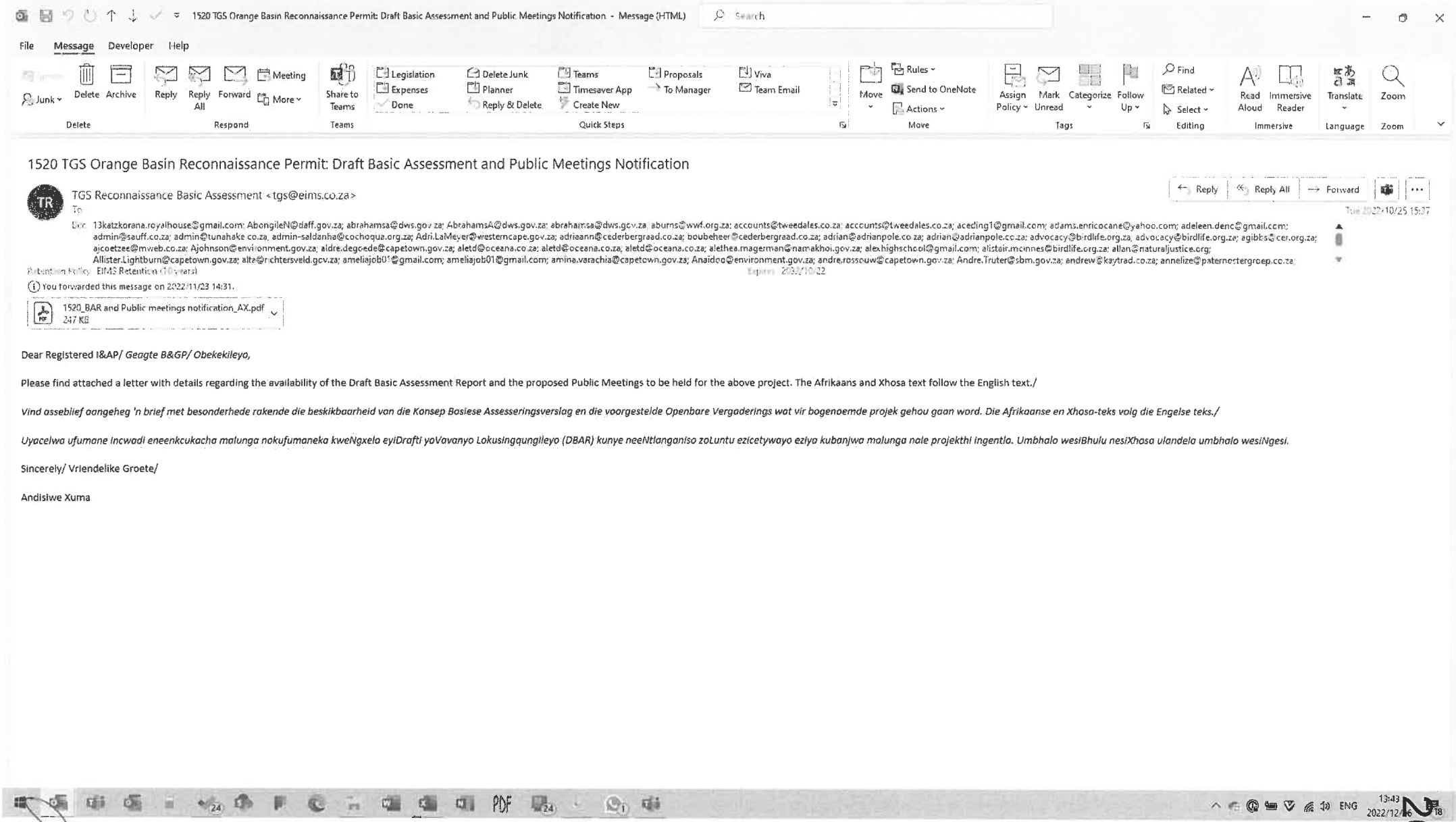
Uyacelwa ufumane incwadi eneenkcukacha malunga nokufumaneka kweNgxela eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.

Sincerely/ Vriendelike Groete/

Andisiwe Xuma

ENG 13:44 2022/12/06

2670



1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

TGS Reconnaissance Basic Assessment <tgs@eims.co.za>
To

Reply | Reply All | Forward

Tue 2022/10/25 15:37

Cc: 13katzkorana.royalhouse@gmail.com; AbongileN@daff.gov.za; abrahamsa@dws.gov.za; AbrahamsA@dws.gov.za; abrahamsa@dws.gov.za; aburns@wwf.org.za; accounts@tweedales.co.za; accounts@tweedales.co.za; aceding1@gmail.com; adams.enricocane@yahoo.com; adeleen.denc@gmail.com; admin@sauff.co.za; admin@tunahake co.za; admin-saldanha@cochoqua.org.za; Adri.LaMeyer@westerncape.gov.za; adriaann@cederbergraad.co.za; boubeheer@cederbergraad.co.za; adrian@adrianpole.co za; adrian@adrianpole.co.za; advocacy@birdlife.org.za; advocacy@birdlife.org.za; agibbs@cer.org.za; ajcoetzee@mweb.co.za; Ajohnson@environment.gov.za; aidre.degoede@capetown.gov.za; aletd@oceana.co.za; aletd@oceana.co.za; aletd@oceana.co.za; alethea.magerman@namakhoi.gov.za; alex.highschool@gmail.com; alistair.mcinnes@birdlife.org.za; allan@naturaljustice.org; Allister.Lightburn@capetown.gov.za; alta@richtersveld.gov.za; ameliajob01@gmail.com; ameliajob01@gmail.com; amina.varachia@capetown.gov.za; Anaidoo@environment.gov.za; andre.rosscouw@capetown.gov.za; Andre.Truter@sbm.gov.za; andrew@kaytrad.co.za; annelize@paternostergroep.co.za;

Retention Policy: EIMS Retention (10 years) Expires: 2032/10/22

You forwarded this message on 2022/11/23 14:31.

1520_BAR and Public meetings notification_AX.pdf
247 KB

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

Uyacelwa ufumane incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.

Sincerely/ Vriendelike Groete/

Andisiwe Xuma

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)

File Message Developer Help

Ignore Junk Delete Archive | Reply Reply All Forward Meeting More | Share to Teams | Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email | Move Rules Send to OneNote Actions | Assign Policy Mark Unread Categorize Follow Up | Find Related Select | Read Aloud Immersive Reader | Translate | Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

Reply Reply All Forward

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

Tue 2022/10/25 15:37

To

Bcc annettes@daff.gov.za; answa.delange@petrosa.co.za; Anthony.benadie@capetown.gov.za; Anton.Meyer@debeersgroup.com; antonio@tunacor.com.na; aqfishing@mweb.co.za; arainbow@mweb.co.za; ArnoM@nda.agric.za; amunro@environment.gov.za; arshad.dolan@oceana.co.za; Asanda.Tolbadi@sbm.gov.za; atmorerodgers123@gmail.com; aukotowafisheries@gmail.com; aukotowafisheries@gmail.com; awevorster@gmail.com; babdinor@cer.org.za; Bakkies52@gmail.com; BernacialM@daff.gov.za; bertiev70@gmail.com; bianca@comfish.co.za; bmtamzeli@csir.co.za; boating@telkomsa.net; bockana1963@gmail.com; bongam@nalitha.co.za; bonnies@ewt.org.za; booihs@gmail.com; boyadams1965@gmail.com; brendapieterson1967@gmail.com; brent.whittington@sanparks.org; bronwen.dtec@gmail.com; bslenkoe@ncpg.gov.za; busisiwe.magazi@dmr.gov.za; buyeung@telkomsa.net; bwilliams@sahra.org.za; c.gomes@smit.com; capetown@houtbay.gov.za; cardojaars187@gmail.com; carel@eigevis.com; carisasou22@gmail.com; carlavssr@gmail.com; carol-ann.mocke@angloamerican.com; cassandra@sdceango.co.za; cassi@icon.co.za; cattwood@mweb.co.za;

Retention Policy EIMS Retention (10 years) Expires 2032/10/22

You forwarded this message on 2022/11/23 14:31.

1520_BAR and Public meetings notification_AX.pdf
247 KB

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

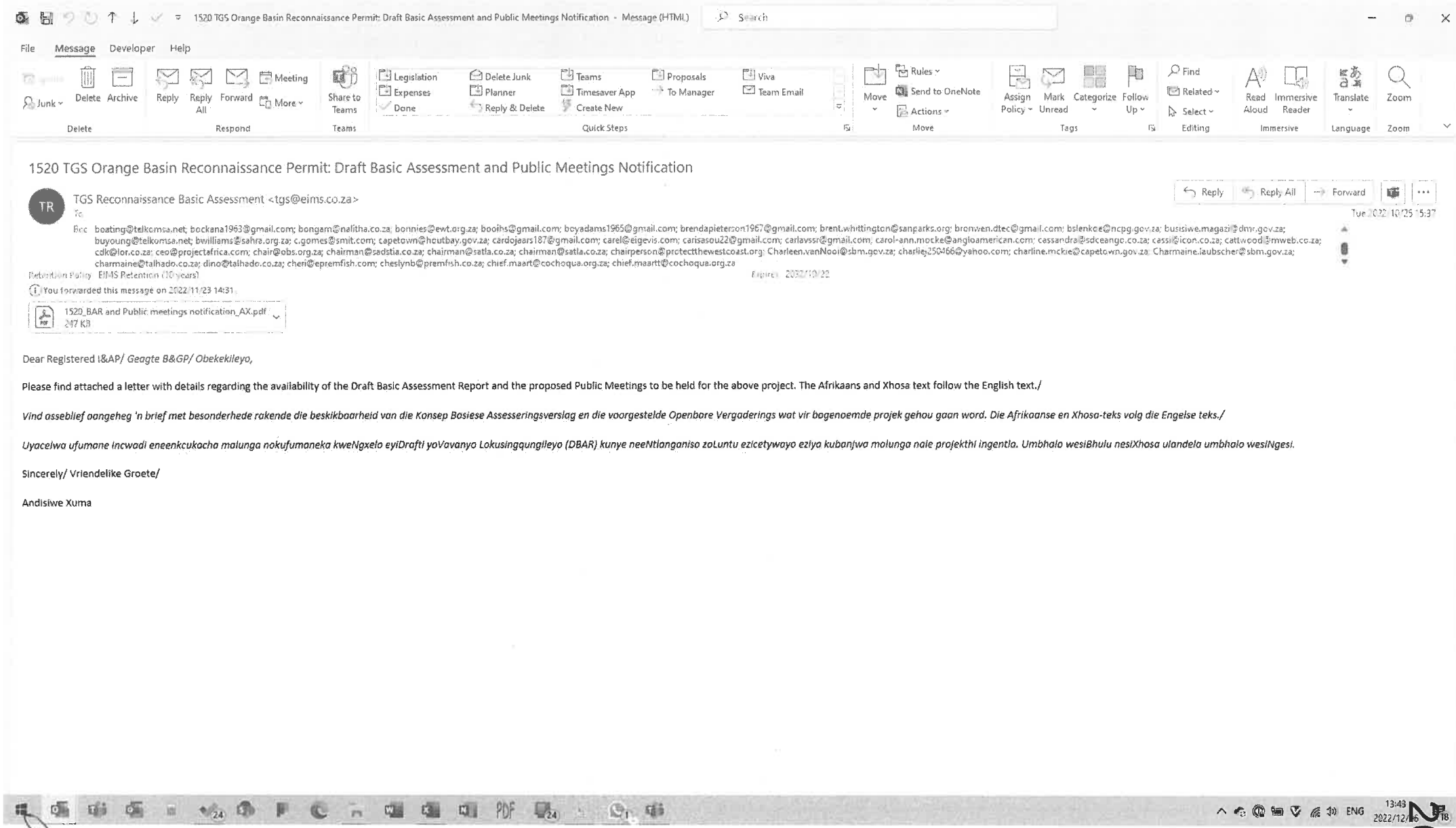
Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

Uyacelwa ufumene incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziyo kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.

Sincerely/ Vriendelike Groete/

Andisiwe Xuma



1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)

Search

File Message Developer Help

Junk Delete Archive | Reply Reply All Forward Meeting More | Share to Teams | Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email | Move Rules Send to OneNote Actions | Assign Policy Mark Unread Categorize Follow Up | Find Related Select | Read Aloud Immersive Reader | Translate | Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

TR

TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Reply Reply All Forward

Tue 2022/10/25 15:37

Bcc: boating@telkomsa.net; bockana1963@gmail.com; bongam@nalitha.co.za; bonnies@ewt.org.za; booihs@gmail.com; boyadams1965@gmail.com; brendapieterson1967@gmail.com; brent.whittington@sanparks.org; bronwen.dtec@gmail.com; bslenkce@ncpg.gov.za; busisiwe.magazi@dmr.gov.za; buyoung@telkomsa.net; bwilliams@sahra.org.za; c.gomes@smit.com; capetown@houtbay.gov.za; cardojaars187@gmail.com; carel@eigevis.com; carisasou22@gmail.com; carlavssr@gmail.com; carol-ann.mocke@angloamerican.com; cassandra@sdceange.co.za; cassi@icon.co.za; cattwood@mweb.co.za; cdk@lor.co.za; ceo@projectafrica.com; chair@obs.org.za; chairman@sadstia.co.za; chairman@satla.co.za; chairman@satla.co.za; chairperson@protectthewestcoast.org; Charleen.vanNooi@sbm.gov.za; charliej250466@yahoo.com; charline.mckie@capetown.gov.za; Charmaine.laubscher@sbm.gov.za; charmaine@talhado.co.za; dino@talhado.co.za; cheri@epremfish.com; cheslynb@premfish.co.za; chief.maart@cochoqua.org.za; chief.maartt@cochoqua.org.za

Retention Policy: EIMS Retention (10 years) Expires: 2032/10/22

You forwarded this message on 2022/11/23 14:31.

1520_BAR and Public meetings notification_AX.pdf
247 KB

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

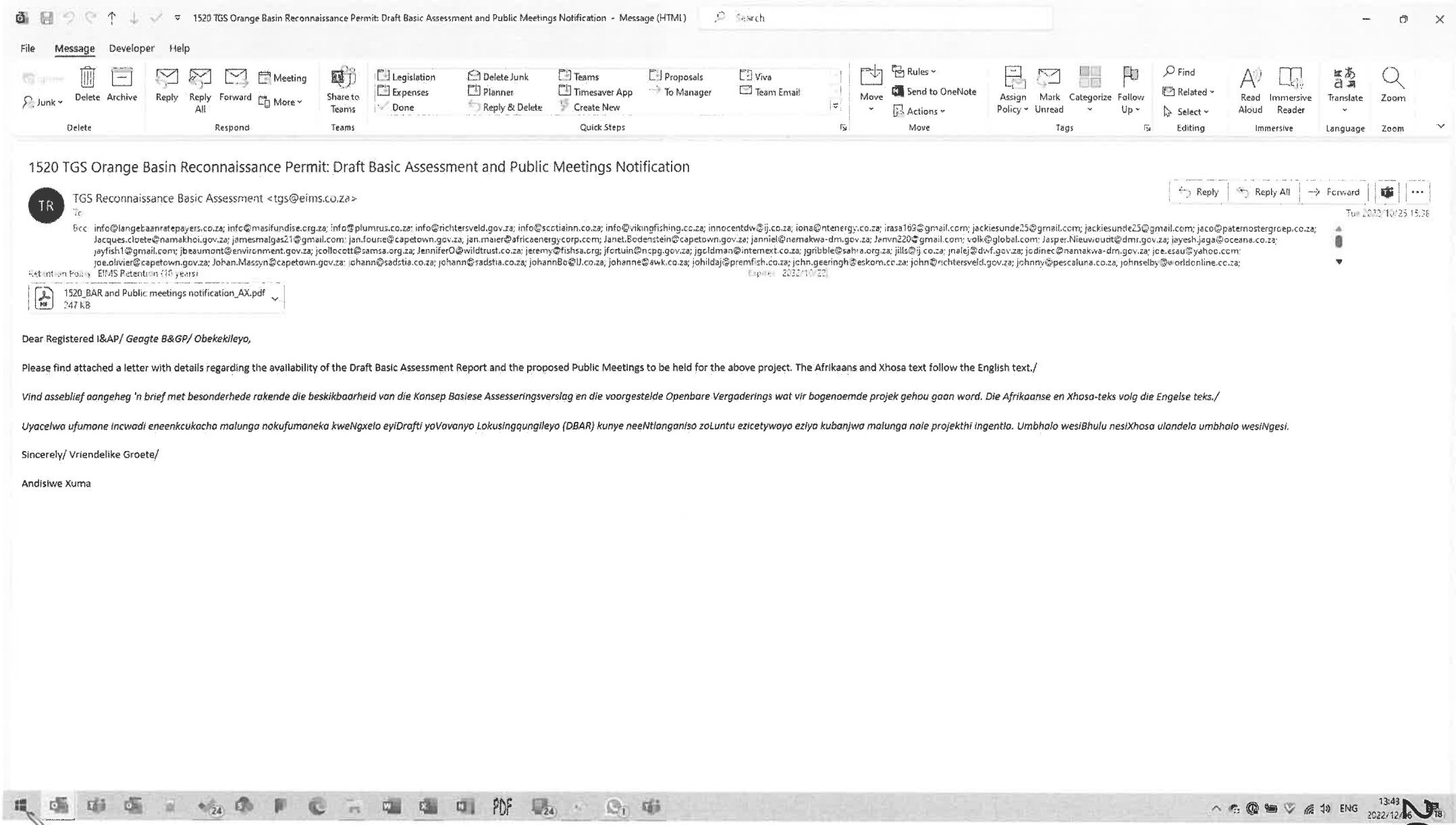
Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

Uyacelwa ufumane incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa molunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.

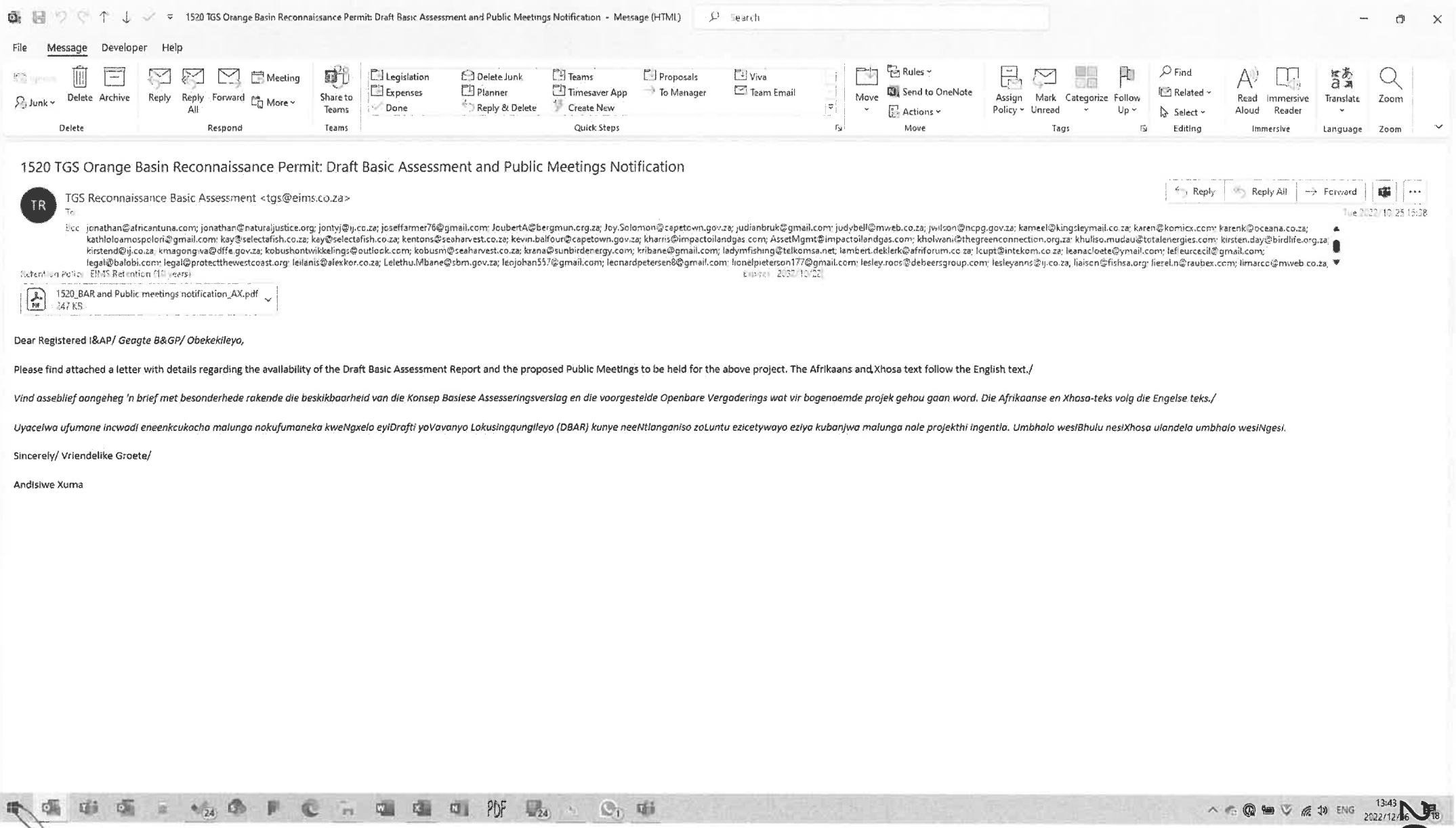
Sincerely/ Vriendelike Groete/

Andisiwe Xuma

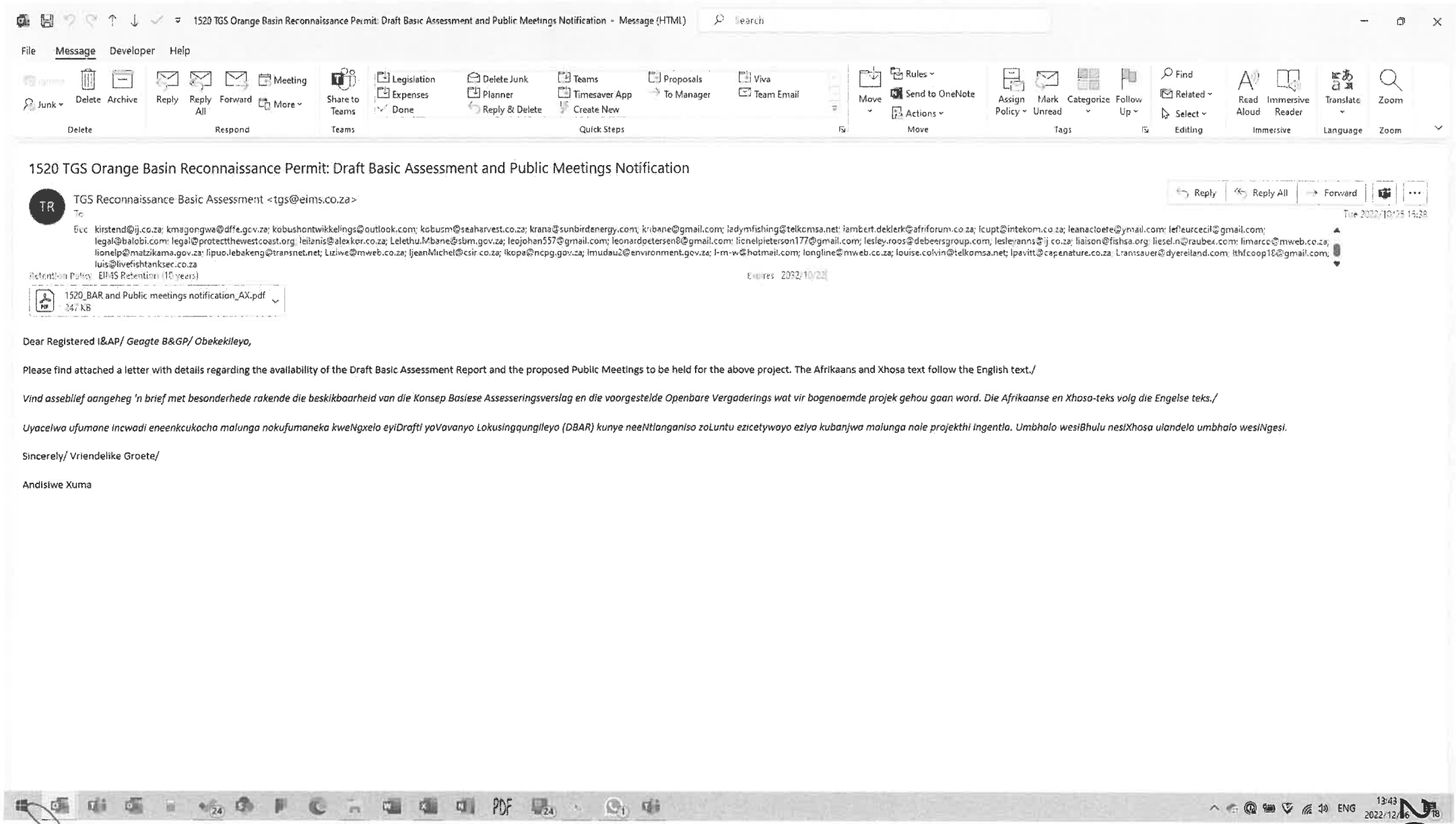
ENG 13:43 2022/12/06


1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)
Search
File
Message
Developer
Help
Junk
Delete
Archive
Reply
Reply All
Forward
Meeting
More
Share to Teams
Legislation
Expenses
Done
Delete Junk
Planner
Reply & Delete
Teams
Timesaver App
Create New
Proposals
To Manager
Viva
Team Email
Move
Rules
Send to OneNote
Actions
Assign Policy
Mark Unread
Categorize
Follow Up
Find
Related
Select
Read Aloud
Immersive Reader
Translate
Zoom
Delete
Respond
Teams
Quick Steps
Move
Tags
Editing
Immersive
Language
Zoom
1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification
TR
TGS Reconnaissance Basic Assessment <tgs@eims.co.za>
To
Reply
Reply All
Forward
Tue 2022/10/25 15:36
Bcc info@langebaanratepayers.co.za; info@masifundise.org.za; info@plumrus.co.za; info@richtersveld.gov.za; info@scotiainn.co.za; info@vikingfishing.co.za; innocentdw@ij.co.za; iona@ntenergy.co.za; irasa163@gmail.com; jackiesunde25@gmail.com; jackiesunde25@gmail.com; jaco@paternostergroep.co.za; Jacques.cloete@namakhoi.gov.za; jamesmalgas21@gmail.com; jan.fourie@capetown.gov.za; jan.maier@africaenergycorp.com; Janet.Bodenstein@capetown.gov.za; janniel@namakwa-dm.gov.za; Jenvn220@gmail.com; volk@global.com; Jasper.Nieuwoudt@dmr.gov.za; jayesh.jaga@oceana.co.za; jayfish1@gmail.com; jbeaumont@environment.gov.za; jcollocott@samsa.org.za; JenniferO@wildtrust.co.za; jeremy@fishsa.org; jfortuin@ncpg.gov.za; jgoldman@internext.co.za; jgribble@sahra.org.za; jills@ij.co.za; jnalej@dwf.gov.za; jodinec@namakwa-dm.gov.za; joe.esau@yahoo.com; joe.olivier@capetown.gov.za; Johan.Massyn@capetown.gov.za; johann@sadstia.co.za; johann@sadstia.co.za; johannBo@IJ.co.za; johanne@awk.co.za; johildaj@premfish.co.za; john.geeringh@eskom.co.za; john@richtersveld.gov.za; johnny@pescaluna.co.za; johnselby@worldonline.co.za;
Retention Policy EIMS Retention (10 years)
Expires 2032/10/23
1520_BAR and Public meetings notification_AX.pdf
247 kB
Dear Registered I&AP/ Geagte B&GP/ Obekekileyo,
Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./
Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./
Uyacelwa ufumone incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.
Sincerely/ Vriendelike Groete/
Andiswe Xuma
ENG
13:43
2022/12/16

2674


1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)
File
Message
Developer
Help
Junk
Delete
Archive
Reply
Reply All
Forward
Meeting
More
Share to Teams
Legislation
Expenses
Done
Delete Junk
Planner
Reply & Delete
Teams
Timesaver App
Create New
Proposals
To Manager
Viva
Team Email
Move
Rules
Send to OneNote
Actions
Assign Policy
Mark Unread
Categorize
Follow Up
Find
Related
Select
Read Aloud
Immersive Reader
Translate
Zoom
Delete
Respond
Teams
Quick Steps
Move
Tags
Editing
Immersive
Language
Zoom
1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification
TR
TGS Reconnaissance Basic Assessment <tgs@eims.co.za>
To
Reply
Reply All
Forward
Tue 2022/10/25 15:08
Bcc jonathan@africantuna.com; jonathan@naturaljustice.org; jontyj@ij.co.za; joseffarmer76@gmail.com; JoubertA@bergmun.org.za; Joy.Solomon@capetown.gov.za; judianbruk@gmail.com; judybell@mweb.co.za; jwilson@ncpg.gov.za; kameel@kingsleymail.co.za; karen@komicx.com; karenk@oceana.co.za; kathloloamospolori@gmail.com; kay@selectafish.co.za; kay@selectafish.co.za; kentons@seaharvest.co.za; kevin.balfour@capetown.gov.za; kharris@impactoilandgas.com; AssetMgmt@impactoilandgas.com; kholwani@thegreenconnection.org.za; khuliso.mudau@totalenergies.com; kirsten.day@birdlife.org.za; kirstend@ij.co.za; kmagongwa@dffe.gov.za; kobushontwikkelings@outlook.com; kobusm@seaharvest.co.za; krana@sunbirdenergy.com; kribane@gmail.com; ladymfishing@telkomsa.net; lambert.deklerk@afriforum.co.za; lcupt@intekom.co.za; leanacloete@ymail.com; lefeurcecil@gmail.com; legal@balobi.com; legal@protectthewestcoast.org; leilanis@alexkor.co.za; Lelethu.Mbane@sbm.gov.za; leojohan557@gmail.com; leonardpetersen8@gmail.com; lionelpieterson177@gmail.com; lesley.roos@debeersgroup.com; lesleyanns@ij.co.za; liaison@fishsa.org; liesel.n@raubex.com; limarco@mweb.co.za;
Retention Policy EIMS Retention (10 years)
Expires 2032/10/22
1520_BAR and Public meetings notification_AX.pdf
247 KB
Dear Registered I&AP/ Geagte B&GP/ Obekekileyo,
Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./
Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./
Uyacelwa ufumone incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.
Sincerely/ Vriendelike Groete/
Andisiwe Xuma
ENG
13:43
2022/12/06

2675



1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)

File Message Developer Help

Delete Archive Reply Reply All Forward Meeting More Share to Teams Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email Move Rules Send to OneNote Actions Assign Policy Mark Unread Categorize Follow Up Find Related Select Read Aloud Immersive Reader Translate Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Reply Reply All Forward Tue 2022/10/25 15:38

Bcc kirstend@ij.co.za; kmagongwa@dffe.gov.za; kobushontwikkelings@outlook.com; kobusm@seaharvest.co.za; krana@sunbirdenergy.com; kribane@gmail.com; ladymfishing@telkomsa.net; lambert.deklerk@afriforum.co.za; lcupt@intekom.co.za; leanacloete@ymail.com; lefleurcecil@gmail.com; legal@balobi.com; legal@protectthewestcoast.org; leitanis@alexkor.co.za; Lelethu.Mbane@sbm.gov.za; leojohan557@gmail.com; leonardpetersen8@gmail.com; licnelpieterson177@gmail.com; lesley.roos@debeersgroup.com; lesleyanns@ij.co.za; liaison@fishsa.org; liesel.n@raubex.com; limarcc@mweb.co.za; lionelp@matzikama.gov.za; lipuo.lebakeng@transnet.net; Liziwe@mweb.co.za; ljeanMichel@csir.co.za; lkopa@ncpg.gov.za; lmudau2@environment.gov.za; l-m-w@hotmail.com; longline@mweb.co.za; louise.colvin@telkomsa.net; lpavitt@capenature.co.za; Lramsauer@dyereiland.com; lthfcoop18@gmail.com; luis@livefishtanksec.co.za

Retention Policy: EIMS Retention (10 years) Expires: 2032/10/22

1520_BAR and Public meetings notification_AX.pdf 347 KB

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

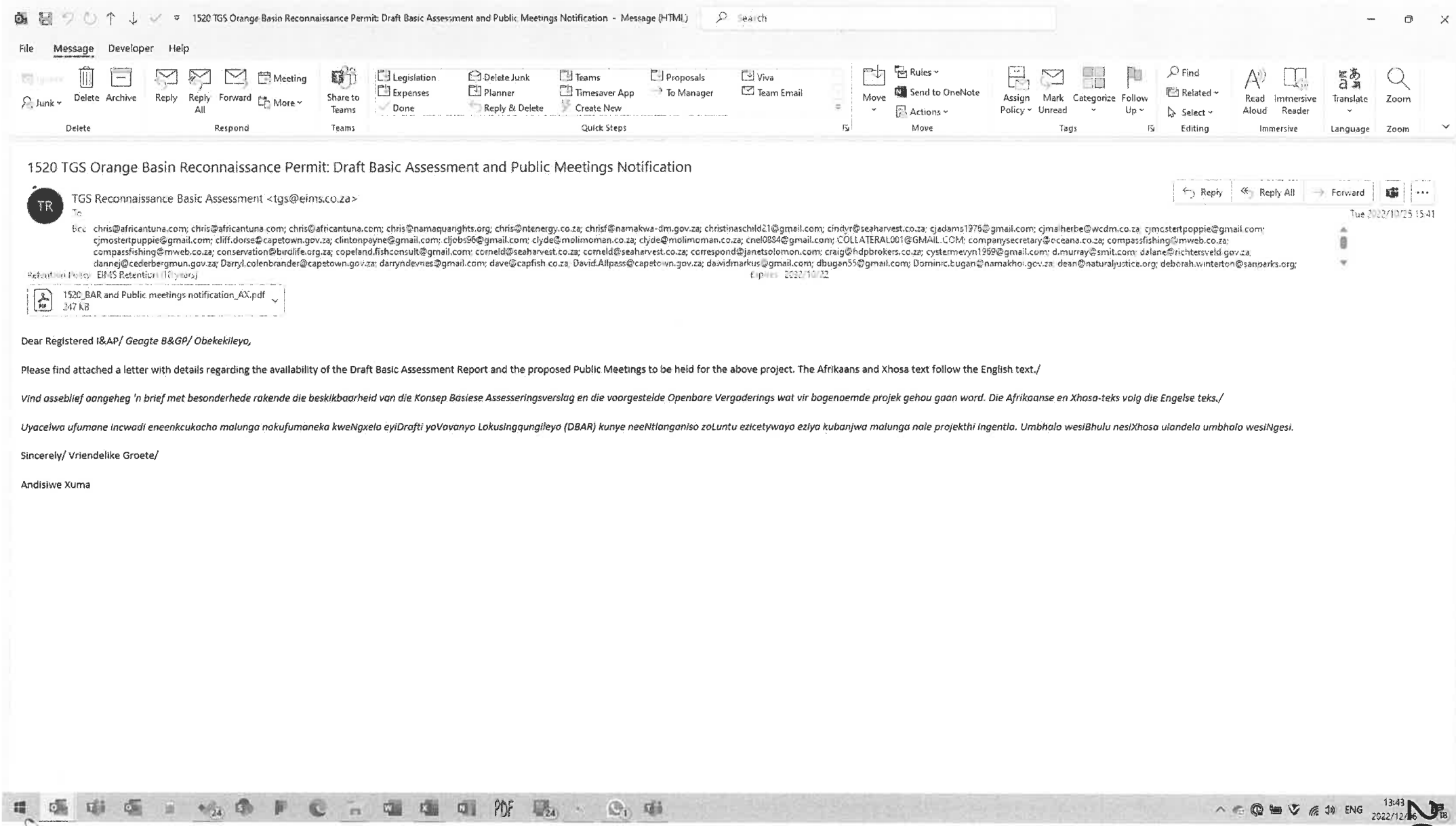
Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

Uyacelwa ufumane incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.

Sincerely/ Vriendelike Groete/

Andisiwe Xuma



1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)

File Message Developer Help

Junk Delete Archive Reply Reply All Forward Meeting More Share to Teams Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email Move Rules Send to OneNote Actions Assign Policy Mark Unread Categorize Follow Up Find Related Select Read Aloud Immersive Reader Translate Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Reply Reply All Forward

Tue 2022/10/25 15:41

Bcc chris@africantuna.com; chris@africantuna com; chris@africantuna.com; chris@namaquarights.org; chris@ntenergy.co.za; chrisf@namakwa-dm.gov.za; christinaschild21@gmail.com; cindyr@seaharvest.co.za; cjadams1976@gmail.com; cjmalherbe@wcdm.co.za; cjmcstertpoppie@gmail.com; cjmostertpuppie@gmail.com; cliff.dorse@capetown.gov.za; clintonpayne@gmail.com; cljobs96@gmail.com; clyde@molimoman.co.za; clyde@molimoman.co.za; cnel0884@gmail.com; COLLATERAL001@GMAIL.COM; companysecretary@oceana.co.za; compassfishing@mweb.co.za; compassfishing@mweb.co.za; conservation@birdlife.org.za; copeland.fishconsult@gmail.com; corneld@seaharvest.co.za; corneld@seaharvest.co.za; correspond@janetsolomon.com; craig@hdpbrokers.co.za; cystermevyn1969@gmail.com; d.murray@smit.com; dalane@richtersveld.gov.za; dannej@cederbergmun.gov.za; Darryl.colenbrander@capetown.gov.za; darryndevnes@gmail.com; dave@capfish co.za; David.Allpass@capetown.gov.za; davidmarkus@gmail.com; dbugan55@gmail.com; Dominic.bugan@namakhoi.gov.za; dean@naturaljustice.org; deborah.winterton@sanparks.org;

Retention Policy EIMS Retention (10 years)

Expires 2032/10/22

1520_BAR and Public meetings notification_AX.pdf
347 kB

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

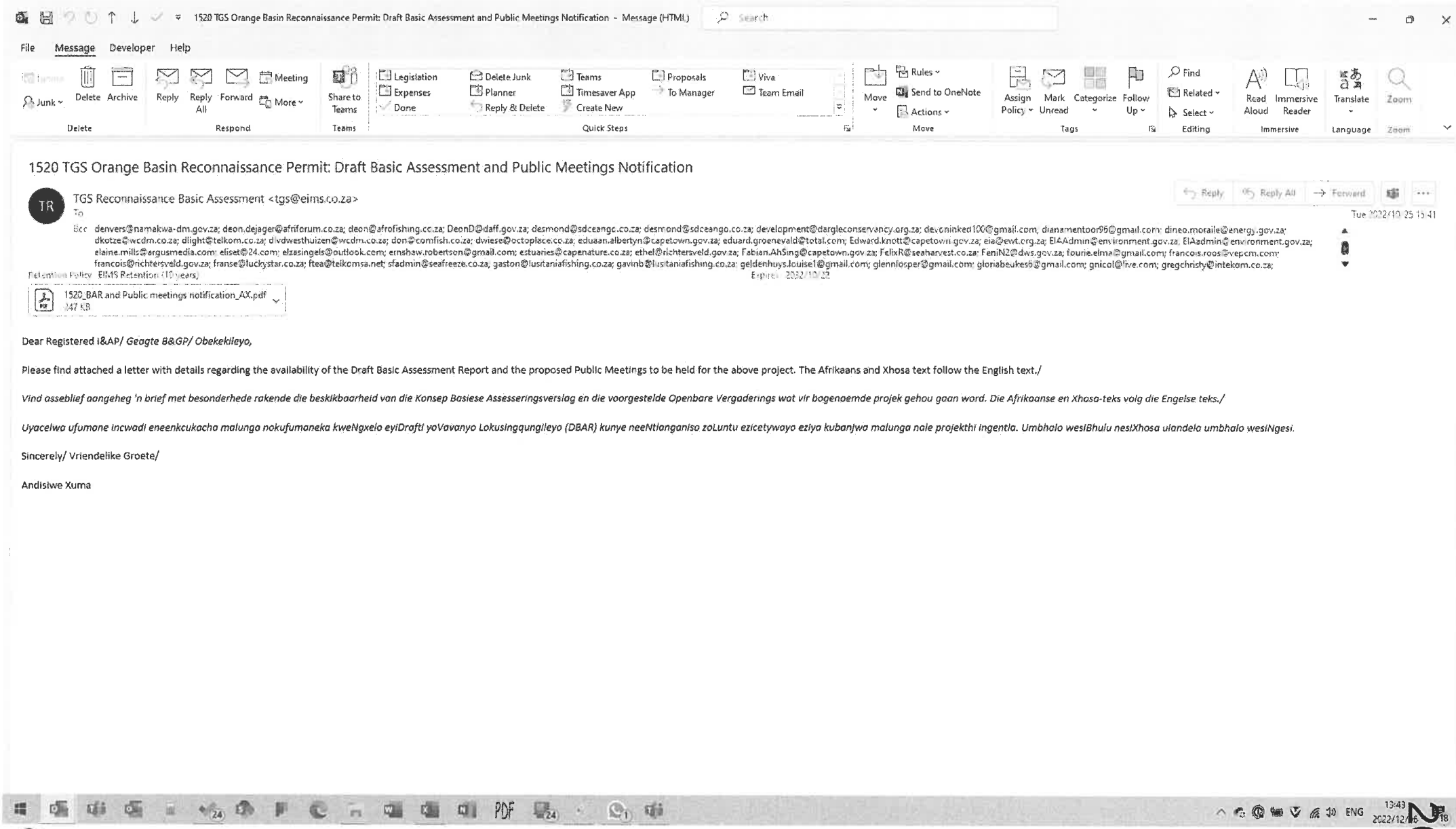
Uyacelwa ufumene incwadi eneenkcukacho malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo ezlyo kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandelo umbhalo wesiNgesi.

Sincerely/ Vriendelike Groete/

Andisiwe Xuma

ENG 13:43 2022/12/06

2677



1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)

File Message Developer Help

Junk Delete Archive Reply Reply All Forward Meeting More Share to Teams Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email Move Rules Send to OneNote Actions Assign Policy Mark Unread Categorize Follow Up Find Related Select Read Aloud Immersive Reader Translate Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

TR **TGS Reconnaissance Basic Assessment <tgs@eims.co.za>**

To

Reply Reply All Forward

Tue 2022/10/25 15:41

Bcc denvers@namakwa-dm.gov.za; deon.dejager@afriforum.co.za; deon@afrofishing.co.za; DeonD@daff.gov.za; desmond@sdceange.co.za; desmond@sdceango.co.za; development@dargleconservancy.org.za; devoninked100@gmail.com; dianamentoor96@gmail.com; dineo.moraile@energy.gov.za; dkotze@wcdm.co.za; dlight@telkom.co.za; dlvdwesthuizen@wcdm.co.za; don@comfish.co.za; dwiese@octoplace.co.za; eduaan.albertyn@capetown.gov.za; eduard.groenevald@total.com; Edward.knott@capetown.gov.za; eia@ewt.org.za; EIAdmin@environment.gov.za; EIAadmin@environment.gov.za; elaine.mills@argusmedia.com; eliset@24.com; elzasingels@outlook.com; emshaw.robertson@gmail.com; estuaries@capenature.co.za; ethel@richtersveld.gov.za; Fabian.AhSing@capetown.gov.za; FelixR@seaharvest.co.za; FeniN2@dws.gov.za; fourie.elma@gmail.com; francois.roos@vepcm.com; francois@richtersveld.gov.za; franse@luckystar.co.za; ftea@telkomsa.net; sfadmin@seafreeze.co.za; gaston@lusitaniafishing.co.za; gavinb@lusitaniafishing.co.za; geldenhuys.louise1@gmail.com; glennfosper@gmail.com; gloriabeukes8@gmail.com; gnicol@live.com; gregchristy@intekom.co.za;

Retention Policy: EIMS Retention (10 years) Expires: 2032/10/23

1520_BAR and Public meetings notification_AX.pdf 347 KB

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

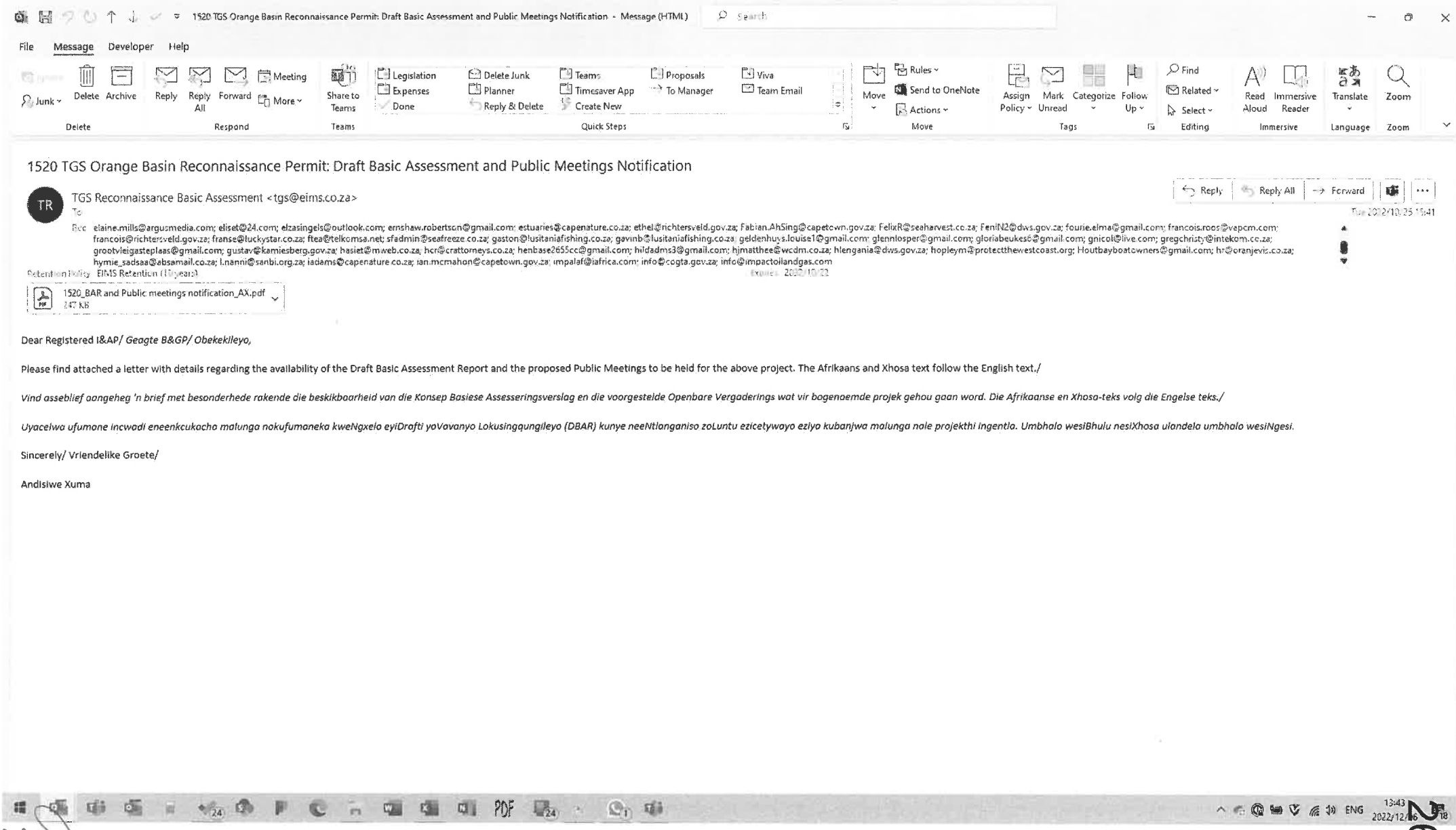
Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

Uyacelwa ufumone incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.

Sincerely/ Vriendelike Groete/

Andisiwe Xuma



1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)

File Message Developer Help

Junk Delete Archive Reply Reply All Forward Meeting More Share to Teams Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email Move Rules Send to OneNote Actions Assign Policy Mark Unread Categorize Follow Up Find Related Select Read Aloud Immersive Reader Translate Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Reply Reply All Forward

Tue 2022/10/25 15:41

Bcc elaine.mills@argusmedia.com; eliset@24.com; elzasingels@outlook.com; emshaw.robertson@gmail.com; estuaries@capenature.co.za; ethel@richtersveld.gov.za; Fabian.AhSing@capetown.gov.za; FelixR@seaharvest.co.za; FeniN2@dws.gov.za; fourie.elma@gmail.com; francois.roos@vepcm.com; francois@richtersveld.gov.za; franse@luckystar.co.za; ftea@telkomsa.net; sfadmin@seafreeze.co.za; gaston@lusitaniafishing.co.za; gavinb@lusitaniafishing.co.za; geldenhuys.louise1@gmail.com; glennlosper@gmail.com; gloriabeukes6@gmail.com; gnicol@live.com; gregchristy@intekom.co.za; grootvleigasteplaas@gmail.com; gustav@kamiesberg.gov.za; hasiet@mweb.co.za; hcr@crattorneys.co.za; henbase2655cc@gmail.com; hildadms3@gmail.com; hjmatthee@wcdm.co.za; hlengania@dws.gov.za; hopleym@protectthewestcoast.org; Houtbayboatowners@gmail.com; hr@oranjevis.co.za; hymie_sadsaa@absamail.co.za; i.nanni@sanbi.org.za; iadams@capenature.co.za; ian.mcmahon@capetown.gov.za; impalaf@iafrica.com; info@cogta.gov.za; info@impactoilandgas.com

Retention Policy EIMS Retention (10 years) Expires 2032/10/23

1520_BAR and Public meetings notification_AX.pdf 247 KB

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

Uyacelwa ufumene incwadi eneenkcukacho malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziyo kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.

Sincerely/ Vriendelike Groete/

Andisiwe Xuma

ENG 13:43 2022/12/06

2679

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)

File Message Developer Help

Junk Delete Archive | Reply Reply All Forward Meeting More | Share to Teams | Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email | Move Rules Send to OneNote Actions | Assign Policy Mark Unread Categorize Follow Up | Find Related Select | Read Aloud Immersive Reader | Translate | Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

TR **TGS Reconnaissance Basic Assessment <tgs@eims.co.za>**

To

Reply Reply All Forward

Tue 2022/10/25 15:44

Cc luzonne@richtersveld.gov.za; lwazi.maze@gmail.com; lydiab@daff.gov.za; lynweth@polka.co.za; m.mokoncto@sanbi.org.za; m.vanderbank@sanbi.org.za; MadodaK@SeaHarvest.co.za; Magdalena.VanZyl@capetown.gov.za; magobiyane.kulukazi@gmail.com; mahunonyanem@dwa.gov.za; maia@masifundise.org.za; manetrade@telkomsa.net; mapaseka.lukhele@transnet.net; maraisk@swartland.org.za; marcus@afriforum.co.za; mariapapier7@gmail.com; marilyn@rsaweb.co.za; marinemanager@balobi.com; Marius.Hermanus@sbm.gov.za; marius.rademeyer@sigmacoatings.co.za; mark.brodovcky@capetown.gov.za; mark@balobi.com; mark@mcleods.co.za; mark@mcleods.co.za; Marlene.Laros@westerncape.gov.za; marthin.potgieter@luckystar.co.za; martin.taylor@birdlife.org.za; martinette@richtersveld.gov.za; martsternlaw@mweb.co.za; matzikamacollab@phoenixmail.co.za; mayor@wcdm.co.za; mbanga777@gmail.com; md@protectthewestcoast.org; mdofishing@hotmail.com; meissenheimer.ernst@gmail.com; melissa@naturaljustice.org; melissaesau321@gmail.com; Merle.Sowman@uct.ac.za; mfishing@mweb.co.za; michael.bin2bin@telkomsa.net;

Retention Policy FIMS Retention (10 years) Expires 2023/10/22

1520_BAR and Public meetings notification_AX.pdf
247 KB

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

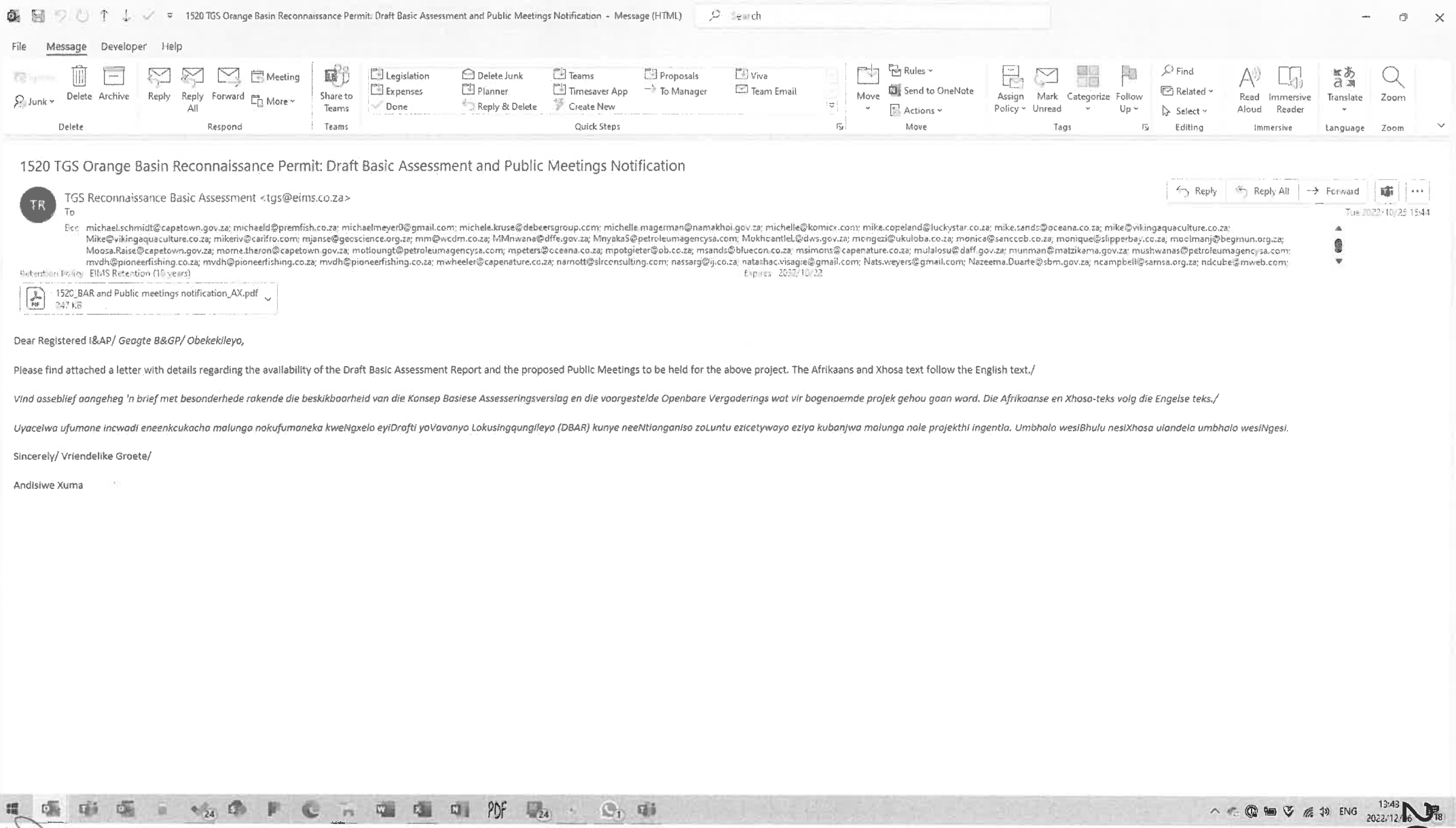
Uyacelwa ufumane incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziyo kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.

Sincerely/ Vriendelike Groete/

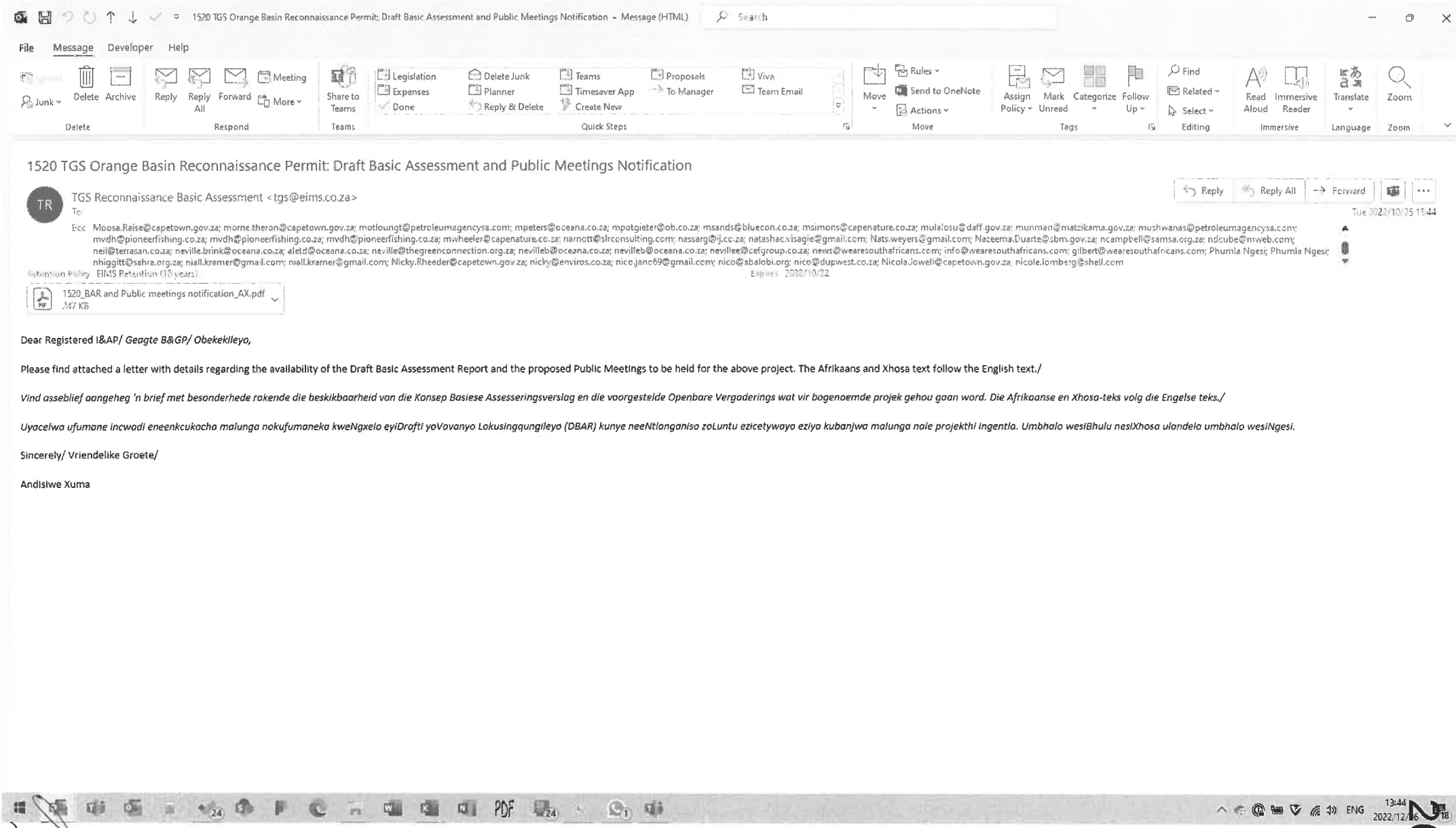
Andiswe Xuma

ENG 13:43 2022/12/06

2680


1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)
File Message Developer Help
Junk Delete Archive Reply Reply All Forward Meeting More Share to Teams
Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email
Move Rules Send to OneNote Actions Assign Policy Mark Unread Categorize Follow Up Find Related Select Read Aloud Immersive Reader Translate Zoom
Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom
1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification
TR
TGS Reconnaissance Basic Assessment <tgs@eims.co.za>
To
Reply Reply All Forward
Tue 2022-10-25 15:44
Bcc michael.schmidt@capetown.gov.za; michaeld@premfish.co.za; michaelmeyer0@gmail.com; michele.kruse@debeersgroup.com; michelle.magerman@namakhoi.gov.za; michelle@komicx.com; mike.copeland@luckystar.co.za; mike.sands@oceana.co.za; mike@vikingaquaculture.co.za; Mike@vikingaquaculture.co.za; mikeriv@carifro.com; mjanse@geoscience.org.za; mm@wcdm.co.za; MMnwana@dffe.gov.za; MnyakaS@petroleumagencysa.com; MokhcantleL@dws.gov.za; mongezi@ukuloba.co.za; monica@senccob.co.za; monique@slipperbay.co.za; moolmanj@begmun.org.za; Moosa.Raise@capetown.gov.za; morne.theron@capetown.gov.za; motloungt@petroleumagencysa.com; mpeters@oceana.co.za; mpotgieter@ob.co.za; msands@bluecon.co.za; msimons@capenature.co.za; mulalosu@daff.gov.za; munman@matzikama.gov.za; mushwanas@petroleumagencysa.com; mvdh@pioneerfishing.co.za; mvdh@pioneerfishing.co.za; mvdh@pioneerfishing.co.za; mwheeler@capenature.co.za; narnott@slrconsulting.com; nassarg@ij.co.za; natashac.visagie@gmail.com; Nats.weyers@gmail.com; Nazeema.Duarte@sbm.gov.za; ncampbell@samsa.org.za; ndcube@mweb.com;
Retention Policy EIMS Retention (10 years)
Expires 2032/10/22
1520_BAR and Public meetings notification_AX.pdf
247 KB
Dear Registered I&AP/ Geagte B&GP/ Obekekileyo,
Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./
Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./
Uyacelwa ufumone incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.
Sincerely/ Vriendelike Groete/
Andisiwe Xuma
ENG 13:43 2022/12/06

2681



1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)

File Message Developer Help

Junk Delete Archive | Reply Reply All Forward Meeting More | Share to Teams | Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email | Move Rules Send to OneNote Actions | Assign Policy Mark Unread Categorize Follow Up | Find Related Select | Read Aloud Immersive Reader | Translate | Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Reply Reply All Forward

Tue 2022/10/25 15:44

Bcc Moose.Raise@capetown.gov.za; morne.theron@capetown.gov.za; motloungt@petroleumagencysa.com; mpeters@oceana.co.za; mpotgieter@ob.co.za; msands@bluecon.co.za; msimons@capenature.co.za; mulalosu@daff.gov.za; munman@matzikama.gov.za; mushwanas@petroleumagencysa.com; mvdh@pioneerfishing.co.za; mvdh@pioneerfishing.co.za; mvdh@pioneerfishing.co.za; mwheeler@capenature.co.za; narnott@slrconsulting.com; nassarg@ij.co.za; natashac.visagie@gmail.com; Nats.weyers@gmail.com; Nazeema.Duarte@sbm.gov.za; ncampbell@samsa.org.za; ndcube@mweb.com; neil@terrasan.co.za; neville.brink@oceana.co.za; aletd@oceana.co.za; neville@thegreenconnection.org.za; nevilleb@oceana.co.za; nevilleb@oceana.co.za; nevillee@cefgroup.co.za; news@wearesouthafricans.com; info@wearesouthafricans.com; gilbert@wearesouthafricans.com; Phumla Ngesi; Phumla Ngesi; nhiggitt@sahra.org.za; niall.kramer@gmail.com; niall.kramer@gmail.com; Nicky.Rheeder@capetown.gov.za; nicky@enviros.co.za; nico.janc69@gmail.com; nico@abalobi.org; nico@dupwest.co.za; Nicola.Jowell@capetown.gov.za; nicole.lomberg@shell.com

Retention Policy EIMS Retention (10 years) Expires 2032/10/22

1520_BAR and Public meetings notification_AX.pdf 347 KB

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

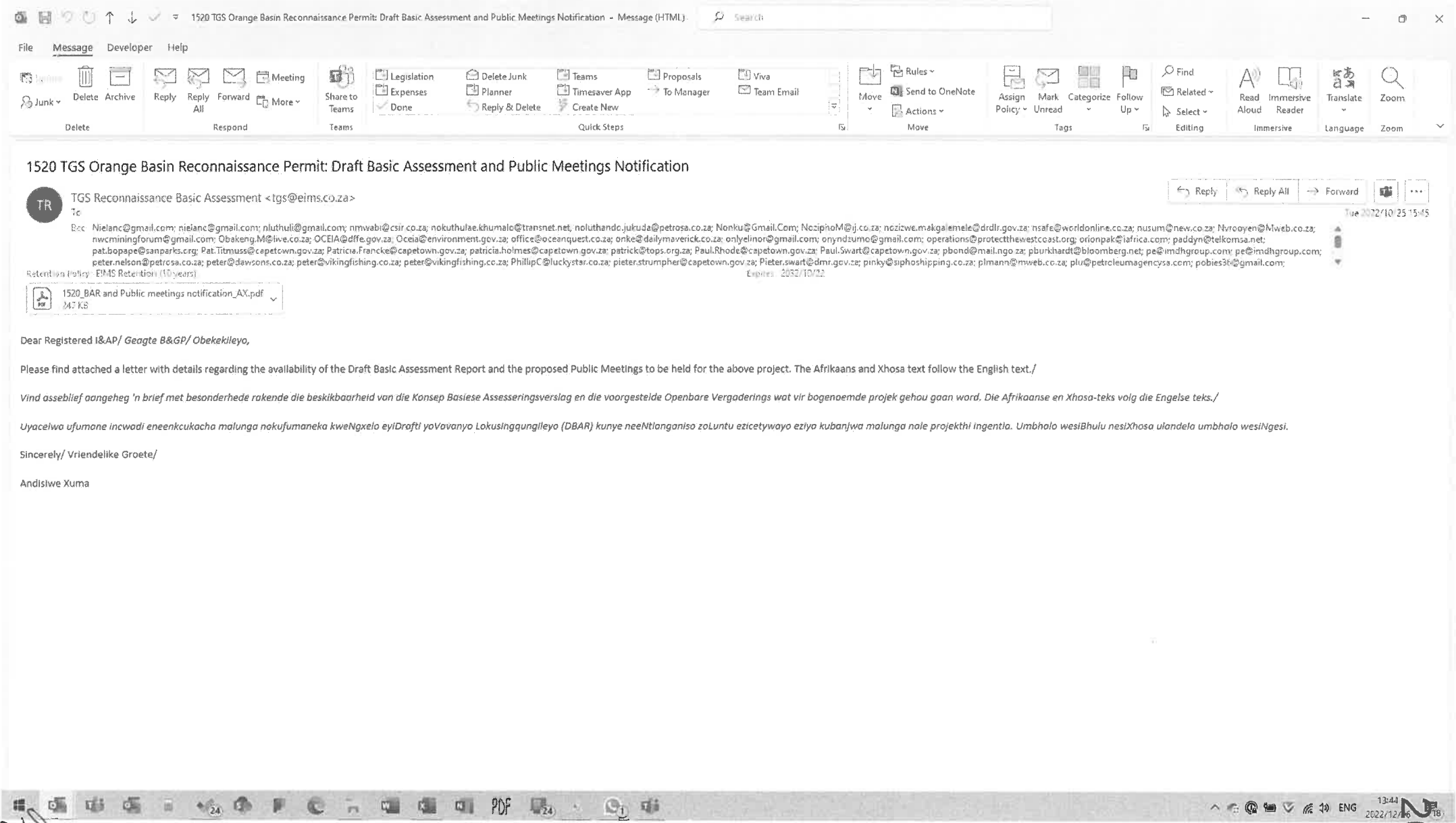
Uyacelwa ufumane incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.

Sincerely/ Vriendelike Groete/

Andisiwe Xuma

ENG 13:44 2022/12/06

2682



1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)

File Message Developer Help

Junk Delete Archive | Reply Reply All Forward Meeting More | Share to Teams | Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email | Move Rules Send to OneNote Actions | Assign Policy Mark Unread Categorize Follow Up | Find Related Select | Read Aloud Immersive Reader | Translate | Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Reply Reply All Forward

Tue 2022/10/25 15:45

Bcc: Nielanc@gmail.com; nielanc@gmail.com; nluthuli@gmail.com; nmwabi@csir.co.za; nokuthulae.khumalo@transnet.net; noluthando.jukuda@petrosa.co.za; Nonku@Gmail.Com; NoziphoM@ij.co.za; nozizwe.makgalemele@drdlr.gov.za; nsafe@worldonline.co.za; nusum@new.co.za; Nvrooyen@Mweb.co.za; nwcminingforum@gmail.com; Obakeng.M@live.co.za; OCEIA@dffe.gov.za; Oceia@environment.gov.za; office@oceanquest.co.za; onke@dailymaverick.co.za; onlyelinor@gmail.com; onyndzumo@gmail.com; operations@protectthewestcoast.org; orionpak@iafrica.com; paddyn@telkomsa.net; pat.bopape@sanparks.org; Pat.Titmuss@capetown.gov.za; Patricia.Francke@capetown.gov.za; patricia.holmes@capetown.gov.za; patrick@tops.org.za; Paul.Rhode@capetown.gov.za; Paul.Swart@capetown.gov.za; pbond@mail.ngo.za; pburkhardt@bloomberg.net; pe@imdhgroup.com; pe@imdhgroup.com; peter.nelson@petrosa.co.za; peter@dawsons.co.za; peter@vikingfishing.co.za; peter@vikingfishing.co.za; PhillipC@luckystar.co.za; pieter.strumpher@capetown.gov.za; Pieter.swart@dmr.gov.za; pinky@siphoshipping.co.za; plmann@mweb.co.za; plu@petroleumagencysa.com; pobies3t@gmail.com;

Retention Policy: EIMS Retention (10 years) Expires: 2032/10/22

1520_BAR and Public meetings notification_AX.pdf 247 KB

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

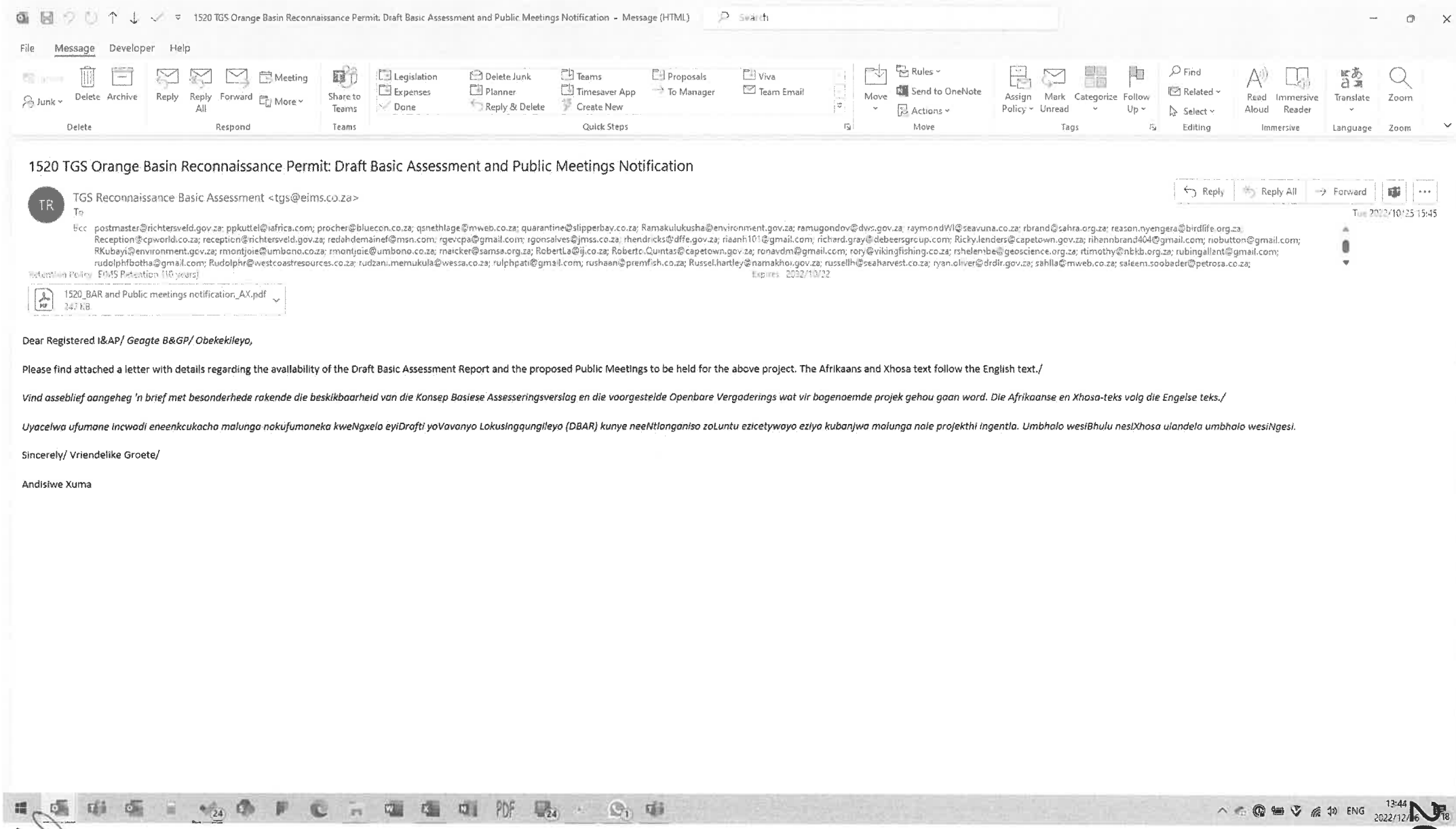
Uyacelwa ufumene incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandelo umbhalo wesiNgesi.

Sincerely/ Vriendelike Groete/

Andisiwe Xuma

ENG 13:44 2022/12/06

2683



1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)

File Message Developer Help

Junk Delete Archive | Reply Reply All Forward Meeting More | Share to Teams | Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email | Move Rules Send to OneNote Actions | Assign Policy Mark Unread Categorize Follow Up | Find Related Select | Read Aloud Immersive Reader | Translate | Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Reply Reply All Forward

Tue 2022/10/25 15:45

Bcc postmaster@richtersveld.gov.za; ppkuttel@iafrica.com; procher@bluecon.co.za; qsnethlage@mweb.co.za; quarantine@slipperbay.co.za; Ramakulukusha@environment.gov.za; ramugondov@dws.gov.za; raymondWI@seavuna.co.za; rbrand@sahra.org.za; reason.nyengera@birdlife.org.za; Reception@cpworld.co.za; reception@richtersveld.gov.za; redahdemainef@msn.com; rgevcpa@gmail.com; rgonsalves@jmss.co.za; rhendricks@dffe.gov.za; riaanh101@gmail.com; richard.gray@debeersgroup.com; Ricky.lenders@capetown.gov.za; rihennbrand404@gmail.com; riobutton@gmail.com; RKubayi@environment.gov.za; rmontjoie@umbono.co.za; rmontjoie@umbono.co.za; rnaicker@samsa.org.za; RobertLa@ij.co.za; Robert.Quintas@capetown.gov.za; ronavdm@gmail.com; rory@vikingfishing.co.za; rshelembe@geoscience.org.za; rtimothy@nbkb.org.za; rubingallant@gmail.com; rudolphfbotha@gmail.com; Rudolphr@westcoastresources.co.za; rudzani.memukula@wessa.co.za; rulphpati@gmail.com; rushaan@premfish.co.za; Russel.hartley@namakhoi.gov.za; russellh@seaharvest.co.za; ryan.oliver@drdlr.gov.za; sahila@mweb.co.za; saleem.soobader@petrosa.co.za;

Retention Policy EIMS Retention (10 years) Expires 2032/10/22

1520_BAR and Public meetings notification_AX.pdf 247 KB

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

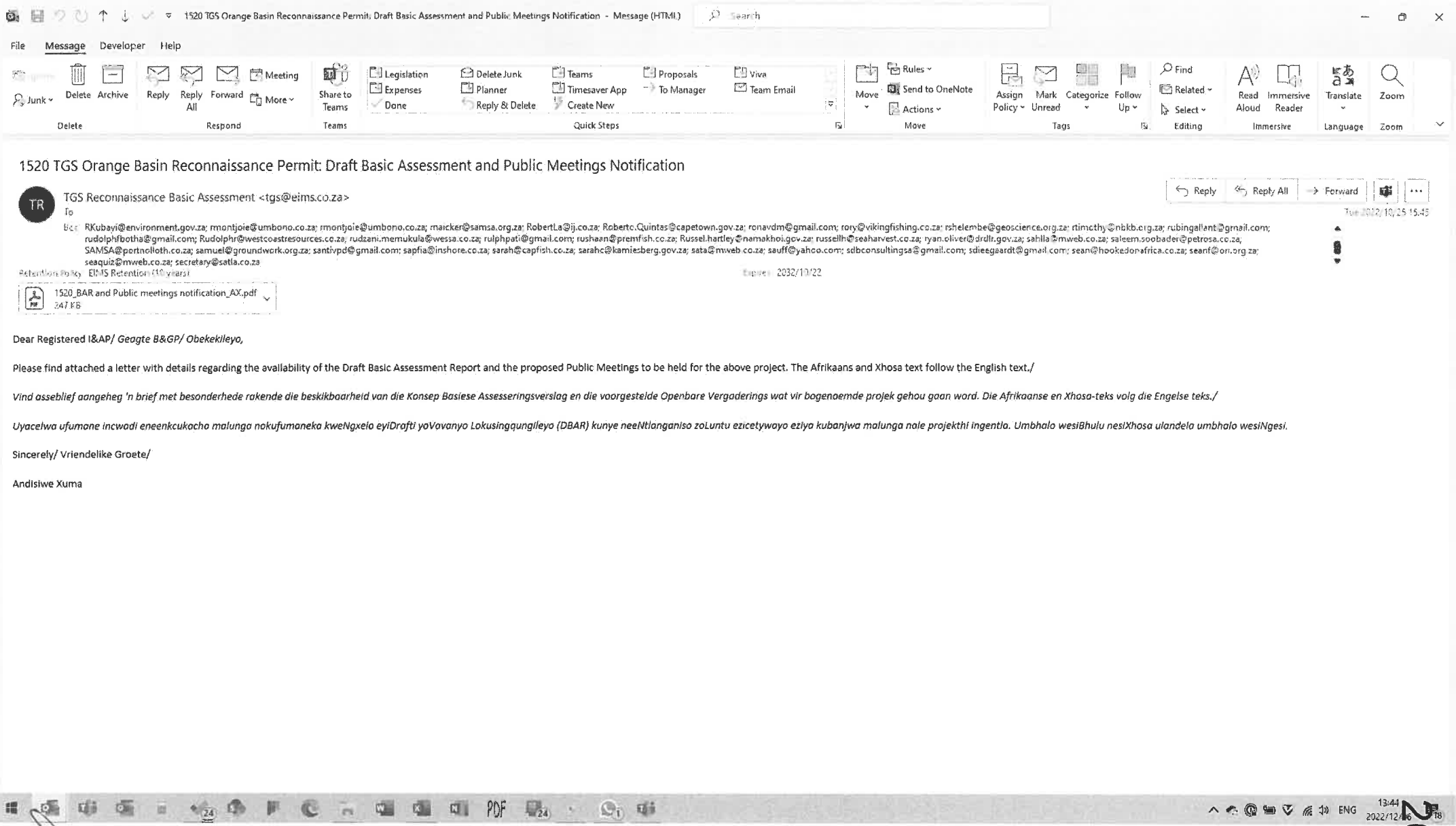
Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

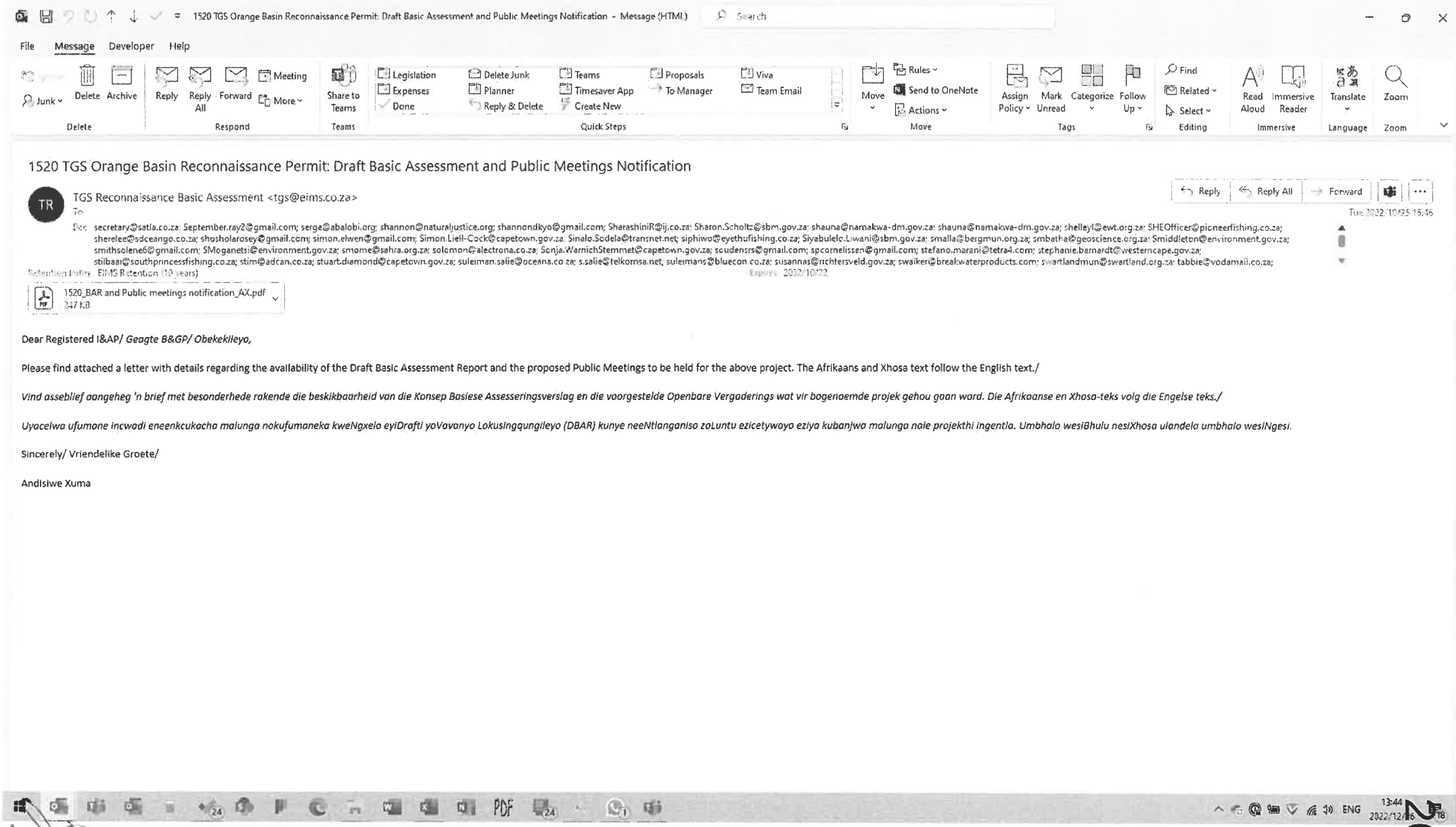
Uyacelwa ufumane incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlonganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.

Sincerely/ Vriendelike Groete/

Andisiwe Xuma


1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)
File
Message
Developer
Help
Junk
Delete
Archive
Reply
Reply All
Forward
Meeting
More
Share to Teams
Legislation
Expenses
Done
Delete Junk
Planner
Reply & Delete
Teams
Timesaver App
Create New
Proposals
To Manager
Viva
Team Email
Move
Rules
Send to OneNote
Actions
Assign Policy
Mark Unread
Categorize
Follow Up
Find
Related
Select
Read Aloud
Immersive Reader
Translate
Zoom
Delete
Respond
Teams
Quick Steps
Move
Tags
Editing
Immersive
Language
Zoom
1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification
TR
TGS Reconnaissance Basic Assessment <tgs@eims.co.za>
To
Reply
Reply All
Forward
RKubayi@environment.gov.za; rmontjoie@umbono.co.za; rmontjoie@umbono.co.za; rnaicker@samsa.org.za; RobertLa@ij.co.za; Roberto.Quintas@capetown.gov.za; ronavdm@gmail.com; rory@vikingfishing.co.za; rshelembe@geoscience.org.za; rtimothy@nbkb.org.za; rubingallant@gmail.com; rudolphfbotha@gmail.com; Rudolphr@westcoastresources.co.za; rudzani.memukula@wessa.co.za; rulphpati@gmail.com; rushaan@premfish.co.za; Russel.hartley@namakhoi.gov.za; russellh@seaharvest.co.za; ryan.oliver@drdlr.gov.za; sahila@mweb.co.za; saleem.soobader@petrosa.co.za; SAMSA@portnolloth.co.za; samuel@groundwork.org.za; santivpd@gmail.com; sapfia@inshore.co.za; sarah@capfish.co.za; sarahc@kamiesberg.gov.za; sata@mweb.co.za; sauff@yahoo.com; sdbconsultingsa@gmail.com; sdieegaardt@gmail.com; sean@hookedonafrica.co.za; seanf@orl.org.za; seaquiz@mweb.co.za; secretary@satla.co.za
Retention Policy EIMS Retention (10 years)
Expires 2032/10/22
1520_BAR and Public meetings notification_AX.pdf
347 KB
Dear Registered I&AP/ Geagte B&GP/ Obekekileyo,
Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./
Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./
Uyacelwa ufumene incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.
Sincerely/ Vriendelike Groete/
Andisiwe Xuma
ENG
13:44
2022/12/06

2685



1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)

File Message Developer Help

Junk Delete Archive Reply Reply All Forward Meeting More Share to Teams Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email Move Rules Send to OneNote Actions Assign Policy Mark Unread Categorize Follow Up Find Related Select Read Aloud Immersive Reader Translate Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

TR TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Reply Reply All Forward

Tue 2022/10/25 15:46

Bcc: secretary@satia.co.za; September.ray2@gmail.com; serge@abalobi.org; shannon@naturaljustice.org; shannondkyo@gmail.com; SharashiniR@ij.co.za; Sharon.Scholtz@sbm.gov.za; shauna@namakwa-dm.gov.za; shauna@namakwa-dm.gov.za; shelleyf@ewt.org.za; SHEOfficer@pioneerfishing.co.za; sherelee@sdceango.co.za; shosholarosey@gmail.com; simon.elwen@gmail.com; Simon.Liell-Cock@capetown.gov.za; Sinolo.Sodela@transnet.net; siphiwo@eyethufishing.co.za; Siyabulelc.Liwani@sbm.gov.za; smalla@bergmun.org.za; smbatha@geoscience.org.za; Smiddleton@environment.gov.za; smithsolene6@gmail.com; SMoganetsi@environment.gov.za; smome@sahra.org.za; solomon@alectrona.co.za; Sonja.WarnichStemmet@capetown.gov.za; scudensrs@gmail.com; spcornelissen@gmail.com; stefano.marani@tetra4.com; stephanie.barnardt@westerncape.gov.za; stilbaai@southprincessfishing.co.za; stim@adcan.co.za; stuart.diamond@capetown.gov.za; suleiman.salie@oceana.co.za; s.salie@telkomsa.net; suleimans@bluecon.co.za; susannas@richtersveld.gov.za; swaiker@breakwaterproducts.com; swartlandmun@swartland.org.za; tabbie@vodamail.co.za;

Retention Policy: EIMS Retention (10 years) Expires: 2032/10/22

1520_BAR and Public meetings notification_AX.pdf
247 KB

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

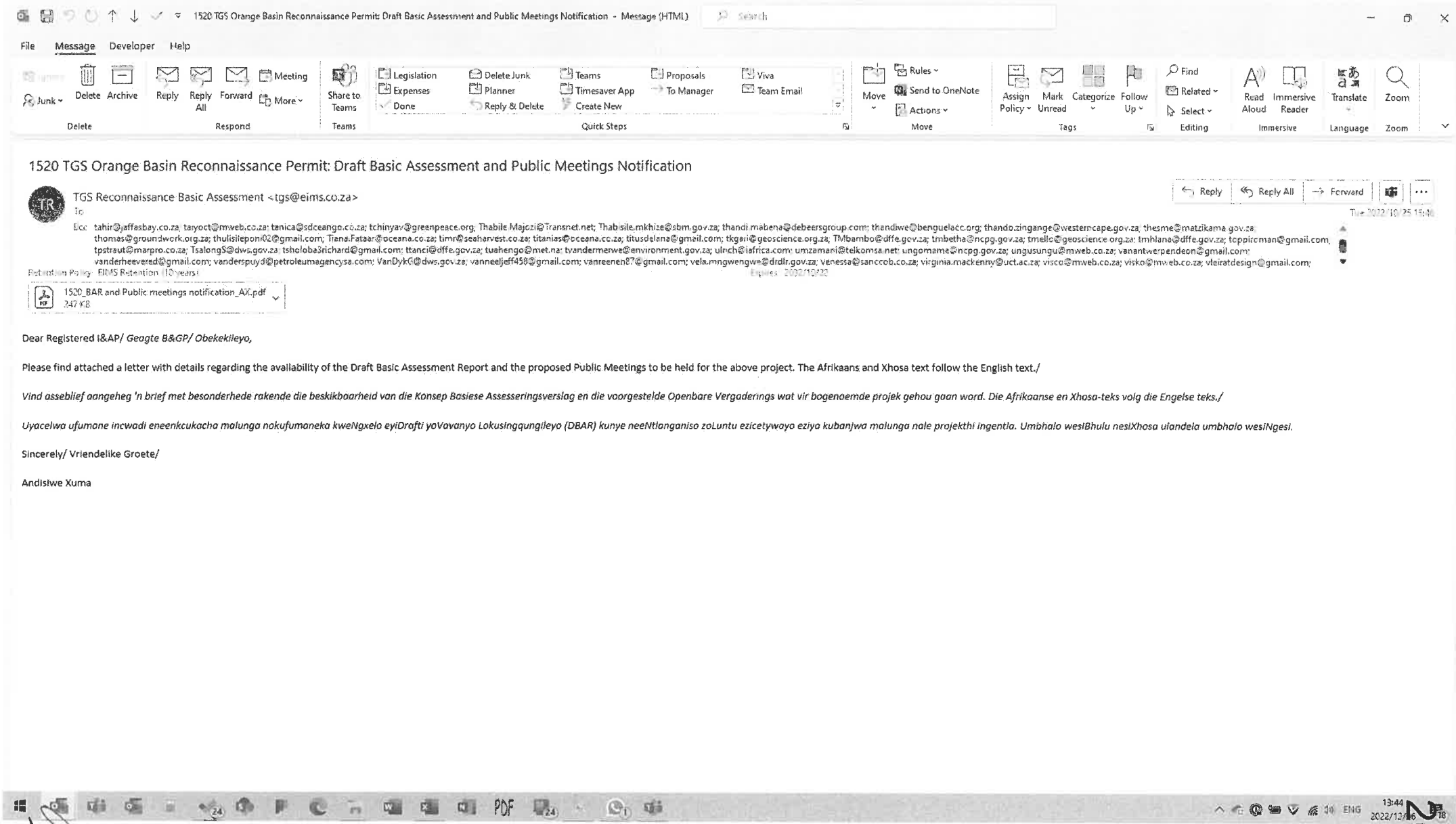
Uyacelwa ufumone incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.

Sincerely/ Vriendelike Groete/

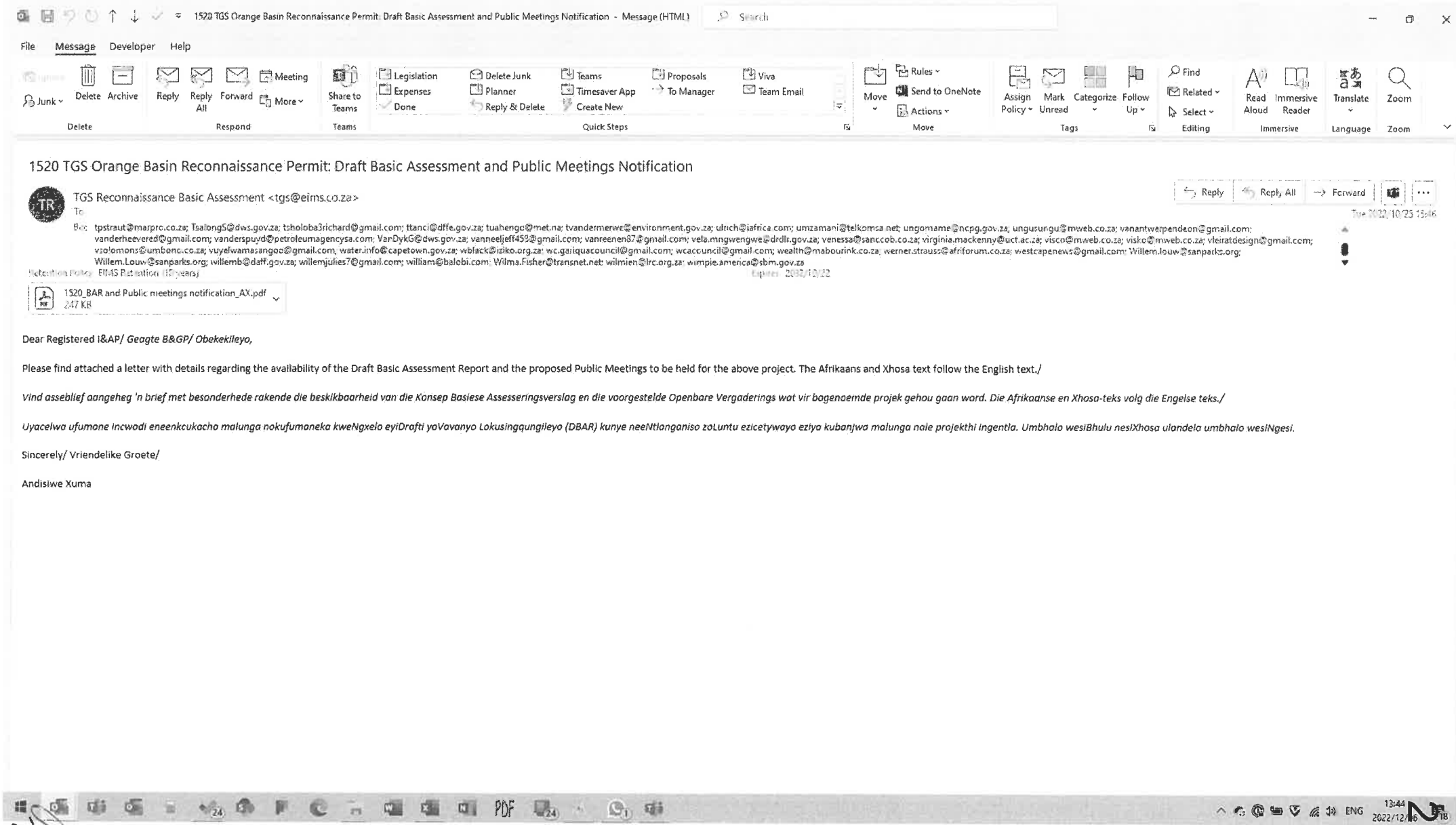
Andisiwe Xuma

ENG 13:44 2022/12/16

2686


1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)
File Message Developer Help
Junk Delete Archive Reply Reply All Forward Meeting More Share to Teams
Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email
Move Rules Send to OneNote Actions
Assign Policy Mark Unread Categorize Follow Up
Find Related Select Read Aloud Immersive Reader Translate Zoom
Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom
1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification
TGS Reconnaissance Basic Assessment <tgs@eims.co.za>
To
Reply Reply All Forward
Bcc tahir@jaffasbay.co.za; taiyoct@mweb.co.za; tanica@sdceango.co.za; tchinyay@greenpeace.org; Thabile.Majozi@Transnet.net; Thabisile.mkhize@sbm.gov.za; thandi.mabena@debeersgroup.com; thandiwe@benguelacc.org; thando.zingange@westerncape.gov.za; thesme@matzikama.gov.za; thomas@groundwork.org.za; thulisileponi02@gmail.com; Tiena.Fataar@oceana.co.za; timr@seaharvest.co.za; titanias@oceana.co.za; titusdelana@gmail.com; tkgari@geoscience.org.za; TMbambo@dffe.gov.za; tmbetha@ncpg.gov.za; tmelic@geoscience.org.za; tmhlana@dffe.gov.za; toppiremani@gmail.com; tpstraut@marpro.co.za; TsalongS@dws.gov.za; tsholoba3richard@gmail.com; ttanci@dffe.gov.za; tuahengo@met.na; tvandermerwe@environment.gov.za; ulrich@iafrica.com; umzamani@telkomsa.net; ungomame@ncpg.gov.za; ungusungu@mweb.co.za; vanantwerpendeon@gmail.com; vanderheevered@gmail.com; vanderspuyd@petroleumagencysa.com; VanDykG@dws.gov.za; vanneeljeff458@gmail.com; vanreenen87@gmail.com; vela.mngwengwe@drdlr.gov.za; venessa@sanccob.co.za; virginia.mackenny@uct.ac.za; visco@mweb.co.za; visko@mweb.co.za; vleiratdesign@gmail.com;
Retention Policy FIMS Retention (10 years)
Expires 2022/10/32
1520_BAR and Public meetings notification_AK.pdf
247 KB
Dear Registered I&AP/ Geagte B&GP/ Obekekileyo,
Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./
Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./
Uyacelwa ufumene incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.
Sincerely/ Vriendelike Groete/
Andiswe Xuma
ENG 13:44 2022/12/06

2687



1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification - Message (HTML)

File Message Developer Help

Junk Delete Archive Reply Reply All Forward Meeting More Share to Teams Legislation Expenses Done Delete Junk Planner Reply & Delete Teams Timesaver App Create New Proposals To Manager Viva Team Email Move Rules Send to OneNote Actions Assign Policy Mark Unread Categorize Follow Up Find Related Select Read Aloud Immersive Reader Translate Zoom

Delete Respond Teams Quick Steps Move Tags Editing Immersive Language Zoom

1520 TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment and Public Meetings Notification

TGS Reconnaissance Basic Assessment <tgs@eims.co.za>

To

Bcc: tpstraut@marpro.co.za; Tsalong5@dws.gov.za; tsholoba3richard@gmail.com; ttanci@dffe.gov.za; tuahengo@met.na; tvandermerwe@environment.gov.za; ulrich@iafrica.com; umzamani@telkomsa.net; ungomame@ncpg.gov.za; ungusungu@mweb.co.za; vanantwerpendeon@gmail.com; vanderheevered@gmail.com; vanderspuyd@petroleumagencysa.com; VanDykG@dws.gov.za; vanneeljeff452@gmail.com; vanreenen87@gmail.com; vela.mngwengwe@drdlr.gov.za; venessa@sanccob.co.za; virginia.mackenny@uct.ac.za; visco@mweb.co.za; visko@mweb.co.za; vleiratdesign@gmail.com; vsolomons@umbonc.co.za; vuyelwamasangoo@gmail.com; water.info@capetown.gov.za; wblack@iziko.org.za; wc.gariquacouncil@gmail.com; wcaccouncil@gmail.com; wealth@mabourink.co.za; werner.strauss@afriforum.co.za; westcapenews@gmail.com; Willem.louw@sanparks.org; Willem.Louw@sanparks.org; willemb@daff.gov.za; willemjulies7@gmail.com; william@balobi.com; Wilma.Fisher@transnet.net; wilmien@lrc.org.za; wimpie.america@sbm.gov.za

Retention Policy: EIMS Retention (10 years) Expires: 2033/10/22

1520_BAR and Public meetings notification_AX.pdf 247 KB

Reply Reply All Forward Tue 2022/10/25 15:46

Dear Registered I&AP/ *Geagte B&GP/ Obekekileyo,*

Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text./

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks./

Uyacelwa ufumone incwodi eneenkcukacho malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.

Sincerely/ Vriendelike Groete/

Andisiwe Xuma

Scheduled for :	10/25/2022 4:35:06 PM
Send created :	10/25/2022 4:35:14 PM
Number of messages :	210
Cost (credits) :	630
Example message :	Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the EIMS website. https://www.eims.co.za/2022/08/15/1520-proposed-tgs-seismic-reconnaissance and other public venues. For more information on the report and public meetings to be held from 31 Oct to 4 Nov, please contact EIMS: 0117897170; tgs@eims.co.za; PO Box 2083, Pinegowrie, 2123.
Groups sent to:	Name
Group :	1520 Call to Register

Scheduled for :	10/25/2022 4:37:53 PM
Send created :	10/25/2022 4:38:11 PM
Number of messages :	210
st (credits) :	630
Example message :	Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaar op die EIMS-webwerf. https://www.eims.co.za/2022/08/15/1520-proposed-tgs-seismic-reconnaissance en ander openbare plekke. Vir meer inligting oor die verslag en openbare vergaderings wat van 31 Okt tot 4 Nov gehou sal word, kontak asseblief EIMS: 0117897170; tgs@eims.co.za; Posbus 2083, Pinegowrie, 2123.
Groups sent to:	Name
Group :	1520 Call to Register

Scheduled for :	10/25/2022 4:50:34 PM
Send created :	10/25/2022 4:50:40 PM
Number of messages :	210
Cost (credits) :	630
Example message :	Isaziso malunga ne Reconnaissance Permit ye-TGS: Ingxelo yeBA eyiDrafti iyafumaneka kwiwebhusayithi yeEIMS ukuze unike izimvo. https://www.eims.co.za/2022/08/15/1520-proposed-tgs-seimic-reconnaissance kunye nezinye iindawo zoluntu. Ukufumana ulwazi oluthe vetshe malunga nengxelo kunye neentlanganiso zoluntu eziza kubanjwa ukusuka nge-31 Oct ukuya kwi-4 Nov, nceda uqhagamshelane ne-EIMS: 0117897170; tgs@eims.co.za; PO Box 2083, Pinegowrie, 2123.
Groups sent to:	Name
oup :	1520 Call to Register

Scheduled for :	10/26/2022 7:20:18 AM
Send created :	10/26/2022 7:20:38 AM
Number of messages :	209
Cost (credits) :	627
Example message :	Isaziso malunga ne Reconnaissance Permit ye-TGS: Ingxelo yeBA eyiDrafti iyafumaneka kwiwebhusayithi yeEIMS ukuze unike izimvo. https://www.eims.co.za/2022/08/15/1520-proposed-tgs-seismic-reconnaissance kunye nezinye iindawo zoluntu. Ukufumana ulwazi oluthe vetshe malunga nengxelo kunye neentlanganiso zoluntu eziza kubanjwa ukusuka nge-31 Oct ukuya kwi-4 Nov, nceda uqhagamshelane ne-EIMS: 0117897170; tgs@eims.co.za; PO Box 2083, Pinegowrie, 2123.
Groups sent to:	Name
Group :	1520 Call to Register

Qaphela Magaqa

From: SMSPortal <noreply@smsportal.com>
Sent: Tuesday, 25 October 2022 16:37
To: gp@eims.za; Qaphela Magaqa
Subject: Campaign Confirmation - TGS

LOG IN NOW

Campaign Confirmation

TGS campaign is scheduled for 25 October 2022 at 16:35.

Campaign Details:

Created:	25 October 2022 @ 16:35
Sent:	25 October 2022 @ 16:35
Quantity:	210
Credits:	630

Message: Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the EIMS website. https://www.eims.co.za/2022/08/15/1520-proposed-tgs-seismic-reconnaissance and other public venues. For more information on the report and public meetings to be held from 31 Oct to 4 Nov, please contact EIMS: 0117897170; tgs@eims.co.za; PO Box 2083, Pinegowrie, 2123.

Need some help? Our comprehensive documentation and guides are here to get you started.
Click here to view our guides.

273

[redacted]



DISCLAIMER: This email contains proprietary information some or all of which may be legally privileged. It is for the intended recipient only. If an addressing or transmission error has misdirected this email please notify the author by replying to this email. If you are not the intended recipient, you must not use, disclose, copy, print, or rely on this email. We cannot accept liability for any statements made which are clearly the sender's own and not expressly made on behalf of this company or one of its agents.

Qaphela Magaqa

From: SMSPortal <noreply@smsportal.com>
Sent: Wednesday, 26 October 2022 07:23
To: GP Kriel; Qaphela Magaqa
Subject: Campaign Confirmation - TGS

LOG IN NOW

Campaign Confirmation

TGS campaign is scheduled for 26 October 2022 at 07:20.

Campaign Details:

Created:	26 October 2022 @ 07:20
Sent:	26 October 2022 @ 07:20
Quantity:	209
Credits:	627

Message: Isaziso malunga ne Reconnaissance Permit ye-TGS: Ingxelo yeBA eyiDrafti iyafumaneka kwiwebhusayithi yeEIMS ukuze unike izimvo. https://www.eims.co.za/2022/08/15/1520-proposed-tgs-seismic-reconnaissance kunye nezinye iindawo zoluntu. Ukufumana ulwazi oluthe vetshe malunga nengxelo kunye neentlanganiso zoluntu eziza kubanjwa ukusuka nge-31 Oct ukuya kwi-4 Nov, nceda uqhagamshelane ne-EIMS: 0117897170; tgs@eims.co.za; PO Box 2083, Pinegowrie, 2123.

TGS

Need some help? Our comprehensive documentation and guides are here to get you started.
Click here to view our guides.

Home Page | Contact Us | Live Chat

DISCLAIMER: This email contains proprietary information some or all of which may be legally privileged. It is for the intended recipient only. If an addressing or transmission error has misdirected this email please notify the author by replying to this email. If you are not the intended recipient, you must not use, disclose, copy, print, or rely on this email. We cannot accept liability for any statements made which are clearly the sender's own and not expressly made on behalf of this company or one of its agents.

Phonenumber	"Network"	"Status"	"ScheduledDate"	"SubmittedDate"	"StatusDate"	CustomerID	SentData	"Value1"	"Value2"	"Value3"	"Value4"	"Value5"	"Value6"	"Group Name"	"Group Description"
							Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the EIMS website https://www.eims.co.za/2022/08/15/1520-proposed-tgs-seismic-reconnaissance and other public venues. Comment by 25 Nov 2022. EIMS: 0117897170; tgs@eims.co.za; PO Box								
27603411315	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		2083, Pinegowrie, 2123	N Dowries						1520 DBAR Reminder	DBAR Reminder SMS
27604174618	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Thobeka Gxakaza							1520 DBAR Reminder	DBAR Reminder SMS
27604175882	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Christian John Adams							1520 DBAR Reminder	DBAR Reminder SMS
27604856807	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Teresa Boois							1520 DBAR Reminder	DBAR Reminder SMS
27604934965	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the David Dirk							1520 DBAR Reminder	DBAR Reminder SMS
27605729811	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Mapaseka Lukhele							1520 DBAR Reminder	DBAR Reminder SMS
27607798560	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the H.A. Hornimann							1520 DBAR Reminder	DBAR Reminder SMS
27608244713	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Anthony Sloet							1520 DBAR Reminder	DBAR Reminder SMS
27608650958	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Carisa Soudens							1520 DBAR Reminder	DBAR Reminder SMS
27609712488	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Jeff Heinecken							1520 DBAR Reminder	DBAR Reminder SMS
27610984064	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Shana Diergaardt							1520 DBAR Reminder	DBAR Reminder SMS
27615423676	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Rubin Gallant							1520 DBAR Reminder	DBAR Reminder SMS
27620742115	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Callen Clockie							1520 DBAR Reminder	DBAR Reminder SMS
27621026932	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Gloria Beukes							1520 DBAR Reminder	DBAR Reminder SMS
27626739894	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Georga Lenee							1520 DBAR Reminder	DBAR Reminder SMS
27627216114	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 17:26		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Richard Dewee							1520 DBAR Reminder	DBAR Reminder SMS
27630513903	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Jeff van Neel							1520 DBAR Reminder	DBAR Reminder SMS
27630912970	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Masonwabe Zwelifile							1520 DBAR Reminder	DBAR Reminder SMS
27631180777	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Davice Heese							1520 DBAR Reminder	DBAR Reminder SMS
27631465634	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 19:35		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Walter Steenkamp							1520 DBAR Reminder	DBAR Reminder SMS
27632127099	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Gloria Girlmane							1520 DBAR Reminder	DBAR Reminder SMS
27632147674	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the John Ellis							1520 DBAR Reminder	DBAR Reminder SMS
27632865440	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Anna Bock							1520 DBAR Reminder	DBAR Reminder SMS
27633190161	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:48		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the C Lombard							1520 DBAR Reminder	DBAR Reminder SMS
27633235131	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Desmond Bertoni							1520 DBAR Reminder	DBAR Reminder SMS
27633523333	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Charmain Coetzee							1520 DBAR Reminder	DBAR Reminder SMS
27634109952	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Davin du Plessis							1520 DBAR Reminder	DBAR Reminder SMS
27634281525	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Lee Markus							1520 DBAR Reminder	DBAR Reminder SMS
27634585327	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Schalk							1520 DBAR Reminder	DBAR Reminder SMS
27634830653	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Charleen Claudette van Nooi							1520 DBAR Reminder	DBAR Reminder SMS
27635249200	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Rudi Young							1520 DBAR Reminder	DBAR Reminder SMS
27637884504	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Karin Cloete							1520 DBAR Reminder	DBAR Reminder SMS
27638061277	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Edward Mostert							1520 DBAR Reminder	DBAR Reminder SMS
27642401921	CELL C	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the D Samuels							1520 DBAR Reminder	DBAR Reminder SMS
27643668832	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Frikkie Smit							1520 DBAR Reminder	DBAR Reminder SMS
27656180827	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Sharon Marionette Scholtz							1520 DBAR Reminder	DBAR Reminder SMS
27658708983	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Rosina Klaase							1520 DBAR Reminder	DBAR Reminder SMS
27661306348	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Kate Vraagom							1520 DBAR Reminder	DBAR Reminder SMS
27661687330	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Daniswa Nyondo							1520 DBAR Reminder	DBAR Reminder SMS
27663492092	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Menka Vansent							1520 DBAR Reminder	DBAR Reminder SMS
27664057488	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Delana Titus							1520 DBAR Reminder	DBAR Reminder SMS
27664560910	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Joseph Glenn Losper							1520 DBAR Reminder	DBAR Reminder SMS
27664796411	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Neville Van Rooy							1520 DBAR Reminder	DBAR Reminder SMS
27664859785	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Elaine Mills							1520 DBAR Reminder	DBAR Reminder SMS
27664944764	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Rosey Shoshola							1520 DBAR Reminder	DBAR Reminder SMS
27665866712	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Lindiwe Franks							1520 DBAR Reminder	DBAR Reminder SMS
27681952755	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Sheldon Mathys							1520 DBAR Reminder	DBAR Reminder SMS
27682845286	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Mnqobi Ngubane							1520 DBAR Reminder	DBAR Reminder SMS
27685043306	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 18:06		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Nico Jano							1520 DBAR Reminder	DBAR Reminder SMS
27691125664	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Leonard Peterson							1520 DBAR Reminder	DBAR Reminder SMS
27693955580	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Carisa J. Soudens							1520 DBAR Reminder	DBAR Reminder SMS
27710110424	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Gogili Daibe							1520 DBAR Reminder	DBAR Reminder SMS
27710416877	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Lwazi Mase							1520 DBAR Reminder	DBAR Reminder SMS
27710901290	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:55		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Beverly v/d Heever Schalk							1520 DBAR Reminder	DBAR Reminder SMS
27712262617	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Christiaan Mackenzie							1520 DBAR Reminder	DBAR Reminder SMS
27712319953	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Marcia Manes							1520 DBAR Reminder	DBAR Reminder SMS
27714840775	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Daryl Charles Kerspuy							1520 DBAR Reminder	DBAR Reminder SMS
27715187434	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 17:12		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the George N							1520 DBAR Reminder	DBAR Reminder SMS
27716720968	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Darryn de Vries							1520 DBAR Reminder	DBAR Reminder SMS
27716888292	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Paul Burkhardt							1520 DBAR Reminder	DBAR Reminder SMS
27717546754	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Riaan Hendricks							1520 DBAR Reminder	DBAR Reminder SMS
27718589339	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Sherelee Odayar							1520 DBAR Reminder	DBAR Reminder SMS
27718820846	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Lisa Makaula							1520 DBAR Reminder	DBAR Reminder SMS
27719757170	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the L Maxxus							1520 DBAR Reminder	DBAR Reminder SMS
27719949546	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 18:05		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the William Jaap							1520 DBAR Reminder	DBAR Reminder SMS
27720638359	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Paul Stephanus Swart							1520 DBAR Reminder	DBAR Reminder SMS
27721224232	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Bonnie Schumann							1520 DBAR Reminder	DBAR Reminder SMS
27721353974	Vodacom	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Elizabeth Klasse							1520 DBAR Reminder	DBAR Reminder SMS
27721437303	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:45		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Beulah Williams							1520 DBAR Reminder	DBAR Reminder SMS
27721941947	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Alta Kotze							1520 DBAR Reminder	DBAR Reminder SMS
27722419157	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Andre Brahm Truter							1520 DBAR Reminder	DBAR Reminder SMS
27723267504	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39		Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Meryn Cydal							1520 DBAR Reminder	DBAR Reminder SMS

27723764809	Vodacom	BLIST	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Nicholas Arnott	1520 DBAR Reminder	DBAR Reminder SMS
27724513058	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Adrian Ace Charles	1520 DBAR Reminder	DBAR Reminder SMS
27724600495	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Leilani Swartbooi	1520 DBAR Reminder	DBAR Reminder SMS
27724959715	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Darryl Colenbrander	1520 DBAR Reminder	DBAR Reminder SMS
27726535763	Vodacom	BLIST	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Nicola Joel	1520 DBAR Reminder	DBAR Reminder SMS
27726640698	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Ismat Adams	1520 DBAR Reminder	DBAR Reminder SMS
27727294282	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Nicollete Rheeder	1520 DBAR Reminder	DBAR Reminder SMS
27728095007	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Edward Mostert	1520 DBAR Reminder	DBAR Reminder SMS
27729129396	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Rose Nalon	1520 DBAR Reminder	DBAR Reminder SMS
27730814298	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the W Poggenloet	1520 DBAR Reminder	DBAR Reminder SMS
27731197988	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Ilze Worner	1520 DBAR Reminder	DBAR Reminder SMS
27732379775	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Joy Solomon	1520 DBAR Reminder	DBAR Reminder SMS
27732842780	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Rihann Brand	1520 DBAR Reminder	DBAR Reminder SMS
27733615105	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Wahlid	1520 DBAR Reminder	DBAR Reminder SMS
27733974712	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the C Louw	1520 DBAR Reminder	DBAR Reminder SMS
27734877040	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Morgen Dila	1520 DBAR Reminder	DBAR Reminder SMS
27735018378	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Katlholo Polori	1520 DBAR Reminder	DBAR Reminder SMS
27735102477	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Richard Petrus	1520 DBAR Reminder	DBAR Reminder SMS
27735416487	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Regan James	1520 DBAR Reminder	DBAR Reminder SMS
27735474948	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Natalie Weyers	1520 DBAR Reminder	DBAR Reminder SMS
27735612593	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Insaat Neale	1520 DBAR Reminder	DBAR Reminder SMS
27735857819	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Shannon Goouk	1520 DBAR Reminder	DBAR Reminder SMS
27736379312	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Lelethu Mbane	1520 DBAR Reminder	DBAR Reminder SMS
27737233193	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Allister Gerome Lightburn	1520 DBAR Reminder	DBAR Reminder SMS
27737510107	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 17:14	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Amelia Job	1520 DBAR Reminder	DBAR Reminder SMS
27737728425	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Nicolaas Booysen	1520 DBAR Reminder	DBAR Reminder SMS
27737778866	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Siyabulela Liwani	1520 DBAR Reminder	DBAR Reminder SMS
27738777274	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Siyabulelo Mafuneko	1520 DBAR Reminder	DBAR Reminder SMS
27739620432	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Mellisa Esau	1520 DBAR Reminder	DBAR Reminder SMS
27739681037	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the	1520 DBAR Reminder	DBAR Reminder SMS
27739799951	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 17:10	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Pedro Garcia	1520 DBAR Reminder	DBAR Reminder SMS
27739948156	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Cilla Abrahams	1520 DBAR Reminder	DBAR Reminder SMS
27743364149	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Tribal Authority Lamberts Bay	1520 DBAR Reminder	DBAR Reminder SMS
27744224205	CELL C	UNDELIV	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 19:10	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Dominic Bugan	1520 DBAR Reminder	DBAR Reminder SMS
27744633225	CELL C	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Marcus Banga	1520 DBAR Reminder	DBAR Reminder SMS
27748351001	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Elma Fourie	1520 DBAR Reminder	DBAR Reminder SMS
27749635034	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Fidelis Moudeen	1520 DBAR Reminder	DBAR Reminder SMS
27760346173	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Boy Adams	1520 DBAR Reminder	DBAR Reminder SMS
27761659936	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Collin Cloete	1520 DBAR Reminder	DBAR Reminder SMS
27761676221	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Derick Maarman	1520 DBAR Reminder	DBAR Reminder SMS
27763140961	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Mala Nangle	1520 DBAR Reminder	DBAR Reminder SMS
27766880414	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Diana Mentoor	1520 DBAR Reminder	DBAR Reminder SMS
27767742709	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Pedro Garcia	1520 DBAR Reminder	DBAR Reminder SMS
27768088839	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the David Harper	1520 DBAR Reminder	DBAR Reminder SMS
27768122920	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Temba Tanci	1520 DBAR Reminder	DBAR Reminder SMS
27768696168	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Enrico Adams	1520 DBAR Reminder	DBAR Reminder SMS
27769166921	Vodacom	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Rio Button	1520 DBAR Reminder	DBAR Reminder SMS
27780527937	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Christine Naneville	1520 DBAR Reminder	DBAR Reminder SMS
27780787764	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Moddie de Wet	1520 DBAR Reminder	DBAR Reminder SMS
27780992780	MTN	UNDELIV	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 18:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Charlton James Stuurman	1520 DBAR Reminder	DBAR Reminder SMS
27781002058	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Johannes Jogemes Moolman	1520 DBAR Reminder	DBAR Reminder SMS
27781030685	MTN	UNDELIV	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 18:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Pedro Garcia	1520 DBAR Reminder	DBAR Reminder SMS
27783135525	CELL C	UNDELIV	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 18:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Hermanus Frederick	1520 DBAR Reminder	DBAR Reminder SMS
27783252675	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:45	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Mable Samuels	1520 DBAR Reminder	DBAR Reminder SMS
27783984585	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Natasha James	1520 DBAR Reminder	DBAR Reminder SMS
27784590950	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:47	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Albertus Johannes Pool	1520 DBAR Reminder	DBAR Reminder SMS
27787468627	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Angelina Thana	1520 DBAR Reminder	DBAR Reminder SMS
27787588969	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Vhonani Ramugondo	1520 DBAR Reminder	DBAR Reminder SMS
27787713228	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Jenifer Swartz	1520 DBAR Reminder	DBAR Reminder SMS
27787992545	Vodacom	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Rudian Daily	1520 DBAR Reminder	DBAR Reminder SMS
27788855441	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Oregus	1520 DBAR Reminder	DBAR Reminder SMS
27791116342	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Derian Rooi	1520 DBAR Reminder	DBAR Reminder SMS
27793977081	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Mtutuzeli Tyalimpi	1520 DBAR Reminder	DBAR Reminder SMS
27795117431	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the William Josef Farmer	1520 DBAR Reminder	DBAR Reminder SMS
27795453563	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Lina Papier	1520 DBAR Reminder	DBAR Reminder SMS
27795661332	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Charles Lakay	1520 DBAR Reminder	DBAR Reminder SMS
27795882305	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Patricia francke	1520 DBAR Reminder	DBAR Reminder SMS
27796284177	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 17:05	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Onke Ngcuka	1520 DBAR Reminder	DBAR Reminder SMS
27797307175	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Johan Leo	1520 DBAR Reminder	DBAR Reminder SMS
27798402364	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the James Malgas	1520 DBAR Reminder	DBAR Reminder SMS
27799063081	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Lionel Pietersen	1520 DBAR Reminder	DBAR Reminder SMS
27799274131	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Grezelda Samuels	1520 DBAR Reminder	DBAR Reminder SMS
27799951915	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Eduard Groenewald	1520 DBAR Reminder	DBAR Reminder SMS
27810658880	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Patrick Obies	1520 DBAR Reminder	DBAR Reminder SMS
27810739918	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Audrey Small	1520 DBAR Reminder	DBAR Reminder SMS
27812171752	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Werner Strauss	1520 DBAR Reminder	DBAR Reminder SMS

27812460350	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit. The Draft BA Report is available for comment on the Louise C Calvin	1520 DBAR Reminder DBAR Reminder SMS
27813743488	Telkom Mobile	UNDELIV	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 18:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Stefano Marani	1520 DBAR Reminder DBAR Reminder SMS
27817319659	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit. The Draft BA Report is available for comment on the Moosa Hendrik Raise	1520 DBAR Reminder DBAR Reminder SMS
27820423502	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Roberto Miguel Quintas	1520 DBAR Reminder DBAR Reminder SMS
27822834227	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 18:53	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Korasie Maarman	1520 DBAR Reminder DBAR Reminder SMS
27822918052	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Elizabeth Basson	1520 DBAR Reminder DBAR Reminder SMS
27823212985	Vodacom	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Trevor Wilson	1520 DBAR Reminder DBAR Reminder SMS
27823408534	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Adrian Pole	1520 DBAR Reminder DBAR Reminder SMS
27823484315	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Colleen Plower	1520 DBAR Reminder DBAR Reminder SMS
27823734883	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Rudolph Raath	1520 DBAR Reminder DBAR Reminder SMS
27823995134	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit. The Draft BA Report is available for comment on the John Van der Heever	1520 DBAR Reminder DBAR Reminder SMS
27824276686	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:45	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the	1520 DBAR Reminder DBAR Reminder SMS
27824524081	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Wendy Black	1520 DBAR Reminder DBAR Reminder SMS
27825340296	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Niall Kramer	1520 DBAR Reminder DBAR Reminder SMS
27825517230	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Simon Pratrick Leill-Cock	1520 DBAR Reminder DBAR Reminder SMS
27825646603	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Wilherm Joriaas America	1520 DBAR Reminder DBAR Reminder SMS
27825694116	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Gustav von Mollendorf	1520 DBAR Reminder DBAR Reminder SMS
27825762183	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Johannes Gerhardus Knoesen	1520 DBAR Reminder DBAR Reminder SMS
27826012444	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Don Ncube	1520 DBAR Reminder DBAR Reminder SMS
27826529137	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Lemgang Alvin Pitsoe	1520 DBAR Reminder DBAR Reminder SMS
27826741407	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Rolf J	1520 DBAR Reminder DBAR Reminder SMS
27827232344	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Marshadevi Chetty	1520 DBAR Reminder DBAR Reminder SMS
27827289673	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Sarah Wilkinson	1520 DBAR Reminder DBAR Reminder SMS
27827304534	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Nicolaas Booysen	1520 DBAR Reminder DBAR Reminder SMS
27827489322	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Patrick Rulph	1520 DBAR Reminder DBAR Reminder SMS
27827826067	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Nicky McLeod	1520 DBAR Reminder DBAR Reminder SMS
27827896161	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the	1520 DBAR Reminder DBAR Reminder SMS
27828057553	Vodacom	UNDELIV	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 18:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Moses Mahunonyane	1520 DBAR Reminder DBAR Reminder SMS
27828200062	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Adele Fourie	1520 DBAR Reminder DBAR Reminder SMS
27828293911	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Johann Augustym	1520 DBAR Reminder DBAR Reminder SMS
27828499251	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the	1520 DBAR Reminder DBAR Reminder SMS
27828500274	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Phumla Ngesi	1520 DBAR Reminder DBAR Reminder SMS
27828506514	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Mike Muzzroll	1520 DBAR Reminder DBAR Reminder SMS
27828526466	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Francois Du Toit	1520 DBAR Reminder DBAR Reminder SMS
27828537815	Vodacom	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the	1520 DBAR Reminder DBAR Reminder SMS
27828798611	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Chris Heinecken	1520 DBAR Reminder DBAR Reminder SMS
27828820826	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Christo Reeders	1520 DBAR Reminder DBAR Reminder SMS
27828836741	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Abe Abrahams	1520 DBAR Reminder DBAR Reminder SMS
27828880782	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Bryan Chennells	1520 DBAR Reminder DBAR Reminder SMS
27828963593	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Charmaine Laubscher	1520 DBAR Reminder DBAR Reminder SMS
27829007514	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Michele Rivarola	1520 DBAR Reminder DBAR Reminder SMS
27829644662	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Thabang Komo	1520 DBAR Reminder DBAR Reminder SMS
27832271922	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Derek Light	1520 DBAR Reminder DBAR Reminder SMS
27832293861	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Nico Bezuidenhout	1520 DBAR Reminder DBAR Reminder SMS
27832523136	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Jannie Loubser	1520 DBAR Reminder DBAR Reminder SMS
27832652042	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Renato Gonsalves	1520 DBAR Reminder DBAR Reminder SMS
27832682818	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Chris Kimber	1520 DBAR Reminder DBAR Reminder SMS
27832743579	CELL C	BLIST	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Ian Patrick Mc Mahon	1520 DBAR Reminder DBAR Reminder SMS
27832767596	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Cassi Goodman	1520 DBAR Reminder DBAR Reminder SMS
27833091192	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Elise Tempelhoff	1520 DBAR Reminder DBAR Reminder SMS
27834008554	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Anthony Maximilian Benadie	1520 DBAR Reminder DBAR Reminder SMS
27834157610	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Joos Engelbrecht	1520 DBAR Reminder DBAR Reminder SMS
27834197720	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 17:32	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the David Phillips	1520 DBAR Reminder DBAR Reminder SMS
27834216196	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Mario Andrews	1520 DBAR Reminder DBAR Reminder SMS
27834410084	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Budwalk	1520 DBAR Reminder DBAR Reminder SMS
27834508753	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Sydney Yon	1520 DBAR Reminder DBAR Reminder SMS
27834536060	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 17:02	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Michael Adolph Rangasamy	1520 DBAR Reminder DBAR Reminder SMS
27834599959	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the	1520 DBAR Reminder DBAR Reminder SMS
27834603963	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Sean Amor	1520 DBAR Reminder DBAR Reminder SMS
27834604260	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Jacques Burgers	1520 DBAR Reminder DBAR Reminder SMS
27835178197	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:41	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Nomathemba Sotomela	1520 DBAR Reminder DBAR Reminder SMS
27836110494	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Rudolph Botha	1520 DBAR Reminder DBAR Reminder SMS
27836308953	MTN	BLIST	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Stephanus Petrus Cornelissen	1520 DBAR Reminder DBAR Reminder SMS
27836405298	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Willem Louw	1520 DBAR Reminder DBAR Reminder SMS
27836456565	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Jacques Cloete	1520 DBAR Reminder DBAR Reminder SMS
27836754919	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Brendin Robert Tweedale	1520 DBAR Reminder DBAR Reminder SMS
27836778872	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Dorothy Louise Tweedale	1520 DBAR Reminder DBAR Reminder SMS
27837033882	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Mogammud Allie Baderoen	1520 DBAR Reminder DBAR Reminder SMS
27837232510	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Authur Jasen	1520 DBAR Reminder DBAR Reminder SMS
27837426342	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Nonkululeko Sylvia Dlamini	1520 DBAR Reminder DBAR Reminder SMS
27837432042	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Jan van Niekerk	1520 DBAR Reminder DBAR Reminder SMS
27837702166	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the John Mentoor	1520 DBAR Reminder DBAR Reminder SMS
27837891067	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Janet Solomon	1520 DBAR Reminder DBAR Reminder SMS
27838702889	MTN	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Kerwin Rana	1520 DBAR Reminder DBAR Reminder SMS
27839458667	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Jodine Cloete	1520 DBAR Reminder DBAR Reminder SMS
27839559777	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Ikhaesen Maart	1520 DBAR Reminder DBAR Reminder SMS

27839826939	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Desmond Mathew	1520 DBAR Reminder	DBAR Reminder SMS
27839881196	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Obakeng Molelu	1520 DBAR Reminder	DBAR Reminder SMS
27840309672	CELL C	EXPIRED	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 21:36	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the A Adams	1520 DBAR Reminder	DBAR Reminder SMS
27840502315	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Fabian Kevin Ah-sing	1520 DBAR Reminder	DBAR Reminder SMS
27840875199	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Johannes Walter Steenkamp	1520 DBAR Reminder	DBAR Reminder SMS
27842159911	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Denver Smith	1520 DBAR Reminder	DBAR Reminder SMS
27842511875	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the D.E Moyser	1520 DBAR Reminder	DBAR Reminder SMS
27843455387	Telkom Mobile	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Ohentse Reginald Leeuw	1520 DBAR Reminder	DBAR Reminder SMS
27845147637	Vodacom	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:39	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Clinton Payne	1520 DBAR Reminder	DBAR Reminder SMS
27845939373	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Ilze Kruger	1520 DBAR Reminder	DBAR Reminder SMS
27847562203	MTN	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 20:11	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Camilla Mostert	1520 DBAR Reminder	DBAR Reminder SMS
27849661249	CELL C	DELIVRD	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 16:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Patrick Dowing	1520 DBAR Reminder	DBAR Reminder SMS
2,78326E+11	MTN	UNDELIV	2022/11/23 16:40	2022/11/23 16:39	2022/11/23 18:40	Reminder Proposed TGS Reconnaissance Permit: The Draft BA Report is available for comment on the Budget Wods	1520 DBAR Reminder	DBAR Reminder SMS

Phonenumber	"Network"	"Status"	"ScheduledDate"	"SubmittedDate"	"StatusDate"	CustomerID	SentData	"Value1"	"Value2"	"Value3"	"Value4"	"Value5"	"Value6"	"Group Name"	"Group Description"
							Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaar op die EIMS-webwerf, https://www.eims.co.za/2022/08/15/1520-proposed-tgs-seismic-reconnaissance en ander openbare plekke. Kommentaar deur 25 Nov 2022. EIMS: 0117897170; tgs@eims.co.za; Posbus 2083, Pinegowrie, 2123.	N Dowries						1520 DBAR Reminder	DBAR Reminder SMS
27603411315	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Thobeka Gxakaza						1520 DBAR Reminder	DBAR Reminder SMS
27604174618	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Christian John Adams						1520 DBAR Reminder	DBAR Reminder SMS
27604175882	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Teresa Boois						1520 DBAR Reminder	DBAR Reminder SMS
27604856807	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	David Dirk						1520 DBAR Reminder	DBAR Reminder SMS
27604934965	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Mapaseka Lukhele						1520 DBAR Reminder	DBAR Reminder SMS
27605729811	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	H.A. Hornimann						1520 DBAR Reminder	DBAR Reminder SMS
27607798560	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Anthony Sloet						1520 DBAR Reminder	DBAR Reminder SMS
27608244713	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:56		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Carisa Soudens						1520 DBAR Reminder	DBAR Reminder SMS
27608650958	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Jeff Heinecken						1520 DBAR Reminder	DBAR Reminder SMS
27609712488	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Shana Diergaardt						1520 DBAR Reminder	DBAR Reminder SMS
27610984064	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Rubin Gallant						1520 DBAR Reminder	DBAR Reminder SMS
27615423676	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Callen Clockie						1520 DBAR Reminder	DBAR Reminder SMS
27620742115	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Gloria Beukes						1520 DBAR Reminder	DBAR Reminder SMS
27621026932	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Georga Lenee						1520 DBAR Reminder	DBAR Reminder SMS
27626739894	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Richard Dewee						1520 DBAR Reminder	DBAR Reminder SMS
27627216114	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 17:58		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Jeff van Neel						1520 DBAR Reminder	DBAR Reminder SMS
27630513903	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Masonwabe Zwelifile						1520 DBAR Reminder	DBAR Reminder SMS
27630912970	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Davice Heese						1520 DBAR Reminder	DBAR Reminder SMS
27631180777	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Walter Steenkamp						1520 DBAR Reminder	DBAR Reminder SMS
27631465634	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 19:36		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Gloria Girimane						1520 DBAR Reminder	DBAR Reminder SMS
27632127099	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	John Ellis						1520 DBAR Reminder	DBAR Reminder SMS
27632147674	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 18:11		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Anna Bock						1520 DBAR Reminder	DBAR Reminder SMS
27632865440	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	C Lombard						1520 DBAR Reminder	DBAR Reminder SMS
27633190161	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:48		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Desmond Bertoni						1520 DBAR Reminder	DBAR Reminder SMS
27633235131	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Charmain Coetzee						1520 DBAR Reminder	DBAR Reminder SMS
27633523333	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Davin du Plessis						1520 DBAR Reminder	DBAR Reminder SMS
27634109952	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Lee Markus						1520 DBAR Reminder	DBAR Reminder SMS
27634281525	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Schalk						1520 DBAR Reminder	DBAR Reminder SMS
27634585327	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Charleen Claudette van Nooi						1520 DBAR Reminder	DBAR Reminder SMS
27634830653	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Rudi Young						1520 DBAR Reminder	DBAR Reminder SMS
27635249200	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Karin Cloete						1520 DBAR Reminder	DBAR Reminder SMS
27637884504	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Edward Mostert						1520 DBAR Reminder	DBAR Reminder SMS
27638061277	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	D Samuels						1520 DBAR Reminder	DBAR Reminder SMS
27642401921	CELL C	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Frikkie Smit						1520 DBAR Reminder	DBAR Reminder SMS
27643668832	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Sharon Marionette Scholtz						1520 DBAR Reminder	DBAR Reminder SMS
27656180827	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Rosina Klaase						1520 DBAR Reminder	DBAR Reminder SMS
27658708983	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Kate Vraagom						1520 DBAR Reminder	DBAR Reminder SMS
27661306348	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Daniswa Nyondo						1520 DBAR Reminder	DBAR Reminder SMS
27661687330	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Menka Vansent						1520 DBAR Reminder	DBAR Reminder SMS
27663492092	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Delana Titus						1520 DBAR Reminder	DBAR Reminder SMS
27664057488	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Joseph Glenn Losper						1520 DBAR Reminder	DBAR Reminder SMS
27664560910	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Neville Van Rooy						1520 DBAR Reminder	DBAR Reminder SMS
27664796411	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Elaine Mills						1520 DBAR Reminder	DBAR Reminder SMS
27664859785	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Rosey Shoshola						1520 DBAR Reminder	DBAR Reminder SMS
27664944764	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Lindiwe Franks						1520 DBAR Reminder	DBAR Reminder SMS
27665866712	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Sheldon Mathys						1520 DBAR Reminder	DBAR Reminder SMS
27681952755	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Mnqobi Ngubane						1520 DBAR Reminder	DBAR Reminder SMS
27682845286	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Nico Jano						1520 DBAR Reminder	DBAR Reminder SMS
27685043306	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 18:06		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Leonard Peterson						1520 DBAR Reminder	DBAR Reminder SMS
27691125664	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Carisa J. Soudens						1520 DBAR Reminder	DBAR Reminder SMS
27693955580	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Gogill Daibe						1520 DBAR Reminder	DBAR Reminder SMS
27710110424	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Lwazi Mase						1520 DBAR Reminder	DBAR Reminder SMS
27710416877	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Beverly v/d Heever Schalk						1520 DBAR Reminder	DBAR Reminder SMS
27710901290	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:56		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Christiaan Mackenzie						1520 DBAR Reminder	DBAR Reminder SMS
27712262617	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Marcia Manes						1520 DBAR Reminder	DBAR Reminder SMS
27712319953	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Daryl Charles Kerspuy						1520 DBAR Reminder	DBAR Reminder SMS
27714840775	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	George N						1520 DBAR Reminder	DBAR Reminder SMS
27715187434	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 17:12		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Darryn de Vries						1520 DBAR Reminder	DBAR Reminder SMS
27716720968	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Paul Burkhardt						1520 DBAR Reminder	DBAR Reminder SMS
27716888292	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Riaan Hendricks						1520 DBAR Reminder	DBAR Reminder SMS
27717546754	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Sherelee Odayar						1520 DBAR Reminder	DBAR Reminder SMS
27718589339	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Lisa Makaula						1520 DBAR Reminder	DBAR Reminder SMS
27718820846	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	L Maxxus						1520 DBAR Reminder	DBAR Reminder SMS
27719757170	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	William Jaap						1520 DBAR Reminder	DBAR Reminder SMS
27719949546	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 18:02		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Paul Stephanus Swart						1520 DBAR Reminder	DBAR Reminder SMS
27720638359	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Bonnie Schumann						1520 DBAR Reminder	DBAR Reminder SMS
27721224232	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Elizabeth Klasse						1520 DBAR Reminder	DBAR Reminder SMS
27721353974	Vodacom	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Beulah Williams						1520 DBAR Reminder	DBAR Reminder SMS
27721437303	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:45		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Alta Kotze						1520 DBAR Reminder	DBAR Reminder SMS
27721941947	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Andre Brahm Truter						1520 DBAR Reminder	DBAR Reminder SMS
27722419157	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:46		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	Meryn Cydal						1520 DBAR Reminder	DBAR Reminder SMS
27723267504	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41		Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa								

27723764809	Vodacom	BLIST	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Nicholas Arnott	1520 DBAR Reminder	DBAR Reminder SMS
27724513058	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Adrian Ace Charles	1520 DBAR Reminder	DBAR Reminder SMS
27724600495	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Leilani Swartbooi	1520 DBAR Reminder	DBAR Reminder SMS
27724959715	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Darryl Colenbrander	1520 DBAR Reminder	DBAR Reminder SMS
27726535763	Vodacom	BLIST	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Nicola Joel	1520 DBAR Reminder	DBAR Reminder SMS
27726640698	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Ismat Adams	1520 DBAR Reminder	DBAR Reminder SMS
27727294282	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Nicollete Rheeder	1520 DBAR Reminder	DBAR Reminder SMS
27728095007	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Edward Mostert	1520 DBAR Reminder	DBAR Reminder SMS
27729129396	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Rose Nalon	1520 DBAR Reminder	DBAR Reminder SMS
27730814298	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa W Poggenloet	1520 DBAR Reminder	DBAR Reminder SMS
27731197988	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Ilze Worner	1520 DBAR Reminder	DBAR Reminder SMS
27732379775	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Joy Solomon	1520 DBAR Reminder	DBAR Reminder SMS
27732842780	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Rihann Brand	1520 DBAR Reminder	DBAR Reminder SMS
27733615105	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Wahlid	1520 DBAR Reminder	DBAR Reminder SMS
27733974712	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa C Louw	1520 DBAR Reminder	DBAR Reminder SMS
27734877040	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Morgen Dila	1520 DBAR Reminder	DBAR Reminder SMS
27735018378	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Katlholo Polori	1520 DBAR Reminder	DBAR Reminder SMS
27735102477	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Richard Petrus	1520 DBAR Reminder	DBAR Reminder SMS
27735416487	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Regan James	1520 DBAR Reminder	DBAR Reminder SMS
27735474948	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Natalie Weyers	1520 DBAR Reminder	DBAR Reminder SMS
27735612593	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Insaat Neale	1520 DBAR Reminder	DBAR Reminder SMS
27735857819	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Shannon Goouk	1520 DBAR Reminder	DBAR Reminder SMS
27736379312	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Lelethu Mbane	1520 DBAR Reminder	DBAR Reminder SMS
27737233193	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Allister Gerome Lightburn	1520 DBAR Reminder	DBAR Reminder SMS
27737510107	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 17:05	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Amelia Job	1520 DBAR Reminder	DBAR Reminder SMS
27737728425	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Nicolaas Booysen	1520 DBAR Reminder	DBAR Reminder SMS
27737778866	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Siyabulela Liwani	1520 DBAR Reminder	DBAR Reminder SMS
27738777274	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Siyabulelo Mafuneko	1520 DBAR Reminder	DBAR Reminder SMS
27739620432	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Mellisa Esau	1520 DBAR Reminder	DBAR Reminder SMS
27739681037	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	1520 DBAR Reminder	DBAR Reminder SMS
27739799951	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 17:08	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Pedro Garcia	1520 DBAR Reminder	DBAR Reminder SMS
27739948156	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Cilia Abrahams	1520 DBAR Reminder	DBAR Reminder SMS
27743364149	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Tribal Authority Lamberts Bay	1520 DBAR Reminder	DBAR Reminder SMS
27744224205	CELL C	UNDELIV	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 19:11	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Dominic Bugan	1520 DBAR Reminder	DBAR Reminder SMS
27744633225	CELL C	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Marcus Banga	1520 DBAR Reminder	DBAR Reminder SMS
27748351001	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Elma Fourie	1520 DBAR Reminder	DBAR Reminder SMS
27749635034	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Fidelis Moudeen	1520 DBAR Reminder	DBAR Reminder SMS
27760346173	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Boy Adams	1520 DBAR Reminder	DBAR Reminder SMS
27761659936	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Collin Cloete	1520 DBAR Reminder	DBAR Reminder SMS
27761676221	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Derick Maarman	1520 DBAR Reminder	DBAR Reminder SMS
27763140961	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Maia Nangle	1520 DBAR Reminder	DBAR Reminder SMS
27766880414	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Diana Mentoor	1520 DBAR Reminder	DBAR Reminder SMS
27767742709	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Pedro Garcia	1520 DBAR Reminder	DBAR Reminder SMS
27768088839	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa David Harper	1520 DBAR Reminder	DBAR Reminder SMS
27768122920	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Temba Tanci	1520 DBAR Reminder	DBAR Reminder SMS
27768696168	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Enrico Adams	1520 DBAR Reminder	DBAR Reminder SMS
27769166921	Vodacom	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Rio Button	1520 DBAR Reminder	DBAR Reminder SMS
27780527937	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Christine Naneville	1520 DBAR Reminder	DBAR Reminder SMS
27780787764	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Moddie de Wet	1520 DBAR Reminder	DBAR Reminder SMS
27780992780	MTN	UNDELIV	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 18:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Charlton James Stuurman	1520 DBAR Reminder	DBAR Reminder SMS
27781002058	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Johannes Jogemes Moolman	1520 DBAR Reminder	DBAR Reminder SMS
27781030685	MTN	UNDELIV	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 18:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Pedro Garcia	1520 DBAR Reminder	DBAR Reminder SMS
27783135525	CELL C	UNDELIV	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 18:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Hermanus Frederick	1520 DBAR Reminder	DBAR Reminder SMS
27783252675	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Mable Samuels	1520 DBAR Reminder	DBAR Reminder SMS
27783984585	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Natasha James	1520 DBAR Reminder	DBAR Reminder SMS
27784590950	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:42	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Albertus Johannes Pool	1520 DBAR Reminder	DBAR Reminder SMS
27787468627	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Angelina Thana	1520 DBAR Reminder	DBAR Reminder SMS
27787588969	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Vhonani Ramugondo	1520 DBAR Reminder	DBAR Reminder SMS
27787713228	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Jenifer Swartz	1520 DBAR Reminder	DBAR Reminder SMS
27787992545	Vodacom	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Rudian Daily	1520 DBAR Reminder	DBAR Reminder SMS
27788855441	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Oregus	1520 DBAR Reminder	DBAR Reminder SMS
27791116342	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Derian Rooi	1520 DBAR Reminder	DBAR Reminder SMS
27793977081	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Mtutuzeli Tyalimpi	1520 DBAR Reminder	DBAR Reminder SMS
27795117431	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa William Josef Farmer	1520 DBAR Reminder	DBAR Reminder SMS
27795453563	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Lina Papier	1520 DBAR Reminder	DBAR Reminder SMS
27795661332	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Charles Lakay	1520 DBAR Reminder	DBAR Reminder SMS
27795882305	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Patricia francke	1520 DBAR Reminder	DBAR Reminder SMS
27796284177	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 17:05	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Onke Ngcuka	1520 DBAR Reminder	DBAR Reminder SMS
27797307175	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Johan Leo	1520 DBAR Reminder	DBAR Reminder SMS
27798402364	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa James Malgas	1520 DBAR Reminder	DBAR Reminder SMS
27799063081	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Lionel Pietersen	1520 DBAR Reminder	DBAR Reminder SMS
27799274131	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Grezelda Samuels	1520 DBAR Reminder	DBAR Reminder SMS
27799951915	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Eduard Groenewald	1520 DBAR Reminder	DBAR Reminder SMS
27810658880	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Patrick Obies	1520 DBAR Reminder	DBAR Reminder SMS
27810739918	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Audrey Small	1520 DBAR Reminder	DBAR Reminder SMS
27812171752	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Werner Strauss	1520 DBAR Reminder	DBAR Reminder SMS

27812460350	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Louise C Calvin	1520 DBAR Reminder	DBAR Reminder SMS
27813743488	Telkom Mobile	UNDELIV	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 18:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Stefano Marani	1520 DBAR Reminder	DBAR Reminder SMS
27817319659	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Moosa Hendrik Raise	1520 DBAR Reminder	DBAR Reminder SMS
27820423502	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Roberto Miguel Quintas	1520 DBAR Reminder	DBAR Reminder SMS
27822834227	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 18:53	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Korasie Maarman	1520 DBAR Reminder	DBAR Reminder SMS
27822918052	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 17:12	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Elizabeth Basson	1520 DBAR Reminder	DBAR Reminder SMS
27823212985	Vodacom	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Trevor Wilson	1520 DBAR Reminder	DBAR Reminder SMS
27823408534	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Adrian Pole	1520 DBAR Reminder	DBAR Reminder SMS
27823484315	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Colleen Plower	1520 DBAR Reminder	DBAR Reminder SMS
27823734883	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Rudolph Raath	1520 DBAR Reminder	DBAR Reminder SMS
27823995134	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa John Van der Heever	1520 DBAR Reminder	DBAR Reminder SMS
27824276686	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	1520 DBAR Reminder	DBAR Reminder SMS
27824524081	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Wendy Black	1520 DBAR Reminder	DBAR Reminder SMS
27825340296	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Niall Kramer	1520 DBAR Reminder	DBAR Reminder SMS
27825517230	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Simon Pratrick Leill-Cock	1520 DBAR Reminder	DBAR Reminder SMS
27825646603	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Wilherm Joriaas America	1520 DBAR Reminder	DBAR Reminder SMS
27825694116	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Gustav von Mollendorf	1520 DBAR Reminder	DBAR Reminder SMS
27825762183	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Johannes Gerhardus Knoesen	1520 DBAR Reminder	DBAR Reminder SMS
27826012444	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Don Ncube	1520 DBAR Reminder	DBAR Reminder SMS
27826529137	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Lemgang Alvin Pitsoe	1520 DBAR Reminder	DBAR Reminder SMS
27826741407	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Rolf J	1520 DBAR Reminder	DBAR Reminder SMS
27827232344	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Marshadevi Chetty	1520 DBAR Reminder	DBAR Reminder SMS
27827289673	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Sarah Wilkinson	1520 DBAR Reminder	DBAR Reminder SMS
27827304534	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Nicolaas Booysen	1520 DBAR Reminder	DBAR Reminder SMS
27827489322	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Patrick Rulph	1520 DBAR Reminder	DBAR Reminder SMS
27827826067	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Nicky McLeod	1520 DBAR Reminder	DBAR Reminder SMS
27827896161	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	1520 DBAR Reminder	DBAR Reminder SMS
27828057553	Vodacom	UNDELIV	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 18:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Moses Mahunonyane	1520 DBAR Reminder	DBAR Reminder SMS
27828200062	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Adele Fourie	1520 DBAR Reminder	DBAR Reminder SMS
27828293911	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Johann Augustym	1520 DBAR Reminder	DBAR Reminder SMS
27828499251	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	1520 DBAR Reminder	DBAR Reminder SMS
27828500274	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Phumla Ngesi	1520 DBAR Reminder	DBAR Reminder SMS
27828506514	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Mike Muzzroll	1520 DBAR Reminder	DBAR Reminder SMS
27828526466	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Francois Du Toit	1520 DBAR Reminder	DBAR Reminder SMS
27828537815	Vodacom	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	1520 DBAR Reminder	DBAR Reminder SMS
27828798611	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Chris Heinecken	1520 DBAR Reminder	DBAR Reminder SMS
27828820826	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Christo Reeders	1520 DBAR Reminder	DBAR Reminder SMS
27828836741	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Abe Abrahams	1520 DBAR Reminder	DBAR Reminder SMS
27828880782	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Bryan Chennells	1520 DBAR Reminder	DBAR Reminder SMS
27828963593	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Charmaine Laubscher	1520 DBAR Reminder	DBAR Reminder SMS
27829007514	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Michele Rivarola	1520 DBAR Reminder	DBAR Reminder SMS
27829644662	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Thabang Komo	1520 DBAR Reminder	DBAR Reminder SMS
27832271922	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Derek Light	1520 DBAR Reminder	DBAR Reminder SMS
27832293861	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Nico Bezuidenhout	1520 DBAR Reminder	DBAR Reminder SMS
27832523136	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Jannie Loubser	1520 DBAR Reminder	DBAR Reminder SMS
27832652042	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Renato Gonsalves	1520 DBAR Reminder	DBAR Reminder SMS
27832682818	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Chris Kimber	1520 DBAR Reminder	DBAR Reminder SMS
27832743579	CELL C	BLIST	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Ian Patrick Mc Mahon	1520 DBAR Reminder	DBAR Reminder SMS
27832767596	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Cassi Goodman	1520 DBAR Reminder	DBAR Reminder SMS
27833091192	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Elise Tempelhoff	1520 DBAR Reminder	DBAR Reminder SMS
27834008554	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Anthony Maximilian Benadie	1520 DBAR Reminder	DBAR Reminder SMS
27834157610	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Joos Engelbrecht	1520 DBAR Reminder	DBAR Reminder SMS
27834197720	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 17:29	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa David Phillips	1520 DBAR Reminder	DBAR Reminder SMS
27834216196	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Mario Andrews	1520 DBAR Reminder	DBAR Reminder SMS
27834410084	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Budwalk	1520 DBAR Reminder	DBAR Reminder SMS
27834508753	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Sydney Yon	1520 DBAR Reminder	DBAR Reminder SMS
27834536060	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Michael Adolph Rangasamy	1520 DBAR Reminder	DBAR Reminder SMS
27834599959	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa	1520 DBAR Reminder	DBAR Reminder SMS
27834603963	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Sean Amor	1520 DBAR Reminder	DBAR Reminder SMS
27834604260	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Jacques Burgers	1520 DBAR Reminder	DBAR Reminder SMS
27835178197	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Nomathemba Sotomela	1520 DBAR Reminder	DBAR Reminder SMS
27836110494	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Rudolph Botha	1520 DBAR Reminder	DBAR Reminder SMS
27836308953	MTN	BLIST	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Stephanus Petrus Cornelissen	1520 DBAR Reminder	DBAR Reminder SMS
27836405298	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Willem Louw	1520 DBAR Reminder	DBAR Reminder SMS
27836456565	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Jacques Cloete	1520 DBAR Reminder	DBAR Reminder SMS
27836754919	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Brendin Robert Tweedale	1520 DBAR Reminder	DBAR Reminder SMS
27836778872	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Dorothy Louise Tweedale	1520 DBAR Reminder	DBAR Reminder SMS
27837033882	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Mogammud Allie Baderoen	1520 DBAR Reminder	DBAR Reminder SMS
27837232510	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Authur Jasen	1520 DBAR Reminder	DBAR Reminder SMS
27837426342	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Nonkululeko Sylvia Dlamini	1520 DBAR Reminder	DBAR Reminder SMS
27837432042	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Jan van Niekerk	1520 DBAR Reminder	DBAR Reminder SMS
27837702166	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa John Mentoor	1520 DBAR Reminder	DBAR Reminder SMS
27837891067	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Janet Solomon	1520 DBAR Reminder	DBAR Reminder SMS
27838702889	MTN	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Kerwin Rana	1520 DBAR Reminder	DBAR Reminder SMS
27839458667	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Jodine Cloete	1520 DBAR Reminder	DBAR Reminder SMS
27839559777	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Ikhaesen Maart	1520 DBAR Reminder	DBAR Reminder SMS

27839826939	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Desmond Mathew	1520	DBAR Reminder DBAR Reminder SMS
27839881196	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Obakeng Molelu	1520	DBAR Reminder DBAR Reminder SMS
27840309672	CELL C	EXPIRED	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 21:36	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa A Adams	1520	DBAR Reminder DBAR Reminder SMS
27840502315	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Fabian Kevin Ah-sing	1520	DBAR Reminder DBAR Reminder SMS
27840875199	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Johannes Walter Steenkamp	1520	DBAR Reminder DBAR Reminder SMS
27842159911	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Denver Smith	1520	DBAR Reminder DBAR Reminder SMS
27842511875	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa D.E Moyser	1520	DBAR Reminder DBAR Reminder SMS
27843455387	Telkom Mobile	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Ohentse Reginald Leeuw	1520	DBAR Reminder DBAR Reminder SMS
27845147637	Vodacom	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Clinton Payne	1520	DBAR Reminder DBAR Reminder SMS
27845939373	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Ilze Kruger	1520	DBAR Reminder DBAR Reminder SMS
27847562203	MTN	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 20:13	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Camilla Mostert	1520	DBAR Reminder DBAR Reminder SMS
27849661249	CELL C	DELIVRD	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 16:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Patrick Dowing	1520	DBAR Reminder DBAR Reminder SMS
2,78326E+11	MTN	UNDELIV	2022/11/23 16:41	2022/11/23 16:41	2022/11/23 18:41	Herinnering Voorgestelde TGS-verkenningspermit: Die konsep BA-verslag is beskikbaar vir kommentaa Budget Wods	1520	DBAR Reminder DBAR Reminder SMS

PhoneNumber	Network	Status	ScheduledDate	SubmittedDate	StatusDate	CustomerID	SentData	Value1	Value2	Value3	Value4	Value5	Value6	Group Name	Group Description
							ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumaneka ukuze kunikwe izimvo kwiwebhusayithi yeEIMS https://www.elms.co.za/2022/08/15/1520-proposed-tgs-selmic-reconnaissance kunye nezinye iindawo zoluntu. Izimvo nge-25 Nov 2022. EIMS: 0117897170; tgs@elms.co.za; PO Box 2083,								
27603411315	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		Pinegowrie, 2123.	N Dowries						1520 DBAR Reminder	DBAR Reminder SMS
27604174618	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Thobeka Gxakaza						1520 DBAR Reminder	DBAR Reminder SMS
27604175882	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Christian John Adams						1520 DBAR Reminder	DBAR Reminder SMS
27604856807	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Teresa Boois						1520 DBAR Reminder	DBAR Reminder SMS
27604934965	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	David Dirk						1520 DBAR Reminder	DBAR Reminder SMS
27605729811	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Mapaseka Lukhele						1520 DBAR Reminder	DBAR Reminder SMS
27607798560	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	H.A. Hornimann						1520 DBAR Reminder	DBAR Reminder SMS
27608244713	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Anthony Sloet						1520 DBAR Reminder	DBAR Reminder SMS
27608650958	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Carisa Soudens						1520 DBAR Reminder	DBAR Reminder SMS
27609712488	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Jeff Heinecken						1520 DBAR Reminder	DBAR Reminder SMS
27610984064	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Shana Diergaardt						1520 DBAR Reminder	DBAR Reminder SMS
27615423676	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Rubin Gallant						1520 DBAR Reminder	DBAR Reminder SMS
27620742115	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 14:01		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Callen Clockie						1520 DBAR Reminder	DBAR Reminder SMS
27621026932	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:54		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Gloria Beukes						1520 DBAR Reminder	DBAR Reminder SMS
27626739894	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Georga Lenee						1520 DBAR Reminder	DBAR Reminder SMS
27627216114	CELL C	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Richard Dewee						1520 DBAR Reminder	DBAR Reminder SMS
27630513903	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Jeff van Neel						1520 DBAR Reminder	DBAR Reminder SMS
27630912970	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Masonwabe Zwelifile						1520 DBAR Reminder	DBAR Reminder SMS
27631180777	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Davice Heese						1520 DBAR Reminder	DBAR Reminder SMS
27631465634	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 15:24		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Walter Steenkamp						1520 DBAR Reminder	DBAR Reminder SMS
27632127099	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Gloria Girimane						1520 DBAR Reminder	DBAR Reminder SMS
27632147674	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	John Ellis						1520 DBAR Reminder	DBAR Reminder SMS
27632865440	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Anna Bock						1520 DBAR Reminder	DBAR Reminder SMS
27633190161	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	C Lombard						1520 DBAR Reminder	DBAR Reminder SMS
27633235131	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Desmond Bertoni						1520 DBAR Reminder	DBAR Reminder SMS
27633523333	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Charmain Coetzee						1520 DBAR Reminder	DBAR Reminder SMS
27634109952	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Davin du Plessis						1520 DBAR Reminder	DBAR Reminder SMS
27634281525	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Lee Markus						1520 DBAR Reminder	DBAR Reminder SMS
27634585327	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Schalk						1520 DBAR Reminder	DBAR Reminder SMS
27634830653	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Charleen Claudette van Nooi						1520 DBAR Reminder	DBAR Reminder SMS
27635249200	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Rudi Young						1520 DBAR Reminder	DBAR Reminder SMS
27637884504	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Karin Cloete						1520 DBAR Reminder	DBAR Reminder SMS
27638061277	MTN	UNDELIV	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 15:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Edward Mostert						1520 DBAR Reminder	DBAR Reminder SMS
27642401921	CELL C	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	D Samuels						1520 DBAR Reminder	DBAR Reminder SMS
27643668832	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Frikkie Smit						1520 DBAR Reminder	DBAR Reminder SMS
27656180827	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Sharon Marionette Scholtz						1520 DBAR Reminder	DBAR Reminder SMS
27658708983	Telkom Mobile	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Rosina Klaase						1520 DBAR Reminder	DBAR Reminder SMS
27661306348	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Kate Vraagom						1520 DBAR Reminder	DBAR Reminder SMS
27661687330	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Daniswa Nyondo						1520 DBAR Reminder	DBAR Reminder SMS
27663492092	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:55		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Menka Vansent						1520 DBAR Reminder	DBAR Reminder SMS
27664057488	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Delana Titus						1520 DBAR Reminder	DBAR Reminder SMS
27664560910	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Joseph Glenn Losper						1520 DBAR Reminder	DBAR Reminder SMS
27664796411	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Neville Van Rooy						1520 DBAR Reminder	DBAR Reminder SMS
27664859785	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Elaine Mills						1520 DBAR Reminder	DBAR Reminder SMS
27664944764	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Rosey Shoshola						1520 DBAR Reminder	DBAR Reminder SMS
27665866712	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Lindiwe Franks						1520 DBAR Reminder	DBAR Reminder SMS
27681952755	Telkom Mobile	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Sheldon Mathys						1520 DBAR Reminder	DBAR Reminder SMS
27682845286	Telkom Mobile	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:54		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Mnqobi Ngubane						1520 DBAR Reminder	DBAR Reminder SMS
27685043306	Telkom Mobile	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Nico Jano						1520 DBAR Reminder	DBAR Reminder SMS
27691125664	Telkom Mobile	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Leonard Peterson						1520 DBAR Reminder	DBAR Reminder SMS
27693955580	Telkom Mobile	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 14:00		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Carisa J Soudens						1520 DBAR Reminder	DBAR Reminder SMS
27710110424	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Gogill Daibe						1520 DBAR Reminder	DBAR Reminder SMS
27710416877	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Lwazi Mase						1520 DBAR Reminder	DBAR Reminder SMS
27710901290	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Beverly v/d Heever Schalk						1520 DBAR Reminder	DBAR Reminder SMS
27712262617	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Christiaan Mackenzie						1520 DBAR Reminder	DBAR Reminder SMS
27712319953	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Marcia Manes						1520 DBAR Reminder	DBAR Reminder SMS
27714840775	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Daryl Charles Kerspuy						1520 DBAR Reminder	DBAR Reminder SMS
27715187434	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	George N						1520 DBAR Reminder	DBAR Reminder SMS
27716720968	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Darryn de Vries						1520 DBAR Reminder	DBAR Reminder SMS
27716888292	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Paul Burkhardt						1520 DBAR Reminder	DBAR Reminder SMS
27717546754	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Riaan Hendricks						1520 DBAR Reminder	DBAR Reminder SMS
27718589339	Telkom Mobile	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Sherelee Odayar						1520 DBAR Reminder	DBAR Reminder SMS
27718820846	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Lisa Makaula						1520 DBAR Reminder	DBAR Reminder SMS
27719757170	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	L Maxxus						1520 DBAR Reminder	DBAR Reminder SMS
27719949546	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	William Jaap						1520 DBAR Reminder	DBAR Reminder SMS
27720638359	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Paul Stephanus Swart						1520 DBAR Reminder	DBAR Reminder SMS
27721224232	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Bonnie Schumann						1520 DBAR Reminder	DBAR Reminder SMS
27721353974	Vodacom	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Elizabeth Klasse						1520 DBAR Reminder	DBAR Reminder SMS
27721437303	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Beulah Williams						1520 DBAR Reminder	DBAR Reminder SMS
27721941947	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Alta Kotze						1520 DBAR Reminder	DBAR Reminder SMS
27722419157	Telkom Mobile	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49		ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	Andre Brahm Truter						1520 DBAR Reminder	DBAR Reminder SMS

2702

27723267504	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Meryn Cydal	1520 DBAR Reminder	DBAR Reminder SMS
27723764809	Vodacom	BLIST	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Nicholas Arnott	1520 DBAR Reminder	DBAR Reminder SMS
27724513058	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Adrian Ace Charles	1520 DBAR Reminder	DBAR Reminder SMS
27724600495	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Leilani Swartbooi	1520 DBAR Reminder	DBAR Reminder SMS
27724959715	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Darryl Colenbrander	1520 DBAR Reminder	DBAR Reminder SMS
27726535763	Vodacom	BLIST	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Nicola Joel	1520 DBAR Reminder	DBAR Reminder SMS
27726640698	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Ismat Adams	1520 DBAR Reminder	DBAR Reminder SMS
27727294282	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Nicollete Rheeder	1520 DBAR Reminder	DBAR Reminder SMS
27728095007	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Edward Mostert	1520 DBAR Reminder	DBAR Reminder SMS
27729129396	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Rose Nalon	1520 DBAR Reminder	DBAR Reminder SMS
27730814298	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani W Poggenloet	1520 DBAR Reminder	DBAR Reminder SMS
27731197988	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Ilze Worner	1520 DBAR Reminder	DBAR Reminder SMS
27732379775	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Joy Solomon	1520 DBAR Reminder	DBAR Reminder SMS
27732842780	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Rihann Brand	1520 DBAR Reminder	DBAR Reminder SMS
27733615105	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Wahlid	1520 DBAR Reminder	DBAR Reminder SMS
27733974712	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani C Louw	1520 DBAR Reminder	DBAR Reminder SMS
27734877040	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Morgen Dila	1520 DBAR Reminder	DBAR Reminder SMS
27735018378	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Katlholo Polori	1520 DBAR Reminder	DBAR Reminder SMS
27735102477	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Richard Petrus	1520 DBAR Reminder	DBAR Reminder SMS
27735416487	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:51	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Regan James	1520 DBAR Reminder	DBAR Reminder SMS
27735474948	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Natalie Weyers	1520 DBAR Reminder	DBAR Reminder SMS
27735612593	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Insaat Neale	1520 DBAR Reminder	DBAR Reminder SMS
27735857819	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Shannon Goouk	1520 DBAR Reminder	DBAR Reminder SMS
27736379312	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Lelethu Mbane	1520 DBAR Reminder	DBAR Reminder SMS
27737233193	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Allister Gerome Lightburn	1520 DBAR Reminder	DBAR Reminder SMS
27737510107	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Amelia Job	1520 DBAR Reminder	DBAR Reminder SMS
27737728425	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Nicolaas Booysen	1520 DBAR Reminder	DBAR Reminder SMS
27737778866	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Siyabulela Liwani	1520 DBAR Reminder	DBAR Reminder SMS
27738777274	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Siyabulelo Mafuneko	1520 DBAR Reminder	DBAR Reminder SMS
27739620432	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Mellisa Esau	1520 DBAR Reminder	DBAR Reminder SMS
27739681037	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	1520 DBAR Reminder	DBAR Reminder SMS
27739799951	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Pedro Garcia	1520 DBAR Reminder	DBAR Reminder SMS
27739948156	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Cilla Abrahams	1520 DBAR Reminder	DBAR Reminder SMS
27743364149	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:50	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Tribal Authority Lamberts Bay	1520 DBAR Reminder	DBAR Reminder SMS
27744224205	CELL C	UNDELIV	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 16:12	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Dominic Bugan	1520 DBAR Reminder	DBAR Reminder SMS
27744633225	CELL C	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Marcus Banga	1520 DBAR Reminder	DBAR Reminder SMS
27748351001	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Elma Fourie	1520 DBAR Reminder	DBAR Reminder SMS
27749635034	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Fidelis Moudeen	1520 DBAR Reminder	DBAR Reminder SMS
27760346173	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Boy Adams	1520 DBAR Reminder	DBAR Reminder SMS
27761659936	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Collin Cloete	1520 DBAR Reminder	DBAR Reminder SMS
27761676221	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Derick Maarman	1520 DBAR Reminder	DBAR Reminder SMS
27763140961	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Maia Nangle	1520 DBAR Reminder	DBAR Reminder SMS
27766880414	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Diana Mentoor	1520 DBAR Reminder	DBAR Reminder SMS
27767742709	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Pedro Garcia	1520 DBAR Reminder	DBAR Reminder SMS
27768088839	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani David Harper	1520 DBAR Reminder	DBAR Reminder SMS
27768122920	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Temba Tanci	1520 DBAR Reminder	DBAR Reminder SMS
27768696168	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Enrico Adams	1520 DBAR Reminder	DBAR Reminder SMS
27769166921	Vodacom	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Rio Button	1520 DBAR Reminder	DBAR Reminder SMS
27780527937	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Christine Naneville	1520 DBAR Reminder	DBAR Reminder SMS
27780787764	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Moddie de Wet	1520 DBAR Reminder	DBAR Reminder SMS
27780992780	MTN	UNDELIV	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 15:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Charlton James Stuurman	1520 DBAR Reminder	DBAR Reminder SMS
27781002058	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Johannes Jogemes Moolman	1520 DBAR Reminder	DBAR Reminder SMS
27781030685	MTN	UNDELIV	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 15:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Pedro Garcia	1520 DBAR Reminder	DBAR Reminder SMS
27783135525	CELL C	UNDELIV	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:52	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Hermanus Frederick	1520 DBAR Reminder	DBAR Reminder SMS
27783252675	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Mable Samuels	1520 DBAR Reminder	DBAR Reminder SMS
27783984585	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Natasha James	1520 DBAR Reminder	DBAR Reminder SMS
27784590950	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Albertus Johannes Pool	1520 DBAR Reminder	DBAR Reminder SMS
27787468627	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Angelina Thana	1520 DBAR Reminder	DBAR Reminder SMS
27787588969	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Vhonani Ramugondo	1520 DBAR Reminder	DBAR Reminder SMS
27787713228	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Jenifer Swartz	1520 DBAR Reminder	DBAR Reminder SMS
27787992545	Vodacom	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Rudian Daily	1520 DBAR Reminder	DBAR Reminder SMS
27788855441	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Oregus	1520 DBAR Reminder	DBAR Reminder SMS
27791116342	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Derian Rooi	1520 DBAR Reminder	DBAR Reminder SMS
27793977081	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Mtutuzeli Tyalimpi	1520 DBAR Reminder	DBAR Reminder SMS
27795117431	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani William Josef Farmer	1520 DBAR Reminder	DBAR Reminder SMS
27795453563	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 14:24	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Lina Papier	1520 DBAR Reminder	DBAR Reminder SMS
27795661332	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Charles Lakay	1520 DBAR Reminder	DBAR Reminder SMS
27795882305	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Patricia francke	1520 DBAR Reminder	DBAR Reminder SMS
27796284177	Telkom Mobile	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Onke Ngcuka	1520 DBAR Reminder	DBAR Reminder SMS
27797307175	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:51	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Johan Leo	1520 DBAR Reminder	DBAR Reminder SMS
27798402364	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani James Malgas	1520 DBAR Reminder	DBAR Reminder SMS
27799063081	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Lionel Pietersen	1520 DBAR Reminder	DBAR Reminder SMS
27799274131	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Grezelda Samuels	1520 DBAR Reminder	DBAR Reminder SMS
27799951915	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Eduard Groenewald	1520 DBAR Reminder	DBAR Reminder SMS
27810658880	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Patrick Obies	1520 DBAR Reminder	DBAR Reminder SMS
27810739918	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Audrey Small	1520 DBAR Reminder	DBAR Reminder SMS

27812171752	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Werner Strauss	1520 DBAR Reminder	DBAR Reminder SMS
27812460350	Telkom Mobile	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Louise C Calvin	1520 DBAR Reminder	DBAR Reminder SMS
27813743488	Telkom Mobile	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Stefano Marani	1520 DBAR Reminder	DBAR Reminder SMS
27817319659	Telkom Mobile	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Moosa Hendrik Raise	1520 DBAR Reminder	DBAR Reminder SMS
27820423502	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Roberto Miguel Quintas	1520 DBAR Reminder	DBAR Reminder SMS
27822834227	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Korasie Maarman	1520 DBAR Reminder	DBAR Reminder SMS
27822918052	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 14:16	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Elizabeth Basson	1520 DBAR Reminder	DBAR Reminder SMS
27823212985	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Trevor Wilson	1520 DBAR Reminder	DBAR Reminder SMS
27823408534	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Adrian Pole	1520 DBAR Reminder	DBAR Reminder SMS
27823484315	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Colleen Plower	1520 DBAR Reminder	DBAR Reminder SMS
27823734883	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Rudolph Raath	1520 DBAR Reminder	DBAR Reminder SMS
27823995134	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani John Van der Heever	1520 DBAR Reminder	DBAR Reminder SMS
27824276686	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	1520 DBAR Reminder	DBAR Reminder SMS
27824524081	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Wendy Black	1520 DBAR Reminder	DBAR Reminder SMS
27825340296	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Niall Kramer	1520 DBAR Reminder	DBAR Reminder SMS
27825517230	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Simon Pratrick Leill-Cock	1520 DBAR Reminder	DBAR Reminder SMS
27825646603	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Wilherm Jorlaas America	1520 DBAR Reminder	DBAR Reminder SMS
27825694116	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Gustav von Mollendorf	1520 DBAR Reminder	DBAR Reminder SMS
27825762183	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Johannes Gerhardus Knoesen	1520 DBAR Reminder	DBAR Reminder SMS
27826012444	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Don Ncube	1520 DBAR Reminder	DBAR Reminder SMS
27826529137	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Lemgang Alvin Pitsoe	1520 DBAR Reminder	DBAR Reminder SMS
27826741407	Telkom Mobile	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Rolf J	1520 DBAR Reminder	DBAR Reminder SMS
27827232344	Telkom Mobile	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Marshadevi Chetty	1520 DBAR Reminder	DBAR Reminder SMS
27827289673	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Sarah Wilkinson	1520 DBAR Reminder	DBAR Reminder SMS
27827304534	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Nicolaas Booysen	1520 DBAR Reminder	DBAR Reminder SMS
27827489322	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Patrick Rulph	1520 DBAR Reminder	DBAR Reminder SMS
27827826067	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Nicky McLeod	1520 DBAR Reminder	DBAR Reminder SMS
27827896161	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	1520 DBAR Reminder	DBAR Reminder SMS
27828057553	Vodacom	UNDELIV	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 15:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Moses Mahunonyane	1520 DBAR Reminder	DBAR Reminder SMS
27828200062	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 17:29	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Adele Fourie	1520 DBAR Reminder	DBAR Reminder SMS
27828293911	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 17:25	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Johann Augustym	1520 DBAR Reminder	DBAR Reminder SMS
27828499251	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	1520 DBAR Reminder	DBAR Reminder SMS
27828500274	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Phumla Ngesi	1520 DBAR Reminder	DBAR Reminder SMS
27828506514	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Mike Muzzroll	1520 DBAR Reminder	DBAR Reminder SMS
27828526466	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Francois Du Toit	1520 DBAR Reminder	DBAR Reminder SMS
27828537815	Vodacom	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	1520 DBAR Reminder	DBAR Reminder SMS
27828798611	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Chris Helnecken	1520 DBAR Reminder	DBAR Reminder SMS
27828820826	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Christo Reeders	1520 DBAR Reminder	DBAR Reminder SMS
27828836741	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Abe Abrahams	1520 DBAR Reminder	DBAR Reminder SMS
27828880782	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Bryan Chennells	1520 DBAR Reminder	DBAR Reminder SMS
27828963593	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Charmaine Laubscher	1520 DBAR Reminder	DBAR Reminder SMS
27829007514	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Michele Rivarola	1520 DBAR Reminder	DBAR Reminder SMS
27829644662	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Thabang Komo	1520 DBAR Reminder	DBAR Reminder SMS
27832271922	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Derek Light	1520 DBAR Reminder	DBAR Reminder SMS
27832293861	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Nico Bezuidenhout	1520 DBAR Reminder	DBAR Reminder SMS
27832523136	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Jannie Loubser	1520 DBAR Reminder	DBAR Reminder SMS
27832652042	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Renato Gonsalves	1520 DBAR Reminder	DBAR Reminder SMS
27832682818	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Chris Kimber	1520 DBAR Reminder	DBAR Reminder SMS
27832743579	CELL C	BLIST	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Ian Patrick Mc Mahon	1520 DBAR Reminder	DBAR Reminder SMS
27832767596	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Cassi Goodman	1520 DBAR Reminder	DBAR Reminder SMS
27833091192	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Elise Tempelhoff	1520 DBAR Reminder	DBAR Reminder SMS
27834008554	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Anthony Maximilian Benadie	1520 DBAR Reminder	DBAR Reminder SMS
27834157610	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Joos Engelbrecht	1520 DBAR Reminder	DBAR Reminder SMS
27834197720	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani David Phillips	1520 DBAR Reminder	DBAR Reminder SMS
27834216196	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Mario Andrews	1520 DBAR Reminder	DBAR Reminder SMS
27834410084	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Budwalk	1520 DBAR Reminder	DBAR Reminder SMS
27834508753	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Sydney Yon	1520 DBAR Reminder	DBAR Reminder SMS
27834536060	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Michael Adolph Rangasamy	1520 DBAR Reminder	DBAR Reminder SMS
27834599959	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani	1520 DBAR Reminder	DBAR Reminder SMS
27834603963	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Sean Amor	1520 DBAR Reminder	DBAR Reminder SMS
27834604260	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Jacques Burgers	1520 DBAR Reminder	DBAR Reminder SMS
27835178197	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Nomathemba Sotomela	1520 DBAR Reminder	DBAR Reminder SMS
27836110494	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Rudolph Botha	1520 DBAR Reminder	DBAR Reminder SMS
27836308953	MTN	BLIST	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Stephanus Petrus Cornelissen	1520 DBAR Reminder	DBAR Reminder SMS
27836405298	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Willem Louw	1520 DBAR Reminder	DBAR Reminder SMS
27836456565	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Jacques Cloete	1520 DBAR Reminder	DBAR Reminder SMS
27836754919	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Brendin Robert Tweedale	1520 DBAR Reminder	DBAR Reminder SMS
27836778872	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Dorothy Louise Tweedale	1520 DBAR Reminder	DBAR Reminder SMS
27837033882	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Mogammud Allie Baderoen	1520 DBAR Reminder	DBAR Reminder SMS
27837232510	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Authur Jasen	1520 DBAR Reminder	DBAR Reminder SMS
27837426342	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Nonkululeko Sylvia Dlamini	1520 DBAR Reminder	DBAR Reminder SMS
27837432042	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Jan van Niekerk	1520 DBAR Reminder	DBAR Reminder SMS
27837702166	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani John Mentoor	1520 DBAR Reminder	DBAR Reminder SMS
27837891067	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Janet Solomon	1520 DBAR Reminder	DBAR Reminder SMS
27838702889	MTN	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Kerwin Rana	1520 DBAR Reminder	DBAR Reminder SMS
27839458667	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Jodine Cloete	1520 DBAR Reminder	DBAR Reminder SMS

27839559777	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Ikhaesen Maart	1520 DBAR Reminder	DBAR Reminder SMS
27839826939	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Desmond Mathew	1520 DBAR Reminder	DBAR Reminder SMS
27839881196	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Obakeng Molelu	1520 DBAR Reminder	DBAR Reminder SMS
27840309672	CELL C	EXPIRED	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 20:28	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani A Adams	1520 DBAR Reminder	DBAR Reminder SMS
27840502315	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:50	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Fabian Kevin Ah-sing	1520 DBAR Reminder	DBAR Reminder SMS
27840875199	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Johannes Walter Steenkamp	1520 DBAR Reminder	DBAR Reminder SMS
27842159911	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Denver Smith	1520 DBAR Reminder	DBAR Reminder SMS
27842511875	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani D.E Moyser	1520 DBAR Reminder	DBAR Reminder SMS
27843455387	Telkom Mobile	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Ohentse Reginald Leeuw	1520 DBAR Reminder	DBAR Reminder SMS
27845147637	Vodacom	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Clinton Payne	1520 DBAR Reminder	DBAR Reminder SMS
27845939373	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Ilze Kruger	1520 DBAR Reminder	DBAR Reminder SMS
27847562203	MTN	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Camilla Mostert	1520 DBAR Reminder	DBAR Reminder SMS
27849661249	CELL C	DELIVRD	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 13:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Patrick Dowing	1520 DBAR Reminder	DBAR Reminder SMS
2,78326E+11	MTN	UNDELIV	2022/11/24 13:49	2022/11/24 13:49	2022/11/24 15:49	ISikhumbuzi Esicetywayo seMvume yokuFumana kwakhona kweTGS: Ingxelo yeBA eyiDrafti iyafumani Budget Wods	1520 DBAR Reminder	DBAR Reminder SMS

Registered Mail 1520 TGS Reconnaissance Basic Assessment

2022/10/25 DBAR Availability

Pre-identified

1520–42

Cooperative Governance and Traditional Affairs

Private Bag X804, PRETORIA, 0001

Track and Trace Customer Copy

INSURED PARCEL
PA 443 050 773 ZA
A BOOK COPY

ace Barcode

1520–29

Thandiwe

Benguela Current Commission

Executive Secretary

Private Bag 5031 Swakopmund Namibia

Track and Trace Customer Copy

INSURED PARCEL
PA 443 050 760 ZA
A BOOK COPY

ce Barcode

1520–515

Mr Uzair Adam

Track and Trace Customer Copy

Track and Trace Barcode

1520–80

Mr Nicky Alfred

Fishermans Cor Limited

Die Korf No.6, Lambertsbaai, 8130

Track and Trace Customer Copy

REGISTERED LETTER
(with a domestic insurance option)
RC471056261ZA

A BOOK COPY

ce Barcode

1520–190

Mogammud Allie Baderoen

Port Nolloth Abalone

Po Box 79, Bergvliet, Bergvliet, Western Cape, 7800

Track and Trace Customer Copy

REGISTERED LETTER
(with a domestic insurance option)
RC471056264ZA

A BOOK COPY

e Barcode

1520–163

Marcus Banga

Northern Cape Protech and Agri Revolution (Pty) Ltd

17A Hull Street De Beers Kimberley 8301

Track and Trace Customer Copy

REGISTERED LETTER
(with a domestic insurance option)
RC471056278ZA

A BOOK COPY

ce Barcode

1520–94

Marcos Barbery

Hondeklipbaai Visserye Bpk.

Posbus 53, Hondeklipbaai, 8222

Track and Trace Customer Copy

REGISTERED LETTER
(with a domestic insurance option)
RC471056255ZA

A BOOK COPY

ace Barcode

CRESTA
2022 -10- 26
13
2118

EIMS Project: 1520 Post Office Stamp DBAR Availability 2022/10/25

1520 *ε23β5ε12*

Individuals

1520–527 Bryan Chennells

49 Newlands Ave, Newlands, Cape Town

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056247ZA e Barcode

A BOOK COPY

1520–57 Ms Marshadevi Chetty

De Beers Group Services

Private Bag X01 Southdale, Southdale, Gauteng,2135

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056233ZA ace Barcode

A BOOK COPY

1520–667 Mike Copeland

SAPFIA

Chairperson

1st Floor Harbour Place; 7 Martin Hammerschlag Way; Cape Town

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056220ZA ce Barcode

A BOOK COPY

1520–70 Mr Randall Cullen

Diamond Fields South Africa (Pty) Ltd

Programme Manager

P O Box 7425, Roggebaai, 8012

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056216ZA ace Barcode

A BOOK COPY

1520–270 Ms Nonkululeko Sylvia Dlamini

Transnet Ltd

P O Box 72501, Parkview, Gauteng,2122

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056202ZA ce Barcode

A BOOK COPY

1520–167 Adela Fortune

Oceana Group

Group Company Secretary

PO Box 7206, Roggebaai, 8012

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056193ZA ace Barcode

A BOOK COPY

1520–194 Ms Adele Fourie

Port Splendour Pty Ltd

PO Box 13456, Noordstad, Port Elizabeth, Eastern Cape, 6018

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056180ZA ce Barcode

A BOOK COPY

CRESTA 2022 -10- 26 13 2118

EIMS Project: 1520 Post Office Stamp DBAR Availability 2022/10/25

1520 *ε23β5ε12*

1520–69
Lindiwe Franks
DHSWS- office of the Provincial Head
NC Region
28 Central Road Beaconsfield Kimberley 8300

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056176ZA ace Barcode
A BOOK COPY

1520–143
Mr C Goliath
Masakhane Fishing
St Markstraat 47, Lambertsbaai, 8130

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056162ZA and Trace Barcode
A BOOK COPY

1520–58
Mr Daryl Charles Kerspuy
De Beers Group Services
Private Bag X01, Southdale, Southdale, Gauteng, 2135

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056159ZA ce Barcode
A BOOK COPY

1520–122
Mr Chris Kimber
Kernel Marine Pty Ltd
P.O. Box 31, Stellenbosch, 7600

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056145ZA ce Barcode
A BOOK COPY

1520–81
Mr J Klaase
Fishermen Development Organisation
Posbus 125, Doringbaai, 8151

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056131ZA ce Barcode
A BOOK COPY

1520–115
Mr Johannes Gerhardus Knoesen
Isinda Tient Pty Ltd
8 Debra Street, Bellevue, Upington, 881

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056128ZA ce Barcode
A BOOK COPY

1520–191
Gert Koegelenberg
Port Nolloth Fish Factory
P O Box 24, Port Nolloth, 8280

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471056114ZA ce Barcode
A BOOK COPY

EIMS Project: 1520 Post Office Stamp DBAR Availability 2022/10/25

1520 *ε23β5ε12*

CRESTA 2022 -10- 26 13 0 2118

1520–205
Ms Alta Kotze
Richtersveld Municipality
Private Bag x113, Port Nolloth, 8280

REGISTERED LETTER (with a domestic insurance option) RC471056105ZA
A BOOK COPY
ce Barcode

Track and Trace Customer Copy

1520–139
Ohentse Reginald Leeuw
Mabour Ink Energy (Pty) Ltd
P.O. Box 102, Mothibistad Kuruman, 8474

REGISTERED LETTER (with a domestic insurance option) RC471056091ZA
A BOOK COPY
ce Barcode

Track and Trace Customer Copy

1520–180
Mr Joseph Glenn Losper
ORXY Mining
P.O. Box 95, Alexander Bay, 8290

REGISTERED LETTER (with a domestic insurance option) RC471056088ZA
A BOOK COPY
ce Barcode

Track and Trace Customer Copy

1520–256
Desmond Mathew
South Durban Community Environmental Alliance
Coordinator
18 Major Calvert Austerville Durban 4052

REGISTERED LETTER (with a domestic insurance option) RC471056074ZA
A BOOK COPY
ce Barcode

Track and Trace Customer Copy

1520–56
Mr Anton Meyer
De Beers Group of Companies
Namaqualand Mines
Private Bag X01 Kleinsee, 8282

REGISTERED LETTER (with a domestic insurance option) RC471056085ZA
A BOOK COPY
ce Barcode

Track and Trace Customer Copy

1520–257
Sherelee Odayar
South Durban Community Environmental Alliance
18 Major Calvert Austerville Wentworth 4052

REGISTERED LETTER (with a domestic insurance option) RC471056057ZA
A BOOK COPY
e Barcode

Track and Trace Customer Copy

1520–88
Mr Clinton Payne
GCL Inv Pty Ltd
7 Amstel Road, Bothsig

REGISTERED LETTER (with a domestic insurance option) RC471056043ZA
A BOOK COPY
ce Barcode

Track and Trace Customer Copy

EIMS Project: 1520
1520

Post Office Stamp: CRESTA 2022 -10- 26 13 NSW 2118

DBAR Availability 2022/10/25
ε23β5ε12

408

1520–17
Lemgang Alvin Pitsoe
Alexkor Soc Ltd
2nd Floor Building, 15 Woodlands Off, 20 Woodlands Drive, Woodmead, Gauteng, 2191

Track and Trace Customer Copy
REGISTERED LETTER (with a domestic insurance option) RC471056030ZA
A BOOK COPY
e Barcode

1520–575
Colleen Plower
PO Box 13534, Hout Bay, 7806

Track and Trace Customer Copy
REGISTERED LETTER (with a domestic insurance option) RC471056026ZA
A BOOK COPY
ce Barcode

1520–97
Mr Mooshin Seedat
iGas
P.O. Box 786141, Sandton, 2146

Track and Trace Customer Copy
REGISTERED LETTER (with a domestic insurance option) RC471056012ZA
A BOOK COPY
e Barcode

1520–93
Ms Carisa J. Soudens
Hondeklip Bay Women's Group
P. O. Box 60, Hondeklipbaai

Track and Trace Customer Copy
REGISTERED LETTER (with a domestic insurance option) RC471056009ZA
A BOOK COPY
ace Barcode

1520–16
Leilani Swartbooi
Alexkor
1 Orange Road, Alexander Bay, 8290

Track and Trace Customer Copy
REGISTERED LETTER (with a domestic insurance option) RC471055992ZA
A BOOK COPY
ice Barcode

1520–196
The Managing Director
Premier Fishing (SA) (Pty) Ltd
P O Box 24, Port Nolloth, 8280

Track and Trace Customer Copy
REGISTERED LETTER (with a domestic insurance option) RC471055889ZA
A BOOK COPY
ce Barcode

1520–157
Mr Toivo Uahengo
Nambian Government
Ministry of Environment and Tourism, Directorate Scientific Services (DSS), Research and Permit Control
Private Bag 13306, Windhoek, Namibia

Track and Trace Customer Copy
REGISTERED LETTER (with a domestic insurance option) RC471055975ZA
A BOOK COPY
Track and Trace Barcode

EIMS Project: 1520
1520

Post Office
CRESTA
2022 -10- 26
13 6
2118

DBAR Availability 2022/10/25
ε23β5ε12

1520-591 Rimon van Bala

Flat BB9, Hout Bay, Salmander Str, 7806

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055961ZA e Barcode

A BOOK COPY

1520-147 Mr AS Van der Merwe

Moneyline 344 (Pty) Ltd

P O Box 35, Saldanha, 7395

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055958ZA ce Barcode

A BOOK COPY

1520-186 Mr Van Noordwyk

Pioneer Fishing (Pty) Ltd

P O Box 25, St Helena Bay, 7390

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055944ZA ace Barcode

A BOOK COPY

1520-181 Mr van Wyk

Pakamani Fishing (Pty) Ltd

P O Box 41, Saldanha, 7395

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055935ZA ace Barcode

A BOOK COPY

1520-119 Gustav von Mollendorf

Kamiesberg LM

PO Box X200 , Garies , 8220

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055927ZA e Barcode

A BOOK COPY

1520-158 Ms Avril Williamson

National Department of Cooperative Governance and Traditional Affairs

Private Bag X804, Pretoria, 0001

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055913ZA ce Barcode

A BOOK COPY

Pre-identified: Competent Authority

1520-303 Mrs L Mekwe

Petroleum Agenc SA

RSA Rights and Permits

PO Box 5111, Tygervalley, 7536

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055900ZA ce Barcode

A BOOK COPY

Pre-identified: District Municipality

CRESTA Post Office Stamp 2022 -10- 26 13 6 2718

EIMS Project: 1520

DBAR Availability 2022/10/25

1520

ε23β5ε12

1520–305 Jodine Cloete
Namakwa District Municipality
Communications Manager
Private Bag X20, SPRINGBOK, 8240

Track and Trace
Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055895ZA
A BOOK COPY
Barcode

1520–306 Mr Chris Fortuin
Namakwa District Municipality
Municipal Manager
Private Bag X20, SPRINGBOK, 8240

Track and Trace
Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055887ZA
A BOOK COPY
Barcode

1520–309 Ms Vic Kabelin
West Coast Marine Conservation Society
39 Highway Road, Fish Hoek, 7975

Track and Trace
Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055873ZA
A BOOK COPY
Barcode

1520–307 Mr Denver Smith
Namakwa District Municipality
Environmental Manager
Private Bag X20, Springbok, 8240

Track and Trace
Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055880ZA
A BOOK COPY
Barcode

Pre-identified: Local Municipality

1520–345 Swartland Muni
Swartland Local Municipality
Development Services
Private Bag X52, Malmesbury 7299

Track and Trace
Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055856ZA
A BOOK COPY
Barcode

1520–332
Richtersveld Local Municipality
Private Bag X113, Port Nolloth, 8280

Track and Trace
Customer Copy

INSURED PARCEL
PA 443 050 742 ZA
A BOOK COPY
Barcode

1520–333 Ms Gloria Beukes
Richtersveld Local Municipality
Ward 3
Private Bag X113, Port Nolloth, 8280

Track and Trace
Customer Copy

INSURED PARCEL
PA 443 050 756 ZA
A BOOK COPY
Barcode

1520–317
Damphne Beukes
Kamiesberg Local Municipality
Head of Communications
Private Bag X200, Garies, 8220

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055842ZA ce Barcode
A BOOK COPY

1520–319
Mr Joseph Cloete
Kamiesberg Local Municipality
Municipal Manager
Private Bag X200, Garies, 8220

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055825ZA ce Barcode
A BOOK COPY

1520–318
Cllr Mervine Cloete
Kamiesberg Local Municipality
Executive Mayor
Private Bag X200, Garies, 8220

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055811ZA e Barcode
A BOOK COPY

1520–335
Ms Ethel Cloete
Richtersveld Local Municipality
Head of Communications
Private Bag X113, Port Nolloth, 8280

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055839ZA ce Barcode
A BOOK COPY

1520–329
Mr Gareth Cloete
Namakwa District Municipality
Corporate and Municipal Health Services
Private Bag X20, SPRINGBOK, 8240

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055768ZA ace Barcode
A BOOK COPY

1520–326
Mr Moeketsi Dichaba
Nama Khoi Local Municipality
Municipal Manager
Private Bag X1012, De Aar, 7001

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055754ZA ce Barcode
A BOOK COPY

1520–336
Ms Danele Farmer
Richtersveld Local Municipality
Private Bag X113, Port Nolloth, 8280

Track and Trace Customer Copy

REGISTERED LETTER (with a domestic insurance option) RC471055745ZA ce Barcode
A BOOK COPY

EIMS Project: 1520
1520

DBAR Availability 2022/10/25
ε23β5ε12

CRESTA
2022 -10- 26
13 6
NSM 2118

1520–337
Cllr Authur Jasen
Richtersveld Local Municipality
Executive Mayor
Private Bag X113, Port Nolloth, 8280

Track and Trace Customer Copy

REGISTERED LETTER with a domestic insurance option RC471055737ZA
A BOOK COPY
e Barcode

1520–346
Mr Marais Kobus
Swartland Local Municipality
Occupational and Environmental Health Services
Private Bag X52, Malmesbury 7300

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 525 ZA
A BOOK COPY
ace Barcode

1520–338
Mr John Koninisi
Richtersveld Local Municipality
Infrastructure Manager
Private Bag X113, Port Nolloth, 8280

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 534 ZA
A BOOK COPY
ace Barcode

1520–330
Jannie Loubser
Namakwa District Municipality
Senior Management IDP
Private Bag X20, SPRINGBOK, 8240

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 548 ZA
A BOOK COPY
race Barcode

1520–314
Adriaan Neethling
Cederberg Local Municipality
Town Planning and Building Control / Environmental Management: Manager
Private Bag X2, Clanwilliam, 8135

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 551 ZA
A BOOK COPY
ace Barcode

1520–321
Mr Lionel Phillips
Matzikama Local Municipality
Community Developmement Sevices
PO Box 98, Vredendal, 8160

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 565 ZA
A BOOK COPY
race Barcode

1520–339
Ms Susanna S
Richtersveld Local Municipality
Land Use Zoning
Private Bag X113, Port Nolloth, 8280

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 579 ZA
A BOOK COPY
race Barcode

EIMS Project: 1520
1520

Post Office Stamp
CRESTA
2022 -10- 26
13 6
2118

DBAR Availability 2022/10/25
ε23β5ε12

1520–322
Mr G Seas
Matzikama Local Municipality
Municipal Manager
PO Box 98, Vredendal, 8160

Track and Trace Customer Copy
INSURED PARCEL
PA 443 043 582 ZA
A BOOK COPY
ace Barcode

1520–328
Cllr Jan van Wyk
Nama Khoi Local Municipality
Mayor
Private Bag X1012, De Aar, 7000

Track and Trace Customer Copy
INSURED PARCEL
PA 443 043 596 ZA
A BOOK COPY
ce Barcode

Pre-identified: NGO

1520–386
Mr Simon Gear
Birdlife South Africa
PO Box 515

Track and Trace Customer Copy
INSURED PARCEL
PA 443 043 605 ZA
A BOOK COPY
ace Barcode

1520–390
Ms Shelly Lizzio
Endangered Wildlife Trust
National Biodiversity and Business Network
Private Bag X11, Modderfontein, 1645

Track and Trace Customer Copy
INSURED PARCEL
PA 443 043 619 ZA
A BOOK COPY
ace Barcode

1520–391
Mr Thomas Mnguni
GroundWork
PO Box 2375, Pietermaritzburg, 320

Track and Trace Customer Copy
INSURED PARCEL
PA 443 043 622 ZA
A BOOK COPY
ace Barcode

1520–395
Mr Rudzani Nemajuka
Wildlife and Environment Society of South Africa (WESSA)
Environmental Officer
PO Box 435

Track and Trace Customer Copy
INSURED PARCEL
PA 443 043 636 ZA
A BOOK COPY
race Barcode

1520–376
Adrian Pole
Adrian Pole Attorneys on behalf of Green Connection
P O Box 671 · Hillcrest · 3650

Track and Trace Customer Copy
INSURED PARCEL
PA 443 043 640 ZA
A BOOK COPY
ace Barcode

EIMS Project: 1520
1520

Post Office Stamp
CRESTA
2022 -10- 26
2118

DBAR Availability 2022/10/25
ε23β5ε12

1520–388
Ms Hanneline Smit-Robinson
Birdlife South Africa
CEO
PO Box 515, Randburg, 2125

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 653 ZA
A BOOK COPY

ace Barcode

1520–379
Werner Strauss
Afriforum
District Coordinator: Kalahari Community Structures
P. O. Box 17216, Lyttelton, 0140

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 667 ZA
A BOOK COPY

ace Barcode

1520–389
Mr Martin Taylor
Birdlife South Africa
Special Projects
PO Box 515, Ranburg, 2125

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 684 ZA
A BOOK COPY

race Barcode

Pre-identified: Onshore Exploration

1520–406
Stefano Marani
Tetra4 (Pty) Ltd
Private Bag X10030, Randburg, 2125

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 707 ZA
A BOOK COPY

ice Barcode

1520–401
Mrs Carol-Ann Mocke
Anglo America
PO Box 62179, Marshalltown, 2107

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 724 ZA
A BOOK COPY

ce Barcode

1520–403
Ms Fiona Moir
Inert Fas Industries
P.O. Box 650555

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 738 ZA
A BOOK COPY

ace Barcode

1520–405
Moshe More
Maarifa Resources (Pty) Ltd
P.O. Box 78138, Sandton, 7536

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 715 ZA
A BOOK COPY

ace Barcode

Pre-identified: Organ of State

EIMS Project: 1520
1520

Post Office CRESTA
2022 -10- 26
13 6
2118

DBAR Availability 2022/10/25
ε23β5ε12

1520–425

National Department of Environmental Affairs
Directorate: Coastal Conservation Strategies
PO Box 52126, V&A Waterfront, Cape Town, 8002

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 698 ZA
A BOOK COPY
race Barcode

1520–452

Mr Abe Abrahams
Northern Cape Department of Water and Sanitation
Chief Director
Private Bag X602, Kimberly, 8300

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 675 ZA
A BOOK COPY
ace Barcode

1520–441

Mr Lorato Banda
Northern Cape Department of Agriculture, Land Reform and Rural Development
Senior Management
Private Bag X5018, Kimberly, 8300

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 809 ZA
A BOOK COPY
ace Barcode

1520–421

Ms R.L. Bosoga
National Department of Agriculture, Forestry and Fisheries
Land Use and Soil Management
Private Bag X120, Pretoria, 0001

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 812 ZA
A BOOK COPY
ce Barcode

1520–447

Mr J. Fortuin
Northern Cape Department of Environment and Conservation
Private Bag X16, Springbok, 8240

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 786 ZA
A BOOK COPY
ce Barcode

1520–418

Mr John Geeringh
Eskom
Senior Environmental Advisor Eskom GC - Land Development
PO Box 1091, Johannesburg, 2001

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 790 ZA
A BOOK COPY
ace Barcode

1520–464

Ms Natasha Higgitt
SAHRA
Heritage Officer
PO Box 4637, Cape Town, 8000

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 769 ZA
A BOOK COPY
ce Barcode

EIMS Project: 1520

1520

DBAR Availability 2022/10/25

ε23β5ε12

CAPE TOWN
2022 -10- 26
13
Nsm
2118

1520–438
Ms Jeanine Julies
National Department of Water and Sanitation
Chief Director: Communication Services
Private Bag X313, Pretoria, 0001

INSURED PARCEL
PA 443 043 772 ZA
A BOOK COPY
ce Barcode

Track and Trace
Customer Copy

1520–455
Mr N Latsky
Paternoster Fishery Group
Posbus 3859, Tygervallei, 7536

INSURED PARCEL
PA 443 043 741 ZA
A BOOK COPY
ce Barcode

Track and Trace
Customer Copy

1520–468
Lipuo Lebakeng
Transnet
Port Terminal: Cape Town
PO Box 10124, O. R. Tanbo Parade, Durban, 4056

INSURED PARCEL
PA 443 043 755 ZA
A BOOK COPY
ce Barcode

Track and Trace
Customer Copy

1520–445
Mr G Mabilo
Northern Cape Department of Economic Development and Tourism
Acting Head of Department
Privte Bag X6108, Kimberly, 8300

INSURED PARCEL
PA 443 043 826 ZA
A BOOK COPY
ace Barcode

Track and Trace
Customer Copy

1520–417
Mr Moses Mahunonyane
Department of Water and Sanitation
Director IE Northern Cape
Private Bag X601, Kimberly, 8300

INSURED PARCEL
PA 443 043 843 ZA
A BOOK COPY
ace Barcode

Track and Trace
Customer Copy

1520–436
Dr Nozizwe Makgalemele
National Department of Rural Development and Land Affairs
DDG: Spatial Planning and Land Use Management
Private Bag X833, Pretoria, 0001

INSURED PARCEL
PA 443 043 830 ZA
A BOOK COPY
e Barcode

Track and Trace
Customer Copy

1520–440
Mr Ernst Meissenheimer
Northern Cape Department of Agriculture
Posbus 18, Springbok, 8240

INSURED PARCEL
PA 443 043 857 ZA
A BOOK COPY
ce Barcode

EIMS Project: 1520
1520

Post Office Stamp
CRESTA
2022 -10- 26

DBAR Availability 2022/10/25
ε23β5ε12

1520–437
Adv. Vela Mngwengwe
National Department of Rural Development and Land Affairs
CD: Property Management and Advisory Services
Private Bag X833, Pretoria, 0001

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 865 ZA
A BOOK COPY

ace Barcode

1520–450
Mr Herman Mooketsi
Northern Cape Department of Social Development
Executive Manager of Social Welfare Services
Private Bag X5042, Kimberly, 8300

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 874 ZA
A BOOK COPY

ace Barcode

1520–427
Mr Ramakulukusha Moses
National Department of Environmental Affairs
Coastal Conservation Strategies
P.O. Box 52126, V&A Waterfront, Cape Town, 8002

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 888 ZA
A BOOK COPY

ace Barcode

1520–443
Mr WVD Mothibi
Northern Cape Department of Agriculture, Land Reform and Rural Development
Head of Department
Private Bag X5018, Kimberly, 8300

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 891 ZA
A BOOK COPY

e Barcode

1520–454
Lebogang Motlhaping
Northern Cape: Department of Transport, Safety and Liason
MEC's Office
Private Bag X1368, Kimberley, 8300

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 905 ZA
A BOOK COPY

ace Barcode

1520–448
Mr Kholekile Nogwili
Northern Cape Department of Roads and Public Works
Head of Department
PO Box 3132, Kimberly, 8300

Track and Trace Customer Copy

INSURED PARCEL
PA 443 043 914 ZA
A BOOK COPY

ce Barcode

1520–407
Loren Pavitt
CapeNature
Private Bag X29, Gatesville, 7766

Track and Trace Customer Copy

Track and Trace Barcode
INSURED PARCEL
PA 443 043 928 ZA
A BOOK COPY

EIMS Project: 1520

CRESTA Post Office Stamp
2022 -10- 26
13 8
2118

DBAR Availability 2022/10/25

1520

ε23β5ε12

1520–453
Ms Vhonani Ramugondo
Northern Cape Department of Water and Sanitation
Environmental Officer
Private Bag X6101, Kimberly, 8301

INSURED PARCEL
PA 443 043 931 ZA
A BOOK COPY

Track and Trace
Customer Copy

Trace Barcode

1520–449
Mr Herold Roberts
Northern Cape Department of Roads and Public Works
District Manager: Namakwa
PO Box 3132, Kimberly, 8300

INSURED PARCEL
PA 443 043 945 ZA
A BOOK COPY

Track and Trace
Customer Copy

ace Barcode

1520–451
Ms H. Samson
Northern Cape Department of Social Development
Head of Department
Private Bag X5042, Kimberly, 8300

INSURED PARCEL
PA 443 043 959 ZA
A BOOK COPY

Track and Trace
Customer Copy

ace Barcode

1520–422
Mrs Annette Stoltz
National Department of Agriculture, Forestry and Fisheries
Private Bag X120, Pretoria, 0001

INSURED PARCEL
PA 443 043 962 ZA
A BOOK COPY

Track and Trace
Customer Copy

ace Barcode

1520–423
Ms Mulalo Sundani
National Department of Agriculture, Forestry and Fisheries
Private Bag X120, Pretoria, 0001

INSURED PARCEL
PA 443 043 976 ZA
A BOOK COPY

Track and Trace
Customer Copy

ace Barcode

1520–439
Mr R. Timothy
Northern Cape Provincial Heritage Resource Agency
Private Bag X5004, Kimberly, 8300

INSURED PARCEL
PA 443 043 993 ZA
A BOOK COPY

Track and Trace
Customer Copy

ce Barcode

1520–429
Mr Toinette Van Der Merwe
National Department of Environmental Affairs
Integrated Environmental Authorisations
Private Bag X447, Pretoria, 0001

INSURED PARCEL
PA 443 043 980 ZA
A BOOK COPY

Track and Trace
Customer Copy

ace Barcode

EIMS Project: 1520 Office Use Only Stamp

CRESTA
2022 -10- 26
13
Msp 30118

DBAR Availability 2022/10/25

1520

ε23β5ε12

1520–465 Mr Brent Whittington
SANPARKS
Park Manager
PO Box 787, Pretoria, 0001

Track and Trace Customer Copy

INSURED PARCEL
PA 443 044 000 ZA
A BOOK COPY

ace Barcode

1520–446 Ms Jean Wilson
Northern Cape Department of Economic Development and Tourism
Acting Executive Manager: Tourism
Private Bag X6108, Kimberly, 8300

Track and Trace Customer Copy

INSURED PARCEL
PA 443 044 013 ZA
A BOOK COPY

ace Barcode

Pre-identified: Ward Councillor

1520–501 Cllr Marlene Cathlene Fredericks
Richtersveld Local Municipality
Ward 2
Private Bag X113, PORT NOLLOTH, 8280

Track and Trace Customer Copy

INSURED PARCEL
PA 443 044 027 ZA
A BOOK COPY

ace Barcode

1520–502 Cllr Maria Lovina Obies
Richtersveld Local Municipality
Ward 4
Private Bag X113, PORT NOLLOTH, 8280

Track and Trace Customer Copy

INSURED PARCEL
PA 443 044 035 ZA
A BOOK COPY

ace Barcode

1520–500 Cllr Katlholo Polori
Nama Khoi Local Municipality
Ward 8 (Kleinzee, Komaggas, Swartkop)
PO BOX 335, KOMMAGAS, KOMMAGAS, NORTHERN CAPE, 8242

Track and Trace Customer Copy

INSURED PARCEL
PA 443 044 044 ZA
A BOOK COPY

ace Barcode

1520–503 Cllr Caretas Sonamzi
Richtersveld Local Municipality
Ward 3
Private Bag X113, PORT NOLLOTH, 8280

Track and Trace Customer Copy

INSURED PARCEL
PA 443 044 058 ZA
A BOOK COPY

ace Barcode

Total Registered Letters: 111

Signature of Accepting Officer: _____

EIMS Project: 1520 Post Office Stamp DBAR Availability 2022/10/25

1520 *ε23β5ε12*

CRESTA
2022 -10- 26
13 6
2118

elfax.eims@gmail.com

From:	elfax.eims@gmail.com
Sent:	Tuesday, 25 October 2022 16:51
To:	0538313635@faxfx.net; 0538314685@faxfx.net; 0276528001@faxfx.net; 0276528001 @faxfx.net; 0276528001@faxfx.net; 0538711062@faxfx.net; 0538314685@faxfx.net; 0538313635@faxfx.net; 0538391773@faxfx.net; 0538711062@faxfx.net; 0538314535 @faxfx.net; 0538367692@faxfx.net; 0227188814@faxfx.net; 0117895188@faxfx.net; 0277121635@faxfx.net; 0278311596@faxfx.net; 0123295938@faxfx.net; 0113745418 @faxfx.net; 0866915580@faxfx.net; 0278311175@faxfx.net; 0538382600@faxfx.net; 0114833040@faxfx.net; 0277128040@faxfx.net; 0117895188@faxfx.net; 0275272556 @faxfx.net; 0277128041@faxfx.net; 0314681257@faxfx.net; 0275272556@faxfx.net; 0276528001@faxfx.net; 0123340603@faxfx.net; 0275272556@faxfx.net; 0278518847 @faxfx.net; 0865950676@faxfx.net; 0277128040@faxfx.net; 0277188814@faxfx.net; 0277128040@faxfx.net; 0866606092@faxfx.net; 0538313668@faxfx.net; 0114845004 @faxfx.net; 0118838576@faxfx.net; 0113082528@faxfx.net; 0123197607@faxfx.net; 0538314534@faxfx.net; 0117895188@faxfx.net; 0275272556@faxfx.net; 0277122270 @faxfx.net; 0277121635@faxfx.net; 0114833040@faxfx.net; 0214624509@faxfx.net; 0123234516@faxfx.net; 0277188814@faxfx.net; 0219383520@faxfx.net; 0278511101 @faxfx.net; 0218192425@faxfx.net; 0538420461@faxfx.net; 0538074600@faxfx.net; 0212500098@faxfx.net; 0219293104@faxfx.net; 0278517699@faxfx.net; 0866724183 @faxfx.net; 0123423948@faxfx.net; 0117924599@faxfx.net; 0538392291@faxfx.net; 0464406902@faxfx.net; 0866279835@faxfx.net; 0333425665@faxfx.net; 0538392291 @faxfx.net; 026461263131@faxfx.net; 0538313668@faxfx.net; 0866460663@faxfx.net; 0862934966@faxfx.net
Subject:	1520: TGS Reconnaisance Permit: Draft BAR and Public Meeting Notification
Attachments:	1520_BAR and Public meetings notification_AX.pdf

Dear Registered I&AP/ Geagte B&GP/Obekekileyo

Please find attached a letter with details regarding the availability of the Draft Basic Assessment Report and the proposed Public Meetings to be held for the above project. The Afrikaans and Xhosa text follow the English text.

Vind asseblief aangeheg 'n brief met besonderhede rakende die beskikbaarheid van die Konsep Basiese Assesseringsverslag en die voorgestelde Openbare Vergaderings wat vir bogenoemde projek gehou gaan word. Die Afrikaanse en Xhosa-teks volg die Engelse teks.

Uyacelwa ufumane incwadi eneenkcukacha malunga nokufumaneka kweNgxelo eyiDrafti yoVavanyo Lokusingqungileyo (DBAR) kunye neeNtlanganiso zoLuntu ezicetywayo eziya kubanjwa malunga nale projekthi ingentla. Umbhalo wesiBhulu nesiXhosa ulandela umbhalo wesiNgesi.

Kind regards,
Andisiwe Xuma
E: tgs@eims.co.za
T: 011 789 7170

From	Subject	Received	Size
Yesterday			
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
Fax Support	**Fax Error**	**Tue 2022/10/25...**	**4 KB**
<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		

3228

!	From	Subject	Received	Size
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Error	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Unable to send fax. Call was ended by receiver.		
	Fax Support	Fax Success	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Your fax was successfully sent.		
	Fax Support	Fax Success	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Your fax was successfully sent.		
	Fax Support	Fax Success	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Your fax was successfully sent.		
	Fax Support	Fax Success	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Your fax was successfully sent.		
	Fax Support	Fax Success	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Your fax was successfully sent.		
	Fax Support	Fax Success	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Your fax was successfully sent.		
	Fax Support	Fax Success	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Your fax was successfully sent.		
	Fax Support	Fax Success	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Your fax was successfully sent.		
	Fax Support	Fax Success	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Your fax was successfully sent.		
	Fax Support	Fax Success	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Your fax was successfully sent.		
	Fax Support	Fax Success	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Your fax was successfully sent.		
	Fax Support	Fax Success	Tue 2022/10/25...	4 KB
	<http://outbound01.ngntelecoms.com/logos/logo_1_20210831134601.png>	Your fax was successfully sent.		

SCREENING REPORT FOR AN ENVIRONMENTAL AUTHORIZATION AS REQUIRED BY THE 2014 EIA REGULATIONS – PROPOSED SITE ENVIRONMENTAL SENSITIVITY

EIA Reference number:

Project name: TGS Geophysical Reconnaissance Basic Assessment

Project title: TGS Geophysical Reconnaissance Basic Assessment

Date screening report generated: 25/07/2022 12:31:02

Applicant: TGS Geophysical Company (UK) Limited

Compiler: GP Kriel

Compiler signature:

.....

Application Category: Mining|Exploration Right|Gas or Oil Marine

OFFICIAL

Disclaimer applies
25/07/2022

Table of Contents

Proposed Project Location 3
Orientation map 1: General location 3
Map of proposed site and relevant area(s) 4
Cadastral details of the proposed site 4
Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area 4
Environmental Management Frameworks relevant to the application 4
Environmental screening results and assessment outcomes 5
Relevant development incentives, restrictions, exclusions or prohibitions 5
Map indicating proposed development footprint within applicable development incentive, restriction, exclusion or prohibition zones 6
Proposed Development Area Environmental Sensitivity 6
Specialist assessments identified 7
Results of the environmental sensitivity of the proposed area. 9

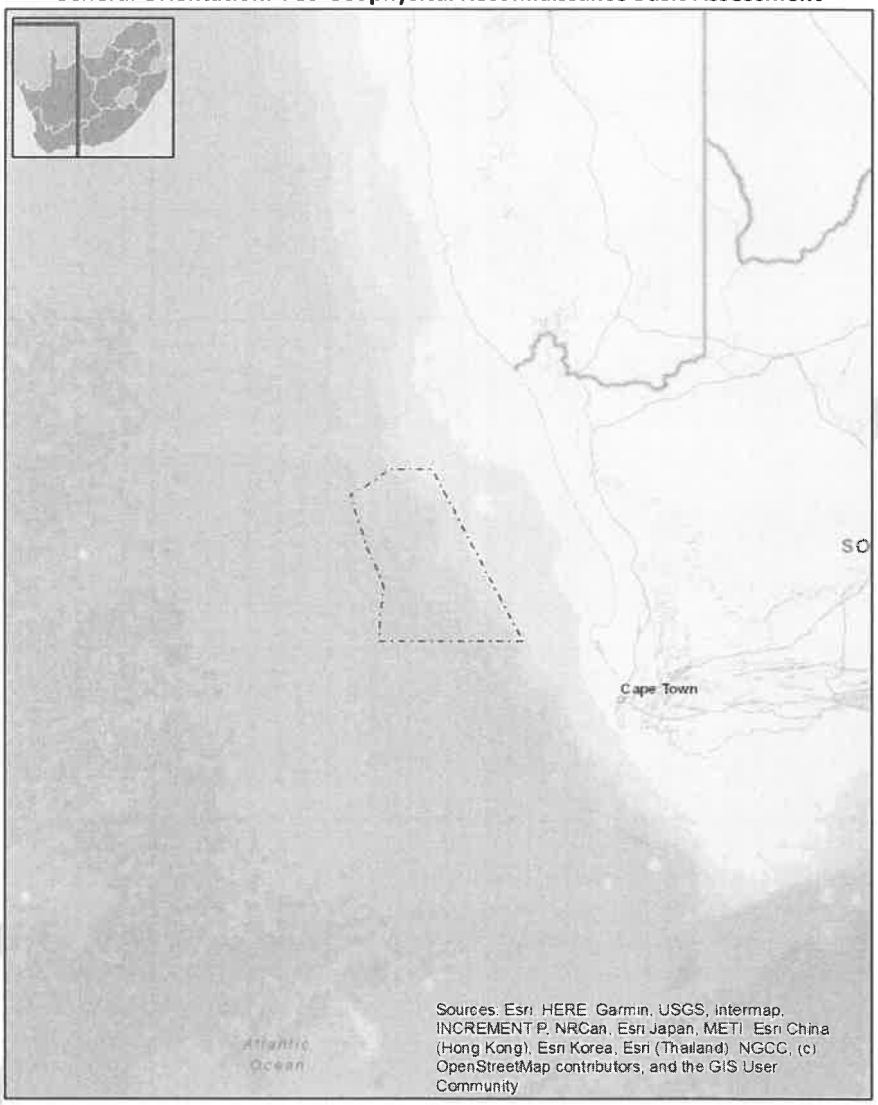
OFFICIAL

Disclaimer applies
25/07/2022

Proposed Project Location

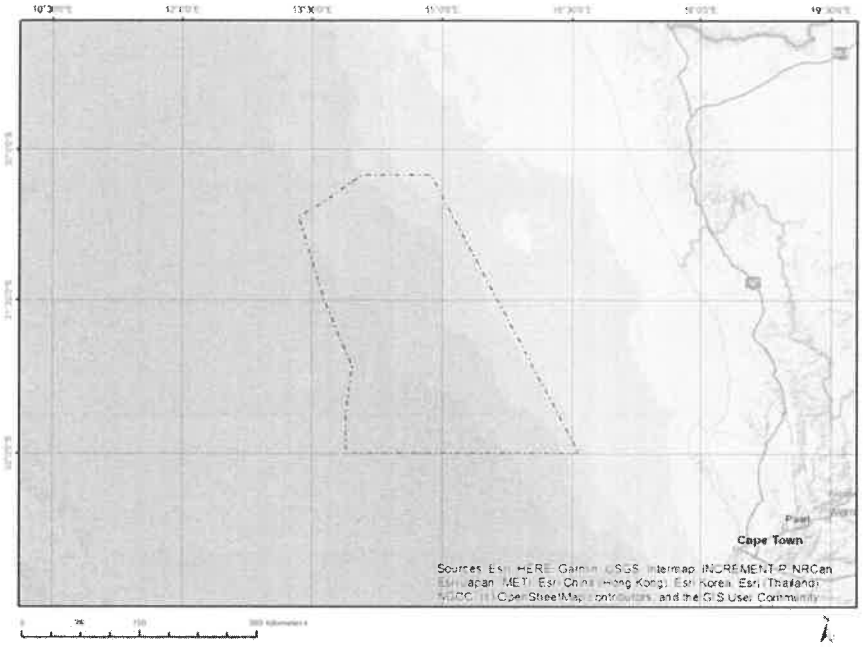
Orientation map 1: General location

General Orientation: TGS Geophysical Reconnaissance Basic Assessment



Disclaimer applies
25/07/2022

Map of proposed site and relevant area(s)



Cadastral details of the proposed site

Property details:
No intersection with any properties found.

Development footprint[1] vertices:
No development footprint(s) specified.

Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area

No nearby wind or solar developments found.

Environmental Management Frameworks relevant to the application

No intersections with EMF areas found.

[1] "development footprint", means the area within the site on which the development will take place and incudes all ancillary developments for example roads, power lines, boundary walls, paving etc. which require vegetation clearance or which will be disturbed and for which the application has been submitted.

OFFICIAL

Environmental screening results and assessment outcomes

The following sections contain a summary of any development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmental sensitive features on the site based on the site sensitivity screening results for the application classification that was selected. The application classification selected for this report is: **Mining|Exploration Right|Gas or Oil Marine**.

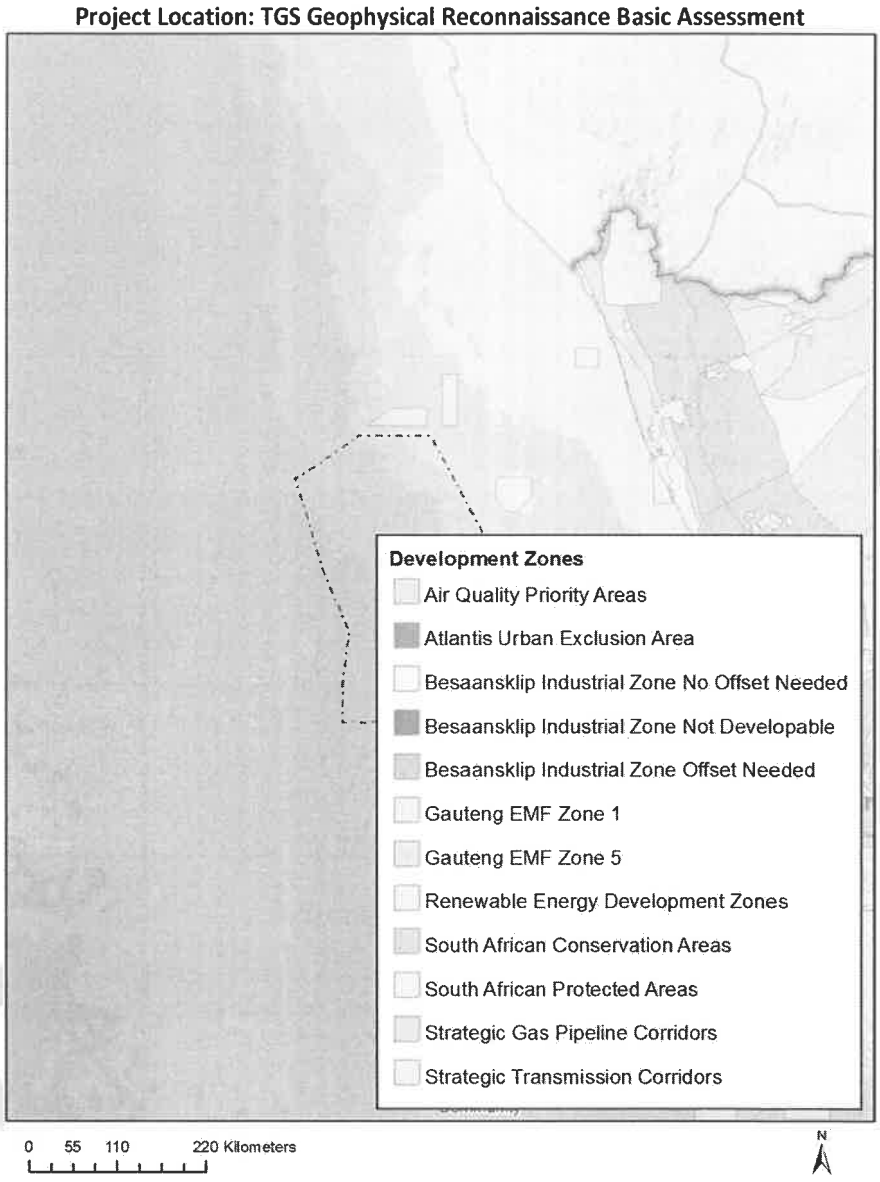
Relevant development incentives, restrictions, exclusions or prohibitions

The following development incentives, restrictions, exclusions or prohibitions and their implications that apply to this site are indicated below.

No intersection with any development zones found.

OFFICIAL

Map indicating proposed development footprint within applicable development incentive, restriction, exclusion or prohibition zones



Proposed Development Area Environmental Sensitivity

The following summary of the development site environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

No intersection with any sensitive areas found.

Specialist assessments identified

Based on the selected classification, and the environmental sensitivities of the proposed development footprint, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.

No	Specialist assessment	Assessment Protocol
1	Landscape/Visual Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
2	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Aquatic_Biodiversity_Assessment_Protocols.pdf
3	Marine Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
4	Avian Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Avifauna_Assessment_Protocols.pdf
5	Defense Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Defence_Installations_Assessment_Protocols.pdf
6	Noise Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Noise_Impacts_Assessment_Protocol.pdf
7	Radioactivity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
8	Traffic Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
9	Geotechnical Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
10	Climate Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
11	Health Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf

Disclaimer applies
25/07/2022

12	Socio-Economic Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
13	Ambient Air Quality Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
14	Air Quality Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
15	Seismicity Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf

OFFICIAL

Disclaimer applies
25/07/2022

JW08

Results of the environmental sensitivity of the proposed area.

The following section represents the results of the screening for environmental sensitivity of the proposed site for relevant environmental themes associated with the project classification. It is the duty of the EAP to ensure that the environmental themes provided by the screening tool are comprehensive and complete for the project. Refer to the disclaimer.

OFFICIAL

Disclaimer applies
25/07/2022

FNB

NOTIFICATION OF PAYMENT

To Whom It May Concern:

First National Bank hereby confirms that the following payment instruction has been received:

Date Actioned	: 2022/09/06
Time Actioned	: 06:56:38
Trace ID	: LNVV51WJ

Payer Details

Payment From	: *Environmental Impact M Ment Serv (pty)
Cur/Amount	: 2,000.00

Payee Details

Recipient/Account No	: . . 030832
Name	: Petroleum Agency SA
Bank	: ABSA BANK LIMITED
Branch Code	: 502110
Reference	: 12/1/040

END OF NOTIFICATION

To authenticate this Payment Notification, please visit the First National Bank website at fnb.co.za, select the "Verify Payments" link and follow the on-screen instructions.

Our customer (the payer) has requested First National Bank Limited to send this notification of payment to you. Should you have any queries regarding the contents of this notice, please contact the payer. First National Bank Limited does not guarantee or warrant the accuracy and integrity of the information and data transmitted electronically and we accept no liability whatsoever for any loss, expense, claim or damage, whether direct, indirect or consequential, arising from the transmission of the information and data.

First National Bank A division of FirstRand Bank Limited, An Authorised Financial Services and Credit Provider (NCRCP20).

Dr. Paul Martinez
Vice President Exploration
Africa Oil Corp.
Lilly House,
13 Hanover Square
London, W1S 1HN

26th July 2022

Dear Dr. Martinez,

Proposed 3D Multiclient Seismic Survey, Offshore South Africa

TGS Geophysical Company (UK) Limited ("TGS"), a wholly-owned subsidiary of TGS ASA, is established as a key player in the seismic services market. The company focuses on delivering high-quality Multi-Client seismic data and holds the world's largest offshore seismic library.

TGS is planning to acquire a 3D multi-client seismic survey, offshore South Africa. The survey is designed to image the limits of ultra-deepwater prospectivity along the South African margin, and the proposed survey is located over blocks with valid Exploration Rights. TGS requests permission to enter Block 3B/4B, offshore South Africa under the following conditions:

Indemnification:
Where during any seismic data acquisition services, TGS enters Block 3B/4B, TGS shall be and remain liable for, and hereby releases Africa Oil Corp. and any of its affiliates and officers and employees from all liability for, and shall protect, defend, indemnify, and hold Africa Oil Corp. and any of its affiliates and officers and employees harmless from and against, any and all claims:

(i) directly or indirectly arising out of any physical illness, injury, or death of any of TGS's personnel;
(ii) directly or indirectly arising out of any loss, harm, infringement, destruction, or damage of TGS's property, equipment or instruments or those of any TGS's affiliates;
(iii) arising in favour of or asserted by third parties on account of personal injury, death or damage to property of such third parties caused by TGS or any of TGS's affiliates or suppliers arising from, connected with or under the acquisition; and
(iv) for damage to the environment arising directly from surface pollution or contamination emanating from TGS's vessels while under TGS's custody or

TGS

TEL +44 1483 730201
FAX +44 1483 762620
Dukes Court, Duke Street
Woking, Surrey, GU21 5BH, UK

SPECTRUM GEO LTD Reg. no: 1979422
Reg. office: c/o Peachey & Co LLP, 95 Aldwych, London WC2B 4JF

control, caused or arising during the performance of any seismic data acquisition services.

Consent:

The consent by Africa Oil Corp. is granted on the following conditions:

(1) TGS shall have obtained all necessary regulatory approvals from the South African authorities to acquire 3D multi-client seismic data over the aforementioned blocks offshore the Orange Basin;

(2) TGS's planned acquisition of 3D multi-client seismic data over the aforementioned blocks in the Orange Basin shall not interfere with operations of Africa Oil Corp.; in the event of conflict of operations over same block or any other block operated by of Africa Oil Corp. (whether adjacent or not), Africa Oil Corp.'s operations shall take full precedence, except as otherwise previously agreed in writing by Africa Oil Corp.;

(3) The duration of the consent shall last for a period of twenty-four (24) months starting on the date on which this letter is approved and countersigned by signed Africa Oil Corp., and shall terminate at the end of same 24-month period unless a request for an extension to same 24-month period is previously granted in writing by Africa Oil Corp. at the request of TGS detailing the reasons for such requested extension;

(4) It is understood and agreed by both parties that the consent granted herein by Africa Oil Corp. does not in any way commit or bind Africa Oil Corp. to participate in TGS's planned acquisition of seismic data nor to license the TGS's acquired seismic data at any later date, and further that Africa Oil Corp. is not entitled to a copy of the seismic data without purchasing a license to such data from TGS; and

(5) Consent is granted on the basis that the ingress rights granted herein are granted on a non-exclusive basis, and TGS shall be solely responsible for coordination of its operations with third parties in the event of other contractors being active at the same time in the aforementioned blocks.

TGS provides assurance that proposed vessels and operatives meet the highest international QHSE standards and will ensure complete compliance with local restrictions, and government rules and regulations applicable to the safe conduct of marine seismic operations in the waters of South Africa.

We look forward to your kind consent to this forward-looking project. Please do not hesitate to contact me if you require any further information.

Yours sincerely,

Jason Robinson

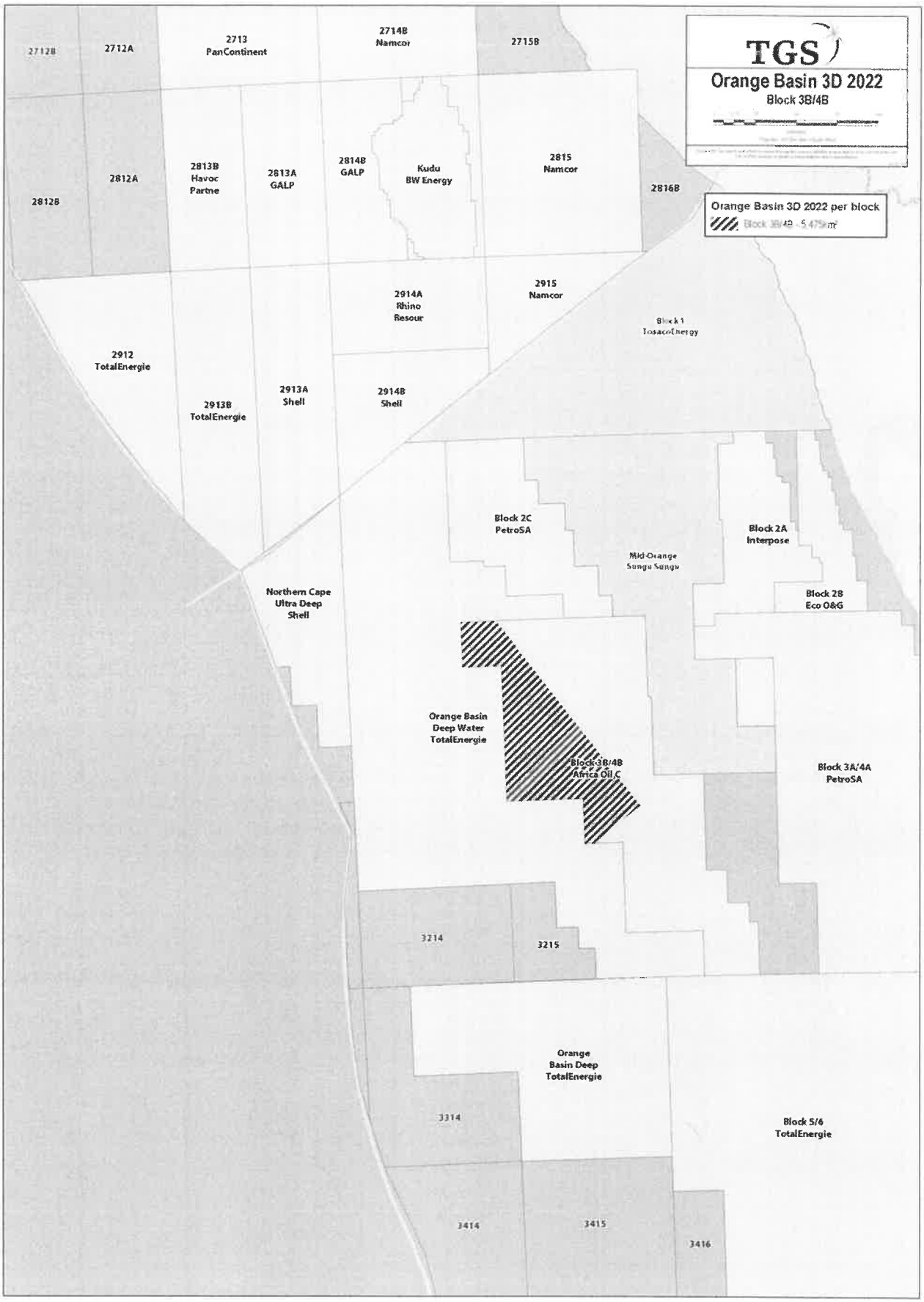
AGREED & ACCEPTED AFRICA OIL CORP.

Signed Paul A Martinez

Date August 1 2022

Paul A. Martinez

Name


TGS
Orange Basin 3D 2022
Block 3B/4B
Orange Basin 3D 2022 per block
Block 3B/4B - 5 475km²
2712B
2712A
2713
PanContinent
2714B
Namcor
2715B
2812B
2812A
2813B
Havoc
Partne
2813A
GALP
2814B
GALP
Kudu
BW Energy
2815
Namcor
2816B
2914A
Rhino
Resour
2915
Namcor
Block 1
TosacoEnergy
2912
TotalEnergie
2913B
TotalEnergie
2913A
Shell
2914B
Shell
Block 2C
PetroSA
Block 2A
Interpose
Mid-Orange
Sungu Sungu
Block 2B
Eco O&G
Northern Cape
Ultra Deep
Shell
Orange Basin
Deep Water
TotalEnergie
Block 3B/4B
Africa Oil C
Block 3A/4A
PetroSA
3214
3215
Orange
Basin Deep
TotalEnergie
3314
Block 5/6
TotalEnergie
3414
3415
3416

TotalEnergies
TOTALENERGIES EP SOUTH AFRICA B.V.
Exploration & Production

Cape Town, 29th August 2022

Our reference.: TEEPSA/2022-0086/GM.AF

Jevon Hilder
TGS
Dukes Court, Duke Street,
Woking, GU21 5BH, United Kingdom

Email: jevon.hilder@tgs.com

Copy: PASA Compliance Department:
Ms S Malie: malie.sibongile@petroleumagencysa.com;
Mr. D Aphane: aphaned@petroleumagencysa.com

Dear Jevon

RE: TGS NEW 3D MULTI-CLIENT SEISMIC ACQUISITION, OVER PART OF THE TOTALENERGIES EP SOUTH AFRICA B.V. ("TEEPSA B.V.") OPERATED DEEP WESTERN ORANGE BASIN BLOCK OFFSHORE, SOUTH AFRICA AND ORANGE DEEP BASIN BLOCK, OFFSHORE ORANGE RIVER BASIN, SOUTH AFRICA

This letter serves as a response to your letter dated 19th July 2022, seeking authorisation to acquire the multiclient 3D seismic data over TotalEnergies Blocks as illustrated in Appendix A, defined as Block Deep Western Orange Basin (DWOB) and Orange Deep Basin Block (OBD) (the "Blocks").

TEEPSA B.V. takes note of TGS SPECTRUM GEO LTD'S plan to acquire up to approximately 57,400 km2 of long-offset continuously recorded 3D seismic data over the Orange River Basin off the West Coast of South Africa and as defined in the attached map. With this letter, TEEPSA B.V. hereby grants TGS SPECTRUM GEO LTD permission to acquire data over the Blocks where TEEPSA B.V. is the operator. TGS SPECTRUM GEO LTD must ensure TEEPSA B.V. is continuously updated with the latest acquisition plan, including notification once a firm date of commencement of acquisition operations is available. In addition, once operations commence, TGS SPECTRUM GEO LTD must keep TEEPSA B.V. informed on the progress of operations on at least a weekly basis.

P O Box 4997, Tygervalley, Bellville 7536
T: +27(0) 21 900 4000

TotalEnergies EP South Africa B.V.
3rd Floor, Tygervalley Chambers Two, 27 Willie van Schoor Avenue, Bellville, 7530, South Africa
Reg. No. (External Profit Company 2010/020[illegible])

The consent and permission of TEEPSA B.V. under this letter are granted under the following conditions:

1) Indemnification:

Where during any seismic data acquisition activities, TGS SPECTRUM GEO LTD and/or any of its affiliates and/or subcontractors (collectively "TGS") enter TEEPSA B.Vs Blocks, TEEPSA B.V. shall not assume any responsibility nor liability for TGS SPECTRUM GEO LTD'S activities in the area, and TGS SPECTRUM GEO LTD shall be and remain liable for, and hereby releases TEEPSA B.V. and any of its affiliates and officers and employees from all liability for, and shall protect, defend, indemnify and hold TEEPSA B.V. and any of its affiliates and officers and employees harmless from an against any and all claims;

(i) Directly or indirectly arising out of any physical illness, injury, or death of any of TGS SPECTRUM GEO LTD's personnel;

(ii) Directly or indirectly arising out of any loss, harm, infringement, destruction, or damage of TGS SPECTRUM GEO LTD's property, equipment or instruments;

(iii) Arising from, connected with or under the acquisition or arising in favour of or asserted by third parties on account of personal injury, death or damage to property of such third parties caused by TGS SPECTRUM GEO LTD or any of its suppliers; and

(iv) Any and all claims for damage to the environment arising directly from surface pollution or contamination emanating from TGS SPECTRUM GEO LTD's vessels while under TGS SPECTRUM GEO LTD's custody or control caused or arising during the performance of any seismic data acquisition services.

2) Limited consent (any reconnaissance permit would be denied):

Furthermore, the consent by TEEPSA B.V. under this letter is granted on the following conditions:

(1) TGS SPECTRUM GEO LTD will have obtained all necessary regulatory approvals from the South African regulatory authorities to conduct and acquire multi-client 3D Seismic data over the Blocks, it being understood, however, that, as a matter of clarification, such regulatory approvals cannot and may not include any reconnaissance permit or other kind of permit whatsoever over any part of the Blocks, the issuing of which are prohibited under Section 74(2)(b) of the MPRDA. The issuing of any reconnaissance permit or other permit whatsoever would infringe the exclusive statutory rights of the current holders of the exploration rights over the Blocks and any successor in title, to conduct exploration activities and apply for continuation of licencing (with the sole exception of exploration activities authorized from time to time by those holders to third parties seeking for a permission to temporary ingress under certain conditions) and would be denied and, where appropriate, challenged before courts for being declared illegal and granted on an ultra vires basis;

(2) TGS SPECTRUM GEO LTD's planned acquisition of multi-client 3D Seismic data over the Blocks will be conducted entirely independently of any TEEPSA B.V.'s activities, and shall not interfere directly or indirectly with operations of TEEPSA B.V. in the event of conflict of operations over same Blocks or any other blocks operated by TEEPSA B.V. (whether adjacent or not), TEEPSA B.V.'s operations shall take full precedence, except as otherwise previously agreed in writing by TEEPSA B.V.

(3) The duration of the consent shall last for a period of twenty-four (24) months starting on the date on which this letter is approved and countersigned by signed Total E & P South Africa B.V., and shall terminate at the end of same 24-month period unless a request for an extension to same 24-month period is previously granted in writing by Total E & P South Africa B.V. at the request of TGS detailing the reasons for such requested extension ; and

(4) It is understood and agreed by both parties that the consent granted herein by TEEPSA B.V. does not in any way commit or bind TEEPSA B.V. to participate in TGS's planned acquisition of seismic data, nor to licence the TGS SPECTRUM GEO LTD's acquired seismic data at any later date, nor to otherwise contribute to the funding of any TGS SPECTRUM GEO LTD's survey.

Bertrand Touze (bertrand.touze@totalenergies.com) is the Business Development Manager for the TEEPSA B.V. operated Blocks which will be covered by your proposed survey and is the primary contact for matters regarding authorizations/permissions.

Yours sincerely,

Adewale FAYEMI
General Manager

Appendix: A

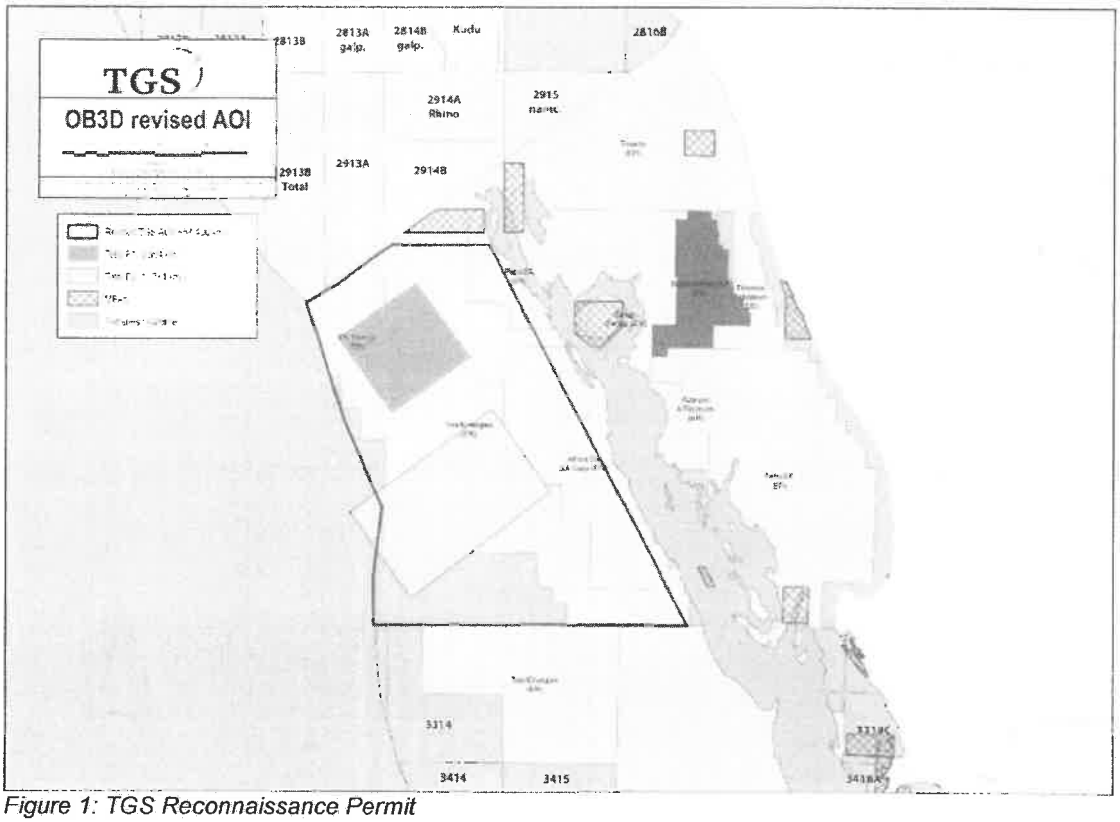


Figure 1: TGS Reconnaissance Permit

mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

Enquiries: Ms Sinazo Mnyaka
EAP Reg No.: 2022/5486
Email Address: mnyakas@petroleumagencysa.com

ENVIRONMENTAL AUTHORISATON IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF1998) AS AMENDED ("NEMA") AND ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 AS AMENDED

IN RESPECT OF

THE PROPOSED 3D SESIMIC SURVEY ACTIVITIES OFFSHORE, OFF THE WEST COAST, SOUTH AFRICA

APPLICATION DETAILS

Application Reference Number	12/1/040
Holder of Environmental Authorisation	TGS Geophysical Company (UK) Limited
Location of the Activity	The EA application area is located between approximately 120 km offshore of St Helena Bay, extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay. It covers several petroleum license blocks.
Size of the Environmental Authorisation application area	Approximately 5 740 000 ha

This authorisation does not negate the holder of the authorisation of the responsibility to comply with any other statutory requirements that may be applicable to the undertaking of the proposed activity.

DECISION ON THE AUTHORISATION

ACRONYMS

AGENCY	: Petroleum Agency SA
BAR	: Basic Assessment Report
DEPARTMENT	: Department of Mineral Resources and Energy
ECO	: Environmental Control Officer
EA	: Environmental Authorisation
EIA	: Environmental Impact Assessment
EIA REGULATIONS	: EIA Regulations, 2014, as amended
EMPr	: Environmental Management Programme
I&APs	: Interested and Affected Parties
MPRDA	: Mineral and Petroleum Resource Development Act, 2002 (Act 28 of 2002), as amended
NEMA	: National Environmental Management Act, 1998 (Act 107 of 1998), as amended

The Department is satisfied with the information made available to it, and subject to compliance with the conditions of this authorisation, that the applicant should be authorised to undertake NEMA EIA listed activities specified below. Details regarding the basis on which the Department reached this decision are set out in Annexure 1 of this authorisation.

ACTIVITY (S) AUTHORISED

By virtue of the powers conferred on it by the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations") the Department hereby **grants** the authorisation to **TGS Geophysical Company (UK) Limited** to undertake NEMA EIA listed activities specified in section 3 below and as described in the BAR/EMPr submitted on **06 December 2022.**

The granting of this authorisation is subject to compliance with conditions specified under section 5 below.

1. DETAILS OF THE HOLDER OF THIS ENVIRONMENTAL AUTHORISATION

TGS Geophysical Company (UK) Limited
TGS, Dukes Court Street
Woking, GU21 5BH
United Kingdom

Contact Person	: Mr Jevon Hilder
Tel	: +44 1483 742644
Cell	: +44 7788 315682
Email	: jevon.hilder@tgs.com

2. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

Environmental Impact Management Services (Pty) Ltd
PO Box 2083
Pinegowrie
2123

Contact Person	: Mr Liam Whitlow
Tel	: +27(0) 11 789 7170
Email	: liam@eims.co.za

3. LIST OF ACTIVITIES AUTHORISED

The following activity as listed under the EIA Regulations, 2014: Government Notice No. R983 of 04 December 2014, is authorised:

Listing Notice 1	
Activity Number	**: 21(b)**
Listed Activity	: Any activity including the operation of that activity which requires a reconnaissance permit in terms of section 74 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), as well as any other applicable activity as contained in this Listing Notice or

TGS Geophysical Company (UK) Limited-12/1/040

in Listing Notice 3 of 2014, required to exercise the reconnaissance permit, excluding:

(a) any desktop study; and

(b) any arial survey.

The holder of this authorisation is authorised to conduct the following activities within the area described under section 4 below:

- Acquisition of 3D seismic survey data, which involves generation of high-level, low frequency sound pulses by an acoustic instrument towed behind a survey vessel below the sea surface. The sounds are directed towards the seabed and the seismic signal is reflected by the geological interfaces below the seafloor. The reflected signals are received by an array of receivers or sets of hydrophones towed behind the vessel in a single streamer (2D) or in multiple streamers (3D) and are fed back to the recording instruments on board.
- The survey would involve a seismic sound source and multiple hydrophone streamers, which would be approximately 8 000 m long and 2 000 m wide. The streamers would be towed at a depth of 8 m below the surface and would not be visible, except for the tail-buoy at the terminal end of the cable.
- The array has an operating pressure of 2 000 pounds per square inch. The sound source would be towed behind the vessel at a depth of between 5 – 25 m below the surface. As the survey vessel would be restricted in maneuverability, other vessels should remain clear of it. Therefore, a support vessel usually assists in the operation of keeping other vessels at a safe distance.
- Each triggering of a sound source is termed a seismic pulse, and these are discharged at intervals of 6 – 20 seconds (depending on water depth and other environmental characteristics). Each seismic pulse is usually only between 5 and 30 milliseconds in duration, despite peak levels within each pulse being high, the total energy delivered into the water is low.
- Seismic sources have an energy frequency range of 5-300 Hz, with the optimal frequency required for deep penetration seismic work being 50-80 Hz. Sound levels from individual sound sources used today in the seismic industry range from 200 to 255 dB re 1 µPa at 1 m, for small to large individual seismic sources, respectively.
- For sound source arrays, sound levels range from 235 dB re 1 µPa at 1 m for a small array (500 cubic inches) to 260 dB re 1 µPa at 1 m for large arrays (7 900 cubic inches). Most of the produced energy is below 250 Hz, with 90% of the energy between 70 to 140 Hz, although pulses do contain some higher frequencies up to 16 kHz. It must be noted, however, that the sound level specifications for sound source arrays refer to sound levels in the vertical direction directly beneath the sound source array, generally near its centre, with nominal sound levels in the horizontal direction being ~10-20 dB lower.

- The seismic vessel travels along a transect of a prescribed grid within the application area chosen to cross any known or suspected geological structure in the area at a speed of between four and six knots during acquisition of data. The survey vessel length is approximately 100 m.

4. LOCATION OF THE APPLICATION AREA

The EA application area is located in the Northern and Western Cape Provinces approximately 120 km offshore of St Helena Bay extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay. It covers several petroleum license blocks. The area is approximately 5 740 000 hectares in extent and is adjacent to the Namaqualand and West Coast District Municipalities. The application area coordinates are listed in Table 1 below.

Table 1: Coordinates of the application area

Point	Latitude	Longitude	Point	Latitude	Longitude
1	32°59'53.46"S	16°35'02.75"E	6	30°40'16.36"S	13°20'38.26"E
2	32°59'57.95"S	13°53'17.25"E	7	30°32'53.92"S	13°35'15.39"E
3	32°39'06.43"S	13°53'26.20"E	8	30°15'21.82"S	14°04'05.31"E
4	32°09'29.22"S	13°58'04.38"E	9	30°15'27.76"S	14°52'28.65"E
5	31°31'44.64"S	13°39'01.12"E			

5. CONDITIONS OF THE AUTHORISATION

5.1 SCOPE OF AUTHORISATION

5.1.1 The holder is authorised to undertake activities specified in section 3 above.

5.1.2 The authorised activities must only be carried out within the application area specified in section 4.

5.1.3 The holder of this authorisation is responsible for ensuring compliance with the conditions of this authorisation.

5.1.4 Any person(s) acting on behalf of the holder, inclusive of contractor(s), subcontractor(s), consultant(s), and employees are also subject to the conditions of this authorisation. This condition, however, does not exonerate the holder from its accountability and responsibility to ensure compliance with the conditions of this authorisation.

5.1.5 Any changes to, or deviations from, and amendments to the proposed activities and conditions of this authorisation must be approved in writing by this Department before such changes, deviations or amendments are effected. The Department reserves the right to request the submission of information deemed necessary to assess and evaluate the significance and impacts of such changes, deviations, and amendments. Any changes, deviations and amendments may be subject to the provisions of Chapter 5 of the EIA Regulations, 2014 pertaining to the amendments of this authorisation.

5.2 NOTIFICATION AND APPEAL OF AUTHORISATION

5.2.1 The holder must, in writing, within fourteen (14) days of the date of this authorisation, notify all I&APs of the outcome of the application.

5.2.2 The notification contemplated above must, amongst other issues:

5.2.2.1 Stipulate the date of the decision, and the date of issue of the authorisation.

5.2.2.2 Provide reasons for the decision.

5.2.2.3 Inform I&APs of the appeals procedure in terms of the National Environmental Management Act, 1998: National Appeals Regulations (GN R 993 of 08 December 2014).

5.2.2.4 Draw the attention of the I&APs to the manner in which they may access the decision, including obtaining the copy of the authorisation.

5.3 COMMENCEMENT OF THE ACTIVITY(S)

5.3.1 This authorisation will only be effective in the event that an application for reconnaissance permit is granted in terms of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002). None of the activities listed in this authorisation may therefore commence without a reconnaissance permit.

5.3.2 The authorised activities shall not commence within twenty (20) days of the date of this authorisation, pending potential lodgement of appeal(s).

5.3.3 Where an appeal is lodged against the decision by any party, this authorisation or any provision or condition thereof will be suspended in accordance with section 43(7) of the National Environmental Management Act, 1998; and as such you may not commence with any activity, until a decision on the appeal(s) is taken.

5.3.4 The authorised activities must commence within a period of one (1) year from the date of issue of this authorisation. If commencement of the authorised activities does not occur within the said period, the authorisation lapses, unless an extension is granted in terms of regulation 30 of the EIA Regulations, 2014. If the authorisation lapses and the holder intends undertaking the authorised activity(s), a new authorisation in terms of the EIA Regulations, 2014 must be obtained.

5.4 MANAGEMENT, MONITORING AND AUDITING OF OPERATIONS INCLUDING REPORTING REQUIREMENTS

5.4.1 The BAR/EMPr is hereby approved. It is hence mandatory for the holder to implement all the recommendations and management measures stipulated in the EMPr throughout all phases of the proposed activities.

5.4.2 Any non-compliance with the EMPr constitutes non-compliance with this authorisation, and any non-compliance with this authorisation may result in its suspension and may render the holder guilty of an offence in terms of section 49A of NEMA and may, if convicted, be liable for penalty as contemplated in terms of section 49B(1).

5.4.3 Should there be changes in the operation and management of the authorised activities, the EMPr must be amended to accommodate those changes and be submitted to the competent authority for approval before implementation commences.

5.4.4 The holder of this authorisation must undertake the necessary measures, to ensure that operators, contractors, subcontractors, and any person(s) acting on behalf of the holder, has full awareness of the recommendations of the EMPr before commencing with any authorised activity.

5.4.5 The EMPr must be included in all contractual documentation entered thereto between the holder and contractor(s).

5.4.6 A copy of the EMPr must always be kept onboard survey vessel(s).

5.4.7 The holder must, before the commencement of the authorised activity, appoint the following:

5.4.7.1 An independent and experienced Environmental Control Officer (ECO) who will ensure that the conditions of this authorisation and recommendations of the EMPr are implemented and adhered to.

5.4.7.2 Independent, qualified, and experienced Marine Mammal Observers (MMO), Passive Acoustic Monitoring (PAM) Operators and Fisheries Liaison Officer (FLO) to monitor the interaction between marine mammals and survey operations and interactions with other marine users for the duration activity.

5.4.8 The holder of this authorisation must submit daily and monthly environmental monitoring reports during seismic survey operations. Furthermore, the holder must within sixty (60) days of completion of the 3D seismic survey, submit a survey closure report, completed by the ECO.

5.5 SPECIFIC CONDITIONS

5.5.1 The holder or appointed ECO must, thirty (30) days before the commencement of the seismic surveys, distribute notifications to the I&APs including the Agency informing them of the operational plans. The said notifications must include the following:

5.5.1.1 Commencement date, including survey and support vessel(s) mobilisation date, and anticipated duration of the survey.

5.5.1.2 Details of the seismic survey and support vessels.

5.5.1.3 Sketch plans showing the operational area(s) including survey grids.

5.5.1.4 Details of the ECO, FLO, MMO, PAM Operators and contact details for reporting environmental issues associated with the planned activities.

5.5.1.5 Invitation to I&APs to confirm if they should be included in the distribution list for daily MMO, PAM and FLO reports.

5.5.2 Avoid operating during periods of peak fishing efforts and migratory season of cetaceans and their aggregates on the summer feeding grounds between St Helena Bay and Dassen Island.

5.5.3 The National Environmental Management: Protected Areas Act, 2003 prohibits any exploration activities within the Marine Protected Areas, National Parks, and Nature Reserves. The holder must ensure that none of the authorised activities take place within these areas. Furthermore, a 5 km buffer zone must be implemented around all Marine Protected Areas during seismic survey data acquisition.

5.5.4 Marine Mammal Observers must be equipped with infra-red cameras.

5.5.5 Passive Acoustic Monitoring is mandatory where visual observations are not possible due adverse weather conditions or at night. If PAM system is not functional, operations must temporarily be suspended to prevent any potential impacts to marine mammals.

5.5.6 The holder must submit a Shipboard Oil Pollution Emergency Plan (SOPEP) in accordance with MARPOL 73/78 Annex I and the National Oil Spill Continency Plan (NOSCP).

5.5.7 In addition to SOPEP, Emergency Response and Medical Evacuation Plan must be submitted. The said plans must take into consideration all resources that may be required in case of an oil spill incident or any emergency incident. The plans must be submitted to the Petroleum Agency

SA (hereafter referred to as the ' Agency') thirty (30) days before the mobilisation of the seismic survey vessel.

5.5.8 Ensure that 'turtle-friendly' tail buoys are used by the survey contractor or existing tail buoys are fitted with either exclusion or deflector 'turtle guards'.

5.5.9 Ensure that solid streamers are used instead of fluid-filled streamers to avoid leaks.

5.5.10 Maintain a pre-acquisition watch of sixty (60) minutes before any instances of seismic source testing, to confirm that there are no penguins or feeding aggregations of diving seabirds, shoaling large pelagic fish, turtles, seals, or cetaceans within 500 m of the seismic source, and implement a "soft- start" procedure as defined in the approved BAR/EMPr. If only a single lowest power seismic source is tested, the pre-acquisition watch period can be reduced to thirty (30) minutes.

5.5.11 Line changes and break in acquisition must follow the procedures defined in the approved BAR/EMPr and must be synchronized with "soft-start" procedures as defined in the approved BAR/EMPr.

5.5.12 Terminate seismic source on detection and/or observation of mortality or injuries of marine life within the 500m mitigation zone.

5.5.13 Illegal dumping of waste or any equipment aboard the vessels is prohibited. In the event of loss of any equipment that presents risks to the navigational activities, other marine users and the environment, measures to retrieve lost equipment must be undertaken, and such incidents must be reported to the Agency and South African National Hydrographic Office within twelve (12) hours of occurrence.

5.5.14 During the demobilisation process, the holder must ensure that the survey area is left as it was prior to the operations and all I&APs must be informed of the completion of the survey. The holder remains accountable and liable for any residual or latent risks that may occur or are identified at completion of the surveys. In this regard, necessary measures to address such risks are mandatory.

5.5.15 Develop a community engagement protocol that is based on the San Code of Research Ethics. This should be done in consultation with the affected communities and must include a community strategy and grievance mechanism.

5.5.16 All recommended mitigation measures included in the BAR/ EMPr dated 06 December 2022 are deemed to be conditions of this authorisation and must therefore be adhered to.

6. GENERAL

A copy of this authorisation and the EMPr must be kept onboard the seismic survey vessel to ensure appropriate implementation of the mitigation measures.

7. DISCLAMER

The Department shall not be responsible for any damages or losses suffered by the holder in an instance where the operation is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.

8. RECOMMENDATION

In view of the above, and having taken into consideration environmental management principles as set out in section 2 of NEMA, and information presented in the environmental authorisation application and BAR, and subject to compliance with conditions of this authorisation, this Department is satisfied that the proposed activities will not be in conflict with the objectives of the Integrated Environmental Management set out in Chapter 5 of NEMA and will not result to any detrimental risks to the environment and public. **The authorisation is accordingly granted.**

.....

MR JACOB MBELE
DIRECTOR-GENERAL
DATE OF THE EA: 17/4/2023

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Ms Maria Papier

Date 2022/08/23 Method Email

Comment	Response
Om te registreer en meer inligting	Good Day Ms Papier, Thank you for your email. Please note that your details will be registered on the I&AP database so that you can receive future notifications regarding the Basic Assessment process. Please find the attached Background Information Document for further information. Regards, Andisiwe Xuma

Ms Lisa Starr

Date 2022/11/24 Method Email

Comment	Response
Dear Sir/Madam, hope you are well. We would like to comment on TGS 3D seismic survey application for the ocean off Hondeklipbaai on The West Coast. I am the founder of the Helderberg Ocean Awareness Movement. We have been busy protecting our ocean and everything which resides in it for the past 4 years. We have many active citizens here in Cape Town and South Africa who are connected to the ocean and understand it's importance to our survival. We are extremely concerned about this and are 100% against all new oil and gas applications. We firmly believe that this process will "Disturb the peace" and have a negative impact on all living creatures in the ocean. We know that the plankton gets killed off during this testing also. It may be small but it's the basis of the food chain and all marine life are reliant on it, as are we. 1. If we are serious about CLIMATE change, we dont need to drill for more oil and gas. 2. Recent studies say that there is no economic rationale that south africa needs to turn to large scale gas fired power generation as part of a transition. 3. Drilling could run a risk of a oil spill as a result of an uncontroled wellhead blowout..this oil pollution would threaten the marine ecosystem on which coastal communities like fishers depend for their livelihoods. 4. Seismic surveys do cause harm and mitigation measures are not good enough. Observers cannot see whales or other animals at night but seismic surveys are proposed to happen at night. As mentioned above zooplankton include larval fish and rocklobster and can be damaged by seismic blasts. snoek will be impacted. 5. So a precautionary approach is necessary as plankton are base of food chain and knock on impacts on rest of ocean could risk fisher livelihoods. 6. Communities are opposed to the project social risks as well as potential damage to cultural and indegenous rights may be significant. 7. The way forward is to live sustainably and to move over to green energy. We have people living off the land and the ocean whose footprint is minimal. You have no right to take that away from them. For these reasons, the green connection and The Helderberg Ocean Awareness Movement recommends that TGS's application should be refused. Kind Regards Lisa Starr Founder of the Helderberg Ocean	Good Day Ms Starr Please find the attached correspondence in response to the comments submitted by the Helderberg Ocean Awareness Movement. Regards, EIMS Public Participation Team

JWS6

2752

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Ms Lisa Starr

Awareness Movement. "Nature doesn't speak our language that's why it's up to us to protect it".

Date 2022/12/01 **Method** Email

Comment	Response
Dear Sir/Madam, did you receive my email? Kind Regards Lisa Starr Founder of the Helderberg Ocean Awareness Movement.	Good Day Ms Starr, Apologies for the delayed response, was received and a response letter has been sent to your email. Regards, Andisiwe.

Mr Andy Pienaar

Date 2022/11/25 **Method** Email

Comment	Response
Goeie dag, My naam is Andy Pienaar, inboorling van Komaggas in die Namakwa streek van die Noord Kaap Provinsie en ek verteenwoordig hierin myself, my organisasie te wete Kobush Ontwikkelingsvereniging en die gevoel van 'n beduidende aantal gemeenskapslede met betrekking tot die voorgestelde soektog na en die ontwikkeling van olie en gas bronne aan ons kus. Ek wil dit aanhaal dat ek en my genante terdee bewus daarvan is dat ons onlosmaaklik deel van ons natuurlike omgewing is en dat ek en meer van ons, ons bestaan in besonders te danke het aan die bronne wat hierdie oseaan so genadiglik aan ons beskikbaar gestel het. Ons gee ook erkenning aan die rol en verantwoordelikheid wat ons Skepper, deur ons plasing hier, aan ons gegee het om na Sy Skepping om te sien en ons glo dat dit nou meer as ooit tevore nodig geword het dat ons in die gesig van aanhoudende aanslae vir haar in die bresse sal tree. Let wel ons sien hierdie aansoek as deel van die bedreiging wat die skielike belangstelling in die minerale en pertoleum potensiaal wat die Namakwalandse kuslyn, vir ons gemeenskappe inhou. Ek wil dit ook aan die begin van my beswaar dit duidelik stel dat ek verstaan dat die industrie kennis neem van die besware en bekommernisse wat ons tydens soveel konsultasie prosesse geopper het en dat dit ons verder bekommerd maak dat die industrie nie enige sigbare poging aanwend om ten minste sommige van die opgetekende bekommernisse aan te spreek nie. Dit versterk die aanname onder ons dat meeste van die versagtende voorstelle in die plan van die aansoeker lee beloftes is en dat ons nie daarop sal kan staatmaak nie. Ons bekommernis is verder dat indien goedkeuring aan hierdie aansoek gegee word, die data wat hiertydens versamel word u regverdiging sal vir die uiteindelik ekstraksie van die fossielbrandstof teenoor die kummulatiewe impak op die plaaslike lewensbestaan, sal versterk en dan 'n groter risiko factor vir die gemeenskappe teweeg bring. Soos alreeds voorheen gestel, is dit vir my onverklaarbaar dat aan die een kant is ons so erg besorg oor klimaatsverandering dat ons internasionale konvensies daaroor ondersteun maar aan die ander	Good Day Mr Pienaar, Please find the attached letter in response to the comments raised below. Regards, EIMS Public Participation Team

Mr Andy Pienaar

kant wend ons oordrewe en oorhaastige pogings aan verdere fossielbrandstowwe, wat een van die belangrikste drywers van klimaatsverandering is, te soek om te ontgin. Ek verstaan ook uit die opinie van kundiges dat Suid Afrika nie baie goeie ekonomiese beweegredes het om met die grootskaalse verbranding van gas, as deel van ons oorgang na energie geregtigheid, voort te gaan nie. Vir ons in die geweste is dit moeilik om te verstaan dat daar soveel natuurlike en herwinbare energiebronne in hierdie streek is wat nie ontgin word nie terwyl ons al die risikos vir hierdie ongewenste industrie moet onderneem om te dra. Ek wil weereens beklemtoon dat myself en die groter gedeelte van die Namakwalandse se gemeenskap lewe in erkenning van ons komvandaan en wil graag sien dat nog baie generasies van ons nakomelinge ook die wonder van ons habitat in Goeie verhouding tot ons kulturele ondervinding sal beleef en dat ons nie omgee vir 'n flietende oomblik in wereldnuus wanneer die veronderstelde ongeluksvrye proses deur 'n onvoorsiene ongeluk ons hele kuslyn en 'n groot gedeelte van ons voedselketting met olie besoedel nie. Die versagtende maatreels wat in u document vir die impak van siemiese toetsing op dieselfde voedselketting aanbied kan ook myns insiens nie aanvaar word aangesien daar in ons opinie nooit nie visse van watter spesie ook al, in die beoogde ondersoek gebied gedurende die nag of gedurende die dag sal wees nie. Ek maak beswaar teen die verwagte verdere ekonomiese uitsluiting en ontmagtiging van ons plaaslike vissers en die uiteindelike sluiting van die bedryf wat vir so baie geslagte lank 'n lewensaar vir ons mense was. Vissery is deel van ons lewensbloed en dit is baie swaar vir myself en baie van my genante om die ongenaakbare aanslag ter wille van mense aan die ander kant van ons land, daarop te sien. Ons sal graag wil sien dat die industrie meer sal doen as net skouers optrek wanneer dit kom by direkte plaaslike ekonomiese bevoordeling van 'n gemeenskap wie die groot natuurlike risikos moet dra nie. Ek dank u dat u na my inset geluister het. Andy Pienaar Kobush Ontwikkelingsvereniging 062 102 6006

Solomon Lephoto

Date 2022/09/01 Method Email

Comment	Response
Dear Andisiwe, I do not have any objection to the survey. We need oil and gas exploration for our broader long-term energy security.	Good Day Solomon Thank you for your email. Your comments have been noted and will be included in the Comments and Responses Report which will be submitted to the competent authority. Kind Regards, Andisiwe Xuma

Richard Tsholoba

Date 2022/09/05 Method Email

Comment	Response

27754

Richard Tsholoba

To whom it may concern : Attention: Executive Mayor Namakwa District Municipality Aplication for financial assistance Dear Hnr Executive Mayor My, name is Richard Tsholoba, a single parent of 2 boys. I am a resident of Carolusberg Hostel, living in Room 4. My request involves my son who is in need of glasses to attend classes. I enclose herein the quotation of the glasses. I am currently unemployed and have no source of income. I urge and plead that the mayor can assist me with this ask. Yours Sincerely Richard Tsholoba	Good Day Mr Tsholoba Thank you for your email, we sympathise with your sons need to financial assistance. It is understood that there are challenges such as unemployment in the immediate communities, however, neither EIMS nor the applicant is in a position to offer any financial assistance for this project at the moment. Kind Regards, Andisiwe Xuma

Louise Geldenhuys

Date 2022/08/25 Method Email

Comment	Response
Good day, Please include me as an interested/affected party. Regards, Louise Geldenhuys Production Scientist: Coastal Ecologist Pr.Sci.Nat.	Good Day Ms Geldenhuys, Thank you for your email. Your details will be registered in the I&AP database for this project. Regards, Andisiwe Xuma

Date 2022/11/27 Method Email

Comment	Response
Dear Andisiwe Xuma, Please find attached some comments on the Draft Basic Assessment Report for the above-mentioned project. Thank you for the opportunity to comment. Please accept my apologies for submitting today instead of Friday. Regards, Louise	Good day Ms Geldenhuys, Please find the attached letter in response to the comments submitted on 27 November 2022.12.06 Regards, EIMS

Mike Copeland

Date 2022/08/25 Method Email

Comment	Response
Good day, Please register me as an I&AP in the above project. MD Copeland Chair South African Pelagic Fishing Industry Association (SAPFIA) Small pelagic fishing operations	Good Day Mr Copeland, Thank you for your email. Your details will be added to the registered I&AP database for the project. Regards, Andisiwe Xuma

Karen - Dawn Koen

Date 2022/08/30 Method Email

Comment	Response
Good Day Please register the undersigned as an interested and affected party. Kind regards	Good Day Ms Koen, Thank you for your email, please note that your details will be registered in the project I&AP database as requested. Regards, Andisiwe Xuma

2755

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Janet Solomon

Date 2022/08/29 Method Email

Comment	Response
Good afternoon Andisiwe, Please could you explain why there is no facility for online participation? This is an enormous tract of the ocean commons which belongs to every South African citizen. Please confirm online links and details when you have them to ensure FPIC. In anticipation, Janet	Good Day Ms Solomon, Thank you for your email. Please note that physical meetings are being held at different towns along the West Coast this week so that those who can attend have the opportunity to participate in these initial public meetings. Additionally, EIMS will host virtual meetings with I&APs with access to online resources in the next few weeks after the initial public participation meetings. Notification emails will be sent out to all registered I&APs so that they get an opportunity to register and attend the virtual meetings. Public participation in this project is not limited to physical/virtual meetings, however I&APs may also send the comments by email or call EIMS on the contact details provided in the attached documents. The process for identification of I&APs is ongoing and anyone can register as an I&AP. Our public participation process is guided by the NEMA EIA Regulations 2014 (as amended). We have employed various methods to disseminate notification regarding the project including site notices, hand delivery of notification letters, company website (www.eims.co.za), radio and newspaper adverts. Regards, Andisiwe Xuma

Date 2022/11/25 Method Email

Comment	Response
Oceans Not Oil Enquiries: Ms. J. Solomon 151 Umbilo Road Durban info@oceansnotoil.com 25 Nov 2022 Environmental Impact Management Services (EIMS) P.O. Box 2083 Pinegowrie, 2123 Attention: Andisiwe Xuma Per email: tgs@eims.co.za CC: PASA Per email: plu@petroleumagencysa.com EIMS Reference Number: 1520 pertains Submission on 1520 TGS Geophysical Company UK (TGS) TGS Orange Basin Reconnaissance Permit: Draft Basic Assessment Report Herewith you'll find our comments and objection to the above-mentioned survey. Kindly acknowledge receipt of the attached correspondence. Yours sincerely, Janet J a n e t S o l o m o n For Oceans Not Oil	Good day Ms Solomon, Please find the attached letter in response to the comments submitted on 25 November 2022. Regards, EIMS

Briege Williams

Date 2022/08/23 Method Email

Comment	Response
Dear Andisiwe Thank you for the notification regarding the above project. SAHRA is the commenting authority in regards to any possible impacts on underwater cultural heritage. Therefore, in order to issue a comment we require the project, once it reaches the Basic Assessment phase, to be uploaded onto SAHRIS, then I will assign myself as case officer and	Good Day Ms Williams, Please note that a case has been created on SAHRIS for the TGS project , the CaseID: 19429. Regards, Andisiwe Xuma

Briege Williams

issue a comment once the relevant documents have been uploaded. In order to create a case on SHARIS please follow the below link: https://sahris.sahra.org.za/ Once you have created the case, please let me know so I can process it ASAP. Kind regards Briege	

Date 2022/08/23 Method Email

Comment	Response
Dear Andisiwe Thank you for the notification regarding the above project. SAHRA is the commenting authority in regards to any possible impacts on underwater cultural heritage. Therefore, in order to issue a comment we require the project, once it reaches the Basic Assessment phase, to be uploaded onto SAHRIS, then I will assign myself as case officer and issue a comment once the relevant documents have been uploaded. In order to create a case on SHARIS please follow the below link: https://sahris.sahra.org.za/ Once you have created the case, please let me know so I can process it ASAP. Kind regards Briege	Good Day Ms Williams, Thank you for your email. I will notify you once the SAHRIS case has been created. The Basic Assessment Report is currently being compiled and will be uploaded on SAHRIS when it is ready for public review. Kind Regards, Andisiwe Xuma

Date 2022/09/06 Method Email

Comment	Response
Dear Andisiwe I have now issued a comment for the above project and uploaded it onto SAHRIS, I have also attached a PDF copy to this email. Kind regards Briege	Good Day Ms Williams, Thank you for your email. The comments by SAHRA have been received and will be addressed in the Basic Assessment Process. Regards, Andisiwe Xuma

Date 2022/10/26 Method Email

Comment	Response
Dear Andisiwe Thank you for the notification regarding the availability of the DBAR for the above project. Please can you upload the DBAR and relevant supporting documents onto the existing case on SAHRIS (Case ID 19429), I will then review the report and issue a comment in due course. Kind regards Briege	Good day Ms Williams, Thank you for your email. Please be advised that the Draft BAR and associated Specialist studies has been uploaded on the SAHRIS case ID 19429. Regards, Andisiwe Xuma

Date 2022/12/01 Method Email

Comment	Response
Dear Andisiwe I have now issued the comment for the above case and uploaded it onto SAHRIS, I have also attached a PDF copy to this email. As this is our final comment I will now change the case status to Closed(approved) but can you please upload the Final BAR onto the case once it has been published so we can have a record of it on the case file. Kind regards Briege	Good Day Ms Williams, Thank you, the comment from SAHRIS has been received and noted. The Final BAR will be uploaded on SAHRIS once it becomes available. Regards, Andisiwe

2752

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Mr Christiaan Mackenzie

Date 2022/11/24 Method Email

Comment	Response
Good day Sir or Madam, Please find letter attached for your attention. Kind regards Mr. Christiaan Mackenzie	Good day Mr Mackenzie Please find the attached letter in response to the comments submitted by Aukotowa Fisheries Primary Co – operative Ltd. Regards, EIMS Public Participation Team

Ms Nicole Lomberg

Date 2022/08/22 Method Email

Comment	Response
Hi Andisiwe, Thanks for your email below. Please could you send me a map of the proposed project area for the recon survey. Thanks, Nicole	Hi Andisiwe, Most appreciated. Regards, Nicole

Date 2022/08/22 Method Email

Comment	Response
Hi Andisiwe, Thanks for your email below. Please could you send me a map of the proposed project area for the recon survey. Thanks, Nicole	Good Day Ms Lomberg, I previously sent you a site notice containing the project map, but I thought a kml file may be useful as well. Please find attached as well as the background information document. Please do not hesitate to contact EIMS Should you need any further information. Regards Andisiwe Xuma

Date 2022/08/30 Method Email

Comment	Response
Good day Andisiwe, I'm following up with regards to my previous request for a map of the project area please. Regards, Nicole	Good Day Ms Lomberg, Please find the attached site notice which contains a map of the application area. Regards, Andisiwe

Ms Natalie Weyers

Date 2022/08/22 Method Email

Comment	Response
Reference nr: 1520 As part of the conservation club in Kleinzee as well as being a resident for over 30 years in Kleinzee, we object to this as it will without a doubt affect the entire coastal sea life. kindly keep me updated thank you	Good Day Ms Weyers, Thank you for your email. Your comments have been noted and will be included in the comments and responses report that will be submitted to the competent authority. I have attached a copy of the project background information document for your perusal. Please do not hesitate to contact EIMS should you have any queries or concerns. Regards, Andisiwe Xuma

Ms Natalie Weyers

Paolo Esposito

Date 2022/08/23 Method Email

Comment	Response
Dear Andisiwe Xuma, On behalf of Belton Park Trading 127 (Pty) Ltd, holder of mining rights over sea concession 2C & 3C (MR 10101 NC), we acknowledge receipt of your email. We express the intention to be registered as interested and affected party, and to participate to the environmental authorization process for the TGS Seismic Survey Project. Please circulate any relevant additional registration document, if available. Otherwise we look forward to hearing from you in due course. Best Regards, Paolo Esposito | COO	Good Day Mr Esposito Thank you for your email. The information provided in the email below is noted and the contact details provided will be registered in the I&AP database for this project. Correspondence regarding the project will be sent to all registered I&APs. Please find a copy of the background information document for your perusal. Regards, Andisiwe Xuma

Dr Jackie Sundae

Date 2022/11/25 Method Email

Comment	Response
Please find Comments with Annexures Attached and delete the previous email which did not have the annexures attached. Thank you - 25 November 2022 For Attention: ENVIRONMENTAL IMPACT MANAGEMENT SERVICES (EIMS) (c/o Andisiwe Xuma) By Email: tgs@eims.co.z Dear Mr Xuma Re Submission of comments on the Basic Assessment Report (BAR) prepared by EIMS on behalf of TGS Ref 1520 Attached please find my comments on the TGS Basic Assessment Report (BAR) Ref 1520. I make this submission as a researcher with more than 20 years' experience working with small-scale fishing communities in South Africa. Thank you Dr Jacqueline Sunde One Ocean Hub Small-scale Fisheries Research Team	Good Day Ms Sunde, Thank you for your email. Please find the attached letter in response to your comments submitted on 25 November 2022. The previous email will be ignored. Regards, EIMS Public Participation Team

Mr Adrian Pole

Date 2022/09/05 Method Email

Comment	Response
Dear Andisiwe Xuma I would be grateful if you please register myself (on behalf of the Green Connection NPC) as an interested and affected party (I&AP). The Green Connection is a non-profit civil society organisation with an interest in protecting the environment. I would be grateful to receive confirmation that I have been registered as an I&AP by return of email. Kind	Good Day Mr Pole, Thank you for your email. This is to confirm that your details will be registered on the I&AP database for this project. Please also find the attached background information for your perusal. Regards, Andisiwe Xuma

2759

Mr Adrian Pole

regards

Angila Joubert

Date 2022/08/30 Method Email

Comment	Response
Andisiwe Xuma Kindly provide clarity on this application, as previous Companies also applied with using EIMS as the EAP. Spectrum and Searcher also done previous applications. Not sure how this is linked? Kind regards Angila Joubert Environmental Management Officer	Good Day Ms Joubert, Thank you for your email. This application by TGS is separate from the previous applications by Searcher and others. The DMR does allow parallel and \overlapping Reconnaissance permit applications from different entities but would only grant the exploration right to one company for a specific block/area. At this stage, all these companies are requesting permission to conduct surveys to understand the geological composition of the seabed at the particular areas , so that if the findings indicate the presence of sufficient reserves, they can proceed with exploration right applications. You are correct in saying that EIMS has been appointed as the independent EAP for the Searcher application as well as the TGS application. I hope this clarifies things. Please do not hesitate to contact EIMS should you need any further information. Regards, Andisiwe Xuma

Date 2022/08/30 Method Email

Comment	Response
Good day Andisiwe Thank you for your feedback, this is noted and documented. Kindly find attached my registration form. Kind regards Angila Joubert Environmental Management Officer	Good Day Ms Joubert, Thank you, your registration form is received. A number of specialists have been appointed to conduct assessment (such as Marine Ecology, Heritage, Acoustics) and provide mitigation measures which will be incorporated into the Basic Assessment report. The notification will be sent out to all registered I&APs when draft BAR is available for public review and comment. Regards, Andisiwe Xuma

Danne Joubert

Date 2022/09/26 Method Email

Comment	Response
Good day TGS & Andisiwe Refer to my attached registration form and comments for this proposed project. Regards/ Groete Danné	Good Day Ms Joubert, Thank you for your email. Your comments on the registration form have been noted and will be taken into consideration during compilation of the Basic Assessment Report (BAR). Specialists have been appointed to conduct studies such as Marine ecology, Heritage, acoustics and their findings will be incorporated into the BAR. Some impacts have been predicted and will be investigated during the assessment phase and the specialist will recommend mitigation measures. Regards, Andisiwe

2760

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Nazeema Duarte

Date 2022/08/22 Method Email

Comment	Response
Dear Andisiwe Please register the Saldanha Bay Municipality as an interested and affected party. Regards	Good Day Ms Duarte, Thank you for your email. Saldanha Bay Municipality will be registered on the project I&AP database as requested. Kind Regards, Andisiwe Xuma

Date 2022/11/14 Method Email

Comment	Response
Dear Andisiwe Xuma Please see attached comment from the Environment and Heritage Section of the Saldanha Bay Municipality. Regards Nazeema	Good day Ms Duarte, Thank you for your email. Please find the attached correspondence which acknowledges and responds to the comments from the Environment and Heritage Section of the Saldanha Bay Municipality. Regards Andisiwe Xuma

Swartland Muni

Date 2022/08/30 Method Email

Comment	Response
Your Reference Number: 4449081 We Acknowledge receipt of your letter dated 2022-08-29 regarding REMINDER: TGS ORANGE BASIN RECONNAISSANCE PERMIT BASIC ASSESSMENT INITIAL PUBLIC MEETINGS: 29 AUG - 3 SEPT 2022 and confirm that the correspondence is being referred to the relevant Department for attention. Reference Number: 4449081	Good Day, Thank you for your response. Please find the attached project background information document, please do not hesitate to contact EIMS should you have any queries or concerns. Regards, Andisiwe Xuma

Walter Steenkamp

Date 2022/11/23 Method Email

Comment	Response
Stop big mining No to oil and gas in our ocean	Goeie dag Mnr Steenkamp, Baie dankie vir u e-pos. Ons neem kennis van u kommentaar en sluit dit in ons verslag aan die owerhede in. Ons dank u vir u deelname aan ons proses. Vriendelike Groete, EIMS

Date 2022/11/24 Method Email

Comment	Response
Stop big mining. No to oil and gas in our ocean.	Thank you for your email. We note your comments and will include this in the report to the authorities. We thank you for your participation in our process.

2761

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Kirsten Day

Date 2022/08/31 Method Email

Comment	Response
Ms Day attended a public meeting in Cape Town and requested a shapefile or kml of the application are	Greetings Ms Day, Thank you for attending the public meeting yesterday, as discussed, please find the attached kml of the TGS application area. Kind Regards, Andisiwe Xuma

Mr Martin Gilbert

Date 2022/10/26 Method Email

Comment	Response
What are the political affiliations of your clients!	Good day Mr Martin, Thank you for your email. The applicant, TGS is a Geophysical Company from the UK with operations in several countries including the United States. The client does not have any political affiliations in South Africa. Regards, Andisiwe Xuma

Date 2022/11/04 Method Email

Comment	Response
That is factually incorrect, who is the data being collected for? I want the political affiliations of those companies. Gilbert	Good day Mr Martin, Thank you for your query below, TGS have provided the following response: "TGS is a global geophysical service company, providing subsurface data to companies in the exploration industry to help enhance their understanding of the underlying geological structures. As a company with offices all over the world, we hold no political affiliations in South Africa or elsewhere. The aim of this survey is to help the existing Exploration Rights (ER) holders to evaluate whether further exploration is advisable. These ER holders are typically international energy companies. Our business model means that we undertake these surveys on a speculative basis in the hope that ER holders will license the data from us. As such all of the ER holders within the permit area are currently potential, but unconfirmed, clients." Please do not hesitate to contact EIMS should you have any further queries or concerns. Regards, Andisiwe Xuma

Date 2022/11/24 Method Email

Comment	Response
This is the same copy and paste response as during the Searcher situation in the beginning of this year for another copy. We will take this matter further and hope you, in your conscience, do not suggest this gets granted.	Good day Mr Martin, Thank you for your email. EIMS posed the question to TGS directly and we received the quoted response provided below. This response was not copied and pasted from the Searcher response. We take note of your comments and will include these in the Participation Report to be submitted to the authorities for their adjudication. We thank you for your participation in our process. Sincerely, EIMS Public Participation Team

27962

Cllr Delana Titus

Date 2022/08/23 Method Email

Comment	Response
My details is as follows: Delana Titus Dept of Coghsta P.O.Box 46 Hondeklipbaai 8222	Good Day Ms Titus, Thank you for your email. Your details will be registered on the I&AP database for this project. Regards, Andisiwe Xuma

Errol Duckett

Date 2022/11/21 Method Questionaire

Comment	Response
Mr Duckett submitted an IAP questionnaire at the public meeting stating that he is not directly affected by the project.	Mr Duckett's questionnaire was received and acknowledged at the time of the public meeting

Niall Kramer

Date 2022/08/22 Method Email

Comment	Response
Please register me as an IAP Niall Kramer niall.kramer@gmail.com 0825340296 interested in oil and gas exploration	Good Day Mr Kramer, Thank you for your email. Your contact details will be registered in the I&AP database for this project. Regards, Andisiwe

Dawid Markus

Date 2022/09/02 Method Email

Comment	Response
Mr Markus sent a link to an article that discusses the effects of seismic tests on the environment. https://www.bowmanslaw.com/insights/shipping-aviation-and-logistics/seismic-testing-effect-marine-environment/	Good day Mr Markus, Thank you for the article provided in the link below, the impacts specified in the article will be taken into consideration in the draft Basic Assessment Report (dBAR) which will be made available for public review in due course. Various specialist studies in the fields of Marine Ecology, Fisheries and Acoustics have been appointed to assess the potential impacts of the proposed project. We are also undertaking Social and Cultural Heritage Impact Assessments as part of the Basic Assessment, where specialists are going into the communities and talking to the different cultural groups to have a better understanding of the social setting. Mitigation measures will be proposed in the draft Basic Assessment Report to minimize or avoid the potential impacts. Your participation in this process is greatly appreciated and we look forward to engaging with you during the DBAR review period. Regards, Andisiwe Xuma

Sheldon Mathys

Date 2022/11/01 Method Questionaire

Comment	Response
Mr Matthys submitted a questionnaire stating that he is a resident of Hondeklipbbay and suggested that posters be used to notify communities since some of the people do not have cellphone and email.	Mr Matthys questionnaire was received and acknowledged at the time of the public meeting. The use of posters for notification is already being done.

Michele Rivarola

Date 2022/08/22 Method Email

Comment	Response
Kindly note that the link in the pdf file returns an error 404 making the notice legally defective	Good day Mike, Thank you for bringing this to our attention. Our sincere apologies, there seems to have been a technical issue. The website was up and running yesterday afternoon.

Date 2022/08/23 Method Email

Comment	Response
Kindly note that the technical glitch has not been resolved as none of the links work on the web page and return a 404 error. On this basis the notification persists to remain legally defective as the registration forms are inaccessible	Good day Michele, Once again, we would like to thank you for your feedback. We have rectified the issue and the document links are accessible from the website for this project. In order to register as an I&AP, it is not a requirement that the registration forms be completed and returned. Registration or comments can be submitted directly via email. Should you have any further queries or concerns, please do not hesitate to contact EIMS. Kind regards, EIMS

Date 2022/08/25 Method Email

Comment	Response
Attached my registration form. I hope this madness and wanton destruction of our natural environment will stop and that true ethical scientists will see that there is no justification for continuing with exploration that does nothing more than destroy the small amount of the environment that remain pristine. Money does buy you a conscience. You are doing nothing more than the fox's bidding in the chicken coop.	Good Day, Thank you for your email and the completed registration form is received. Your comments have been noted and your details will be registered on the I&AP database for the project. All comments received will be included in the Comments & Responses Report to be submitted to the Competent Authority. Regards, Andisiwe Xuma

Date 2022/08/29 Method Email

Comment	Response
Kindly note the following: • You have identified as IAPs only persons and organisations who	Thank you for the prompt response

27694

Michele Rivarola

reside in proximity of a specific geographical area (which is substantively incorrect) and arranged for in person meetings that can only be attended by persons who reside in areas which are close enough to the meeting venues. There is no provision for any remote meeting where IAPs who are not necessarily resident in the areas identified by yourselves can participate • Legislation does not restrict the residence or locality of IAPs to areas which you have identified and further does not restrict participation, in fact it places the onus of encouraging participation rpm all potential IAPs squarely on the shoulders of the applicants • The ocean is a shared resource in which every citizen has a stake and a right to make sure that it is preserved for current and future generations. By limiting participation, in practice, you have denied the right to be heard to those who are not able to travel to the venues chosen by yourselves I request that you arrange for at least one remote Public Meeting Yours faithfully, Michele Rivarola PrEng PrCPM BSc(Eng) FAArbSA C 082 900 7514

Date 2022/08/29 Method Email

Comment

Kindly note the following: • You have identified as IAPs only persons and organisations who reside in proximity of a specific geographical area (which is substantively incorrect) and arranged for in person meetings that can only be attended by persons who reside in areas which are close enough to the meeting venues. There is no provision for any remote meeting where IAPs who are not necessarily resident in the areas identified by yourselves can participate • Legislation does not restrict the residence or locality of IAPs to areas which you have identified and further does not restrict participation, in fact it places the onus of encouraging participation rpm all potential IAPs squarely on the shoulders of the applicants • The ocean is a shared resource in which every citizen has a stake and a right to make sure that it is preserved for current and future generations. By limiting participation, in practice, you have denied the right to be heard to those who are not able to travel to the venues chosen by yourselves I request that you arrange for at least one remote Public Meeting Yours faithfully, Michele Rivarola PrEng PrCPM BSc(Eng) FAArbSA C 082 900 7514

Response

Good Day Mr Rivarola, Thank you for your email. Your comments are acknowledged and appreciated and will be recorded on the project Comments and Responses Report. Please note that physical meetings are being held at different towns along the West Coast this week so that those who can attend have the opportunity to participate in these initial public meetings. Additionally, EIMS will host virtual meetings with I&APs with access to online resources in the next few weeks after the initial public participation meetings. Notification emails will be sent out to all registered I&APs so that they get an opportunity to register and attend the virtual meetings. Public participation in this project is not limited to physical/virtual meetings, however I&APs may also send the comments by email or call EIMS on the contact details provided in the attached documents. The process for identification of I&APs is ongoing and anyone can register as an I&AP. Our public participation process is guided by the NEMA EIA Regulations 2014 (as amended). We have employed various methods to disseminate notification regarding the project including site notices, hand delivery of notification letters, company website (www.eims.co.za), radio and newspaper adverts. Please do not hesitate to contact EIMS should you have any further queries or concerns. Regards, Andisiwe Xuma

Date 2022/11/23 Method Email

Comment

Please note that I have already registered my opposition to this with reasons. I am surprised that anyone calling himself or herself a scientist choses to ignore the very same science they purport to be governed by. Money buys most things what it does not buy you is your

Response

Good day Mr Rivarola, We note your comments regarding the Searcher Project and will capture this for the TGS Project as well. EIMS has undertaken the Basic Assessment in line with the requirements of the National Environmental Management Act (Act No. 107 of 1998 – NEMA) and

2769

Michele Rivarola

conscience which will forever be tainted. Judas sold his for 30 pieces of silver how much did they pay you? Regards, Michele Rivarola PrEng PrCPM BSc(Eng) FAArbSA C 082 900 7514	the Associated Environmental Impact Assessment (EIA) Regulations, 2014. As part of this process, EIMS and our specialist team have taken into consideration the scientific research available and used this as the basis for the impact assessment in the context of the proposed activity. The available scientific research has not been ignored. On the basis of your comment, it is unclear which specific science was, in your view, ignored. We would like to thank you for your comments and participation in our process for this project. All comments and responses will be submitted, together with the Basic Assessment Report and associated appendices to the Competent Authority for consideration in the decision-making process. Regards, EIMS Public Participation Team

John Van der Heever

Date 2022/08/23 Method Email

Comment	Response
To those concerned As an indigenous subsistence Fisher for almost three decades whose heritage are built mainly on harvesting fish and lobsters,near shore my intuition fill one with the idea that unforseen and the unpleasant may happen during your biopsy of the seabed and the debris which will be released as an effect of the destabilisation of the sediment. Take the fact of global warming into account and the negative economic impact it will have on sustainability of biodiversity and those like us who struggle to makes ends meet. I don't know if there is any provision made to observe for the buoyant eggs of certain species and migrating birds. Hopefully this submission draw your attention to the plight of the near shore fishing sector's fear for their livelihood could been a hit on an almost empty stomach. Kind regards Yours faithful John Ashley Van Der Heever	Good Day Mr John Van der Heever, Thank you for your email, your comments have been noted and will be included in the Comments and Responses report that will be submitted to the competent authority for decision making. Please note that the concerns mentioned below will be considered during the impact assessment phase of the project and mitigation measures will be proposed in the draft Basic Assessment Report and EMPr that will be made available for public review. I have attached a copy of the Background Information Document (BID) which provides the preliminary impacts that have been identified as well as details on how to participate in the project. Please do not hesitate to contact EIMS should you have further questions or queries. Regards, Andisiwe Xuma

Date 2022/11/21 Method Questionaire

Comment	Response
Mr van der Heever submitted his questionnaire at the public meeting. His main concerns were related to how exploitation of resources discovered under the ocean will have negative impacts on the marine ecosystem.	Mr van der Heever's questionnaire was submitted and acknowledged in the public meeting. The potential impacts of the proposed activity were explained as well as the mitigation measures that will be included in the FBAR and EMPr

Marius Wheeler

Date 2022/10/25 Method Email

Comment	Response

2766

Marius Wheeler

Dear Andisiwe Thanks for letting me know. Please you don't need to send the notices to me – as long as you send it to Mr Ismat Adams, our Landuse scientist for landscape west (CapeMetro and West Coast District Municipal) areas, it is fine. More information on which contacts to engage for the different CapeNature areas are available online: Land Use Planning and Development Applications – Capenature Thanks you very much. Kind regards, Marius	Good day Mr Wheeler, Thank you for your email. As per your request below, you will no longer be sent notifications regarding the proposed project and all correspondence will be sent to Mr Ismat Adams. Kind Regards, Andisiwe Xuma

Mr Ismat Adams

Date 2022/08/22 Method Email

Comment	Response
Good day Please register me as I&AP. Name: Ismat Adams Organisation: CapeNature Capacity: Land-Use Scientist – Landscape West Email: iadams@capenature.co.za Contact no.: 0870873188 For future reference, please use the attached contact details for notifications. See also attached our application document requirements. Please send on Google Earth KML files or QGIS shapefiles of the development footprint. Kind regards,	Good Day Mr Adams, Thank you for your email. Your details will be registered on the I&AP database for the project. The attached documents have been noted and will be taken into consideration during the Application and Environmental Assessment Process . Please find the attached kmz of the application area as requested. Kind Regards Andisiwe Xuma

Date 2022/10/31 Method Email

Comment	Response
Good day Please send on Google Earth KML files or QGIS shapefiles of the development footprint. Kind regards,	Good Day Mr Adams, Please find the attached kml file of the application area. Kind Regards, Andisiwe Xuma

Pierre de Villiers

Date 2022/08/23 Method Email

Comment	Response
Hi do you have a map of the areas concerned? Are there specific times involved as these will impact on whale migration routes. Regards Pierre	Good Day Mr de Villiers, Thank you for your email. Please find the attached Background Information Document which includes a map of the areas of interest. Should the environmental authorization be granted, it is anticipated that the survey would be conducted between December and April. Regards, Andisiwe Xuma

Solene Smith

Date 2022/11/25 Method Email

Comment	Response

27627

Solene Smith

Hi Andisiwe we as coastal links fishers of langebaan dont support any project or survey or any thing that have a impact on our oceans we as fishers know that all these things will do harm to our oceans our fish stocks and our lively hood please listen to us and hear our cry for too long fishers must be in the back and politicians have the say stop every thing bc people is busy to destroy our lively hood	Good Day Mrs Smith Thank you for your email. Your concerns as the fishing community are noted and will be included in the comments and response report which will be submitted to the competent authority for consideration during the decision-making process. Regards, Andisiwe Xuma

Date 2022/11/28 Method Email

Comment	Response
Dear Andisiwe Thanks for sending this – please ensure all relevant documents remain available on EIMS' website, so people can access them at all times. Here are my comments – I will be brief, as I have comment burnout.... 1. We are in an existential crisis a. Climate catastrophe is evident around the world – extreme weather events coming at us thick and fast b. Species extinctions are gathering apace and seem to go unnoticed and without concern – what's the fuss? As humans, we need nature to be sustained to support all our lives and livelihoods. c. Humans do not have priority over nature. We need to learn to live in harmony. d. The misery everyone is facing is worsening, except for those with wealth to buy their way out of suffering – however, even they are starting to notice there is a problem when they venture out of their fortresses. Let's all head for Mars? Oh sorry, it is only for those who have made their fortunes off nature and the labour of others less fortunate. 2. There is a better way – we all have to find how we can live better lives without destruction of the natural world upon which we depend. a. There are limits to growth and we need to find an alternative to the development agenda based on extraction from nature and exploitation of natural systems. b. We cannot energise our lives and livelihoods sustainably in this way – swapping fossil fuels for renewables is not the answer either. c. Leave fossil fuels in the earth – on land or under the sea. d. We need to stop. We did for Covid-19, so why not now? 3. There is no way to defend marine seismic surveys or off-shore exploration – they are just not right. a. The ocean is needed for us to live in a heating climate, with less water available to drink, arable soil to grow food – you name it, we need healthy oceans for healthy lives. b. Just because you cannot see what makes the oceans thrive, it doesn't mean it is devoid of life. This project is morally wrong. That is the nub of the issue. Please ensure my comments are recorded and let me know when you get this email. Thanks Judy	Good day Ms Bell, Thank you for your email. Your comments are acknowledged and will be recorded in the comments and responses report which will be submitted to the competent authority with the Final BAR. Regards, Andisiwe Xuma

Thandeka Mbambo

Date 2022/09/01 Method Email

Comment	Response

2768

Thandeka Mbambo

Good Day Andiswa Please find the attached comments on the Background Information Document for the Environmental Authorisation Application Process for the Proposed TGS Orange Basin Seismic Reconnaissance Basic Assessment Process for your attention and review. Regards Thandeka Mbambo on behalf of Oceans & Coasts EIA Department of Forestry, Fisheries and the Environment	Good day Ms Mbambo, Thank you for your email, please find the attached response to the comments received from DFFE Oceans and Coasts. Regards, Andisiwe Xuma

Liziwe McDaid

Date 2022/08/29 Method Email

Comment	Response
Dear Andiswe, Please could you provide directions to the three anchor bay venue? Thank you Liziwe McDaid	Good Day Liziwe, I am not sure which part of town you will be coming from but the physical address is 30 Main Road, Three Anchor Bay, Cape Town. If you come from the Waterfront area, please click on the link below for directions: https://goo.gl/maps/pMo5HkpJ3Dzu1sVE9 Regards, Andisiwe

Diana Mentoor

Date 2022/08/29 Method Email

Comment	Response
Hi, EiMS. First I want to ask if I say yes to do, what u wanted in and on our coast. Please tell me, what will I gain out of it. Cause our communities here are not one, but live separated and not communicate with each other regarding this matter. I'm busy now to start my own Company, because off that we here, the leaders does not recocnise all others. They just doing it for their own needs. But not for us, who are there also suffer, because there are no work for us. Or anything else. They just doing this for their needs, and not for the community. Like ì said, I'm busy to start my own company. And still I do not have the funds to register it. So if u can help me and us who is 30, people, with Funding, and projects, what lies ahead, then please let me know, if u can help us. We will be very appreciated. Contact me as soon as u read this. I will get the 30 people to say ,yes, for doing what u want on our ocean. I will tell them to be on your side. My regards: Diana Mentoor.	Good Day Ms Mentoor, Thank you for your email. The purpose of the IAP at this stage is to notify the public regarding the proposed activity and provide an opportunity to comment on the information provided. It is understood that there are challenges such as unemployment in the immediate communities, however, neither EIMS nor the applicant is in a position to offer any employment or funding opportunities for this project currently. I have attached a copy of the project background information document for your perusal. Please do not hesitate to contact EIMS should you have any queries or concerns. Regards, Andisiwe Xuma

Date 2022/08/31 Method Email

Comment	Response
Thanks, I will be there.	Dear Registered Interested and Affected Party/ Geagte Geregistreerde Belanghebbende en Geaffekteerde Party/Kulowo unomdla nochaphazeleayo, Please find attached a reminder of the

2769

Diana Mentoor

	public meetings taking place this week. Vind aangeheg 'n herinnerng van die publieke vergarderings wat hierdie week plaasvind. Esi sisaziso sokukhumbuza malunga neentlanganiso zoluntu ezizakubakho kule veki. Kind regards/ Vriendelike Groete/Ozithobileyo ,

Mrs Thesmé van Zyl

Date 2022/08/30 Method Email

Comment	Response
Dear Andisiwe Please register this Municipality as an Interested and Affected party with regards to the Notice of the attached advertisement Project 1520 – Proposed Searcher Seismic Survey Basic Assessment Project. Contact Persons: The Municipal Manager Matzikama Municipality E-mail: matzikamacollab@phoenixmail.co.za Mrs T van Zyl Environmental Officer Matzikama Municipality E-mail: thesme@matzikama.gov.za Kind Regards	Good Day Ms van Zyl, Thank you for your email. Please note that there are separate applications to conduct seismic surveys in the area between St Helena and Hondeklipbay, Your contact details will be registered on the IAP database for both these projects. Kind Regards, Andisiwe

Allan Basajjasubi

Date 2022/08/14 Method Email

Comment	Response
Good Morning Andisiwe I would like to request if you could add my colleague Dean Palmer to the interested and affected parties database as a representative of Natural Justice. His email address is dean@naturaljustice.org. Kind regards	Good day, This is to confirm that Mr Palmer has been registered as an I&AP for this project. I have attached a copy of the Background Information Document for your information. Regards, Andisiwe Xuma

Mellisa Groenink

Date 2022/11/25 Method Email

Comment	Response
Dear Sirs, Kindly find herewith comments submitted on behalf of the Green Connection and Natural Justice in respect of the draft BAR for the seismic surveys planned by TGS. Please acknowledge receipt. Best wishes, Melissa	Good day, Please find the attached letter in response to the comments raised below. Regards EIMS Public Participation Team

Shannon Marcoux

Date 2022/08/23 Method Email

Comment	Response

2770

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Shannon Marcoux

Dear Andisiwe Xuma, Please add the following email addresses (copied herein) to your database of interested and affected parties for EIMS Project Number 1520: Shannon Marcoux: shannon@naturaljustice.org Allan Basajjasubi : allan@naturaljustice.org Melissa Groenink : melissa@naturaljustice.org Jonathan van der Westhuizen : jonathan@naturaljustice.org Thank you, Shannon Marcoux	Good Day Ms Marcoux Thank you for your email. The contact details provided below have been noted and will be registered on the I&AP database for this project. Regards, Andisiwe Xuma

Patrick Forbes

Date 2022/08/23 Method Email

Comment	Response
Dear Andisiwe, Please can I register on behalf of Protect the West Coast NPC.	Good Day Mr. Forbes, Thank you for your email. Your details will be registered on the I&AP database for this project so that you can receive future notifications regarding the Basic Assessment process. Regards, Andisiwe Xuma

Monica Stassen

Date 2022/08/24 Method Email

Comment	Response
I would like to register as an Interested and Affected Party for the Proposed TGS Seismic Survey Basic Assessment Project.	This serves to confirm that you have been registered as an Interested and affected party for this project.

Nicholas Arnott

Date 2022/08/22 Method Email

Comment	Response
Good Day, Please register me as an Interested Party. Kind Regards, Nicholas	Good Day Nicholas. Thank you for your email, your details have been added on the IAP database for the project. Regards, Andisiwe Xuma

Cassandra Schnoor

Date 2022/09/02 Method Email

Comment	Response
Good day Please note that there is a new oil and gas touch point for SDCEA - her name is Janeira Reddy. I am unfortunately no longer working at SDCEA so please contact her on	Good Day Cassandra, Thank you for your email. The change in contact information has been noted and Janeira will be added as the contact person for SDCEA. Regards, Andisiwe Xuma

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Cassandra Schnoor

0780386007 should you need her and please copy Tanica (tanica@sdceango.co.za) and Des (desmond@sdceango.co.za) on all email correspondence regarding oil, gas and livelihoods until Janeira gets her new email address. Regards Cassandra ..... Oil, Gas, Livelihoods

Sinalo Sodela

Date 2022/11/24 Method Email

Comment	Response
Good day, Are you able to share the link to the document or share the actual document, thanks. Regards	Good day Ms Sodela, I have attached a copy of the main report to this email. The draft BAR and appendices including specialist reports can be accessed on the link below: https://www.eims.co.za/2022/10/25/1520-proposed-tgs-seismic-reconnaissance/ Please do not hesitate to contact EIMS should you have any queries or concerns. Regards, Andisiwe Xuma

Ms Adri La Meyer

Date 2022/08/24 Method Email

Comment	Response
Dear Andisiwe Xuma, Thank you for your email of 22 August 2022. Kindly register the Department of Environmental Affairs and Development Planning as a commenting authority for the basic assessment application. You may add me as the Department's contact person for the BA application. Please could you notify me when the Draft BAR is released for public consultation? Kind regards, Adri	Good Day Ms La Meyer, Thank you for your email. The Department of Environmental Affairs and Development Planning will be added as a commenting authority and your contact details will be registered on the I&AP database for this project. All registered I&APs will be notified when the Draft BAR becomes available for comment. Regards, Andisiwe Xuma

Mr Francois Du Toit

Date 2022/08/22 Method Email

Comment	Response
I really do not know how you and your colleagues sleep at night, knowing the devastation you are about to facilitate and unleash on our fragile ecosystems at sea. Please keep me posted. Regards Francois du Toit African Conservation Trust Founder member of FrackfreeSA	Good day Mr Du Toit, Thank you for your email. Your comments will be recorded in the Comments and Responses report that will be submitted to the competent authority. All registered IAPs will be notified when the Draft BAR becomes available for public review and comment. Regards, Andisiwe Xuma

Judy Bell

Date 2022/11/25 Method Email

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Judy Bell

Comment	Response
Hi Andiswe I have been away for a month and now ploughing through my emails. I have not been able to find the draft BA review. Please send it to me. I see the deadline is today – please may I have an extension to Monday? Thanks Judy Bell	Good Day Ms Bell, Apologies for the delayed response. Please find the attached draft BAR for your review. Please do sent your comments as soon as you are able to as the EAP will be finalizing the report for submission next week. The specialist reports can be downloaded from the link below: https://www.eims.co.za/2022/10/25/1520-proposed-tgs-seismic-reconnaissance/ Regards, Andisiwe Xuma

Ms Carisa J. Soudens

Date 2022/11/21 Method Questionaire

Comment	Response
Ms Soudens submitted a questionnaire during the public meeting in Garies. She stated that as a community, they live off the sea and depend on the ocean for their livelihood. She provided contact details of a women's group in Hondeklip Bay and mentioned that she is in the process of starting a farming project. Climate change was mentioned as one of the impacts of concern and how this project would benefit the community.	Ms Soudens submitted her questionnaire at the meeting and the issues raised were acknowledged and addressed in the meeting. The environmental impact assessment process was explained including the detailed social impact studies undertaken. It was mentioned that at this stage, it is unforeseen that there would be high job creation for local communities.

Dr Jackie Sunde

Date 2022/08/30 Method Email

Comment	Response
Dear Andiswa Please will you register Ms Priscilla Abrahams from St Helena Bay as an I &AP - telephone 0739948156 she is a small-scale fisher woman and myself Dr Jacqueline Sunde, email jackiesunde25@gmail.com Thank you Dr Jackie Sunde Dept of Environmental and Geographical Science University of Cape Town	Good day Dr Sunde, This is to conform that you and Ms Abrahams have been registered as I&APs for this project. I have attached a copy of the BID for your information. Regards, Andisiwe

Date 2022/11/25 Method Email

Comment	Response
Report.doc 25 November 2022 For Attention: ENVIRONMENTAL IMPACT MANAGEMENT SERVICES (EIMS) (c/o Andisiwe Xuma) By Email: tgs@eims.co.z Dear Mr Xuma Re Submission of comments on the Basic Assessment Report (BAR) prepared by EIMS on behalf of TGS Ref 1520 Attached please find my comments on the TGS Basic Assessment Report (BAR) Ref 1520. I make this submission as a researcher with more than 20 years' experience working with small-scale fishing communities in South Africa. Thank you Dr Jacqueline Sunde One Ocean Hub Small-scale Fisheries Research Team	Good Day Ms Sunde, Thank you for your email. Please find the attached letter in response to your comments submitted on 25 November 2022.12.06 Regards, EIMS Public Participation Team

2773

Dr Jackie Sunde

Ms Thandile Chinyavanhu

Date 2022/08/22 Method Email

Comment	Response
Good day Andisiwe I hope you are keeping well. This email serves as an indication of Greenpeace Africa's intentions to be listed as an interested and affected party concerning the planned seismic activity proposed TGS seismic survey. Greenpeace Africa is an environmental organisation in pursuit of environmental and social justice. We are opposed to any extractive projects which will exacerbate the climate crisis. Our details are as follows; Organisation: Greenpeace Africa address: 293 Kent Avenue, Ferndale, Randburg, 2194 tel: 011 482 4696 email:coafrica@greenpeace.org Point person: Thandile Chinyavanhu (Campaigner) cell: +27 82 614 2676 email: tchinyav@greenpeace.org Kind regards Thandile	Good Day Ms Chinyavanhu, I am very well, thank you. The contact details provided below have been noted and Greenpeace Africa will be registered on the interested and Affected Parties database for the proposed project. Your comments will be included in the Comments and Responses Report which will be submitted to the competent authority. Regards, Andisiwe Xuma

Mr Thandisile Mjadu

Date 2022/09/27 Method Email

Comment	Response
Good day Please find the attached document below Thank you	Good Day Mr Mjadu, Thank you for your email. Please note that the project is not accepting any CVs at this point as there are no vacancies but rather a public notification and consultation process is being conducted for the proposed TGS seismic survey application. Regards, Andisiwe Xuma

Ms Camelita Mostert

Date 2022/08/31 Method Fax

Comment	Response
Ms Mostert submitted her I&AP registration form where she included the following comments: 1. We as fishermen depend on the ocean and it is our life, so we say no to drilling. 2.I am a fisherwoman and I was born along the coast, so I have a right in the community to catch fish for a living. 3. Our fishing grounds will be affected because they will be disturbed by the proposed activity. 4. The individual fishers must be notified as well as the fishing communities, make use of media and television. 5. We are a fishing community and we must be respected, so we say no to drilling. I repeat that with everything that is happening, we will protect our ocean. Fishing is	Good Day Ms Mostert, This is to confirm that your IAP registration form has been received and that your details have been registered on the IAP database for this project. Your comments regarding your concerns as a fisherwoman whose livelihood is dependent on the ocean are noted and will be consideration during the Basic Assessment process. It is understood that the fishing community is protective of the ocean and that for many fishing is a single source of food and income. Please be advised that no drilling activities are included in the application for environmental authorisation as the 3D survey utilizes sound waves (airgun) to record the

2774

Ms Camelita Mostert

our heritage as fishers and we will protect our heritage. 6. Consider our tradition and also that we were born along the ocean and our livelihoods depend on the coastal resources. I am concerned because this is our livelihood and our only source of food and income. Where will we get food, how will we live? So no to anything that will cause our fish reserves to decline.	geological composition of the seabed within the TGS application area. Various specialist studies in the fields of Marine Ecology, Fisheries and Acoustics have been appointed to assess the potential impacts of the proposed project. We are also undertaking Social and Cultural Heritage Impact Assessments as part of the Basic Assessment, where specialists are going into the communities and talking to the different cultural groups to have a better understanding of the social setting. Mitigation measures will be proposed in the draft Basic Assessment Report which will be shared with all registered IAPs for review and comment in due course. Your participation and comments provided are appreciated. Please do not hesitate to contact EIMS should you have any queries or concerns. Regards, Andisiwe Xuma

Mr Dean Palmer

Date 2022/10/31 Method Email

Comment	Response
Good day Andisiwe, I trust this email finds you well. Kindly note that I have been unable to download the Public Participation Report from EIMS website – it provides me with the notification which states that it cannot be downloaded securely. I think it might be an error with how the document was uploaded. Could you please provide me with a copy of the report? I look forward to your reply, Kind regards Dean Palmer	Good day Mr Palmer, I am well, thank you for asking. The PPR was uploaded as a zip file with multiple PDF documents in the folder, I suspect that is why you are getting that error message. If you right click on the App 2 link on the EIMS website or click on http://www.eims.co.za/wp-content/uploads/2022/Public/1520/dbar/1520dbarapp2.zip select save link as, it should download the file, when you get the error message just click on the file and select keep file and you will be prompted to save the zip folder at your preferred location on your PC. Please let me know if you still have any issues with the download. Regards, Andisiwe Xuma

Ms Vivienne Solomons

Date 2022/08/23 Method Email

Comment	Response
Dear Andisiwe, Thank you for your correspondence dated 15 August 2022. We hereby register Umbono Energy Partners (UEP) as an Interested and Affected Party (I&AP) in the proposed 3D Seismic Survey by TGS Geophysical Company (UK) Ltd. UEP has a significant economic interest in Sunbird Energy, who is the holder of a Production Right over Block 2A. Our contact details are as follows: Richard Montjoie I Geologist E-mail: rmontjoie@umbono.co.za Kind regards, Vivienne Solomons	Good Day Ms Solomons, Thank you for your email. The information provided below has been noted and UEP will be registered in the I&AP database for this project. Regards, Andisiwe Xuma

Mr Masonwabe Zwelifile

Date 2022/09/27 Method Email

2779

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Mr Masonwabe Zwelifile

Comment	Response
Good Day Attached find CV Regard	Good Day Masonwabe, Thank you for your email. Please note that the project is not accepting any CVs at this point as there are no vacancies but rather a public notification and consultation process is being conducted for the proposed TGS seismic survey application. Regards, Andisiwe Xuma

Mr Christopher Hamel

Date 2022/08/29 Method Email

Comment	Response
Dear Andisiwe I hereby confirm my attendance at the Cape Town meeting tomorrow afternoon at 16:00 and please find my details below. Name: Christopher Hamel Company: ADR Fishing Cell: 082 3333100 Work: 027 386 6578 We operate vessels in the South African fishing industry. Regards Chris Hamel	Good Day Mr Hamel, Thank you for your email. Your contact details have been added to the IAP database for this project so that you can receive notifications regarding the Basic Assessment process. Regards, Andisiwe Xuma

Mr Ricardo Jaars

Date 2022/08/31 Method Email

Comment	Response
Good day Please find attached the above mentioned kind regard	Good Day Mr Jaars, Thank you for your email. Please note that the project is not accepting any CVs at this point as there are no vacancies but rather a public notification and consultation process is being conducted for the proposed TGS seismic survey application. Regards, Andisiwe Xuma

Date 2022/09/08 Method Email

Comment	Response
Goeie dag Vind asb aangeheg en terugvoering gee per sms Dankie	Good day, Thank you for your email, your registration form has been received and your details have been registered on the I&AP database. Regards, Andisiwe Xuma

Mr E. Adin Harmer

Date 2022/08/22 Method Email

Comment	Response

Mr E. Adin Harmer

Man can eat fish but not gas, oil or hydrocarbons.	Good Day Mr Harmer Thank you for your email. Your comments have been noted and will be included in the comments and responses report that will be submitted to the competent authority. The livelihood of the West Coast communities is an important aspect that will be addressed in the Social Impact Assessment and Draft BAR which will be made available for public review and comment. Regards, Andisiwe Xuma

Ms Christina Schild

Date 2022/09/01 Method Email

Comment	Response
Good day, Please may I, Christina Marie Schild, be listed as an Interested and Affected Party with regards to Project 1520. I am concerned with the process of public consultation, namely the actuality of it being meaningful and the sensitivity to the cultural, gendered and social conditions of the communities in question. I am furthermore concerned with the impacts that this proposed TSG Seismic Survey will have on larger marine mammals, penguin populations and breeding stocks of fish. Furthermore, I am concerned with the lack of precautionary principle applied herein and I am concerned that the realities of negative impacts and consequences have not been accurately portrayed to the communities in question. I am interested to know how this project relates to Operation Phakisa, the Just Energy Transition Transaction and the wider need for sustainable development, employment and social upliftment. Thank you, Christina Schild	Good Day Ms Schild, Thank you for your email. Your contact details will be registered on the I&AP database for this project as requested. We have had initial public meetings with communities along the West Coast in order to notify the I&APs regarding the proposed project. We are also undertaking Social and Cultural Heritage Impact Assessments as part of the Basic Assessment, where specialists are going into the communities and talking to the different cultural groups to have a better understanding of the social setting. Additionally, various specialists studies in the fields of Marine Ecology, Fisheries and Acoustics have been appointed to assess the potential impacts of the proposed project and these reports will be shared with all registered IAPs for review and comment. The project is being proposed by a private entity. The precautionary principle is being applied by undertaking the environmental application process and associated specialist studies. The applicant will only implement the project if authorised by the competent authority after consideration of all information presented and proposed mitigation measures, as well as the results of the public consultation. It is noted that the end product of the proposed survey is oil/gas which are non-renewable energy sources. As part of the transition to renewable energies, currently the Integrated Resources Plan of the country allows for a mix of both renewable and non-renewable energy sources. This proposed project aims to identify potential sources of offshore oil and gas. As part of this specific application, it is anticipated that there will be minimal employment opportunities for the immediate communities at this stage. The potential for potential future exploration or production activities in terms of employment and social upliftment can only be assessed should potential reserves be discovered. Should you have any further queries or concerns, please do not hesitate to contact EIMS. Sincerely, Andisiwe Xuma

Ms Natalie Van Wyk

Date 2022/11/25 Method Email

Comment	Response

2777

Ms Natalie Van Wyk

We say no toe SEISMIC cause our Snoek dont want SEISMIC even in our oceaan respect our customary rights .....dis ons gewoontereg and now one can take it a way from us ...the politics talk amongst the fisher ...where did they get a mandate?who did say they can talk for us?we as fishers say no no no to tgs no no no the polutitions lie to you cause they see money but we as the fishers see out livelihoods we are dependent of the oceans its comes from generations all the years so what do you think about us as fishers.... . VOERSEK AWAY WITH SEISMICS

Good Day Ms van Wyk We take note of your comments and ensure that these comments are included in our final Report to the Competent Authorities. EIMS understands that the fishing community along the West Coast of South Africa have utilised and rely on the ocean for income and that there is a strong cultural connection to the ocean. In order to assess this, a Cultural Heritage Assessment was undertaken and specifically addressed the impact of intangible heritage for the adjacent communities. It was concluded that: "The scientific studies conducted for this project identified impacts on fishing stock as low for all species. By inference, a potential impact on fishing yield could be expected and thus potential economic impact on communities due to reduced caught fish volumes. The recommended mitigation measures, as listed in the specialist reports for the project, focus on the reduction of impacts on fish species and the projected reduction of the impact on the commercial and small-scale fishery catch yield. These mitigation measures should then indirectly positively impact the potential negative impacts on the cultural heritage of the communities to be impacted. A pre-mitigation negative impact on a regional scale over the long term with a moderate intensity is predicted due to the potential indirect impact on the communities and, ultimately, their heritage, with a high probability of this impact occurring. The pre-mitigation impact on heritage resources is rated as MEDIUM. The potential residual impact on heritage resources, with mitigation measures from the scientific studies, is projected as LOW with a medium confidence factor. Considering the assessment based on the findings of the fieldwork as well as the scientific studies relating to the impact on fisheries, the specialist is of the opinion that the impact of the proposed project on the cultural heritage resources can be mitigated through the implementation of the recommendations in this report." Additionally, a Social Impact Assessment (Appendix 3 of the BAR) was undertaken and the impact on the livelihoods assessed to be of Medium significance. To this end, Section 8.3.4 of the Social Impact Assessment concluded that: "Livelihoods are already compromised due to the fishing quota system, over-fishing, lack of employment opportunities, pollution, effects of climate change and the recent Covid 19 pandemic. However, with reference to the assessment of the impacts on the catch rates from the fisheries assessment undertaken by CapMarine (2022), the impact on livelihoods is not because of the actual impact on catch rates, but because of the perceived impact of the oil/gas industry on fishing industry." Additionally, the Social Impact Assessment further specifically addressed the impact of further marginalisation of vulnerable groups. As per Section 9 of the Social Impact Assessment, it was concluded that: "From a social perspective it is clear that the communities and majority of local people are opposed to the project. If the project is considered in isolation, the impacts are negligible. However, the project does not happen in a vacuum, and the social environment is much wider than the footprint of the project. If the social risks and potential damage to cultural and indigenous rights are considered the impact on the social fabric of already vulnerable communities may be significant. At this stage communities feel that they cannot make informed decisions. Although all legal processes have been followed, the seismic survey industry is not moving at the pace of the community, and in the long run this will be detrimental to the industry. Potential future benefits and the economic development of the

Ms Natalie Van Wyk

	country should the surveys find any significant resources are not disputed. From a social perspective it is recommended that the project proceed subject to the mitigation measures (i.e. meaningful consultation, local research, education, and awareness raising in the project-affected communities) forming part of the conditions for authorisation and being implemented prior to the commencement of the actual survey." We would like to thank you for your comments and participation in our process for this project. All comments and responses will be submitted, together with the Basic Assessment Report and associated appendices to the Competent Authority for consideration in the decision-making process. Regards, EIMS Public Participation Team

Mr Chester Van Der Heever

Date 2022/09/01 Method Fax

Comment	Response
Mr Van der Heever submitted his I&AP registration form where he stated that he is part of the fishing industry and he is born and bred a fisherman in Lambertsbay. He also mentioned that in Lamberts Bay harbour, there is a a bird island with sensitive bird species. It was stated that bird island cape gannets breed on the island which is connected to the mainland. Among the impacts that should be considered, Mr van der Heever mentioned sea mammals, whales, seals, snoek, sea birds as well as poverty in the area (job creation). He was concerned that the project may affect the snoek run	Good Day Mr van Heever, This is to confirm that your IAP registration form has been received and that your details have been registered on the IAP database for this project. Your comments regarding your involvement in the Lambertsbay fishing industry as well as the sensitive bird species on Bird Island have been acknowledged and will be taken into consideration during the Basic Assessment process. Various specialist studies in the fields of Marine Ecology, Fisheries and Acoustics have been appointed to assess the potential impacts of the proposed project. We are also undertaking Social and Cultural Heritage Impact Assessments as part of the Basic Assessment, where specialists are going into the communities and talking to the different cultural groups to have a better understanding of the social setting. Mitigation measures will be proposed in the draft Basic Assessment Report which will be shared with all registered IAPs for review and comment in due course. Your participation and comments provided are appreciated. Please do not hesitate to contact EIMS should you have any queries or concerns. Regards, Andisiwe Xuma

Ms Melisa Pulen

Date 2022/11/25 Method Email

Comment	Response
Greetings FOR ATTENTION TGS 1. If we are serious about climate change, we do not need to drill for more oi and gas. 2. Recent studies say that there is no economic rationale that South Africa needs to turn to large scale gas fired power generation as part of a transition. 3. Drilling could run a risk of a oil spill as a result of an uncontrolled wellhead blowout, this oil pollution would threaten the marine ecosystem on which the coastal community like fishers depend on	Good Day, Please find the attached letter in response to the comments raised below. Regards, EIMS Public Participation Team

2779

Ms Melisa Pulen

for their livelihoods. 4. Seismic surveys do cause harm and mitigation measures are not good enough. Observers cannot see whales or other animals at night, but seismic surveys are proposed to happen at night. Zooplankton including larval fish and rock lobster can be damaged by seismic blasts and Snoek will also be impacted. These blasting may affect their feeding grounds and also their reproductive behaviours. 5. So a precautionary approach is necessary as plankton are the base of the food chain and knock on impacts on the rest of the ocean and could also risk fishers livelihoods. 6. Communities are opposed to the project's social risks as well as potential damage to cultural and indigenous rights may be significant. 7. This seismic survey supposed to happen directly in the path of the Snoek. The Snoek migrate from west (in the deep) to east (in die wal) and also from east to south and vice versa. Therefore if we allow this to happen than we will be left with no Snoek to catch. 8. Snoek provides employment for all sectors of our society. More than 2000 fishers are active on any given day during the Snoek run, 200 buyers, men and women. Plus the processing of Snoek provides for a further 1000 men and women. 9. This survey also hold other potential dangers of which we are not sure of, therefore we need to take the precautionary route as prescribed by our environment and our constitution. IN THE LIGHT OF THE ABOVE , WE, THE SOUTH AFRICAN COLLECTIVE , A NATIONAL ORGANISATION REPRESENTING FISHERS FROM AROUND THE COAST REJECT THIS APPLICATION AND REQUEST THAT IT BE WITHDRAWN. REGARDS MELISA PULLEN

Mr John Alexander Cloete

Date 2022/11/21 Method Questionaire

Comment	Response
Mr Alexander submitted a questionnaire with his contact details and stated that he is a land owner.	Mr Alexander's questionnaire was submitted in person in the public meeting and acknowledged at that time.

Mr Aaron Larkens

Date 2022/11/24 Method Email

Comment	Response
Good afternoon Andisiwe. Thank you for your email. We would be grateful if you would kindly let us have a copy of the draft Basic Assessment Report, to which you are referring, for our records. Kind regards Aaron Larkens	Good Day Mr Larkens, I have attached a copy of the main report to this email. The report and appendices including specialist reports can be accessed on the link below: https://www.eims.co.za/2022/10/25/1520-proposed-tgs-seismic-reconnaissance/ Please do not hesitate to contact EIMS should you have any queries or concerns. Regards, Andisiwe Xuma

Date 2022/11/24 Method Email

2780

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Mr Aaron Larkens

Comment	Response
Good afternoon Andisiwe. Thank you for your email. We would be grateful if you would kindly let us have a copy of the draft Basic Assessment Report, to which you are referring, for our records. Kind regards	Good Day Mr Larkens, I have attached a copy of the main report to this email. The report and appendices including specialist reports can be accessed on the link below: https://www.eims.co.za/2022/10/25/1520-proposed-tgs-seismic-reconnaissance/ Please do not hesitate to contact EIMS should you have any queries or concerns. Regards, Andisiwe Xuma

Mr Majubase Bonisile Mtati

Date 2022/08/31 Method Email

Comment	Response
Good day Please find the attached document below. Thank you	Good Day Mr Mtati, Thank you for your email. Please note that the project is not accepting any CVs at this point as there are no vacancies but rather a public notification and consultation process is being conducted for the proposed TGS seismic survey application. Regards, Andisiwe Xuma

Mr Anthony Andrews

Date 2022/11/25 Method Email

Comment	Response
Hi Kindly receive community comments from the West Coast Guriqua Council on the proposed project 1520 TGS Orange Basin Reconnaissance Permit. Regards PC Anthony Andrews	Good Day Mr Andrews, Please find the attached letter in response to the comments submitted below. Regards, EIMS

Ms Thulisile Poni

Date 2022/09/01 Method Email

Comment	Response
Good day Please find the attached document below Thank you	Good Day, Thank you for your email. Please note that the project is not accepting any CVs at this point as there are no vacancies but rather a public notification and consultation process is being conducted for the proposed TGS seismic survey application. Regards, Andisiwe Xuma

Ms Thea Jordan

Date 2022/12/06 Method Email

Comment	Response

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Ms Thea Jordan

Dear EAP, Your request for comment dated 25 October 2022 refers. Please find attached this Department's comment. Kinds Regards Thea Jordan Pr. Pl. (A/1237/2002)	Good day, Please find the attached letter in response to the comments received on 25 November 2022.12.06 Regards, EIMS Public Participation Team

Date 2022/12/06 **Method** Email

Comment	Response
Dear EAP, Your request for comment dated 25 October 2022 refers. Please find attached this Department's comment. Kinds Regards Thea Jordan Pr. Pl. (A/1237/2002)	Dear EIMS Team, Thank you for the Comments and Response Report. Kind regards, Adri

Mr Mziyanda Jiba

Date 2022/08/31 **Method** Email

Comment	Response
Good day Please find the attached document below. Thank you	Good Day Mr Jiba, Thank you for your email. Please note that the project is not accepting any CVs at this point as there are no vacancies but rather a public notification and consultation process is being conducted for the proposed TGS seismic survey application. Regards, Andisiwe Xuma

Ms Paulita Mostert

Date 2022/11/24 **Method** Email

Comment	Response
We say no toe SEISMIC cause our Snoek dont want SEISMIC even in our oceaan respect our customary rights .....dis ons gewoontereg and now one can take it a way from us ...the politics talk amongst the fisher ...where did they get a mandate?who did say they can talk for us?we as fishers say no no no to tgs no no no the polutitions lie to you cause they see money but we as the fishers see out livelihoods we are dependent of the oceans its comes from generations all the years so what do you think about us as fishers.... . VOERSEK AWAY WITH SEISMICS	Good day Ms Mostert, We take note of your comments and will ensure that these comments are included in our final Report to the Competent Authorities. EIMS understands that the fishing community along the West Coast of South Africa have utilised and rely on the ocean for income and that there is a strong cultural connection to the ocean. This is specifically acknowledged and considered in the Basic Assessment Report. In order to assess this, a Cultural Heritage Assessment (Appendix 3 of the BAR) was undertaken and specifically addressed the impact of intangible heritage for the adjacent communities. As per Section 9.2 of the Cultural Heritage Assessment, it was concluded that: "The scientific studies conducted for this project identified impacts on fishing stock as low for all species. By inference, a potential impact on fishing yield could be expected and thus potential economic impact on communities due to reduced caught fish volumes. The recommended mitigation measures, as listed in the specialist reports for the project, focus on the reduction of impacts on fish species and the projected reduction of the impact on the commercial and small-scale fishery catch yield. These mitigation measures should then indirectly positively impact the potential negative impacts on the cultural heritage of the

2782

Ms Paulita Mostert

communities to be impacted. A pre-mitigation negative impact on a regional scale over the long term with a moderate intensity is predicted due to the potential indirect impact on the communities and, ultimately, their heritage, with a high probability of this impact occurring. The pre-mitigation impact on heritage resources is rated as MEDIUM. The potential residual impact on heritage resources, with mitigation measures from the scientific studies, is projected as LOW with a medium confidence factor. Considering the assessment based on the findings of the fieldwork as well as the scientific studies relating to the impact on fisheries, the specialist is of the opinion that the impact of the proposed project on the cultural heritage resources can be mitigated through the implementation of the recommendations in this report." Additionally, a Social Impact Assessment (Appendix 3 of the BAR) was undertaken and the impact on the livelihoods assessed to be of Medium significance. To this end, Section 8.3.4 of the Social Impact Assessment concluded that: "Livelihoods are already compromised due to the fishing quota system, over-fishing, lack of employment opportunities, pollution, effects of climate change and the recent Covid 19 pandemic. However, with reference to the assessment of the impacts on the catch rates from the fisheries assessment undertaken by CapMarine (2022), the impact on livelihoods is not because of the actual impact on catch rates, but because of the perceived impact of the oil/gas industry on fishing industry." Additionally, the Social Impact Assessment further specifically addressed the impact of further marginalisation of vulnerable groups. As per Section 9 of the Social Impact Assessment, it was concluded that: "From a social perspective it is clear that the communities and majority of local people are opposed to the project. If the project is considered in isolation, the impacts are negligible. However, the project does not happen in a vacuum, and the social environment is much wider than the footprint of the project. If the social risks and potential damage to cultural and indigenous rights are considered the impact on the social fabric of already vulnerable communities may be significant. At this stage communities feel that they cannot make informed decisions. Although all legal processes have been followed, the seismic survey industry is not moving at the pace of the community, and in the long run this will be detrimental to the industry. Potential future benefits and the economic development of the country should the surveys find any significant resources are not disputed. From a social perspective it is recommended that the project proceed subject to the mitigation measures (i.e. meaningful consultation, local research, education, and awareness raising in the project-affected communities) forming part of the conditions for authorisation and being implemented prior to the commencement of the actual survey." We would like to thank you for your comments and participation in our process for this project. All comments and responses will be submitted, together with the Basic Assessment Report and associated appendices to the Competent Authority for consideration in the decision-making process. Regards, EIMS Public Participation Team

Ms Margo Naude

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Ms Margo Naude

Date 2022/10/27 Method Email

Comment	Response
Hello, I would like to register as an Interested and Affected Party for the ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS SEISMIC SURVEY BASIC ASSESSMENT PROJECT 1520. Regards, Margo Naude	Good Day Ms Naude, Thank you for your email. Your contact details have been registered on the I&AP database for the project. Please click on the link https://www.eims.co.za/2022/10/25/1520-proposed-tgs-seismic-reconnaissance/ to download a copy of the Draft Basic Assessment Report which is currently subject to public review and comment. Regards, Andisiwe Xuma

Date 2022/11/24 Method Email

Comment	Response
To whom it may concern, As an interested and affected party in this matter, I have read through the DBAR and strongly disagree with the findings that the project can go ahead. The Report does not adequately take into account the recent High Court ruling in which Shell was disallowed from conducting a seismic survey off the sensitive Wild Coast. Over and above this, the Report does not adequately give effect to the precautionary principle with regards to the seismic survey's effects on marine fauna and the greater ecosystem. Regards, Margo Naude	Good day Ms Naude. EIMS has reviewed and considered the Makhanda Judgement in the compilation of the Basic Assessment Report and specifically in the context of this specific proposed activity and receiving environment. In terms of the precautionary principle, it should be noted that EIMS has undertaken the Basic Assessment in line with the requirements of the National Environmental Management Act (Act No. 107 of 1998 – NEMA) and the Associated Environmental Impact Assessment (EIA) Regulations, 2014. As part of this process, EIMS and our specialist team have undertaken a detailed impact assessment, including a detailed assessment of the nature, extent, magnitude, duration, and probability for each of the impacts, as well as the confidence level, potential for irreplaceable loss of resources and cumulative impacts. Based on this assessment, the impacts on the marine fauna were found to be of Low/Negligible Significance and it was not considered to be a fatal flaw. Additionally, stringent mitigation measures were included to further ensure the protection of the receiving environment. It is our opinion that due process was followed, and that the precautionary principle was adequately considered. We would like to thank you for your comments and participation in our process for this project. All comments and responses will be submitted, together with the Basic Assessment Report and associated appendices to the Competent Authority for consideration in the decision-making process Regards, EIMS Public Participation Team

Mr Vorster Van Zyl

Date 2022/09/01 Method Email

Comment	Response
Name: vorster van zyl contact details: awevorster@gmail.com I am writing this email because I am deeply concerned about the wellbeing of the west coast as I stay in strandfontein, up the west coast.	Good Day Sir, Thank you for your email. Your contact details will be registered on the Interested and Affected Parties database. Please find the attached background information documents for your perusal, specialist studies will be undertaken to assess the impact of the proposed activity on the social environment as well as the marine environment and fisheries. When the draft Basic

2784

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Mr Vorster Van Zyl

	Assessment Report becomes available for public review, all registered I&APs will be notified. Regards, Andisiwe Xuma

Mr Andre Hector

Date 2022/08/19 Method Email

Comment	Response
Dear Andiswe, Hacky Fishing (Pty) Ltd owns fishing vessels and holds fishing rights. Please add us to the list of interested parties in the offshore seismic survey by sending correspondence to the following addresses: longline@mweb.co.za office@oceanquest.co.za judianbruk@gmail.com Regards, Andre Hector HACKY FISHING (PTY) LTD	Good day Mr Hector, Thank you for your email. The contact details provided have been added to the project I&AP Database and will receive notifications regarding the Basic Assessment process. Regards, Andisiwe Xuma

Ms Lize-Marie Wiese

Date 2022/08/31 Method Email

Comment	Response
Good day, I am a stakeholder in the "ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS SEISMIC RECONNAISSANCE BASIC ASSESSMENT". My family and I have property on the coastline of Lamberts bay and we will be impacted if this application is granted. I will fill in the stakeholder registration from and submit it in due time; as I want to take careful consideration to all the questions and include a list of other parties you should notify. As you have not notified us, even though we own property on the coastline where you indicated, I have only been informed about this from another party today. Therefore, please email me today all information regarding this application as well as a list of all the public participation meetings. We want to attend the meeting today and the one tomorrow in Lamberts Bay. So please email me ASAP. Kind regards, Lize-Marie Wiese.	Good day, Thank you for the information. I will send you my stakeholder form soon. Please in the meantime can you add my email to your distribution list, as well as: dwiese@octoplace.co.za and grootvleigasteplaas@gmail.com Please send us all information relating to this matter in the future, and also send me the minutes of all previous meetings. Please also send us the proposed timelines with deadlines for our and your submissions for the application; and the opposition/comments on to the application. Thank you. Kind regards, Lize-Marie Wiese.

Date 2022/08/31 Method Email

Comment	Response
Good day, I am a stakeholder in the "ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS SEISMIC RECONNAISSANCE BASIC ASSESSMENT". My family and I have property on the coastline of Lamberts bay and we will be impacted if this application is granted. I will fill in the stakeholder registration from and submit it in due time; as I want to take careful consideration to all the questions and include a list of other parties you should notify. As you have not notified us, even though we own property on the coastline where you	Good Day Ms Weise, Thank you for your email and for calling today regarding the proposed survey project. Our process of identification of interested and affected parties is multi-layered in the sense that we use site notices, hand delivery and emailing of notification letters, radio and newspaper adverts as well as public meetings as an attempt to collate a database of all potentially interested and affected. This is still the initial notification and IAP registration is ongoing. Please find the attached notification letter, site notice and background information

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Ms Lize-Marie Wiese

indicated, I have only been informed about this from another party today. Therefore, please email me today all information regarding this application as well as a list of all the public participation meetings. We want to attend the meeting today and the one tomorrow in Lamberts Bay. So please email me ASAP. Kind regards, Lize-Marie Wiese.	document for the proposed project. Todays meeting will be held at Hoedjiesbaai Hotel in Saldanha Bay from 4pm-6pm and Tomorrow it will be at the Community Hall in Lamberts Bay from 4pm-6pm. Please do not hesitate to contact me if you need any further information. Regards, Andisiwe Xuma

Date 2022/08/31 Method Email

Comment	Response
Good day, I am a stakeholder in the "ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS SEISMIC RECONNAISSANCE BASIC ASSESSMENT". My family and I have property on the coastline of Lamberts bay and we will be impacted if this application is granted. I will fill in the stakeholder registration from and submit it in due time; as I want to take careful consideration to all the questions and include a list of other parties you should notify. As you have not notified us, even though we own property on the coastline where you indicated, I have only been informed about this from another party today. Therefore, please email me today all information regarding this application as well as a list of all the public participation meetings. We want to attend the meeting today and the one tomorrow in Lamberts Bay. So please email me ASAP. Kind regards, Lize-Marie Wiese.	Noted, Thank you. Your contact details will be registered on the I&AP Database for this project. All comments received from IAPS will be recorded in a Comments and Responses Report which will be available for public review along with the Basic Assessment Report. Notifications will be sent out to all registered I&APs when the reports are available for review and comment. Kind Regards, Andisiwe Xuma

Ms Katy Harries

Date 2022/10/28 Method Email

Comment	Response
Dear Andisiwe Xuma I would like to register as an Interested and Affected person for project number 1520. Kind regards Katy Harries	Good day Ms Harries, Thank you for your email. Your contact details have been registered on the I&AP Database for the project. Regards, Andisiwe Xuma

Prof. Patrick Bond

Date 2022/08/22 Method Email

Comment	Response
I'm Patrick Bond email: pbond@mail.ngo.za profession: Professor of Sociology (Univ of Johannesburg) reason for interest: concern about gas extraction's impact on climate change	Good Day Mr Bond, Thank you for your email. Your details will be registered on the I&AP database for the project. Please find the attached background information document for your perusal. Please do not hesitate to contact EIMS if you have any further queries. Regards, Andisiwe Xuma

Date 2022/08/30 Method Email

2786

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Prof. Patrick Bond

Comment	Response
Thanks Andisiwe, call me Patrick, The document is meant, in part, to "Allow Interested and Affected Parties (I&APs) the opportunity to obtain a broad understanding of the proposed project and to request or share information." In broad terms, if the proposed surveying identifies hydrocarbons - as it surely will, given geological factors - does EIMS have a specialist study lined up, to address whether exploration and exploitation should go ahead? I see that the word "climate" is not mentioned. Thanks, Patrick	Good day Patrick, The proposed activity relates to Reconnaissance only, at this stage. As such, EIMS can only assess the impacts of the proposed reconnaissance on the receiving environment. The specialists commissioned to undertaken these assessments have been identified in order to assess the impacts of the proposed reconnaissance only. Since reconnaissance and exploration would need to be undertaken to determine the size and extent of a potential resource, it is not currently possible to assess the potential (unknown) climate change impacts as this stage. Should any future production activities be applied for, the climate change assessment would need to be undertaken as part of the required Environmental Impact Assessment for those Production Right Applications. Thank you for your participation in the process. Please do not hesitate to contact EIMS with any further queries. Sincerely, Andisiwe Xuma

Date 2022/11/03 Method Email

Comment	Response
Andisiwe, Thanks, but there did not seem to be any information about climate impacts of gas and oil finds. Was that an appendix or part of the draft assessment that I missed? Thanks, Patrick	Dear Prof. Bond, Thank you for your comments. EIMS acknowledges that climate change is a significant threat globally and more specifically in South Africa. EIMS has not ignored climate change and is not a climate change denialist. The impacts associated with climate change have been assessed, including looking at ecosystems, biodiversity, and human communities at global and regional levels, by the IPCC (Sixth Assessment Report). This report also reviews vulnerabilities and the capacities and limits of the natural world and human societies to adapt to climate change. EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant, namely seismic surveys. Any subsequent authorization would be restricted to these specifically assessed activities. The proposed activities do not include any other exploration, production or combustion of any natural gas or oil resources. There are no significant GHG emissions directly related to the proposed activity nor are there significant climate change vulnerability risks. Should the applicant or other applicants wish to undertake any additional exploration, production, or combustion activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a need to apply for the relevant permissions. These would include a formal application for new EA and where relevant an exploration and production Right, informed by a comprehensive Environmental Impact Assessment and stakeholder consultation assessing the merits of these specific activities. The impacts of such proposed activities would consequently require specific assessment of the associated impacts and public consultation prior to approval. Given that this project seeks to undertake reconnaissance only, and would not provide authorization for potential future exploration or production activities, it is our view that it is premature to assess the likely impacts (including climate change) of further future speculative invasive exploration activities or production activities or future utilization of any resource, as the extent, duration, location, and

2787

Prof. Patrick Bond

magnitude of potential impacts, all of which are crucial to be able to assess the likely environmental impact, are unknown at this stage. Any such assessment is unlikely to be realistic and would consequently be subject to challenge. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, production, and combustion activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed prior to implementation on their merits as and when they are proposed. With reference to Item 125 of the Makhanda Judgement issued on 1 September 2022 (which is currently under appeal), consideration should be given to the Integrated Resource Plan (IRP), 2019, which provides a plan for an energy sector that provides reliable and efficient energy service at competitive rates; that is socially equitable through expanded access to energy at affordable tariffs; and that is environmentally sustainable through reduced emissions and pollution. The IRP 2019 includes the use of natural gas in the planned energy mix to achieve the objectives of the Plan. It is further noted that this plan has also been considered and captured in national plans to address climate change as reflected in the Updated Nationally Determined Contributions under the Paris Agreement. The NDC represents South Africa's contribution to global efforts to reduce greenhouse gas emissions, and mitigate climate change. The planned seismic activities aim only to ascertain whether there are viable natural gas and oil reserves, and the seismic activities do not result in any significant direct GHG emissions. The outcomes of these activities will be able to inform future resource and energy planning. Please do not hesitate to contact us with further queries or concerns. Regards, Andisiwe Xuma

Date 2022/11/22 Method Email

Comment

Resent. Please don't ignore climate. That would be a very serious mistake. I only see one site where GP Kriel claims, "Climate change assessments are more applicable at production stage." But the recent Makhanda High Court case of Sustain the Wild Coast v Shell confirmed that the entire project process must be considered, with estimates of CO2/CH4 emissions provided through the life of the project, and indeed a full cost-benefit analysis supplied on that basis. Why is EIMS so reluctant to offer a straightforward assessment, given that a massive gas and oil expansion within South Africa's electricity would invoke severe climate sanctions by Western trading partners? I don't to have to file a formal complaint and bring EIMS's name into disrepute - the way Nemai/Transnet suffered - as climate denialist. It is really unsatisfactory, in this day and age, for EIMS to be pooh-poohing and delaying consideration of the crisis that could end life as we know it, especially for your generation. Thanks, Patrick

Response

Dear Prof. Bond, Thank you for your comments. EIMS acknowledges that climate change is a significant threat globally and more specifically in South Africa. EIMS has not ignored climate change and is not a climate change denialist. The impacts associated with climate change have been assessed, including looking at ecosystems, biodiversity, and human communities at global and regional levels, by the IPCC (Sixth Assessment Report). This report also reviews vulnerabilities and the capacities and limits of the natural world and human societies to adapt to climate change. EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant, namely seismic surveys. Any subsequent authorization would be restricted to these specifically assessed activities. The proposed activities do not include any other exploration, production or combustion of any natural gas or oil resources. There are no significant GHG emissions directly related to the proposed activity nor are there significant climate change vulnerability risks. Should the applicant or other applicants wish to undertake any additional exploration, production, or combustion activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a need to apply for the relevant

2788

Prof. Patrick Bond

permissions. These would include a formal application for new EA and where relevant an exploration and production Right, informed by a comprehensive Environmental Impact Assessment and stakeholder consultation assessing the merits of these specific activities. The impacts of such proposed activities would consequently require specific assessment of the associated impacts and public consultation prior to approval. Given that this project seeks to undertake reconnaissance only, and would not provide authorization for potential future exploration or production activities, it is our view that it is premature to assess the likely impacts (including climate change) of further future speculative invasive exploration activities or production activities or future utilization of any resource, as the extent, duration, location, and magnitude of potential impacts, all of which are crucial to be able to assess the likely environmental impact, are unknown at this stage. Any such assessment is unlikely to be realistic and would consequently be subject to challenge. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, production, and combustion activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed prior to implementation on their merits as and when they are proposed. With reference to Item 125 of the Makhanda Judgement issued on 1 September 2022 (which is currently under appeal), consideration should be given to the Integrated Resource Plan (IRP), 2019, which provides a plan for an energy sector that provides reliable and efficient energy service at competitive rates; that is socially equitable through expanded access to energy at affordable tariffs; and that is environmentally sustainable through reduced emissions and pollution. The IRP 2019 includes the use of natural gas in the planned energy mix to achieve the objectives of the Plan. It is further noted that this plan has also been considered and captured in national plans to address climate change as reflected in the Updated Nationally Determined Contributions under the Paris Agreement. The NDC represents South Africa's contribution to global efforts to reduce greenhouse gas emissions, and mitigate climate change. The planned seismic activities aim only to ascertain whether there are viable natural gas and oil reserves, and the seismic activities do not result in any significant direct GHG emissions. The outcomes of these activities will be able to inform future resource and energy planning. Please do not hesitate to contact us with further queries or concerns. Regards, Andisiwe Xuma

Date 2022/11/24 **Method** Email

Comment

Sorry Andile, I know you must be trying hard, but you and the team are misreading the judgment. This is your problem, in bold: IN THE HIGH COURT OF SOUTH AFRICA (EASTERN CAPE DIVISION, MAKHANDA) CASE NO: 3491/2021 Reportable In the matter between: SUSTAINING THE WILD COAST NPC MASHONA WETU DLAMINI DWESA-CWEBE COMMUNAL PROPERTY ASSOCIATION NTSINDISO NONGCA VU SAZISE MAXWELL PEKAYO CAMERON THORPE ALL RISE

Response

Dear Prof. Bond, Thank you for your comments. We take note of the comments and will include these in the final Report for submission to the Competent Authorities. With reference to the quoted sections of the Makhanda Judgment, we would like to reiterate that the NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, production, and combustion activities in that these are listed as distinct and separate listed activities. There is

Prof. Patrick Bond

ATTORNEYS FOR CLIMATE AND THE ENVIRONMENT NPC NATURAL JUSTICE GREENPEACE ENVIRONMENTAL ORGANIZATION and MINISTER OF MINERAL RESOURCES AND ENERGY MINISTER OF ENVIRONMENT, FORESTRY AND FISHERIES SHELL EXPLORATION AND PRODUCTION SOUTH AFRICA B V 1st Applicant 2nd Applicant 3rd Applicant 4th Applicant 5th Applicant 6th Applicant 7th Applicant 8th Applicant 9th Applicant 1st Respondent 2nd Respondent 3rd Respondent IMPACT AFRICA LIMITED BG INTERNATIONAL LIMITED 4th Respondent 51h Respondent JUDGMENT ... [109] The intervening parties' contention that the decision-maker gave no proper consideration to the climate change impacts of the decision to grant the exploration right is an important factor to be considered in the process of granting an exploration right. [110] Reliance for this contention, by the intervening parties, is placed on expert testimony113 showing that most of the discovered reserves of oil and gas cannot be burnt if we are to stay on the pathway to keep global average temperature increases below 1.5 degrees Celsius. Authorising new oil and gas exploration, with its goal of finding exploitable oil and/or gas reserves and consequently leading to production, is not consistent with South Africa complying with its international climate change commitments. [111] According to the respondents, climate change considerations and the right to access food and livelihood are irrelevant when considering an application for an exploration right; these considerations are premature because they fall to be considered at a much later stage. [112] On the authority of Director: Mineral Development, Gauteng Region and Another v Save the Vaal Environment and Others114 the processes are discrete stages in a single process that culminates in the production and combustion of oil and gas, and the emission of greenhouse gases that will exacerbate the climate crisis and impact communities' livelihoods and access to food. [113] The respondents' thesis does not find support from Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others,115 either, where Murphy J said: 'The absence of express provision in the statute requiring a climate change impact assessment does not entail that there is no legal duty to consider climate change as a relevant consideration and does not answer the interpretative question of whether such a duty exists in administrative law. Allowing for the respondents' argument that no empowering vision in NEMA or the regulations explicitly prescribes a mandatory procedure or condition to conduct a formal climate change assessment, the climate change impacts are undoubtedly a relevant consideration as contemplated by section 240 of NEMA for the reasons already discussed. A formal expert report on climate change impacts will be the best evidentiary means of establishing that this relevant factor in its multifaceted dimensions was indeed considered, while the absence of one will be symptomatic of the fact that it was not.116' [114] It seems clear from the aforegoing, even taking into account the contentions raised by the respondents, that, had the decision-maker had the benefit of considering a comprehensive assessment of the need and desirability of exploring for new oil and gas reserves for climate change and the right to food perspective, the decision-maker may very well have concluded that the proposed exploration is neither needed nor desirable... 113 Professor New. 114 (133/98) [1999] ZASCA 9 (12 March 1999). 115 (2017) JOL

provision in law for these activities to be assessed prior to implementation on their merits as and when they are proposed. It is not accurate to state that the Reconnaissance will necessarily lead to exploration, or production. As per our previous correspondence we would like to reiterate that EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant, namely seismic surveys, i.e. for reconnaissance only. Any subsequent authorization would be restricted to these specifically assessed activities. The proposed activities do not include any other exploration, production or combustion of any natural gas or oil resources. There are no significant GHG emissions directly related to the proposed activity nor are there significant climate change vulnerability risks. Should the applicant or other applicants wish to undertake any additional exploration, production, or combustion activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a need to apply for the relevant permissions. These would include a formal application for new EA and where relevant an exploration and production Right, informed by a comprehensive Environmental Impact Assessment and stakeholder consultation assessing the merits of these specific activities. The impacts of such proposed activities would consequently require specific assessment of the associated impacts and public consultation prior to approval. Given that this project seeks to undertake reconnaissance only, and would not provide authorization for potential future exploration or production activities, it is our view that it is premature to assess the likely impacts (including climate change) of further future speculative invasive exploration activities or production activities or future utilization of any resource, as the extent, duration, location, and magnitude of potential impacts, all of which are crucial to be able to assess the likely environmental impact, are unknown at this stage. Any such assessment is unlikely to be realistic and would consequently be subject to challenge. We would like to thank you for your comments and participation in our process for this project. All comments and responses will be submitted, together with the Basic Assessment Report and associated appendices to the Competent Authority for consideration in the decision-making process. Regards, EIMS Public Participation Team

2790

Comments and Responses 1520 TGS Reconnaissance Basic Assessment

Prof. Patrick Bond

37526 (GNP); [2017] ZAGPPHC (GP); [2017] 2 All SA 519 (GP). 116 Para 88. Does EIMS really want to be ridiculed for ignoring the obvious? If so, we shall see you in the regulatory process, and the courts, and probably also on the streets and beaches with protesters who are critical of your and your principals' role in planetary destruction - especially young people from your generation. You should consider joining them, not the fossil fuel firms now wrecking your future. Thanks, Patrick

Date 2022/11/25 Method Email

Comment	Response
Date: 25 November 2022 To: Andisiwe Xuma, TGS Reconnaissance Basic Assessment<tgs@eims.co.za> Subject: Interested & Affected Party response to TGS Geophysical Company Environmental Authorization for a 3D seismic survey off the West Coast of South Africa Please consider the attached document to be my comment on the seismic survey proposal. Please confirm receipt.	Good day Prof. Bond, Please find the attached letter in response to the comments submitted on 25 November 2022.12.06 Regards, EIMS Public Participation Team

Mr Gerhard Oosthuizen

Date 2022/08/24 Method Email

Comment	Response
Good Day Andisiwe Xuma I would like to register as an interested and affected party for the above mentioned survey that is proposed 120km offshore from St Helena Bay. Please keep me informed of any developments or public participation meetings that will be conducted.	Good Day Mr Oosthuizen, Thank you for your email, your details will be registered on the I&AP database for this project. Please find the attached notification document which specifies when public meetings for the project will be held. All registered I&APs will be sent notifications regarding the Basic Assessment process. Regards, Andisiwe Xuma

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

JWS7

6 December, 2022

Our ref: GPK/as/1520

Mr Andy Pienaar

Dear Sir

RESPONSE TO COMMENTS ON THE ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS ORANGE BASIN SEISMIC RECONNAISSANCE BASIC ASSESSMENT PROCESS

Please refer to the table below for responses to the comments raised.

Comment/ Recommendation	Response
My naam is Andy Pienaar, inboorling van Komaggas in die Namakwa streek van die Noord Kaap Provinsie en ek verteenwoordig hierin myself, my organisasie te wete Kobush Ontwikkelingsvereniging en die gevoel van 'n beduidende aantal gemeenskapslede met betrekking tot die voorgestelde soektog na en die ontwikkeling van olie en gas bronne aan ons kus. My name is Andy Pienaar, native of Komaggas in the Namaqua region of the Northern Cape Province and I represent in this myself, my organisation Kobush Development Association and the feeling of a significant number of community members regarding the proposed search for and development of oil and gas resources on our coast.	Ons neem kennis van u kommentaar. We take note of your comment.
Ek wil dit aanhaal dat ek en my genante terdee bewus daarvan is dat ons onlosmaaklik deel van ons natuurlike omgewing is en dat ek en meer van ons, ons bestaan in besonders te danke het aan die bronne wat hierdie oseaan so genadiglik aan ons beskikbaar gestel het. Ons gee ook erkenning aan die rol en verantwoordelikheid wat ons Skepper, deur ons plasing hier, aan ons gegee het om na Sy Skepping om te sien en ons glo dat dit nou meer as ooit tevore nodig geword het dat ons in die gesig van aanhoudende aanslae vir haar in die bresse sal tree. Let wel	Ons neem kennis van u kommentaar. Daar word erken dat projekte van hierdie aard moontlik 'n negatiewe impak op die omgewing kan hê. Dit word erken deur die Wet op Nasionale Omgewingsbestuur (Wet No. 107 van 1998 – NEMA) en die gevolglike lys van hierdie aktiwiteite as aktiwiteite wat gedetaileerde assessering en 'n Omgewingsmagtiging (EA) vereis voordat daar voortgegaan word. Die voorgestelde aktiwiteit is daarna geassesseer en dit is die mening van die Omgewingsassesseringspraktisyn (EAP) en die geassosieerde spesialiste dat die projek kan voortgaan, op voorwaarde dat die maatreëls vervat in die Omgewingsbestuursprogram (EMPr) geïmplementeer word, aangesien die geïdentifiseerde impakte

8 Dalmeny Road, Pine Park, 2194 | PO Box 2083, Pinegowrie 2123, South Africa

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
ons sien hierdie aansoek as deel van die bedreiging wat die skielike belangstelling in die minerale en petroleum potensiaal wat die Namakwalandse kuslyn, vir ons gemeenskappe inhou. I want to quote that my associates and I are acutely aware that we are inextricably part of our natural environment and that more of us, and I, owe our existence in particular to the resources that this ocean has so graciously made available to us. We also acknowledge the role and responsibility that our Creator, through our placement here, has given us in caring for His Creation and we believe that now more than ever before, it has become necessary for us to step into the face of constant attacks for her. Please note that we see this application as part of the threat posed to our communities by the sudden interest in the mineral and petroleum potential that the Namaqualand coastline.	van medium en lae belang is. We take note of your comment. It is acknowledged that projects of this nature could potentially have negative impacts on the environment. This is recognised by the National Environmental Management Act (Act No 107 of 1998 – NEMA) and the consequent listing of these activities as activities that require detailed assessment and Environmental Authorisation (EA) prior to proceeding. The proposed activity has been assessed and it is the opinion of the Environmental Assessment Practitioner (EAP) and the associated specialists that the project could proceed, on condition that the measures contained in the Environmental Management Programme (EMPr) be implemented, as the impacts identified were rated to be of medium and low significance.
Ek wil dit ook aan die begin van my beswaar dit duidelik stel dat ek verstaan dat die industrie kennis neem van die besware en bekommernisse wat ons tydens soveel konsultasie prosesse geopper het en dat dit ons verder bekommerd maak dat die industrie nie enige sigbare poging aanwend om ten minste sommige van die opgetekende bekommernisse aan te spreek nie. Dit versterk die aanname onder ons dat meeste van die versagtende voorstelle in die plan van die aansoeker lee beloftes is en dat ons nie daarop sal kan staatmaak nie. I would also like to make it clear at the outset of my objection that I understand that the industry takes note of the objections and concerns that we have raised during so many consultation processes and that it further concerns us that industry is not making any visible effort to address at least some of the recorded concerns. This reinforces the assumption among us that most of the mitigating proposals in the applicant's plan are empty promises and that we	EIMS neem kennis van u beswaar en sal verseker dat dit opgeneem word in die finale verslag wat aan die bevoegde owerhede voorgelê is. Ons wil daarop wys dat as deel van hierdie basiese assesseringsproses 'n baie breër en meer omvattende openbare deelnameproses onderneem is, in vergelyking met vorige projekte, insluitend 'n groot hoeveelheid openbare vergaderings, interaksies met tradisionele / inheemse leiers en gemeenskappe, vissersgemeenskappe en ander organisasies. Daarbenewens is maatskaplike en kulturele spesialisondersoeke onderneem, wat direkte betrokkenheid van die inheemse, vissery- en ander gemeenskappe en hul verteenwoordigers ingesluit het om die impak van die voorgestelde projek op hierdie gemeenskappe te bepaal. As gevolg van bogenoemde is 'n wesenlike klem gelê op voortgesette en verdere samesprekings met gemeenskappe rakende die voorgestelde projek en dit is by die EMPr ingesluit. Die bekommernisse wat tydens die proses geopper is, is in die verslae aangeteken en waar van toepassing weerspieël in die gedetailleerde impakbeoordeling. Gevolglike bestuurs- en versagtingsmaatreëls om die belangrikheid van hierdie impakte te vermy of te verminder, is ingesluit. Hierdie bestuurs- en versagtingsmaatreëls word weer in die Omgewingsbestuurs Program ingesluit, wat, indien die aansoek om magtiging

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
will not be able to rely on them.	goedgekeur word, wetlik bindend op die aansoeker sal word. EIMS takes note of your objection and will ensure that this is included in the final Report submitted to the competent authorities. We would like to point out that as part of this Basic Assessment process, a broad and comprehensive Public Participation Process was undertaken, including numerous public meetings, interactions with traditional/ indigenous leaders and communities, fishing communities and other organisations. Additionally, Social and Cultural Specialist investigations were undertaken, which included direct engagement of the indigenous, fishing and other communities and their representatives in order assess the impact of the proposed project on these communities. As a result of the above, a substantial emphasis has been placed on ongoing and further engagements with communities regarding the proposed project and these have been included in the EMPr. The concerns raised during the process have been recorded in the reports and where applicable reflected in the detailed impact assessment. Consequent management and mitigation measures to avoid or minimise the significance of these impacts have been included. These management and mitigation measures are in turn included in the Environmental Management Programme, which will, should the application for authorisation be approved, become legally binding on the applicant.
Ons bekommernis is verder dat indien goedkeuring aan hierdie aansoek gegee word, die data wat hiertydens versamel word u regverdiging sal vir die uiteindelik ekstraksie van die fossielbrandstof teenoor die kummulatiewe impak op die plaaslike lewensbestaan, sal versterk en dan 'n groter risiko factor vir die gemeenskappe teweeg bring. Our concern is further that if approval is given to this application, the data collected during this period will strengthen your justification for the eventual extraction of the fossil fuel versus the cumulative impact on local livelihoods and then create a greater risk to the communities.	EIMS het die impakbeoordeling gedoen op grond van die aktiwiteite wat deur die aansoeker voorgestel is, naamlik seismiese opnames, d.w.s. slegs vir verkenning. Enige daaropvolgende magtiging sal beperk word tot hierdie spesifiek beoordeelde aktiwiteite. Die voorgestelde aktiwiteite sluit geen ander eksplorasie, produksie of verbranding van enige aardgas- of oliebronne in nie. Indien die aansoeker of ander aansoekers enige bykomende eksplorasie-, produksie- of verbrandingsaktiwiteite wil onderneem wat nie in die huidige omgewingsmagtigingsaansoek (EA) aangespreek word nie, sal dit nodig wees om aansoek te doen vir die betrokke toestemmings. Dit sluit in 'n formele aansoek vir nuwe EA en waar van toepassing 'n eksplorasie- en produksiereg, ingelig deur 'n omvattende omgewingsimpakstudie en konsultasie met belanghebbendes wat die meriete van hierdie spesifieke aktiwiteite beoordeel. Die impak van sulke voorgestelde aktiwiteite sal gevolglik spesifieke assessering van die gepaardgaande impak en openbare konsultasie vereis voor

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	goedkeuring. Die goedkeuring van die seismiese verkenning vervang nie die behoefte en wetlike vereiste vir toekomstige olie- en gaseksplorasie, produksie en benutting van die hulpbron om die gepaardgaande omgewings- en sosiale impak van hierdie aktiwiteite op hul individuele meriete te beoordeel en die nodige omgewingsmagtigings voor aanvang te verkry nie. EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant, namely seismic surveys, i.e. for reconnaissance only. Any subsequent authorization would be restricted to these specifically assessed activities. The proposed activities do not include any other exploration, production or combustion of any natural gas or oil resources. Should the applicant or other applicants wish to undertake any additional exploration, production, or combustion activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a need to apply for the relevant permissions. These would include a formal application for new EA and where relevant an exploration and production Right, informed by a comprehensive Environmental Impact Assessment and stakeholder consultation assessing the merits of these specific activities. The impacts of such proposed activities would consequently require specific assessment of the associated impacts and public consultation prior to approval. The approval of the seismic reconnaissance does not replace the need and legal requirement for any future oil and gas exploration, production, and utilisation of the resource to assess the associated environmental and social impacts of these activities on their individual merits, and obtain the necessary environmental authorisations prior to commencement.
Soos alreeds voorheen gestel, is dit vir my onverklaarbaar dat aan die een kant is ons so erg besorg oor klimaatsverandering dat ons internasionale konvensies daaroor ondersteun maar aan die ander kant wend ons oordrewe en oorhaastige pogings aan verdere fossielbrandstowwe, wat een van die belangrikste drywers van klimaatsverandering is, te soek om te ontgin. As stated before, it is inexplicable to me that on the one hand we are so deeply concerned about climate change that we support international	Volgens die Geïntegreerde Hulpbronplan 2019 (IRP 2019), wat die land se energiebeplanningstrategie is, is daar in die toekoms 'n behoefte aan gas in Suid-Afrika se energiemengsel. Hierdie behoefte word deels aangedryf deur die verwagting dat aardgas as oorgangsbrandstof kan dien, terwyl ander groener tegnologieë volwasse word. Volgens die Nasionale Departement van Bosbou, Visserye en die Omgewing (DFFE) is teikens bepaal om ons nasionale GHG-uitstootverpligtinge te bereik. Hierdie teikens neem die waarskynlike GHG-vrystellingsuitkoms van die implementering van huidige Suid-Afrikaanse beleide, insluitend die IRP, in ag. Die voorgestelde seismiese aktiwiteite kan gebruik word om te bepaal of 'n lewensvatbare gas- of oliebron teenwoordig is. Die uitkomste hiervan kan insig gee in moontlike

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
conventions about it, but on the other hand we are making exaggerated and hasty efforts to seek further fossil fuels, which are one of the main drivers of climate change, to exploit.	alternatiewe voorsieningsopsies om die toekomstige energiebeplanning en -beleid vir Suid-Afrika in te lig. In die lig hiervan, en ander nuwe inligting oor voorsieningsopsies, asook die vinnige tegnologiese vooruitgang in die energiesektor (en spesifiek in die laekoolstof alternatiewe), is dit van kardinale belang dat die energiebeplanning vir Suid-Afrika voortdurend heroorweeg en hersien word om te verseker dat die mees geskikte en volhoubare strategie gedefinieer word. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's energy planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial in our view that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined.
Ek verstaan ook uit die opinie van kundiges dat Suid Afrika nie baie goeie ekonomiese beweegredes het om met die grootskaalse verbranding van gas, as deel van ons oorgang na energie geregtigheid, voort te gaan nie. Vir ons in die geweste is dit moeilik om te verstaan dat daar soveel natuurlike en herwinbare energiebronne in hierdie streek is wat nie ontgin word nie terwyl ons al die risikos vir hierdie ongewenste industrie moet onderneem om te dra. I also understand from the opinion of experts that South Africa does not have very good economic motives for continuing with the large-scale combustion of gas, as part of our transition	Verwys asseblief na die respons op die vorige kommentaar. Please refer to the response to the previous comment.

Comment/ Recommendation	Response
to energy justice. For us in the region, it is difficult to understand that there are so many natural and recyclable energy sources in this region that are not mined while we have to undertake all the risks to this unwanted industry to bear.	
Ek wil weereens beklemtoon dat myself en die groter gedeelte van die Namakwalandse se gemeenskap lewe in erkenning van ons komvandaan en wil graag sien dat nog baie generasies van ons nakomelinge ook die wonder van ons habitat in Goeie verhouding tot ons kulturele ondervinding sal beleef en dat ons nie omgee vir 'n flietende oomblik in wereldnuus wanneer die veronderstelde ongeluksvrye proses deur 'n onvoorsiene ongeluk ons hele kuslyn en 'n groot gedeelte van ons voedselketting met olie besoedel nie. I would like to emphasise once again that myself and the larger section of the Namaqualand community live in recognition of where we come from and would like to see many more generations of our descendants also experience the wonder of our habitat in good proportion to our cultural experience and that we do not care about a fleeting moment in world news when the supposed accident-free process by an unforeseen accident affects our entire coastline and much of our food chain will be polluted with oil.	Die omvang van hierdie projek is slegs tot verkenning beperk (m.a.w. daar is geen boorwerk vir olie/ gas aangewend nie). Enige daaropvolgende magtiging sal beperk word tot hierdie spesifiek beoordeelde aktiwiteite. Die voorgestelde aktiwiteite sluit geen ander eksplorasie, produksie of verbranding van enige aardgas- of oliebronne in nie. Die aansoek is slegs om seismiese opnames te onderneem en gevolglik is daar geen risiko vir beduidende oliestortings of oliebesoedeling tydens normale of onvoorsiene operasionele aktiwiteite nie. The scope of this project is limited to reconnaissance only (i.e. no drilling for oil/ gas has been applied for). Any subsequent authorization would be restricted to these specifically assessed activities. The proposed activities do not include any other exploration, production or combustion of any natural gas or oil resources. The application is for undertaking seismic surveys only and consequently there is no risk of significant oil spills or oil pollution during normal or unanticipated operational activities.
Die versagtende maatreels wat in u document vir die impak van seismiese toetsing op dieselfde voedselketting aanbied kan ook myns insiens nie aanvaar word aangesien daar in ons opinie nooit nie visse van watter spesie ook al, in die beoogde ondersoek gebied gedurende die nag of gedurende die dag sal wees nie. The mitigation measures presented in your document for the impact of seismic testing on the same food chain can also, in my opinion, not be accepted as, in our opinion, there will never not be fish of whatever species, in the intended investigation area during the night or during the	Die versagtingsmaatreëls is opgestel op grond van die internasionale beste praktyk en is ingesluit deur die hoogs ervare spesialiste met werkende kennis van die bedryf wat die beskerming van die ontvangende omgewing sal verseker. Raadpleeg Afdeling 9.3.1.1 (Akoestiese impak van seismiese opnames op mariene fauna) van die BAR wat die impak op die mariene fauna, insluitend alle visspesies, uiteensit. As deel van die impakstudie is die omvang en waarskynlikheid van die impakte vir elke organismegroepe beoordeel. As gevolg hiervan is die verspreiding van die vis in ag geneem by die beoordeling van die impak. Met verwysing na Afdeling 11.1.2 (Marine Ecology Conclusions) is tot die gevolgtrekking gekom dat die voorgestelde opname-aktiwiteite wat deur TGS onderneem moet word, na

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
day.	verwagting 'n impak op mariene ongewerwelde fauna in die Oranjebekken tot gevolg sal hê, wat wissel van weglaatbaar tot baie lae betekenis. Slegs in die geval van potensiële impakte op skilpaaie en mariene soogdiere word die impak van lae betekenis verwag. Die Basiese Assesseringsverslag erken wel die waarskynlikheid dat impakte sal plaasvind, maar bepaal op grond van die beskikbare inligting dat die belangrikheid van hierdie impakte na verwagting medium tot laag sal wees met die implementering van geïdentifiseerde bestuurs- en versagtingsmaatreëls. Op grond van bogenoemde word van mening dat die versagtingsmaatreëls wat in die BAR en die EMPr ingesluit is, voldoende is. The mitigation measures have been prepared based on the international best practice and have been included by the highly experienced specialists with working knowledge of the industry that would ensure the protection of the receiving environment. Please refer to Section 9.3.1.1 (Acoustic Impacts of Seismic Surveys On Marine Fauna) of the BAR which details the impacts on the marine fauna, including all fish species. As part of the impact assessment, the extent and probability of the impacts were assessed for each organism group. As a result, the distribution of the fish has been accounted for in the assessment of the impacts. With reference to Section 11.1.2 (Marine Ecology Conclusions), it was concluded that the proposed survey activities to be undertaken by TGS are expected to result in impacts on marine invertebrate fauna in the Orange Basin, ranging from negligible to very low significance. Only in the case of potential impacts to turtles and marine mammals are impacts of low significance expected. The Basic Assessment Report does acknowledge the likelihood of impacts occurring but determines, on the basis of the information available, that the significance of these impacts are anticipated to be medium to low with the implementation of identified management and mitigation measures. Based on the above, it is considered that the mitigation measures included in the BAR and the EMPr are adequate.
Ek maak beswaar teen die verwagte verdere ekonomiese uitsluiting en ontmagtiging van ons plaaslike vissers en die uiteindelike sluiting van die bedryf wat vir so baie geslagte lank 'n lewensaar vir ons mense was. Vissery is deel van ons lewensbloed en dit is baie swaar vir myself en baie van my genante om die ongenaakbare	Raadpleeg Afdeling 9.3.2.1 (Uitsluiting van visgrond as gevolg van tydelike veiligheidsone rondom opmetingsvaartuig) van die BAR. Op grond van die ligging van die Verkenningspermit-aansoekgebied, is daar geen impak van uitsluiting van visgronde wat verwag word op die demersale trawl, midwater trawl, demersal longline, klein pelagiese beursie-seine, lynvis, weskus rots kreef of kleinskaalse visserye. Daar is 'n groot waarskynlikheid

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
aanslag ter wille van mense aan die ander kant van ons land, daarop te sien. Ons sal graag wil sien dat die industrie meer sal doen as net skouers optrek wanneer dit kom by direkte plaaslike ekonomiese bevoordeling van 'n gemeenskap wie die groot natuurlike risikos moet dra. I object to the expected further economic exclusion and disempowerment of our local fishermen and the eventual closure of the industry which has been a lifeblood for our people for so many generations. Fishing is part of our lifeblood, and it is very heavy on myself and many of my associates to see the harsh onslaught on it for the sake of people on the other side of our country. We would like to see industry do more than just shrug when it comes to direct local economic advantage of a community who must bear the great natural risks.	dat die groot pelagiese langlynsektor (gerig op tuna, swaardvis en haai) oor die duur van die voorgestelde 70 dae-opname verlies aan toegang tot visgrond sal ervaar. Alhoewel die verkenningspermitgebied in die buiteland van die kontinentale bank geleë is, aangesien dit 'n gebied van piekvissery is, is daar 'n groot waarskynlikheid dat vaartuie en dryflyne binne die verkenningspermitgebied verwag kan word. Die omvang van die impak word as streeksgebonde beskou as gevolg van die groot oppervlakte (57 400 km2) waarbinne die opname kon plaasvind. Die impak van uitsluiting word van hoë omvang beskou. Op grond van die kombinasie van omvang, duur en grootte van die impak, en met inagneming van die hoë waarskynlikheid dat die impak sou plaasvind, word die algehele betekenis van die impak as MEDIUM NEGATIEF beskou. As gevolg van die lae waarskynlikheid van die bedrywighede van die tuna-paallynsektor binne die verkenningspermitgebied, word die algehele betekenis van die impak op die sektor as LAE NEGATIEF beskou. Hierdie potensiële impak kan nie uitgeskakel word nie omdat die seismiese vaartuie nodig is om die opname te onderneem en 'n veiligheidsone tydens roetine-operasies rondom die vaartuig afgedwing sal word. Die tydsberekening van die opname om te verhoed dat dit gedurende die maande Junie en Julie plaasvind (periodes van seisoenale hoë visvangpoging) kan lei tot 'n oorblywende impak van LAE NEGATIEWE betekenis op die groot pelagiese langlynsektor. In die lig van bogenoemde word verwag dat die implementering van die projek waarskynlik nie tot ekonomiese uitsluiting en ontmagtiging van ons plaaslike vissers sal lei nie, en daar word ook nie verwag dat dit tot die uiteindelike sluiting van die visbedryf sal lei nie. Die voorgestelde opname van beperkte duur en vermy die geïdentifiseerde visgronde waarop die visbedryf afhanklik is. Ons wil u bedank vir u kommentaar en deelname aan ons proses vir hierdie projek. Alle besware, kommentaar en antwoorde sal saam met die Basiese Assesseringsverslag en gepaardgaande bylaes by die Bevoegde Owerheid ingedien word vir oorweging in die besluitnemingsproses. Please refer to Section 9.3.2.1 (Exclusion From Fishing Ground Due To Temporary Safety Zone Around Survey Vessel) of the BAR. Based on the location of the Reconnaissance Permit application area, there is no impact of exclusion from fishing grounds expected on the demersal trawl, midwater trawl, demersal longline, small pelagic purse-seine, linefish, west coast rock lobster

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	or small-scale fisheries. There is a high probability that the large pelagic longline sector (targeting tuna, swordfish and shark) will experience loss of access to fishing ground over the duration of the proposed 70 day survey. Although the Reconnaissance Permit area is situated offshore of the continental shelf break, this being an area of peak fishing activity, there is a high probability that vessels and drifting lines could be expected within the Reconnaissance Permit area. The extent of the impact is considered to be regional due to the large area (57 400 km2) within which the survey could take place. The impact of exclusion is assessed to be of high magnitude. Based on the combination of extent, duration and magnitude of the impact, and considering the high probability that the impact would occur, the overall significance of the impact is considered to be MEDIUM NEGATIVE. Due to the low probability of the operations of the tuna pole-line sector within the Reconnaissance Permit area, the overall significance of the impact on the sector is considered to be LOW NEGATIVE. This potential impact cannot be eliminated because the seismic vessels are needed to undertake the survey and a safety zone will be enforced around the vessel during routine operations. Timing the survey to avoid taking place during the months of June and July (periods of seasonally high fishing effort) could lead to a residual impact of LOW NEGATIVE significance on the large pelagic longline sector. Considering the above, it is anticipated that the implementation of the project is unlikely to lead to economic exclusion and disempowerment of our local fishermen, nor is it anticipated to lead to the eventual closure of the fishing industry. The proposed survey is transitory, of limited duration, and avoids the identified fishing grounds on which the fishing industry depends. We would like to thank you for your comments and participation in our process for this project. All objections, comments and responses will be submitted, together with the Basic Assessment Report and associated appendices to the Competent Authority for consideration in the decision-making process.

Sincerely,

EIMS Public Participation Team

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

6 December, 2022

Our ref: GPK/as/1520

Ms Louise Geldenhuys

Dear Madam

RESPONSE TO COMMENTS ON THE ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS ORANGE BASIN SEISMIC RECONNAISSANCE BASIC ASSESSMENT PROCESS

Please refer to the table below for responses to the comments raised.

Comment/ Recommendation	Response
Background **EIMS Environmental Impact Management Services has been appointed to submit an application for Environmental Authorisation for TGS Geophysical Company (UK) to conduct a 3D seismic survey off the West Coast of South Africa. The area proposed for the 3D seismic survey is approximately 57 400 km2 in extent. A single survey vessel equipped with seismic sources and streamers will be used, and the survey will take about 70 days. The Basic Assessment has been made available for public review from 25 October to 25 November 2022. Herewith comments and inputs on this Basic Assessment and associated documents.**	Comment noted.
Recommendations / comments: **1. The competent authority should carefully evaluate the cumulative impacts of this survey combined with other proposed seismic surveys in the same general area. Section 9.3.5 of the BAR shows the Searcher proposed 3D survey, and the GX Technology Corporation application, but does not consider the TotalEnergies EP South Africa's proposed well drilling, vertical seismic profiling and sonar survey activities. It will be necessary to investigate how the proposed timeframes for these different seismic surveys in the same area will overlap (or not overlap). It is recommended these surveys should be planned in such a way that the cumulative impacts would be minimised, or that the different companies combine efforts (see point below).**	Comment noted. The Draft Scoping Report for the TotalEnergies EP South Africa (TEEPSA) proposed well drilling states the following: *"TEEPSA is proposing to undertake various exploration activities within the DWOB Licence Block, including:* • *Sonar bathymetry surveys throughout the year;* • *Drop core sampling; and* • *Exploration well drilling.* *TEEPSA proposes to drill one exploration well, and success dependent, up to nine additional wells in total within an Area of Interest within the Block (i.e., up to ten wells in total). The Area of Interest for exploration drilling is 9 711.21 km2 in extent and is located offshore roughly between Port Nolloth and Hondeklip Bay, approximately 188 km from the coast at its closest point and 340 km at its furthest, in water depths between 1000 m and 3000 m."* Section 6.5.1. (Area of Interest for Proposed Drilling and Anticipated Timing) of the TEEPSA proposed well drilling Draft Scoping Report further states that *"The schedule for drilling the*

8 Dalmeny Road, Pine Park, 2194 | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | F (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	wells is not confirmed yet; however, the earliest anticipated date for commencement of drilling, if an Environmental Authorisation is granted, is between the first quarter of 2024 (Q1 2024) and third quarter of 2024 (Q3 2024).” As such, the recommendation that these surveys/ drilling should be planned in such a way that the cumulative impacts would be minimised, and that the competent authority should carefully evaluate the cumulative impacts of this survey combined with other proposed seismic surveys in the same general area, is supported. It is anticipated that this can be achieved through proper scheduling and communication between the licence block holder and the Reconnaissance Permit holder (should the project be authorised).
2. It is noted that another seismic survey (EIMS reference 1518), by Searcher Geodata UK Ltd., is also under consideration in an area that seems to overlap with this proposed survey. It is proposed that these different companies find a way to combine efforts and share the resulting data, instead of doing two separate surveys, which will repeat the impacts over the same area.	Comment noted. However, it is unlikely that concurrent seismic surveys will be undertaken in the same area during the same survey window. However, the cumulative impacts associated with multiple surveys was assessed in section 9.3.5 of the BAR. The decision-making authority will need to make the decision regarding whether concurrent surveys can take place.
3. Under “Description of the project area”, page 8 of the Draft BAR, please note that the area is also adjacent to the Kamiesberg Local Municipality.	Comment noted. Thank you for pointing this out. Kamiesberg Local Municipality has been added to the list of municipalities. Kamiesberg Local Municipality was pre-identified as a key organ of state prior to commencement of the Basic Assessment Process, and has consequently been invited to participate throughout this Basic Assessment Process.
4. Please note that the correct name of the provincial department listed as “Northern Cape Department of Nature and Conservation” is the Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform.	Comment noted. Thank you for pointing this out. References to Northern Cape Department of Nature and Conservation have been amended to Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform.
5. The mitigation measures as described in section 11 of the BAR are supported.	Comment noted.
6. It is recommended that, in addition to the marine mammal observers on-board of the surveys vehicles, aerial surveys should also be considered as an additional mechanism to locate feeding aggregations of marine mammals and other species.	With reference to Section 8.4 of the BAR, feeding aggregations are likely to be encountered outside of the Reconnaissance Application Area. However, it has been recommended that consideration to be given to the practicality (considering the weather conditions and costs) of aerial surveys. Where possible (and weather permitting), the use of drones could be considered

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	to supplement the observations of the MMO prior to soft starts. This recommendation has been added to the recommendations section of the BAR in Section 11.4.
7. It is proposed that the Department of Agriculture, Forestry and Fisheries, Oceans & Coasts, Research component be contacted for possible collaboration on further research on the impact so seismic surveys on the marine ecosystem.	Comment noted. This recommendation has been added to the recommendations section of the BAR in Section 11.4.
We hope you find these recommendations in order.	We would like to thank you for your comments and participation in our process for this project. All objections, comments and responses will be submitted, together with the Basic Assessment Report and associated appendices to the Competent Authority for consideration in the decision-making process.

Sincerely,

EIMS Public Participation Team

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

6 December, 2022

Our ref: GPK/as/1520

Ms Janet Solomon

Dear Madam

RESPONSE TO COMMENTS ON THE ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS ORANGE BASIN SEISMIC RECONNAISSANCE BASIC ASSESSMENT PROCESS

Please refer to the table below for responses to the comments raised.

Comment/ Recommendation	Response
Oceans Not Oil is a coalition of 32 organisations and individuals whose ultimate objective is the cessation of seismic exploration and oil and gas exploitation off our coastline. It is an emancipatory and conservation imperative engaging public support and South African policymakers to build an economy beyond gas and oil (with its consequence to its marine life and intangible heritage, subsistence and commercial fisheries, the tourism, recreation and hospitality industries) and deal with climate change vulnerability that is the legacy of gas and oil. **This letter serves to comment on the Basic Assessment Report (BAR) prepared as part of the environmental impact assessment (EIA) and lodge an**	Comment noted. Oceans Not Oil is registered as an Interested and affected Party (I&AP) for this project. The organisation's objective to achieve the cessation of seismic exploration and oil and gas exploitation is also noted. We would like to thank you for your comments and participation in our process for this project. All objections, comments and responses will be submitted, together with the Basic Assessment Report and associated appendices to the Competent Authority for consideration in the decision-making process.

8 Dalmeny Road, Pine Park, 2194 | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | **F** (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | F (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
objection to the proposed speculative three-dimensional (3D) seismic survey, 57 400 km2 in extent, by TGS Geophysical Company UK (TGS) 120 km offshore of St Helena Bay, extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay over several petroleum licence blocks. **The objection is based on the following, inter alia:**	
1. PROCEDURAL IRREGULARITY **The MPRDA does not enable permitting of non-exclusive multi-client seismic acquisition. Section 74 subsection (1)(a) to (c) of the MPRDA defines the 'holder' of a reconnaissance permit or exploration right as meaning 'the person to whom such right or permit has been granted or such person's successor in title'. Also s74(2)(b), of the MPRDA states requirements of a reconnaissance application include that, "no other person holds a technical co-operation permit, exploration right or production right for petroleum over any part of the area".** **TGS is not the holder of the rights to blocks 12/3/274 ER , 12/3/343**	The applicant was issued an Acceptance Letter in terms of Section 74(2) of the Minerals and Petroleum Resources Development Act (MPRDA), by the Petroleum Agency SA (PASA). The application for EA was initiated based on this acceptance letter. Your concern regarding PASA's ability to accept the application has been noted and is herewith submitted to the decision maker for consideration. The Applicant has applied for an EA which will be duly assessed prior to authorisation. Section 75(4) if the MPRDA, specifically states that a Reconnaissance Permit is not an exclusive right.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
ER , 12/3/339 ER, 12/3/248 ER, therefore TGS holds these permitting rights unlawfully.	
2. TGS SOCIAL IMPACT ASSESSMNET NOT FIT FOR SERVICE That the Social Impact Assessmnet (SIA) recommends that "the project can proceed subject to the mitigation measures (i.e. meaningful consultation, local research, education, and awareness raising in the project-affected communities) forming part of the conditions for authorisation and being implemented prior to the commencement of the actual survey". This implies the public participation process happens after authorisation and before the survey. This is unacceptably irregular and defies the Principles and Values underpinning Public Participation of Section 1 of the Constitution (RSA, 1996) of South Africa which: • Promotes active and representative participation towards enabling all community members to meaningfully	With reference to Section 7 and Appendix 2 of the BA Report, EIMS has undertaken the public participation and consultation processes in accordance with the requirements of the NEMA EIA Regulations. This process included notification and communication in three different languages, via Radio and Newspaper advertisements, site notices, posters, and direct notification; as well as public and focus group meetings within the potentially affected communities. Opportunity was provided to review and comment on the BA Report and associated documentation to be submitted to the decision maker. It should further be noted that detailed consultations with community members and leadership were conducted by the Social and Heritage Specialists to obtain the views of project affected communities and the potential social and heritage impacts of the proposed project. The public participation requirements and obligations of the NEMA EIA Regulations has been complied with. The recommendation of the SIA is that, should the project be approved a representative from TGS must consult with leadership of the community to determine how the communities should be consulted with in future – that is, what is the way the community members prefer to be consulted with for provision of commencement notification and/or daily updates to advise on survey schedules, communication in respect of the proposed research outcomes, etc. The recommendation to include further consultation as part of the conditions of authorisation intends to ensure that the consultation process goes further than just the EIA process, but is continued throughout the entire process, regardless of the outcome. This will assist communities and people on the ground to make informed decisions about technical matters. The intention of the recommendation is not for this condition to be suspensive or determinant on the ultimate decision but rather to function as an additional management/ mitigation measure to be implemented post approval to reduce the significance of the identified impacts and further enhance the community engagements during implementation, should the project be implemented. The SIA specialist has made a reasoned opinion that the project can be approved on the basis of the outcomes of the consultations already undertaken. Communities are diverse and there are community members who are supportive of this type of development, as much as there are community members against the development. Communities were asked to suggest mitigation measures that the specialists should consider, and this influenced some of the recommendations made in the SIA. All perspectives were considered during the EIA process and the social impact analysis. The SIA report makes detailed recommendations about further engagement with the communities, and other mitigation and management measures. The mitigation and management measures should be considered in its entirety within the context of the report. Efficient engagement with a community involves more than merely setting up a meeting and inviting people. In many communities there is an expectation that outsiders should enter the community via the leadership before a community meeting can take place. TGS needs to determine what the most appropriate way would be to interact, and this may differ between communities, in order to engage with the individuals and communities in a decolonised way. Once this is done, TGS can proceed with engaging with the communities as a whole in an appropriate way. Education is suggested as a mitigation measure to empower community

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
influence the decisions that affect their lives; and • **Incorporates the diverse interests and cultures of the community in the development process, and disengages from support of any effort that is likely to adversely affect the disadvantaged members of a community;** **Therefore, this draft BAR is not fit for service.**	members to make informed decisions where they are in a position to weigh up the pros and cons for themselves, as was requested by community members during the public meetings.
3. NEED AND DESIRABILITY OF THE PROJECT **a. It is a fatal flaw in this draft BAR that it has not drawn on the Sustaining the Wild Coast NPC & Others v Minister of Mineral Resources and Energy & Others, High Court of South Africa, Eastern Cape Division, Makhanda – Case No. 3491/2021, to produce a climate impact assessment. Without such an assessment, there is a severely understated existential risk to present and future generations. The draft BAR, therefore, fails to place all relevant**	EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant, i.e. reconnaissance only. Any subsequent authorisation would be restricted to these specifically assessed activities. Should the applicant or other applicants wish to undertake any additional exploration activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a consequent need to apply for the relevant permissions. These would include a formal application for an Exploration or Production Right as well as a new EA. The impacts of such proposed activities would consequently require specific assessment and public consultation prior to approval. It is premature to assess the likely impacts of further invasive exploration activities or production activities as the extent, duration, location, and magnitude applicable to these activities are unknown at this stage. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, and production activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed on their merits as and when they are proposed. Please refer to Section 5 of the BA Report in regard to the need and desirability for the proposed activities. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's energy planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
considerations before the decision-maker, as contemplated under Section 6(2)(e)(iii) of the Promotion of Administrative Justice Act. b. The need and desirability of the project have not been addressed according to guidelines (Guideline on Need and Desirability, 2017) wherein it states, "it must be decided which alternatives represent the "most practicable environmental option", which in terms of the definition in NEMA and the purpose of the EIA Regulations, are that option that provides the most benefit and causes the least damage to the environment as a whole, at a cost acceptable to society, in the long-term as well as in the short-term." c. The issue of global warming is not broader than the scope of the BAR and should be centralised within it. There are existential issues at play that cannot be easily undone. It is trite that alternative sources of renewable energy could replace the reconnaissance for, and consumption of fossil fuels, whilst spurring economic growth in the urgent matter of cutting greenhouse gas	to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial in our view that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined. There are no significant GHG emissions directly related to the proposed activity nor significant climate change vulnerability risks. Also noted is that TGS is a seismic data acquisition company and is in the business of data acquisition, and are not an Oil & Gas Exploration or Production company. Data from TGS' seismic libraries are not only used for petroleum and natural gas exploration and development, data may also be used for development of offshore wind, geothermal energy, low-carbon solutions such as carbon capture and storage and also more generally for providing more insight and understanding into the regional geology of the area for scientific purposes. In response to item c- the EA has not been issued as yet and therefore cannot be set aside. A decision on the application is as yet still to be made by the competent authority.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
emissions (Valli Moosa, deputy chairman of the Presidential Climate Change Coordinating Commission). On this basis of this alone, the authorisation should be reconsidered and set aside. d. It is also trite that there are strategic and economic reasons to re-evaluate identifying oil and gas resources with a view to further exploration and production (International Institute for Sustainable Development, 2022). These reasons include international gas phase-out pressure; reduced funding, increased cost of capital, carbon tax, trade taxes, etc. and that gas-functions in the electricity sector are already outcompeted, or expected, based on trends. e. Offshore hydrocarbon reconnaissance whose ultimate aim is the consumption of oil and methane gas in the years to come, is no longer a practice in societal development. The Scientific Advisory Group on Emergencies (SAGE), Academy of Science of South Africa (ASSAf) have weighed up the systemic risks of this aim as it relates to ocean systems and the climate crisis	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
showing that it will increase climate harms, i. altering winds, water temperatures, sea ice cover and ocean circulation; ii. ocean acidification, which is now irreversible for centuries to come; iii. altering the physiological functioning, behaviour, biological interactions, and productivity of organisms, which, in turn, could lead to shifts in marine life size structure, spatial range, seasonal abundance, community structure and ecosystem function; iv. transferring nutrients from surface waters down into the deep ocean, leaving less at the surface to support plankton growth; v. potentially suppressing marine biological productivity for a millennium; vi. ultimately destroying the fisheries and marine tourism industries of all countries, including South Africa, resulting in devastating job losses, food insecurity, and other adverse socioeconomic consequences; f. plus increase economic costs, and	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
injustice will undermine the immediate realisation of viable alternatives (Singh. J et al, 2022). Ongoing threats from ghg emissions include, i. ocean deoxygenation ii. sea level rise. g. Impacts on coral reefs from marine heat waves (1980 to 2020) encompass 34,846 coral bleaching records from 14,405 sites in 93 countries. Since coral reefs create coastal protection, which provides food and income to humans, their destruction has systematic consequences. The top part of the ocean is warming up 24% faster than it did a few decades ago, and this is accelerating. h. The Global Coral Reef Monitoring Network (GCRMN) report on The Status of Coral Reefs of the World: 2020, utilising data from over 12,000 collection sites across 73 countries spanning from 1978 to 2019, claims the world has lost about 14% of its coral reefs since 2009. Over 25% of the ocean's fish and over half a billion people currently rely on healthy coral reefs. With this climate science as the actual	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
baseline for this project, It is clear that there is no "need' for this project in terms of the broader societal/ public interest nor in terms of the well-being of future generations. In fact, due to South Africa's sensitivity to climate impacts (and the BAR has not acknowledged that climate change is likely to have a significant impact on South Africa's economy) there is a categoric need not to pursue the project.	
4. REPEATED, PERSISTENT OR CUMULATIVE EXPOSURE IMPACTS **a. The BAR understates the compounding effects of multiple abiotic and biotic stressors associated with multiple 3D surveys being undertaken concurrently. Although the BAR acknowledges cumulative issues, it does not highlight that TEEPSA DWOB; Searcher and GX Technology Corporation all have pending applications which overlap the TGS proposed survey area and may occur simultaneously. The risks associated with compounded behavioural disturbance and how**	Please refer to Section 9.3.5 (Cumulative Noise Impacts associated with Multiple Surveys) of the BAR which states the following: Should other seismic survey campaigns be undertaken concurrently with TGS's proposed survey programme (although highly unlikely to be undertaken in the same area during the same survey window due to impacts on operation and data acquisition), cumulative impacts may be likely and there would need for alignment in planning of such concurrent operations in order to reduce cumulative impacts to an acceptable significance in terms of concurrent noise impacts. Current pending applications at PASA include the Searcher Geodata seismic survey application (PASA ref 12/1/043), as well as the GX Technology Corporation survey application (ref 12/1/042), which both overlap the area proposed for the TGS 3D survey. It is understood that there is potentially another application that would overlap the same area, but for which a Reconnaissance Application has not been submitted. Despite the difficultly in undertaking a reliable assessment of the potential cumulative environmental impacts of future seismic acquisition in the Deep Water Orange Basin due to likely variation in the scope, extent and duration of proposed surveys, the cumulative impacts of three potential surveys occurring concurrently needs to be considered. The cumulative assessment assumes the worst-case scenario of three surveys (Searcher, TGS and GX Technologies) occurring simultaneously during the summer survey window in 2022/23. In the unlikely event that multiple surveys would be undertaken concurrently within the Deep Water Orange Basin Area, associated impacts to marine fauna would be of high intensity and extend regionally, over the short-term (assuming they take place over the same summer survey window). The impact consequence for cumulative surveys is therefore considered medium. Concurrent activities such as other planned speculative or proprietary seismic surveys in the southern Benguela region could add to the cumulative impact on fisheries. Simultaneous

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
chronically-present sound could constitute a threat to populations by changing behaviour and distribution regularly at critical times and in critical areas. Parsons et al. (2009) warn that some of the more insidious and potentially devastating impacts arise through long-term, repeated, persistent or cumulative exposures. i. A multiple survey interaction must be considered to clarify whether the interaction is synergistic, additive, or antagonistic. b. Due to the frequency and enormous extent of the multi-client surveys and exploration planned for 2023-2024 the assumption that larger/more mobile and/or migratory animals will avoid and move away from seismic surveys needs serious revision. i. Cumulative effects need to be broadened to encompass neighbouring seismic and exploration applications. ii. Highly precautionary limits on the amounts of annual and concurrent survey activities should be prescribed.	survey operations would result in an increase in the extent and magnitude of the impact on the large pelagic longline sector. The impact duration would remain unchanged. Three seismic surveys of regional extent, undertaken simultaneously, could be expected to result in an impact of medium negative significance on the large pelagic longline sector, both with and without the application of mitigation measures. Once completed there is not expected to be any residual impact. The BAR further goes on to state that in the unlikely event that multiple surveys would take place at the same time within the same survey area, the risk of cumulative noise impact must be considered and is suggested to be managed as follows: • Should surveys be run simultaneously, ensure that a distance of at least 40 km is maintained between survey vessels until sufficient objective evidence is obtained that a reduced buffer distance is acceptable. • Each of the additional activities to those described in the technical noise report would be modelled or otherwise considered in terms of the cumulative noise level and with reference to the criteria described in the report. This modelling is only considered required in the case where a 40 km buffer distance between active survey ships cannot be maintained. Should surveys run simultaneously, it would be required to amend the EMPr, which would be subject to further assessment and consultation.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
5. UNJUSTIFIABLE IMPACTS TO EBSA's and CBA NATURAL AND CBA RESTORE AREAS **a. Although the reconnaissance area does not directly overlap Ecologically or Biologically Significant Areas, it is only logical that sound will infiltrate these areas given the known distances sound propagates through water. The proximity of this survey to our environmentally significant, i.e. Critical Biodiversity Areas (Natural) areas poses a great risk to our marine commons and heritage, the economic importance of our fisheries, and leisure and tourism industries dependent on functional healthy oceans. The results of this BAR should indicate accurate cause for concern for the critically endangered, endangered and vulnerable species and their migration paths as well as the Vulnerable Marine Ecosystems (VME's), and other threatened habitats in the overlapping area that will be subjected to the bombardment of this operation. All the above reasons warrant questioning the lack of a precautionary approach and the impact significance**	As stated in Section 6.2 of the BAR, CBA 1 indicates irreplaceable or near-irreplaceable sites that are required to meet biodiversity targets with limited, if any, option to meet targets elsewhere, whereas CBA 2 are "best design sites" and there are often alternative areas where feature targets can be met; however, these will be of higher cost to other sectors and / or will be larger areas. Activities within these management zones are classified into those that are "compatible", those that are "not compatible", and those that have "restricted compatibility". Non-invasive (e.g. seismic surveys) and invasive (e.g. exploration wells) exploration activities are classified as having "restricted compatibility". Activities with restricted compatibility require a detailed assessment to determine whether the recommendation is that they should be permitted (general), permitted subject to additional regulations (consent), or prohibited, depending on a variety of factors. Petroleum production is, however, classified as "not compatible" in CBAs, but may be compatible, subject to certain conditions, in ESAs. Seismic surveying is not only used for petroleum and natural gas exploration and development. It is also used for development of offshore wind, geothermal energy, and low-carbon solutions such as carbon capture and storage and also more generally for providing more insight and understanding into the regional geology of the area for scientific purposes therefore the CBA areas are not considered no-go areas for the purposes of seismic survey activities. In addition, according to the National Coastal and Marine Spatial Biodiversity Plan for the coast and ocean around the South African mainland states that petroleum production may be possible in CBAs using lateral drilling or other techniques that do not result in biodiversity impacts. According to the plan if significant petroleum resources are identified in these areas the selection of the site as a CBA could be re-evaluated, although this would require alternative CBAs to be identified to meet biodiversity targets. The 3D survey area overlaps with areas mapped as Critical Biodiversity Area 1 (CBA 1): Natural and Critical Biodiversity Area 2: (CBA 2) Natural. Approximately 32.25 % of the proposed 3D survey area is covered by CBA 1 and CBA 2. The CBA areas are not considered no-go areas for the purposes of seismic survey activities. The potential impact on MPAs, CBA's and EBSA's is specifically noted in the BA Report. A buffer of at least 5 km is recommended around MPAs, as stated in the EMPr. No buffer requirements are proposed by the marine fauna specialist for CBAs or ESBAs as the impact on these areas is expected to be low – negligible. The NBA 2018 has rated the South Atlantic bathyal and abyssal unconsolidated habitat types that characterise depths beyond 500 m, as being of 'Least concern', reflecting the great extent of these habitats in the South African Exclusive Economic Zone (EEZ). The CBAs within the reconnaissance permit area would therefore not be protecting benthic ecosystem types, with protection likely to apply primarily to pelagic features. The area falls within pelagic habitat types Bb1 and Bb2 characterised by consistently low productivity, chlorophyll and temperature, with low frequency of sea surface temperature fronts (NBA 2012). Using the distribution maps in Harris et al. 2022 used to delineate the CBAs, there is some overlap of the survey area with: • Leatherback migration routes • Atlantic Yellow-nosed Albatross • Wandering albatross • Spotted gully shark (summer) • Stability with respect to climate change The mitigation measures proposed in the report are considered adequate to protect the first

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
ratings given by this BAR based on minimal existing biological baseline data. b. Furthermore, the survey area is at the edge of the EEZ and most likely the area where the least amount of research has been undertaken, together with the least amount of information available. Similarly, with fisheries, who struggle to enter these areas due to the cost of fuel – these areas are most-likely the only pristine areas left in the SA mainland EEZ (as identified in the CBA maps). It stands to reason that the impacts on fisheries and species may be high if these pristine areas were to be targeted.	four of these, with direct climate change effects due to a seismic survey being negligible.
6. MITIGATION EFFECTIVENESS WAS NOT ADDRESSED. **c. The recommendations on timing for the pelagic fisheries were ignored, refer to Capricorn Marine Environmental Pty Ltd - Commercial and Small-Scale Fisheries Report (p.94)"**	Please refer to Section 9.3.2.1 (Exclusion from Fishing Ground Due to Temporary Safety Zone around Survey Vessel) which incorporates the timing recommendations of the fisheries. Additionally, please refer to Section 6.4 (Scheduling Alternatives) that states the following: Based on the findings of the Acoustics, Marine Ecology and Fisheries recommendations, it is recommended that the survey window of January – May be utilised in order to: ...Avoid periods of peak fishing activity during June and July in order to reduce the probability of disruption to the large pelagic longline fishing sector and tuna pole line fishing sector. The recommendations on timing for the pelaigic fisheries were specifically included in the BAR.
d. The BAR continues to assume that "sound levels for the seismic	Please refer to Section 11. 1.1 (Noise / Acoustics) which summarises the conclusions from the site specific noise modelling undertaken for this project. It was concluded that: *"The zones of potential injuries for fish species with a swim bladder, turtles and fish eggs and*

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
survey could notionally be expected to attenuate to below levels for behavioural disturbance at a distance of 4 km from the source. The spatial extent of the impact of sound (produced by the airgun array) on catch rates is expected to be regional, although localised at any one time. The impact is considered to be of immediate duration and reversible without additional time or cost." This was dispelled by almost 2 decades ago by Madsen et al. (2006) who overturned this assumption finding high exposure levels at considerable ranges from the air-gun array and that received sound pressures and sound exposure levels may actually increase with range beyond 5 km range up to 12.6 km from source. Madsen et al. believe this high-frequency acoustic by-product on marine mammals should not be dismissed lightly and that it poses the challenge of how to mitigate where animals can dive in and out of high exposure levels at	*fish larvae are predicted to be within 180 m from the array source. However, fish species without swim bladders have higher injury impact thresholds, and therefore have smaller zones of potential injuries within 90 m from the airgun array source.* *The zones of potential mortal injuries for fish species with a swim bladder, fish eggs, and fish larvae are predicted to be within 30 m from the adjacent survey lines for all the 24-hour survey operation scenarios considered. For recoverable injury, the zones of impact are predicted to be within 80 m from the adjacent survey lines for fish with a swim bladder for all the operation scenarios considered. Fish without swim bladder are not expected to suffer or any potential injury. The zones of TTS effect for fish species with and without swim bladders are predicted to be within 2.9 km from the adjacent survey lines for the relevant 24-hour survey operation scenarios considered. Existing experimental data regarding recoverable injury and TTS impacts for fish eggs and larvae is sparse and no guideline recommendations have been provided. However, based on a subjective approach, noise impacts are expected to be moderate for fish eggs and larvae. Impact is expected to be low for all of them at intermediate and far field from the source location.* *Three (3) long range modelling source locations are proposed for the 3D seismic survey. The modelling is representative of the noise propagation within the proposed 3D seismic area. Source location L1 is adjacent to the marine sensitive area, L2 represents the average depth of the south survey area and L3 is located towards the deeper water environment of the survey area. As can be seen from the horizontal and vertical contour figures, the received noise levels at far-field locations vary at different angles and distances from the source locations. This directivity of received levels is due to a combination of the directivity of the source array, and propagation effects caused by bathymetry and sound speed profile variations.* *In general, the bathymetry profiles with significant upslope section across the continental slope region have the sound propagations experiencing significant attenuation due to the strong interaction between the sound signal and the seabed. The bathymetry profiles with downslope section have much less sound attenuation. These effects are evident in all locations for propagation paths towards shoreline directions.* *For all source locations and except for downslope sections, the seabed depth variations are not significant along the propagation paths within the deep-water region. Therefore, the directivity of received noise is dominated by the directionality of the source array.* *In terms of the impact from immediate exposure to individual airgun array pulses, the maximum zones of PTS effect for sea turtles are predicted to be within 19 m from the source location. On the other hand, the maximum zones of TTS effect for sea turtles are predicted to be within 24 m of the source array. The behavioural disturbance for sea turtles caused by the immediate exposure to individual pulses are predicted to be within 1.3 km of the source array.* *In terms of the impact from cumulative exposure to multiple airgun array pulses, the noise impacts related to recoverable injury and TTS on sea turtles are expected to be high at the near field from the source location. The maximum zones of PTS impact are predicted to range within 10 m of the source array. The maximum zones of TTS effect for sea turtles are predicted to be within 500 m of the source array. Further work will include the recommendation of underwater noise mitigation measures from seismic survey activities related to zones of impact and*

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
considerable ranges from the air-gun array. This poses a particularly serious risk due to the vicinity of the survey to the shoreline, small-scale fisheries and critical marine biodiversity areas.	*implementation of soft-starts if required."*
e. In South Africa, more conservative approaches to mitigation measures should be taken when in the vicinity of MPA's and when threatened (vulnerable, endangered and critically endangered) species are being intercepted. The mitigation zone should be at least 1220m, the pre-startup watch period should be expanded to 120 minutes as a safeguard against any deep-diving whales' being in the safety zone.	The potential impact on MPAs, CBA's and EBSA's is specifically noted in the BA Report. A buffer of at least 5 km is recommended around MPAs, as stated in the EMPr. The guidelines currently applied to seismic surveying in South African waters are those proposed in the Generic EMPr and by Purdon (2018). Purdon highlights the importance of developing mitigation guidelines both locally and regionally and points out that if South Africa is to maintain environmental integrity, mitigation guidelines for seismic surveys specific to the country, and based on the most recent scientific data, need to be implemented. The mitigation measures proposed for seismic surveys are as provided in Section 11.4.1 for each phase of a seismic survey operation. It should further be noted that a team of qualified specialists considered the proposed activity, identified and assessed potential impacts, and where applicable made recommendations to manage and mitigate the impacts.
f. The BAR justifies low impact ratings to fisheries by claiming, "With the implementation of the project controls and mitigation measures, the residual impact due to seismic noise is considered to be of LOW NEGATIVE significance." These ratings being opinion-	EIMS and our specialist team have undertaken a detailed impact assessment, including a detailed assessment of the nature, extent, magnitude, duration, and probability for each of the impacts, as well as the confidence level, potential for irreplaceable loss of resources and cumulative impacts. The scientific rationale forming the basis for the pre- and post-mitigation rating of each impact is described in Section 9.3 of the BAR, and in relation to the fisheries assessment, Section 4 of the Fisheries Assessment Report. Based on this assessment, the impacts on the fisheries were found to be of Low/Negligible Significance and it was not based on mere opinion.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
based and have no biological or ecological evidence.	
7. IMPACT ON LIVELIHOODS. **a. Please describe by name / brand and composition which dispersants would be "used cautiously" (Commercial and Small-Scale Fisheries Report, p.85) should there be an oil spill.**	The name/ brand of the dispersant, and consequent dispersant is not known at present. However, it should be noted that the Fisheries Assessment further requires that Permission be obtained from the DFFE to use low toxicity dispersants.
b. Please justify the "reversibility" (Commercial and Small-Scale Fisheries Report, p.85) of an oil spill which would extend between 5-50kms from the site, on the fishing sector, by specifying how much "time and cost" might be "significant "enough. **c. Studies worldwide show that oil spills generate coastal impacts that can last many decades. Oil-polluted beaches, lagoons and estuarine wetlands rely chiefly on anaerobic degradation, which is slow. Below just 10–15 cm in beach sand and 2–3 cm in muddier sediments, oxygen levels plummet, and from these anoxic layers, pockets of oil can leach toxicants for decades. In addition to costs incurred by cleanup activities, serious economic**	The impact relating to oil/diesel spills in section 4.3.1 of the Fisheries assessment details the following: • Small instantaneous spills of marine diesel at the surface of the sea can potentially occur during operation during bunkering and such spills are usually of a low volume. • Larger volume spills of marine diesel could occur in the event of a vessel collision or vessel accident. It is further stated that Oil contamination could potentially have the greatest impact on commercial fisheries for rock lobster and sessile filter feeders (e.g. mussels) and grazers (e.g. abalone). Mortality is expected to be high on filter feeders and, to a lesser extent, grazers. These species have low mobility and no means to escape contamination and ultimately mortality. Thus, mariculture facilities could be impacted if a spill extended into these areas. For a large oil spill, fishing / mariculture activities and revenues could be affected over a wide area until such time as the oil has either been dispersed or broken down naturally. The sensitivity of the various fishing sectors that operate in the Reconnaissance Permit area is considered to be medium, as a diesel slick would be blown in a north-westerly direction due to the dominant winds and currents off the West Coast, remaining at the surface for less than 36 hours (PRDW 2013). Both Saldanha Bay and St Helena Bay support nearshore mariculture activities. These activities are far removed from the Reconnaissance Permit area and as such the sensitivity for mariculture is considered to be medium. The Reconnaissance Permit area coincides with fishing grounds used by the large pelagic longline sector only. Thus, any spill within the Reconnaissance Permit application area, could impact this sector. The dominant wind and current direction will ensure that any spill in the survey area is dispersed in a north-westerly direction away from the more actively fished areas inshore of the Reconnaissance Permit application area. An offshore spill is likely to disperse rapidly (days). Without the implementation of mitigation measures, the potential impact on the offshore fishing sectors is considered to be of local extent for small instantaneous spills, of regional for larger volume spills and of moderate magnitude in the short-term. The potential impact on commercial fishing operations is assessed to be of LOW NEGATIVE significance due to the improbable likelihood of such an event occurring. In the case of a spill en route to the survey area (i.e. during a vessel accident), the spill may reach the coastline. Nearshore fishing (linefish and small-scale fisheries) and mariculture

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
losses can be experienced by tourism-dependent businesses, industries and individuals dependent on coastal resources **d. There is a failure by the BAR to deal adequately with cost benefit analysis in the event of a spill and the consequences thereof on private individuals, the commercial sector and on the ecosystem itself. The effect of a spill on climate change is not addressed at all. No reference is made to how these affected systems will be compensated in the event of an oil spill.**	operations (abalone and mussel) would be at risk of the effects of an oil spill (refer to the marine fauna assessment report (Pulfrich, 2022)). The greatest risk of contamination is on sessile filter feeding (e.g. mussels and oysters) and grazing species (e.g. abalone) via physical clogging and or direct absorption of the contaminant, leading to mortality. As stated in the preceding paragraphs, The operator will ensure that the proposed seismic survey is undertaken in a manner consistent with good international industry practice and best available techniques. The primary mitigation measure for avoiding the impacts of an accidental oil spill is to prevent any such spill from taking place. This is done through both technology applications, as well as operational controls. An escort vessel with appropriate radar and communications will be used during the operation to warn vessels that are in danger of breaching the safety/exclusion zone. In the event of a spill incident, the project will implement an emergency response system to mitigate the consequences of the spill. • Regulation 37 of MARPOL Annex I will be applied, which requires that all ships of 400 gross tonnage and above carry an approved Shipboard Oil Pollution Emergency Plan (SOPEP). The purpose of a SOPEP is to assist personnel in dealing with unexpected discharge of oil, to set in motion the necessary actions to stop or minimise the discharge, and to mitigate its effects on the marine environment. Project vessels will be equipped with appropriate spill containment and clean-up equipment, e.g. dispersants and absorbent materials. All relevant vessel crews will be trained in spill clean-up equipment use and routine spill clean-up exercises.
e. A full analysis of the fisheries and their catch composition per month should be indicated in the BAR so stakeholders can be fully briefed of potential impacts and implications of the fishing sector not being able to enter their fishing areas.	Please refer to Figures 3.19, 3.25, 3.32 of the Fisheries Assessment Report that detail the monthly catch rates for the relevant fishing sectors. Additionally, a summary of seasonality in fisheries is provided in Section 3.4 of the Fisheries Assessment Report with Table 3.13 showing a summary of seasonal variation in fishing effort expended by each of the main commercial fisheries sectors operating off the West Coast of South Africa. Table 3.14 provides a summary of the seasonal variation in relative intensity of fishing effort by fisheries sector within the reconnaissance permit application area.
f. Evidence that the Fisheries sector have been fully consulted and are in full support of the Seismic survey should be written	With reference to Section 7 and Appendix 2 of the BA Report, EIMS has undertaken the public participation and consultation processes in accordance with the requirements of the NEMA EIA Regulations. This process included notification and communication in three different languages, via Radio and Newspaper advertisements, site notices, posters, and direct notification; as well as public and focus group meetings within the potentially affected communities. Opportunity was provided to review and comment on the BA Report and

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
into the BAR. Up to now, fisheries appear to have had little to no say that their areas are being intercepted but are expected to stay out of the areas.	associated documentation to be submitted to the decision maker. It should further be noted that detailed consultations were conducted by the Social and Heritage Specialists, with amongst others, the small scall fishing communities, to obtain their views and the potential social and heritage impacts of the proposed project. Considering that the long line fishers are the most potentially affected, notices were specifically distributed and public meetings held in Hout Bay, Cape Town, St Helena Bay and Saldanha Bay, where a large majority of these fishers are based and mobilise from. These fishers were specifically pre-registered and invited to all public meetings and did attend the meeting in Cape Town.
g. The fishery that will be the greatest impacted is most likely the tuna pole fishery. This fishery is the most ecologically and environmentally friendly fishery of all SA fishery types, but it is also the fishery where the catch season is between October to December which is within the exploration period. This fishery spends most of its time at sea searching for fish with actual fishing events taking place over a relatively short period of time. This fishery will be severely disadvantaged being unable to work in their operational areas. **h. The BAR references an Australian study where impacts to their tuna industry couldn't be disentangled from catch variability and stock declines. However, a localized West Coast context study provides important reasons for caution:** **i. According to Russell (2018), The west coast tuna pole and line fishery showed**	With reference to Figure 3.31 of the Fisheries Assessment Report which provides an overview of the spatial distribution of fishing effort expended by the pole- line sector targeting pelagic tuna (offshore areas) and snoek (inshore areas) in relation to the Reconnaissance Permit application area, it can be observed that the majority of the effort for this sector is expended outside of the application area. Russell did not conduct a study to determine the cause of the low catch rates of the Namibian tuna pole sector in 2017 and his report is not published in a peer-reviewed journal. Russel noted that there was a downward trend in catches of the Namibian tuna pole fishery and suggested that this was a result of seismic exploration causing disruption to migration routes. There is no explicit supporting evidence that can show a direct relationship between seismic surveys and tuna availability (in fact one skipper we interviewed said it was the opposite). Tuna availability is variable and highly dependent on environmental conditions. Mr Russell acknowledged that it is hard to provide direct evidence that tuna migration and catch losses were caused by seismic surveys. He relies rather on the circumstantial evidence that the declines in catches were due to the effects of an increase in the number of seismic surveys in the Orange Basin between the years 2012 to 2017. Catches of the tuna pole fishery are by nature variable and fluctuate with environmental factors as well as the amount of vessels that operate during a given year. Figure 3.29 of the fisheries report shows the variability in catches of the tuna pole fishery over a long time series (1980 – 2020), evidence of the variable nature of this sector in particular. The tuna pole and line fishery in Namibia is dependent on inter-annual variability of the stock of south Atlantic albacore which is shared by Angola, Namibia, South Africa and Brazil. Data released by the International Commission for the Conservation of Atlantic Tunas (ICCAT) shows that albacore abundance in these areas has systematically declined and availability is variable (refer to Table 1). Figure 1 shows inter-annual variability in catch rates of albacore reported by the baitboat sector (also known as "tuna pole" or "pole-and'line") in Namibia and South Africa. In Namibia, a decline in catches reported from 2013 onwards was accompanied by a reduction in the number of active vessels from 34 (in 2012) to 10 (in 2013) to 5 (in 2017). (Source: https://www.iccat.int/Documents/BienRep/REP_TRILINGUAL_20-21_I_3.pdf). D. Russell reported in a popular article in the local fishing industry magazine Fishing Industry News (August 2017), recognising that the tuna catches have "dropped off drastically" and that this in part is due to fewer South African vessels fishing in Namibia. His arguments do recognise that the explanations are uncertain and complex and could be a cumulative effect of environmental changes, fishing pressure and externalities such as recent seismic surveys.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response

localised impacts revealing that an 84% decline in tuna catches (650 tonnes in 2013 from 4,046 tonnes in 2011) was a result of an increase in seismic exploration for oil and gas in the Orange River Basin driving tuna from their normal migratory routes forcing them to move on and in 2017 catches dropped off to non-commercial catch rates.

ii. Further to this: Engås et al (1996) stands as the most definitive study to document what has long been observed by fishermen: When seismic surveys are taking place, the fish leave the area.

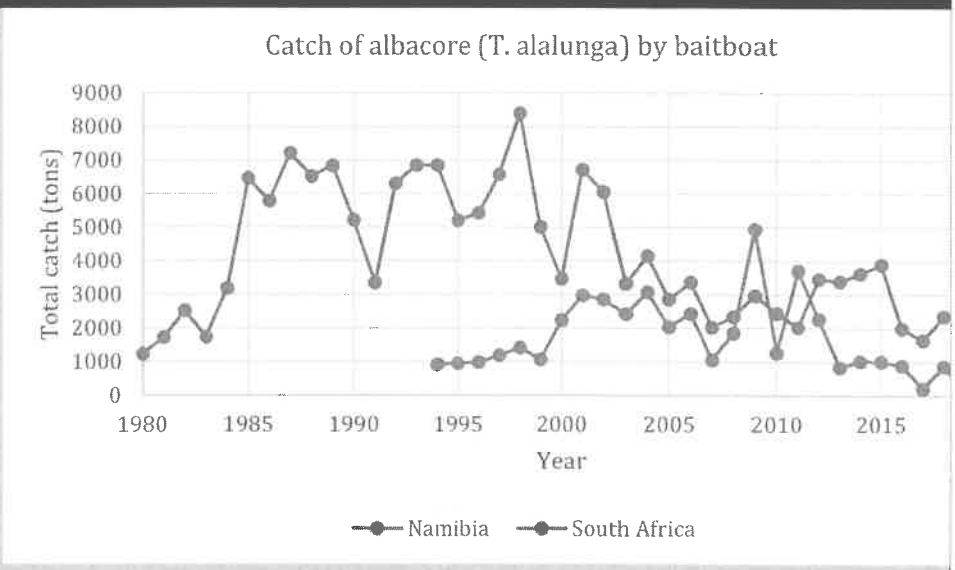
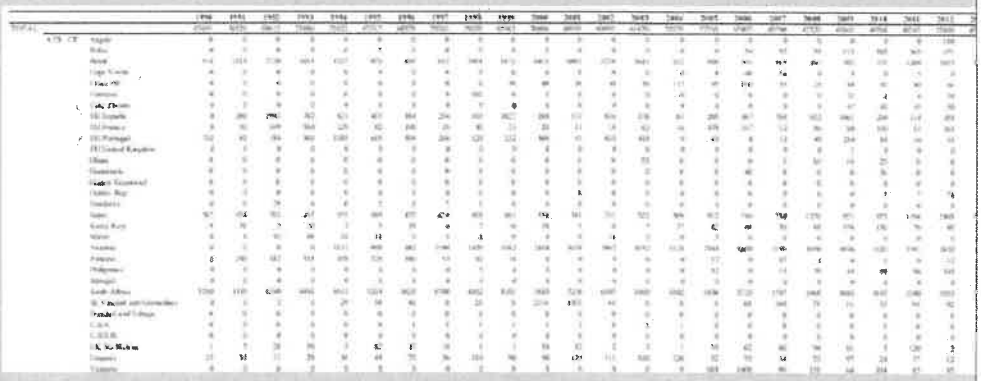


Figure 1:Total nominal catch (tons) of T. alalunga (albacore) by "baitboat" (otherwise referred to as the "tuna pole" sector) reported by South Africa and Namibia between 1980 and 2020. Source: ICCAT, 2021.

Table 1: Estimated catches (t) of albacore (Thunnus alalunga) by flag between 1990 and 2019 (Source: ICCAT, 2020).



https://www.iccat.int/Documents/SCRS/ExecSum/ALB_ENG.pdf

Table 2: Landings (in mt) of ICCAT species caught by bait boats ("pole-and'line") and longline vessels operating in Namibia during the period 2016 to 2019.

Year	BB vessels	LL Vessels	Albacore (ALB)	Swordfish (SWO)	Bigeye Tuna (BET)	Yellowfin Tuna (YFT)	Blue Shark (BSH)	Shortfin Mako (SMA)	Blue Marlin (BUM)
2016	13	24	1062	225	465	42	2137	661	8
2017	5	11	360	717	123	53	1357	194	57
2018	5	15	888	881	109	424	0	0	84
2019	5	22	966.5	511.5	69.65	81.76			52.72

The scientific assessment undertaken by ICCAT in 2013 for the south Atlantic albacore

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	(southern stock) suggests that: "in 2012, the estimated South African and Namibian catch (mainly baitboat), was below the average of the last five years". In 2016, the assessment noted a decline in overall catches of the southern stock of albacore (all gear types) of 40% from 2012 to 2014. The different models used suggested that: • There is a wide confidence interval reflecting the large uncertainty around the estimates of stock status; • Considering all scenarios, there is 57% probability for the stock to be both overfished and experiencing overfishing; • There is a 13% probability for the stock to be either overfished or experiencing overfishing but not both, and; • There is a 30% probability that biomass is above and fishing mortality is below the Convention objectives. However, the scientific committee lacked enough objective information to identify the most plausible scenarios to account for the variability and stock declines. The variability is most likely attributed to a combination of the following (Shomura et al 1995, Kuo-Wie Lan et al 2011, Lehodeya et al 2006 and Punt et al 1996): • Increasing fishing effort exacerbated by improved fish finding technology (vessel monitoring systems, use of sonar, sea surface temperature spatial mapping using satellite technology); • Environmental variability such as cold and warm water events e.g. Benguela El Niño events have been shown to result in a change in the vertical distribution of tuna stocks within the water column, resulting in reduced catch rates; • Migration and feeding patterns that change abundance levels annually and linked to the environment; • Inconsistent or irregular catch reporting. Seismic surveys are not explicitly responsible for these effects. What can be said is that any anthropogenic impacts such as seismic surveys, fishing, pollution and others combined with environmental effects is likely to have a combined effect on fish availability. Tuna and tuna-like species have small or no swimbladders and very small otoliths (earbones) and direct impacts from airguns causing mortality have not been reported. Catch Rate information is available through the scientific working groups at DFFE for all the main commercial stocks and DEFF produce a useful annual State of Stocks report. There has been no conclusive studies on the effects of seismic surveys on fish availability i.e. no direct cause and effect. The study undertaken by Mr D. Russell could find no direct relationship between seismic surveys, catches and recruitment to South African fisheries and was largely speculative (noting that the issue of seismic survey impacts have been addressed on numerous occasions by the scientific working groups at DFFE with no explicit outcomes other than recognising that it is a complex issue that needs to be considered with many other anthropogenic and environmental effects). Catch in fisheries, as used by Mr Russell, is not an appropriate indicator to determine and draw conclusions on the effects of seismic surveys on fisheries. Many studies on fisheries, their catch rates and other related effects such as on recruitment, have been done globally. Results vary and are species-specific particularly related broadly to taxonomic grouping e.g. crustaceans, cephalopods, demersal (bottom) dwelling and pelagic (off the bottom and in the midwater and surface). In recent years there have also been some studies on the impacts of seismic surveys on plankton (mostly zooplankton). While there is a very localised impact (within meters of the airguns), extrapolation of these impacts to the broader ecosystem is tenuous and needs to consider scale (such as to the broader ecosystem) as well as seasonal and local effects as might be

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	expected with seasonal upwelling events.
i. Without an SEA how will communities establish and dialogue around a compensation scheme and conditions to secure the on-going functionality of these fishing sectors and to avoid devastating capital losses in the event of decline in catches or displacement of species or fisheries? k. Taking this into account, all-inclusive seafood supply chain stakeholder engagement will be necessary, in all relevant languages to secure the on-going functionality of these fishing sectors and to avoid devastating capital losses. Discussion around a compensation scheme and conditions of compensation is imperative.	As stated in Section 8.3.10 (Mitigation and management) of the Social Impact assessment Report, assessing all cumulative impacts of the seismic survey industry on the livelihoods of communities, addressing perceptions and alleviating fear from a strategic perspective is not TGS' responsibility and falls outside the scope of one environmental impact assessment. It is the responsibility of the relevant authorities and the industry. However, the seismic survey industry should reassess their position and social licence to operate as an industry in a South African context and conduct a strategic environmental assessment of the impact of the industry and embark on an awareness raising and education campaign. Having meetings will not be sufficient. Participatory processes and workshops where communities can engage in experiential learning should be considered. If the seismic survey industry fails to address the community's need for education and cooperation it will result in significant delays and increase the risk for social unrest. TGS are therefore looking into potential ways to initiate discussion within the industry. The Fisheries Assessment Report further also requires the further notification of the fishing industry and applicable organisations prior to commencement of the surveys as detailed in Table 4.1 of the Fisheries Assessment Report.
j. Where are EIMS actual mitigation measures and recommendations?	Please refer to Section 9.3 and Section 11.4 of the BAR for detailed mitigation measures associated with each impact. Additionally, these mitigation measures have been included in the EMPr (Appendix 6 of the BAR).
8. NO-GO ALTERNATIVE a. In assessing the no-go alternative, inconsistent timeframes to the benefits and risks of the former in relation to the project are applied. The potential	EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant. Any subsequent authorisation would be restricted to these specifically assessed activities. Should the applicant or other applicants wish to undertake any additional exploration activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a consequent need to apply for the relevant permissions. These would include a formal application for an Exploration or Production Right as well as a new EA. The impacts of such proposed activities would consequently require specific assessment and public consultation prior to approval. It is premature to assess the likely impacts of further invasive exploration activities or production activities as the extent,

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
economic benefits of extraction and production— something that is not within the scope of the BAR—are taken into account while the negative consequences of extraction and production – such as toxic, radioactive waste, oil spills and global warming do not factor into the analysis. As such, the assessment incorporates inappropriate content that results in a flawed outcome. In other words, the risks of not proceeding with the no-go alternative are significantly understated. **b. The BAR promotes the assumed "benefits" of the project, instead of appraising the full ecological and socio-economic cost, including hazard and externality costs, and evaluating whether there is a need for this project in the context of this total cost. Alternatives to the extraction of fossil fuels (no-go options) aren't properly explored.**	duration, location, and magnitude applicable to these activities are unknown at this stage. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, and production activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed on their merits as and when they are proposed. Please refer to Section 5 of the BA Report in regard to the need and desirability for the proposed activities. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's energy planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial in our view that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined.
The BAR has been shown to be neither comprehensive nor technically robust thereby not meeting	The BAR has been compiled in accordance with the NEMA EIA Regulations, 2014, as amended. A summary of the report structure, and the specific sections that correspond to the applicable regulations, is provided in Section 1.1 of the BAR.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
its terms of reference or providing the required information for decision making. In light of this, it is requested that the application be withdrawn until the process can result in full consideration of all relevant information on the affected environment, of proposed alternatives and their impacts, and of the measures necessary to monitor and investigate residual effects. **We look forward to your most urgent response**	

Sincerely,

EIMS Public Participation Team

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

6 December, 2022

Our ref: GPK/as/1520

Mr Christiaan Mackenzie,

The Aukotowa Fisheries Primary Co-operative Ltd ,

Joos Engelbrecht Street,

Port Nolloth,

8280

Dear Sir

RESPONSE TO COMMENTS ON THE ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS ORANGE BASIN SEISMIC RECONNAISSANCE BASIC ASSESSMENT PROCESS

Please refer to the table below for responses to the comments raised.

Comment/ Recommendation	Response
The Aukotowa Fisheries Cooperative of Port Nolloth, Northern Cape, is writing to EIMS to state our opposition to the proposed seismic survey conducted by TGS.	We take note of your comments and ensure that these comments are included in our final Report to the Competent Authorities.
The seismic survey exploration presents a danger to our ocean's ecosystem and our culture and livelihoods as small-scale fishers. The seismic survey will not only impact the larger marine life such as whales and dolphins, but also harm smaller fish and species that we depend on for food security and livelihoods.	Detailed Marine Ecological, Cultural and Social Impact Assessments were undertaken as part of the Basic Assessment process. The Marine Ecological Assessment (Appendix 3 of the BAR) included an assessment of all the trophic levels in the marine environment and did not only assess the impact on whales and dolphins. With the implementation of the mitigation measures, the impacts on each of the organism groups were found to be low/ negligible. t was concluded that *"The proposed survey activities to be undertaken by TGS are expected to result in impacts on marine invertebrate fauna in the Orange Basin, ranging from negligible to very low significance. Only in the case of potential impacts to turtles and marine mammals are impacts of low significance expected. If all environmental guidelines, and appropriate mitigation measures recommended in this report are implemented, there is no reason why the proposed seismic survey programme should not proceed."* Additionally, a Social Impact Assessment (Appendix 3 of the BAR) was undertaken and the impact on the livelihoods assessed to be

8 Dalmeny Road, Pine Park, 2194 | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | **F** (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | **F** (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	of medium significance. To this end, Section 8.3.4 of the Social Impact Assessment concluded that: *"Livelihoods are already compromised due to the fishing quota system, over-fishing, lack of employment opportunities, pollution, effects of climate change and the recent Covid 19 pandemic. However, with reference to the assessment of the impacts on the catch rates from the fisheries assessment undertaken by CapMarine (2022), the impact on livelihoods is not because of the actual impact on catch rates, but because of the perceived impact of the oil/gas industry on fishing industry."*
We are concerned about the proximity of the TGS's seismic survey area to our fishing grounds, which are shown in the images below. Noise pollution is not limited to the boundaries that are on the map. This is the area where we do our longline fishing and is the best spot for our export fish, which includes kingklip, hake, monk, sole, and tuna.	Thank you for your comments in this regard. Please refer to Section 9.3.2.2 of the Basic Assessment Report (BAR) (IMPACT OF SOUND ON CATCH RATES). It was discussed that the zones of impact on fish of impulsive signal emissions from the array source are presented in Table 43. The results relate only to physiological effects on fish. The zones of potential injuries were predicted to be within 160 m from the 3D array for fish species with a swim bladder and 80 m for fish species without a swim bladder. The zone of potential impact was predicted to be within 160 m for fish eggs and larvae. Based on the noise exposure criteria provided by Popper et al. (2014) for fish that use a swim bladder for hearing, relatively high behavioural risks are expected at near to intermediate distances (tens to hundreds of meters) from the source location. Relatively moderate behavioural risks are expected for at far field distances (thousands of meters) from the source location. The cumulative sound fields based on one assumed 24-hour survey operation were modelled and the zones of cumulative impact (i.e. the maximum horizontal perpendicular distances from assessed survey lines to cumulative impact threshold levels) are presented in Table 44. The zones of potential mortal injuries for fish species with and without a swim bladder, and for fish eggs and larvae are predicted to be within 60 m from the survey lines. For recoverable injury, the zones of impact are predicted to be within 20 m from the survey lines for fish without a swim bladder, and within 200 m for fish with a swim bladder. The zones of TTS effect for fish species with and without swim bladders are predicted to be within 3.5 km from the survey lines for the 3D survey 24-hour operation scenarios considered. Existing experimental data regarding recoverable injury for fish eggs and larvae is sparse and no guideline recommendations have been provided. However, based on a subjective approach, noise impacts for fish eggs and larvae are expected to be moderate at the near field (i.e. in the distance of tens of meters) from the

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	source location, low at intermediate (i.e. in the distance of hundreds of meters) and far field (i.e. in the distance of thousands of meters) from the source location. Pulfrich (2022) concluded that the impact of the acoustic source on fish eggs and larvae accounts for an insignificant amount of mortality compared to the natural mortality rate per day for most fish species at that life stage. The Reconnaissance Permit area does not coincide with spawning areas of key commercial fish species. The overall effects on the fishing industry of physiological injury to fish as a result of the proposed surveys is considered to be of overall LOW NEGATIVE significance (with mitigation) on the large pelagic longline sector, the only sector that operates within the Reconnaissance Permit application area. Based on the location of the Reconnaissance Permit area, the noise generated during the survey would be expected to the large pelagic longline and tuna pole-line sectors. Because the sector operates across the extent of the Reconnaissance Permit area, the affected area is considered to be of regional extent. Behavioural effects are generally immediate, with duration of the effect being less than or equal to the duration of exposure. The noise generated during the survey would be expected to attenuate to below threshold levels for behavioural disturbance before reaching the fishing grounds of all other sectors viz. demersal trawl, midwater trawl, demersal longline, small pelagic purse-seine, traditional linefish, west coast rock lobster, small-scale fisheries and net fisheries. The Reconnaissance Permit area does not overlap with spawning areas of key commercial species (and the timing of the proposed survey is not expected to coincide with peak spawning periods). Noise would be expected to attenuate to below threshold levels for behavioural disturbance before reaching inshore recruitment and/or nursery areas. Due to the location of the Reconnaissance Permit area in the deepwater environment, sound generated during the survey is not expected to influence the spawning behaviour or migration route of snoek (a species of key importance to the linefish and small-scale fisheries sectors). The Reconnaissance Permit area is situated well offshore of the shelf break which is where snoek are known to spawn during winter-spring. The impact of sound on the large pelagic longline sector is assessed to be of overall MEDIUM NEGATIVE significance before mitigation, whereas the impact on the tuna pole-line sector is

803

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	assessed to be of overall LOW NEGATIVE significance. Due to the distance of the Reconnaissance Permit area from fishing grounds, the sound is likely to attenuate to below threshold levels for behavioural disturbance of all other fisheries sectors viz. the demersal trawl, midwater trawl, demersal longline, small pelagic purse-seine, traditional linefish, west coast rock lobster, small-scale fisheries and netfish sectors. There is no impact expected on these sectors. With the implementation of recommended mitigation measures, the residual impact of sound generated during the proposed survey is assessed to be of LOW NEGATIVE overall significance to the large pelagic longline and tuna pole-line sectors. There is no impact expected on the demersal trawl, midwater trawl, demersal longline, small pelagic purse-seine, traditional linefish, west coast rock lobster, small-scale and netfish sectors. Considering that the fishing grounds referred to in your letter are 37.8 nautical miles (North Fishing Bank Point) and 29.45 nautical miles (South Fishing Bank Point) away from the boundary of the application area, it is anticipated that the behavioural and physiological impact on the catch rates are considered to be low.
We feel that the consultation process for TGS is inadequate and does not take small-scale fishers into consideration. We are only given oil and gas as our only development option, but our community has solutions that do not include the fossil fuel industry. We ask that you listen to our opinions and take our culture, heritage, and livelihoods into consideration. Real consultation should give us options about how we want to utilize our ocean space and ask us what we want for economic development so we can ensure benefits go directly to the community. Our community needs jobs, skills and training, education, and acknowledgement that our relationship to the ocean takes precedence over capitalist development projects.	It is EIMS' opinion that the PP process included meaningful consultation with regard to small scale fishers (Section 7 and Appendix 2 of the BAR). It should also be noted that EIMS specifically consulted with the small-scale fishers and other community members and have given serious consideration to the comments and inputs from the local communities. The BA report specifically notes and considers the views raised in the public participation process. Furthermore, the social specialists were tasked with direct engagement of the fishing community members and their representatives in order to consult with and assess the impact of the proposed project on these communities. Although this project focussed on the assessment of the impacts of the proposed activity, i.e. Reconnaissance using 3D Seismic Survey, the wider environment, including the socio-economic, and biophysical aspects were considered, and also included a consideration of the cumulative impacts considering the existing impacts from other projects. While alternatives for the proposed activity were considered and discussed in the BAR, it is outside the scope of the EIA process to provide other development options. However, the potential approval of this reconnaissance activity would not be exclusive and would not prohibit other

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	developments/ activities from being caried out over the application area. The potential impact on intangible cultural heritage and livelihoods has specifically been identified and assessed in the Basic Assessment Report (refer to section 9.3.3 and Appendix 3.
Our land in Port Nolloth is already damaged from diamond mining, and the near shore is damaged from cofferdam mining. However, the offshore remains untouched, and now companies want to destroy it for the sake of finding oil and gas. The government and private sector claim that we need oil and gas to make the transition to renewable energy, but there is no plan for how that transition is going to be made. We do not believe more oil and gas is needed to make a just energy transition. Creating more carbon emissions is not the answer; it will only cause further degradation to the environment. We urge you to acknowledge the scientific research that has been done on the harm to marine life from seismic surveys. It is not proper consultation if the truth behind seismic survey acquisitions and oil and gas is not revealed during these meetings.	A team of qualified specialists considered the proposed activity, identified and assessed potential impacts, and where applicable made recommendations to manage and mitigate the impacts. All impacts assessed can be reduced to a medium or low significance with the implementation of management and mitigation measures described in the BA report and accompanying EMPr. The proposed activity is not anticipated to destroy the offshore environment. Please refer to Section 5 of the BA Report in regard to the need and desirability for the proposed activities. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's energy planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial in our view that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined. EIMS has undertaken the Basic Assessment in line with the requirements of the National Environmental Management Act (Act No. 107 of 1998 – NEMA) and the Associated Environmental Impact Assessment (EIA) Regulations, 2014. As part of this process, EIMS and our specialist team have taken into consideration the scientific research available and used this as the basis for the impact assessment in the context of the proposed activity. The nature of the proposed activity and the outcomes of

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	the impact assessment were objectively and truthfully presented during the consultation processes.
The sea is in our blood. Fishing is forever. Our livelihood is forever.	Comment noted. With reference to Section 9.3.4 of the BA Report, the potential impact on the livelihood of the fishing communities has been identified and assessed. All comments and responses will be submitted, together with the Basic Assessment Report and associated appendices to the Competent Authority for consideration in the decision-making process.

Sincerely,

EIMS Public Participation Team

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

6 December, 2022

Our ref: GPK/as/1520

Ms Jackie Sunde

Dear Madam

RESPONSE TO COMMENTS ON THE ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS ORANGE BASIN SEISMIC RECONNAISSANCE BASIC ASSESSMENT PROCESS

Please refer to the table below for responses to the comments raised.

Comment/ Recommendation	Response
Cover Letter **Attached please find my comments on the TGS Basic Assessment Report (BAR) Ref 1520. I make this submission as a researcher with more than 20 years' experience working with small-scale fishing communities in South Africa.**	Comment noted. We would like to thank you for your comments and participation in our process for this project. All objections, comments and responses will be submitted, together with the Basic Assessment Report and associated appendices to the Competent Authority for consideration in the decision-making process.
TGS is in the process of applying to undertake a 3D seismic survey off the West Coast of South Africa. This draft Basic Assessment Report (BAR) has been prepared as part of the environmental impact assessment (EIA) process being undertaken for this application for environmental authorisation to conduct the survey. **I submit that this BAR does not provide an adequate assessment of the potential environmental impact assessment and does not meet the NEMA requirements for an environmental authorisation on the following grounds:**	Comments noted.
1. Need and Desirability and related Climate Change cost analysis **The draft BAR fails to motivate adequately for the need and desirability of this survey activity.** **The draft BAR states that the proposed project** ***'aims to identify oil and gas resources to be used in... energy production and/or processing or manufacturing of materials'.1 It is stated further that '[a]s a result of the fact that this project entails only survey activities, it is anticipated that this***	With reference to the quoted sections of the Makhanda Judgment, we would like to reiterate that the NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, production, and combustion activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed prior to implementation on their merits as and when they are proposed. It is not accurate to state that the Reconnaissance will necessarily lead to exploration, or production. EIMS has conducted the impact assessment on the basis of the

8 Dalmeny Road, Pine Park, 2194 | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | **F** (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | **F** (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
project will not lead to a significant impact on the receiving environment'.2 **In line with this, the draft BAR does not consider or assess the potential climate impacts of subsequent oil and gas exploration, production and use. This does not provide sufficient evidence of the need or desirability of this project, and it prevents a full assessment of the project. In the recent judgement in the Makhanda High Court, *Sustaining the Wild Coast NPO and Others versus the Minister and Others* (3491/2021), the Judge confirmed that the entire process of the intended project must be considered and must indicate the impact on climate change. The Judge went on to note that had this been included, the need and desirability of the project might have been very different. Drawing on the authority of the *Save the Vaal* case,3 the judgement states that the** ***'processes are discrete stages in a single process that culminates in the production and combustion of oil and gas, and the emission of greenhouse gases that will exacerbate the climate crisis and impact communities' livelihoods and access to food'.4*** **The court went on to state that the respondent's thesis does not find support in *Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others* either and quoted this judgement:** **The absence of express provision in the statute requiring a climate change impact assessment does not entail that there is no legal duty to consider climate change as a relevant consideration and does not answer the interpretative question of whether such a duty exists in administrative law. Allowing for the respondents' argument that no empowering vision in NEMA or the regulations explicitly prescribes a mandatory procedure or condition to conduct a formal climate change assessment, the climate change impacts are undoubtedly a relevant consideration as contemplated by section 24O of NEMA for the reasons already discussed. A formal expert report on climate change impacts will be the best evidentiary means of establishing that this relevant factor in its multifaceted dimensions was indeed considered, while the absence of one will be symptomatic of the fact that it was not.5** **This report fails to include a full cost analysis of this project for climate change. Hence it cannot be considered adequate in terms of the NEMA requirements and it does not make it possible to consider the need and desirability of the**	activities proposed by the applicant, namely seismic surveys, i.e. for reconnaissance only. Any subsequent authorization would be restricted to these specifically assessed activities. The proposed activities do not include any other exploration, production or combustion of any natural gas or oil resources. There are no significant GHG emissions directly related to the proposed activity nor are there significant climate change vulnerability risks. Should the applicant or other applicants wish to undertake any additional exploration, production, or combustion activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a need to apply for the relevant permissions. These would include a formal application for new EA and where relevant an exploration and production right, informed by a comprehensive Environmental Impact Assessment and stakeholder consultation assessing the merits of these specific activities. The impacts of such proposed activities would consequently require specific assessment of the associated impacts and public consultation prior to approval. Given that this project seeks to undertake reconnaissance only, and would not provide authorization for potential future exploration or production activities, it is our view that it is premature to assess the likely impacts (including climate change) of further future speculative invasive exploration activities or production activities or future utilization of any resource, as the extent, duration, location, and magnitude of potential impacts, all of which are crucial to be able to assess the likely environmental impact, are unknown at this stage. Any such assessment is unlikely to be realistic and would consequently be subject to challenge.

2830308

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
project in the light of the current climate emergency and our international obligations to reduce carbon emissions.	
2. The Draft Basic Assessment Report and CapMarine Expert Fisheries Report contain inaccuracies that lead to a fatal flaw. The Report acknowledges that there may be an impact on the Tuna Pole sector but with regards to the Small-scale Sector, it states **"Note that small-scale fishers are not permitted to target tuna (i.e. the species is not part of the basket allocation), thus would not be expected to operate at the Cape Canyon. There is no overlap of fishing grounds with the Reconnaissance Permit application area, which is situated at least 120 km offshore and at least 100 km from fishing grounds targeted by the linefish sector (page 49).** **This is factually flawed and incorrect. The small-scale sector does have tuna in their basket and so do the Interim Relief fishers of the West Coast and they are allowed to catch it and sell it on a commercial basis. See Annexure 1 and 2. Annexure 1 is the Permit for the Port Nolloth Small-scale Fisheries Cooperative and Annexure 2 is the Permit conditions for the Interim Relief line fishers which applies to all the line fishers along the West Coast including Saldanha, St Helena Bay etc.** **This error impacts the rating of the impact and the mitigation measures required for the project. It is clear from several other instances in the Fisheries Expert Report that the Fisheries Experts do not understand or have knowledge of the Interim Relief fishers. For this reason they are not qualified to assess the impact of the project on them and this report should be withdrawn.**	Please refer to Section 3.3.10 (SMALL-SCALE FISHERIES) of the Fisheries Impact Assessment Report, which accounts for the variability in the distances over which SSF catch from the coast, as well as the actual species targeted. Section 3.3.10 states that *"Small-scale fishermen along the Northern Cape and Western Cape coastlines are unlikely to range beyond 20 km from the coastline; thus, inshore of the Reconnaissance Permit area (refer to Figure 3.42). This assessment is however cognisant of the ongoing issues related to the perceived areas fished and species targeted by SSF off the West Coast of South Africa e.g. that cultural practice of SSF may occur to 55 km offshore. While SSF regulations clearly specify that fishing is required to take place "nearshore" the actual differentiation between SSF and other fishing operations that might include SSF, such as the commercial "traditional linefish" and "pole and line" and the extent to which these commercial fisheries might include SSF, remains unclear. As such the offshore extent to which SSF may operate requires a precautionary approach in this assessment and consideration that the possibility exists (albeit a remote possibility that cannot be verified through the information made available on these fisheries), that SSF may have occurred historically and potentially in the future further offshore than suggested by the information made available for this assessment i.e. there is a remote possibility that some SSF may have targeted certain species (of which tuna and snoek are the main candidate species) further offshore than 20 km. The distance fished offshore by SSF and the associated risks determined in this assessment further necessarily considers practical aspects, notably that bottom fishing is impractical in waters deeper than 100 m and as such any bottom fishing, whether SSF or commercial, is highly unlikely beyond a precautionary depth being the 100 m depth contour. Further, in regard to migratory species, such as longfin tuna and snoek, economic and regulatory aspects relating to distances fished offshore is pertinent [i.e. such as the requirements of the South African Maritime Safety Authority (SAMSA)] in particular that most SSF are not likely to be "B" class certified (i.e. can operate up to 40 nm offshore and are longer than 9m) are likely limited to "C" class being mainly vessels of <9 m permitted to only operate < 15 nm offshore."* Furthermore, it should be noted that with reference to the two sets of permits (supplied) the following: The permit on SSF provided is specific for Zone A and applies to "Traditional Linefish". The second permit also referred to the "Interim Relief 15 Dispensation Permit Conditions" dispensation also refers and would apply to Zone A in this case. The Interim Relief section 2 states that the permit shall not be valid if a SSF permit has been granted (See Para. 2 subsection 2.2c). Section 3 (Fishing Area) then states that in Zone A fishers may only fish for yellowtail and snoek. These confusions between permits issued by DFFE are not helpful. The Fisheries Report assumed Interim Relief does not apply to Port Nolloth SSF. Given the above, it is anticipated that the impact on the SSF has been adequately assessed.
3. The Report fails to adequately rate the evidence	The significance of environmental impacts varies depending

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
of significant harm caused by the seismic survey to marine life and biodiversity **The draft BAR *Biodiversity and Ecosystem Services Assessment Report* ('Pisces Report') indicates the that potential impacts to the marine fauna as a result of the proposed 3D seismic acquisition include:** • **Physiological injury and/or mortality;** • **Behavioural avoidance;** • **Reduced reproductive success/spawning;** • **Masking of environmental sounds and communication;** • **Collision of turtles/marine mammals with the survey and support vessels or entanglement in towed acoustic apparatus; and** • **Indirect impacts on piscivorous predators due to seismic effects on prey species.** **1. The report goes on to state that the highest sensitivities in response to the proposed 3D survey are:** • **Humpback whales, which migrate through the area between June and November (inclusive);** • **Sperm whales, beaked whales and other odontocetes that frequent offshore waters;** • **Large migratory pelagic fish and shark species that show seasonal association with Child's Bank and Tripp Seamount;** • **Leatherback turtles which frequent offshore waters in low numbers and aggregate around seamounts to feed on jellyfish (according to the Pisces report, Leatherback turtle abundance in the study area is unknown but is expected to be low)6; and** • **Various pelagic Albatross, Petrel, Storm Petrel and Shearwater species (the Pisces report indicates that pelagic seabirds are likely to be relatively frequently encountered in the offshore waters of the Reconnaissance Permit area).** **Notwithstanding the above, the report rates the significance of impacts on marine habitats and communities as (mostly) very low to medium before mitigation, and very low to low after**	amongst others on the specific location, prevailing sensitivities, receptors, timing, and extent of the proposed activities. The EAP and the specialists identified and assessed potential environmental impacts (supported by inputs from the public consultation process) and has proposed management and mitigation measures. All impacts identified in the process can be reduced to a low or medium significance with the implementation of the management and mitigation measures. All impacts associated with a proposed project are considered potential impacts until the impact actually occurs. The studies undertaken internationally over the past ~70 years on the impacts of noise on marine fauna (of which some 400 peer-reviewed publications have been summarised and cited in the marine faunal specialist study) have concluded that the effects of underwater sounds vary substantially and depend on a wide variety of physical and biological factors. When writing articles on the effects of seismic acquisition on marine fauna it is therefore not difficult to bias the literature cited to either demonstrate detrimental and irreversible impacts or only very limited impacts, depending on the personal view of the author(s) and/or the targeted readership. The marine faunal assessment has made efforts to present published results objectively, and nowhere claims that acoustic surveys do not result in impacts. Injury is likely at very short range, with behavioural disturbance occurring over greater distances. The final significance ratings are determined using information from the peer-reviewed literature together with the noise modelling results (which put the threshold distances from the source array to mortality and potential mortal injury into perspective), adopting the precautionary principle as is required when undertaking such impact assessments, and taking into account the sensitivity of receptors present in southern African waters. Given all of the evidence, the conclusion reached for the various assessments is that impacts are either of low or very low significance.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
mitigation. The draft BAR in turn relies on this (and other significance ratings) to reach the conclusion that: **...there are no environmental fatal flaws that should prevent the proposed project from proceeding, provided that the recommended mitigation and management measures are implemented... it is the opinion of the EIA project team and the EAP that the significance levels of the majority of identified negative impacts can generally be reduced to an acceptable level by implementing the recommended mitigation measures and the project should be authorized.' (emphasis added)** **2. The Pisces Report downplays the impacts of marine seismic surveys by referring to them as 'potential impacts'. This approach stands in stark contrast to the approach taken by our courts in recent seismic survey judgements, where it was accepted that marine seismic surveys do cause harm (i.e. the TGS seismic survey will result in actual impacts), as a result of which mitigation measures are proposed (Bloem Judgement, Sustaining the Wild Coast and Others, Thulare in the Searcher case in the Cape Town High Court).** **4. Given the known impacts and the remaining uncertainties, it is clear that a precautionary approach is required in this instance.**	
5. Errors in the baseline information available to the Social Impact Assessment and the Heritage Assessment **Both the Heritage Assessment and the Social Impact Assessment base the basis for their assessment of impacts on the information provided by the Expert Fisheries Report. Given the fatal error noted in Point 2 above, it is argued that both of these assessments need to re-consider their Ratings of Impact.**	With reference to the response provided to Point 2 above, it is anticipated that the impact on the SSF has been adequately assessed, and that the ratings of the heritage and social specialist reports remain valid.
6. Unacceptable social risk and absence of a social license to operate **The Social Impact Assessment conducted for this study is very clear. It states** ***"TGS, as well as other companies that want to do surveys or exploration in the area, currently do not have social license to operate. A large part of this is due to a lack of meaningful consultation by previous applicants from a community perspective. If TGS or any other seismic survey company wants to proceed with the project, they***	It should be noted that detailed consultations with community members and leadership were conducted by the Social and Heritage Specialists to obtain the views of project affected communities and the potential social and heritage impacts of the proposed project. The public participation requirements and obligations of the NEMA EIA Regulations has been complied with. The recommendation of the SIA is that, should the project be approved a representative from TGS must consult with leadership of the community to determine how the communities should be consulted with in future – that is, what is the way the community members prefer to be consulted with for provision of

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
will need to engage in meaningful conversation with the communities and try to restore relationships. From a community and social risk perspective this is not negotiable" **(Equispectives SIA September 2022, pp 108).** **This statement makes it very unclear that until such time as TGS engages with the communities further, in a meaningful way, there will be great community and social risk and they will not have a social license to operate". This Draft BAR cannot pre-empt the outcomes of any future community engagements but makes this clear – there needs to be further engagements before the project can be considered to have an acceptable risk level.**	commencement notification and/or daily updates to advise on survey schedules, communication in respect of the proposed research outcomes, etc. The recommendation to include further consultation as part of the conditions of authorisation intends to ensure that the consultation process goes further than just the EIA process, but is continued throughout the entire process, regardless of the outcome. This will assist communities and people on the ground to make informed decisions about technical matters. The intention of the recommendation is not for this condition to be suspensive or determinant on the ultimate decision but rather to function as an additional management/ mitigation measure to be implemented post approval to reduce the significance of the identified impacts and further enhance the community engagements during implementation, should the project be implemented. The SIA specialist has made a reasoned opinion that the project can be approved on the basis of the outcomes of the consultations already undertaken. Communities are diverse and there are community members who are supportive of this type of development, as much as there are community members against the development. Communities were asked to suggest mitigation measures that the specialists should consider, and this influenced some of the recommendations made in the SIA. All perspectives were considered during the EIA process and the social impact analysis. The SIA report makes detailed recommendations about further engagement with the communities, and other mitigation and management measures. The mitigation and management measures should be considered in its entirety within the context of the report. Efficient engagement with a community involves more than merely setting up a meeting and inviting people. In many communities there is an expectation that outsiders should enter the community via the leadership before a community meeting can take place. TGS needs to determine what the most appropriate way would be to interact, and this may differ between communities, in order to engage with the individuals and communities in a decolonised way. Once this is done, TGS can proceed with engaging with the communities as a whole in an appropriate way. Education is suggested as a mitigation measure to empower community members to make informed decisions where they are in a position to weigh up the pros and cons for themselves, as was requested by community members during the public meetings.
7. The Heritage Assessment recognition of intangible culture and rating of impact **The Heritage Report provides a detailed description and analysis of the cultural rights of the West Coast fisher communities. It argues that culture is more than just the tangible but is also**	As stated above, the recommendation of the SIA is that, if the project is approved a representative from TGS should consult with leadership of the community to determine how the communities should be consulted with in future – that is, what is the way the community members prefer to be consulted with for provision of commencement notification and/or daily updates to advise on

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
"shared beliefs, values, language, traditions, functionality, meaning and community connections". ***"Considering the various values and heritage significance as listed in section 3(3) of the NHRA, the cultural and living heritage associated with the communities and indigenous people along the southwestern and west coast of South Africa holds heritage significance. It is part of the national estate and holds importance as a way of life for small-scale fishers and Khoisan descendants alike. The physical and spiritual interaction with the ocean and the shorelines through millennia resulted in a maritimity that developed into the cultural fabric as they experience it today.*** ***The significance of such intangible and living cultural heritage features can potentially have a combined heritage grading of Grade II or even Grade I through further research".*** **Given the recognition of the significance of intangible and living cultural features, it is necessary for the project to consider the impacts on these heritages. By relying on the Social Impact Assessment recommendations, the Heritage Report reinforces the need to put this Draft BAR aside until such time as the recommended engagements with communities have been undertaken and it is possible to ensure that they are in to mitigate the impacts on their cultural heritage. In the interim, the uncertainty about the social impacts and risks described in the SIA demand a precautionary approach that does not go ahead until these necessary socio-cultural processes can be confirmed.**	survey schedules. This is only one of a number of community engagements that is recommended by the SIA. Efficient engagement with a community involves more than merely setting up a meeting and inviting people. In many communities there is an expectation that outsiders should enter the community via the leadership before a community meeting can take place. TGS needs to determine what the most appropriate way would be to interact, and this may differ between communities, in order to engage with the individuals and communities in a decolonised way. Once this is done, TGS can proceed with engaging with the communities as a whole in an appropriate way. Education is suggested as a mitigation measure to empower community members to make informed decisions where they are in a position to weigh up the pros and cons for themselves, as was requested by community members during the public meetings. As per Section 9.2 of the Cultural Heritage Assessment, it was concluded that: *"The scientific studies conducted for this project identified impacts on fishing stock as low for all species. By inference, a potential impact on fishing yield could be expected and thus potential economic impact on communities due to reduced caught fish volumes. The recommended mitigation measures, as listed in the specialist reports for the project, focus on the reduction of impacts on fish species and the projected reduction of the impact on the commercial and small-scale fishery catch yield. These mitigation measures should then indirectly positively impact the potential negative impacts on the cultural heritage of the communities to be impacted.* *A pre-mitigation negative impact on a regional scale over the long term with a moderate intensity is predicted due to the potential indirect impact on the communities and, ultimately, their heritage, with a high probability of this impact occurring. The pre-mitigation impact on heritage resources is rated as MEDIUM. The potential residual impact on heritage resources, with mitigation measures from the scientific studies, is projected as LOW with a medium confidence factor.* *Considering the assessment based on the findings of the fieldwork as well as the scientific studies relating to the impact on fisheries, the specialist is of the opinion that the impact of the proposed project on the cultural heritage resources can be mitigated through the implementation of the recommendations in this report."* Additionally, when considering the impact of the project on livelihoods, the Social Impact Assessment (Appendix 3 of the BAR), Section 8.3.4 concluded that: *"Livelihoods are already compromised due to the fishing quota system, over-fishing, lack of employment opportunities, pollution, effects of climate change and the recent Covid 19 pandemic.*

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	However, with reference to the assessment of the impacts on the catch rates from the fisheries assessment undertaken by CapMarine (2022), the impact on livelihoods is not because of the actual impact on catch rates, but because of the perceived impact of the oil/gas industry on fishing industry." Furthermore, Section 9 of the Social Impact Assessment concluded that: *"From a social perspective it is clear that the communities and majority of local people are opposed to the project. If the project is considered in isolation, the impacts are negligible. However, the project does not happen in a vacuum, and the social environment is much wider than the footprint of the project. If the social risks and potential damage to cultural and indigenous rights are considered the impact on the social fabric of already vulnerable communities may be significant. At this stage communities feel that they cannot make informed decisions. Although all legal processes have been followed, the seismic survey industry is not moving at the pace of the community, and in the long run this will be detrimental to the industry. Potential future benefits and the economic development of the country should the surveys find any significant resources are not disputed. From a social perspective it is recommended that the project proceed subject to the mitigation measures (i.e. meaningful consultation, local research, education, and awareness raising in the project-affected communities) forming part of the conditions for authorisation and being implemented prior to the commencement of the actual survey."*
Given these critical issues that speak to the impact of the activities on the human rights of small-scale fishers and coastal communities have yet to be properly addressed, this submission argues for a precautionary approach that withdraws this application until these recommendations are adequately fulfilled.	Please refer to Section 8.3.2 (Further marginalisation of vulnerable groups) of the SIA which details the aspects related to the human rights of the coastal communities, small scale fishers and the traditional people.

Sincerely,

EIMS Public Participation Team

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

25 November, 2022

Our Ref: GPK/as/1520

Your Ref: 12/1/2/71

Municipal Manager
Saldanha Bay Municipality
Private Bag X12, Vredenburg, 7380

Dear Ms Duarte

RE: PROPOSED TGS SEISMIC SURVEY BASIC ASSESSMENT PROJECT, LOCATED OFFSHORE EXTENDING FROM APPROXIMATELY 120 KM OFFSHORE OF ST HELENA BAY TO 230 KM OFFSHORE OF HONDEKLIP BAY, OFF THE WEST COAST, SOUTH AFRICA

EIMS hereby confirms receipt of the comments by the Saldanha Bay Municipality (SBM) on 14 November 2022. Please refer to the table below for clarification in response to each comment received.

Item No.	Comment/ Recommendation	Response
1.	The Proposed TGS Seismic Survey Basic Assessment Project, located offshore extending from approximately 120 Km Offshore of St Helena Bay to 230 Km offshore of Hondeklip Bay, off the West Coast, South Africa dated 24 October 2022 refers.	Comment noted. Thank you for your comment.
2.	Although the majority of living heritage ought to endure in the face of development, because it is intangible, marginalized communities such as the Peninsular Khoikhoi already face hardships making them especially vulnerable to the addition of a new economic force. If local traditions, practices and customs were abandoned or forced out in favour of non-local ones, unacceptable change would result.	Thank you for your comment. A Heritage Impact Assessment was undertaken and specifically addressed the impact of intangible heritage for amongst others, the Khoi communities. It was concluded that: *"The scientific studies conducted for this project identified impacts on fishing stock as low for all species. By inference, a potential impact on fishing yield could be expected and thus potential economic impact on communities due to reduced caught fish volumes. The recommended mitigation measures, as listed in the specialist reports for the project, focus on the reduction of impacts on fish species and the projected reduction of the impact on the commercial and small-scale fishery catch yield. These mitigation measures should then indirectly positively impact the potential negative impacts on the cultural heritage of the communities to be impacted.* *A pre-mitigation negative impact on a regional scale over the long term with a moderate intensity is predicted due to the potential indirect impact on the communities and, ultimately, their heritage, with a*

8 Dalmeny Road, Pine Park, 2194 | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | F (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Item No.	Comment/ Recommendation	Response
		high probability of this impact occurring. The pre-mitigation impact on heritage resources is rated as MEDIUM. The potential residual impact on heritage resources, with mitigation measures from the scientific studies, is projected as LOW with a medium confidence factor. *Considering the assessment based on the findings of the fieldwork as well as the scientific studies relating to the impact on fisheries, the specialist is of the opinion that the impact of the proposed project on the cultural heritage resources can be mitigated through the implementation of the recommendations in this report."* Additionally, a Social Impact Assessment was undertaken and specifically addressed the impact of further marginalisation of vulnerable groups which included the Khoi communities. It was concluded that: *"From a social perspective it is clear that the communities and majority of local people are opposed to the project. If the project is considered in isolation, the impacts are negligible. However, the project does not happen in a vacuum, and the social environment is much wider than the footprint of the project. If the social risks and potential damage to cultural and indigenous rights are considered the impact on the social fabric of already vulnerable communities may be significant. At this stage communities feel that they cannot make informed decisions. Although all legal processes have been followed, the seismic survey industry is not moving at the pace of the community, and in the long run this will be detrimental to the industry. Potential future benefits and the economic development of the country should the surveys find any significant resources are not disputed. From a social perspective it is recommended that the project proceed subject to the mitigation measures (i.e. meaningful consultation, local research, education, and awareness raising in the project-affected communities) forming part of the conditions for authorisation and being implemented prior to the commencement of the actual survey."*
3.	Ballast water discharge from ships is a major concern for the environment, public health and the economy as ships can act as a vehicle for the transfer and spread of dangerous invasive aquatic	Thank you for your comment. The impacts of marine biodiversity through the introduction of non-native species in ballast water and on ship hulls was specifically assessed and the impact was rated as having a low significance (see Section 9.3.1.2.3 Ballast Water Discharges and Hull Fouling). The

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Item No.	Comment/ Recommendation	Response
	species. Untreated ballast water could have a negative impact on Marine Protected Areas.	following mitigation measures have been recommended in order to further reduce the potential impact of ballast water on the receiving environment: • Avoid the unnecessary discharge of ballast water. • Use filtration procedures during loading in order to avoid the uptake of potentially harmful aquatic organisms, pathogens and sediment that may contain such organisms. • Ensure that routine cleaning of ballast tanks to remove sediments is carried out, where practicable, in mid-ocean or under controlled arrangements in port or dry dock, in accordance with the provisions of the ship's Ballast Water Management Plan. • Ensure all infrastructure (e.g. arrays, streamers, tail buoys etc) that has been used in other regions is thoroughly cleaned prior to deployment.
4.	Although underwater noise caused by the project does disturb fish behaviour on a minor scale, the revenue received by local fisheries will not be affected as seismic acquisition happens outside of main fishing areas. As indicated in the draft report, it is advised against conducting the survey in June and July, when fishing activity for the region's large pelagic longline sector is at its peak.	Comment noted. Thank you for your comment.
5.	Further comments will be provided should Saldanha be identified as the onshore support base.	Comment noted. Thank you for your comment. The base of operations has not been confirmed, but it is likely to be Cape Town or Saldanha. Further consultation with the key stakeholders has been proposed should the activity receive authorisation. However, should there be significant risks that need to be considered as part of this assessment, kindly provide these to us by the comment deadline.

EIMS would like to thank you for your participation in this Public Participation Process. Please do not hesitate to contact EIMS should you have any further queries or concerns.

Sincerely,

Andisiwe Xuma

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

20 October, 2022

Our ref: GPK/as/1520

Ms Thandeka Mbambo
Department of Forestry, Fisheries and the Environment, Oceans and Coast,
2 East Pier Building,
East Pier Road,
Victoria and Alfred Waterfront,
Cape Town, 8001

Dear Madam

RESPONSE TO COMMENTS ON THE BACKGROUND INFORMATION DOCUMENT FOR THE ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS ORANGE BASIN SEISMIC RECONNAISSANCE BASIC ASSESSMENT PROCESS

EIMS hereby confirms receipt of the comments by DFEEE Oceans and Coasts on 01 September 2022. The recommendations provided are appreciated and will be taken into consideration during the Basic Assessment Process Please refer to the table below for clarification in response to each comment received.

Item No.	DFFE Comment/ Recommendation	Response
1.	The Branch O&C will provide detailed comments and recommendations based on the assessment of the adequacy of proposed mitigation measures in the Marine Ecology Impact Assessment, Social Assessment, Acoustic Assessment; and Fisheries Impact Assessment is conducted and more information relating to the anticipated impacts has been made available.	The draft Basic Assessment Report which includes the specified specialist reports will be made available in the next few weeks. Comments and recommendations from Oceans and Coasts will be greatly appreciated.
2.1	The background information document specifies that the TGS proposes to undertake a 3D seismic survey off the West Coast of South Africa. The proposed project area is located approximately 120 km offshore of St Helena Bay, extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay over several petroleum license blocks. The proposed exploration area supports a rich diversity of marine life including sensitive benthic habitats/species, plankton, fish and shark, turtles, seabirds, and marine mammals (including whales, dolphins, and seals) which could be adversely affected by this development.	It is noted that the project area falls in a sensitive marine environment. The specialists have been tasked with the responsibility to identify and assess the impact of the proposed project on the receiving environment, including all sensitivities and these will be detailed in their individual reports.
2.2	Consequently, impacts on marine ecology-potential disturbance of fauna (invertebrates (strandings and/or oiling of seabirds), fish, mammals, seabirds, and turtles), noise (masking of environmental	The scope of the Marine Ecology Assessment includes an assessment of the impacts on marine

8 Dalmeny Road, Pine Park, 2194 | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | **F** (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | **F** (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Item No.	DFFE Comment/ Recommendation	Response
	sounds and communication for marine fauna), shipping activities, fishing activities, tourism, disturbance, and socio-economic impact on fisheries are anticipated. However, an Aquatic Biodiversity Impact Assessment Study has not been identified as part of the scope of specialist studies to be conducted as part of the Basic Assessment Process.	fauna thus no additional study/report will be conducted.
2.3	A combination of environmental concerns relating to the proposed exploration surveying and activities relating to the drilling seabed necessitates that the merits of each proposal be carefully weighed against the externalities to inform whether this proposal is socially responsible, economically justifiable, and ecologically sustainable. This Branch further recommends the inclusion of an Aquatic Biodiversity Impact Assessment Study to assess the potential impact on aquatic biodiversity.	The current application is for reconnaissance rather than exploration, thus there will be no drilling of the seabed. The survey will be limited to use of sound pulses at frequent intervals in order to capture the geological composition of the application area. The impact of this proposed activity on the marine aquatic environment and species will be assessed.
2.4	The Branch O&C will comment on the adequacy of assessment and specialist results and recommendations as part of the subsequent public participation process when these studies have been undertaken and information made available.	Thank you for your comment. Comments will be taken into consideration and addressed accordingly.
2.5	The report specifies that a single survey vessel equipped with seismic sources and streamers may be used. The proposed 3D survey would be supported by up to 2 escort vessels. Therefore, the impacts of noise and vibration are anticipated. This Branch will provide further comments adequacy of assessment of the Acoustic Impact Study as part of the subsequent public participation process when this study has been undertaken and information made available.	Thank you for your comment. Comments will be taken into consideration and addressed accordingly.
2.6	The Branch O&C further recommends the inclusion of a section when assessing the potential impacts of light emissions from vessels and operations, on seabirds.	Thank you for the recommendation, the impact of light emissions from vessels and operations, on seabirds will be assessed with visual impact.
2.7	Maintaining or enhancing sustainable livelihoods and the intensity of the assets on which livelihoods depend is at the heart of sustainable development and integrated management. The scope of proposed activities could have an impact on commercial fisheries that operate in the area through the reduction in catch rates and/or an increase in fishing efforts. The Branch O&C further recommends the further assessment of all potential	The impact on the various fishing sectors will be assessed as part of the Fisheries impact Assessment, which will include an assessment of the potential release of fuel (diesel) during the operational phase of the reconnaissance activities. Suitable mitigation measures will be proposed.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Item No.	DFFE Comment/ Recommendation	Response
	long-term, cumulative, and unintended impacts of oil spills on commercial and small-scale fisheries, including recommending mitigation measures to ensure these that impacts are, mitigated, minimise, or avoided.	
2.8	Past assessment of similar applications has revealed that there is inadequate consideration of cumulative impacts. The scope of cumulative impacts is often limited to direct impacts (project-related activities) and the scope often fails to consider long-term, unintended impacts resulting from similar activities within one area of interest (other seismic surveys/exploration drilling expeditions, oil, and gas activities). The aspect that is often unacknowledged is that all the anticipated impacts of the drilling, sampling, and/or surveying, are taking place together at the same locations. The Branch O&C would like the assessment reviewer and appointed specialist to take cogniscance of this and report on the significance of these impacts in the next report.	Noted, this assessment will be included in the draft BAR.
2.9	The Branch O&C requests to be registered as an I&AP and will provide detailed comments and recommendations during the next public process when specialist studies have been conducted and more information is available.	The Branch O&C has been added to the I&AP database for this project and will be notified when the draft BAR becomes available.

EIMS would like to thank you for your participation in this Public Participation Process. Please do not hesitate to contact EIMS should you have any further queries or concerns.

Sincerely,

Andisiwe Xuma

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

6 December, 2022

Our ref: GPK/as/1520

Ms Mellisa Groenink

Dear Madam

RESPONSE TO COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED TGS 3D SEISMIC SURVEY PROJECT REQUIRING A RECONNAISSANCE PERMIT IN THE ORANGE BASIN, EXTENDING FROM APPROXIMATELY 120KM OFFSHORE OF ST HELENA BAY TO 230KM OFFSHORE OF HONDEKLIP BAY, OFF THE WEST COAST OF SOUTH AFRICA (PASA REF: 12/1/040)

EIMS acknowledges receipt of your comments on 25 November 2022. Please refer to the table below for responses to the comments raised.

Comment	Response
A. INTRODUCTION 1. These comments are submitted on behalf of the Green Connection and Natural Justice. 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. Natural Justice: Lawyers for Communities and the Environment is a non-profit organization specializing 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 natural resources. 3. The comments relate to the draft Basic Assessment Report (BAR) prepared as part of the Environmental Impact Assessment (EIA) process being undertaken in respect of an application for authorisation by TGS Geophysical Company UK (TGS) to undertake a 3D seismic survey over multiple blocks off the West Coast of South	Comment noted.

8 Dalmeny Road, Pine Park, 2194 | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | **F** (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | **F** (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
Africa. 4. The proposed project area is located between approximately 120 km offshore of St Helena Bay, extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay over a number of petroleum licence blocks. The application area for the proposed 3D seismic survey is approximately 57 400 km2 in extent. TGS proposes that a single survey vessel equipped with seismic sources and streamers be used. The proposed 3D survey would be supported by two escort vessels. It is estimated that the 3D survey will take 70 days (including downtime).	
B. PASA'S ACCEPTANCE OF TGS'S RECONNAISSANCE PERMIT APPLICATION WAS UNLAWFUL; NO STATUTORY BASIS FOR SPECULATIVE MULTI-CLIENT SEISMIC SURVEYS 5. The Green Connection and Natural Justice submit that the acceptance of TGS's reconnaissance permit application in circumstances where exploration rights are held by another person/s over the area, is unlawful. 6. Based on available information, PASA accepted TGS's reconnaissance permit application on or about 15 December 2021 (although reference is made in the draft BAR to an Acceptance Letter for reconnaissance permit (Ref: 12/1/040 dated 15 December 2022), with subsequent extension letters dated 10 February 2022 and 19 May 2022 – it is assumed that the reference to 15 December 2022 is a typographical error). 7. In terms of s74 of the Mineral and Petroleum Resources Development Act (MPRDA), 'any person' who wishes to apply to the Minister for a reconnaissance permit must lodge the application as indicated in subsection (1)(a) to (c), and PASA must within 14 days accept an application for a reconnaissance permit if, among other things, 'no other person holds a technical co-operation permit, exploration right or production right for petroleum over any part of the area'(emphasis added). If the application does not comply with the requirements of this section, the designated agency must notify the applicant in writing within 14 days of the receipt of the application and provide reasons. 8. In the Searcher judgement referred to below, Thulare J interpreted the meaning of the wording in s75(1)(c) of the MPRDA. While dealing with the issuing of (rather than acceptance of and application for) a reconnaissance permit, the wording of s75(1) is similar to the wording used in s74(2): s75(1) provides that the Minister must issue a reconnaissance permit if the provisions of s75(1)(c) are met, namely that the reconnaissance will not result in unacceptable pollution, ecological	The applicant was issued an Acceptance Letter in terms of Section 74(2) of the Minerals and Petroleum Resources Development Act (MPRDA), by the Petroleum Agency SA (PASA). The application for EA was initiated based on this acceptance letter. Your concern regarding PASA's ability to accept the application has been noted and is herewith submitted to the decision maker for consideration. The Applicant has applied for an EA which will be duly assessed prior to authorisation. Section 75(4) if the MPRDA, specifically states that a Reconnaissance Permit is not an exclusive right.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
degradation or damage to the environment and that an environmental authorisation is granted. Thulare J explained what is required as follows: *There must be evidence that the proposed reconnaissance will not result in unacceptable pollution, ecological degradation or damage to the environment, an environmental authorization is mandatory and the Minister would act unlawfully in granting a reconnaissance permit where section 75(1)(c) was not satisfied.* 9. Applying the reasoning of Thulare J to section 74(2) of the MPRDA, it follows that there must be evidence that no other person holds an exploration right for petroleum over any part of the area, and that PASA would be acting unlawfully if it accepted a reconnaissance permit application where section 74(2)(b) was not satisfied. 10. It is noted that the draft BAR states that the reconnaissance permit project area extends over the following petroleum license blocks: Petroleum Licence Blocks Covered by Application Area: The following licence blocks are covered by the application area: • 12/3/274 ER; • 12/3/343 ER; • 12/3/339 ER; • 12/3/248 ER; and • Open area. 11. This clearly indicates that four exploration rights have been granted in respect of three of the Petroleum License Blocks covered by the application area, with the balance being open areas. These four exploration rights are held by other persons, not TGS. 12. Applying the reasoning of Thulare J to s74(2), it is submitted that PASA acted unlawfully in accepting TGS's reconnaissance permit application (given that other persons hold exploration rights for petroleum over a substantial part of the application area). 13. The Green Connection and Natural Justice submit further that there is no statutory basis in the MPRDA for the granting of reconnaissance permits to seismic survey companies to conduct speculative multi-client seismic surveys in Blocks where exploration rights are held by other persons, and that the Minister would be acting ultra vires the enabling provisions of the MPRDA should he grant a reconnaissance permit to TGS. 14. The absence of enabling provisions in the MPRDA relating to non-exclusive multi-client speculative surveys is highlighted by proposed new enabling provisions included in the Upstream Petroleum Resources Development Bill (which has not yet been enacted and thus does not have the force of law). For example: • In terms of section 10(b) of the Bill,	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
PASA must formulate [an] exploration strategy that includes acquisition of seismic data through non-exclusive multiclient speculative surveys in frontier or under explored areas ahead of licensing rounds; • Section 16(1) of the Bill provides that the Minister may, by notice in the Gazette, invite applications for a reconnaissance permit from seismic companies to acquire data on a non-exclusive multi-client speculative business model in respect of a block or blocks, or in respect of a wide regional area comprising multiple blocks or areas as specified in the notice. Section 16(2) specifically provides that such a notice may be in relation to multiple blocks or areas which are encumbered by (among other things) exploration rights for purposes of enabling the State to assess the geological potential and establish prospectivity of a wider regional area. Section 16(4) empowers the Minister to grant a reconnaissance permit over an area encumbered by (among other things) exploration rights subject to various conditions. Section 16(5) provides further that, notwithstanding the provisions of subsection 16(1), applications for reconnaissance permits may be lodged in terms of section 34 in the prescribed manner with the Petroleum Agency at any time; • Furthermore, section 38(2)(b) of the Bill provides that PASA must accept an application for a reconnaissance permit if (among other things) no other person holds an exploration right over the same block or blocks. Section 38(3) of the Bill provides that PASA may accept an application for a reconnaissance permit over any part of an area subject to (among other things) an exploration right, subject to the applicant furnishing written consent from the holder of the exploration right giving PASA consent to accept and process the application, while section 38(4) provides that notwithstanding the provisions of subsections (2)(b) and (3), PASA may accept and process an application for a reconnaissance permit over an area encumbered by a permit or a right if the proposed seismic data acquisition will promote and facility the acquisition of	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
petroleum geo-technical data as contemplated in section 2(l). 15. In summary, the Green Connection and Natural Justice submit that the acceptance of TGS's reconnaissance permit application, in circumstances where exploration rights are held by another person/s over the area, is unlawful. The Green Connection and Natural Justice submit further that there is no statutory basis in the MPRDA for the granting of reconnaissance permits to seismic survey companies to conduct speculative multi-client seismic surveys, and that the Minister would be acting ultra vires the enabling provisions of the MPRDA should he grant a reconnaissance permit to TGS.	
C. NEED AND DESIRABILITY 2 16. The NEMA EIA Regulations stipulate that a basic assessment report must include a motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred location. 17. Section 5 of the draft BAR includes a motivation of need and desirability for the proposed 3D seismic survey. Unsurprisingly, the BAR focusses on justifying the 'need and desirability' of the proposed project, and fails to reflect views critical to 3D seismic surveys and offshore oil and gas exploration (and ultimately production). As a consequence, the 'need and desirability' assessment provided in the draft BAR follows the pattern of previous seismic survey EIAs by (among other things) limiting the assessment of potential impacts to the proposed 3D seismic survey, with no assessment of the need and desirability of exploring for (and ultimately producing and using) new oil and gas reserves (including in the context of the climate change crisis and the right to food). The assessment also includes a section motivating the 'need' for seismic data. 18. It is noted that the draft BAR Needs and Desirability analysis indicates that the proposed project 'aims to identify oil and gas resources to be used in... energy production and/or processing or manufacturing of materials'. It is stated further that '[a]s a result of the fact that this project entails only survey activities, it is anticipated that this project will not lead to a significant impact on the receiving environment'. In line with this,	EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant. Any subsequent authorisation would be restricted to these specifically assessed activities. Should the applicant or other applicants wish to undertake any additional exploration activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a consequent need to apply for the relevant permissions. These would include a formal application for an Exploration or Production Right as well as a new EA. The impacts of such proposed activities would consequently require specific assessment and public consultation prior to approval. It is premature to assess the likely impacts of further invasive exploration activities or production activities as the extent, duration, location, and magnitude applicable to these activities are unknown at this stage. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, and production activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed on their merits as and when they are proposed. Please refer to Section 5 of the BA Report in regard to the need and desirability for the proposed activities. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's energy planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
the draft BAR does not consider or assess the potential impacts of subsequent oil and gas exploration, production and use. Climate change 19. The draft BAR states that from a climate change perspective, it is 'not currently possible to accurately assess the risks associated with oil and gas activities, given that the specific details of these potential future activities are not known and therefore climate change impacts would need to be assessed in detail during any subsequent Scoping and EIA processes for any potential subsequent oil and gas production projects'. As a result. the BAR does not conduct any climate change impact assessment, even in broad terms. 20. It is relevant to note that the issue of whether the decision-maker properly considered climate change impacts was referred to in the judgment of the full bench of the Makhanda High Court in the Shell Wild Coast seismic survey case. The court stated in its judgement that the intervening parties' contention that the decision-maker gave no proper consideration to climate change impacts of the decision to grant the exploration right is an important factor to be considered in the process of granting an exploration right. The court referred to expert testimony relied upon to support this contention, which showed that 'most of the discovered reserves of oil and gas cannot be burnt if we are to stay on the pathway to keep global average temperature increases below 1.5 degrees Celsius. Authorising new oil and gas exploration, with its goal of finding exploitable oil and/or gas reserves and consequently leading to production, is not consistent with South Africa complying with its international climate change commitments'. 21. The court noted that according to the respondents in the case, climate change considerations are irrelevant when considering an application for an exploration right, and these considerations are premature because they fall to be considered at a much later stage. 22. The court pointed out that on the authority of the Save the Vaal case, the 'processes are discrete stages in a single process that culminates in the production and combustion of oil and gas, and the	Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial in our view that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined. There are no significant GHG emissions directly related to the proposed activity nor significant climate change vulnerability risks. Also noted is that TGS is a seismic data acquisition company and is in the business of data acquisition, and are not an Oil & Gas Exploration or Production company. Data from TGS' seismic libraries are not only used for petroleum and natural gas exploration and development, data may also be used for development of offshore wind, geothermal energy, low-carbon solutions such as carbon capture and storage and also more generally for providing more insight and understanding into the regional geology of the area for scientific purposes. The Earthlife Africa case referred to relates to the EA issued to construct and operate a new coal fired power station which bears no resemblance to seismic survey data acquisition. It is agreed that pending the outcome of an appraisal on the viability of extracting any oil or gas resource, which this seismic survey is likely to inform, due caution will need to be taken to avoid overcommitments and stranded assets.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
emission of greenhouse gases that will exacerbate the climate crisis and impact communities' livelihoods and access to food'. The court went on to state that the respondent's thesis does not find support in Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others either, and referred approvingly to the following passage in Murphy J's judgement: The absence of express provision in the statute requiring a climate change impact assessment does not entail that there is no legal duty to consider climate change as a relevant consideration and does not answer the interpretative question of whether such a duty exists in administrative law. Allowing for the respondents' argument that no empowering vision in NEMA or the regulations explicitly prescribes a mandatory procedure or condition to conduct a formal climate change assessment, the climate change impacts are undoubtedly a relevant consideration as contemplated by section 24O of NEMA for the reasons already discussed. A formal expert report on climate change impacts will be the best evidentiary means of establishing that this relevant factor in its multifaceted dimensions was indeed considered, while the absence of one will be symptomatic of the fact that it was not. 23. The court in the Shell Wild Coast seismic survey case went on to state the following: It seems clear from the aforegoing, even taking into account the contentions raised by the respondents, that, had the decision-maker had the benefit of considering a comprehensive assessment of the need and desirability of exploring for new oil and gas reserves for climate change and the right to food perspective, the decision-maker may well have concluded that the exploration is neither needed nor desirable. (emphasis added) 24. The Green Connection and Natural Justice submit that the draft BAR is deficient, and the Needs and Desirability analysis incomplete, without at the very least a broad assessment of the climate change impacts should commercially exploitable oil and gas resources be identified through the proposed seismic survey (and should these resources be produced and utilised). It would be pointless to authorise this (and other) 3D seismic surveys should such an assessment conclude that	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
the development of new oil and gas fields is incompatible with South Africa's climate change commitments. The 'climate crisis' 25. The need and desirability (from a climate change perspective) of conducting a 3D seismic survey (which – as mentioned above – the BAR aims to identify oil and gas resources to be used in energy production and/or processing or manufacturing of materials) is particularly important given that climate change has been acknowledged as a 'crisis' with human-induced climate change impacts being experienced in every region. It is also recognised that the climate change 'crisis' requires immediate, rapid and large-scale reductions in greenhouse gas (GHG) emissions to limit global warming to 1.5°C (including accelerated action in this decade to reduce global carbon dioxide emissions by 45 per cent by 2030 relative to the 2010 level and to net-zero around mid-century). In support of these submissions, some of the recent developments relating to the climate crisis are discussed briefly below. 26. In August 2021, the Intergovernmental Panel on Climate Change (IPCC) (an international body for assessing the science related to climate change) released its 6th Assessment Report (AR6). In its summary for policymakers, the IPCC indicates (among other things) that: It is unequivocal that human influence has warmed the atmosphere, ocean and land, and that widespread and rapid changes in the atmosphere, ocean, cryosphere and biosphere have occurred; The scale of recent changes across the climate system as a whole – and the present state of many aspects of the climate system – are unprecedented over many centuries to many thousands of years; Human-induced climate change is already affecting many weather and climate extremes in every region across the globe. Evidence of observed changes in extremes such as heatwaves, heavy precipitation, droughts, and tropical cyclones, and, in particular, their attribution to human influence, has strengthened since AR5; Global surface temperature will continue to increase until at least mid-century under all emissions scenarios	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
considered, and that global warming of 1.5°C and 2°C will be exceeded during the 21st century unless deep reductions in CO2 and other GHG emissions occur in the coming decades; Many changes in the climate system become larger in direct relation to increasing global warming. They include increases in the frequency and intensity of hot extremes, marine heatwaves, heavy precipitation, and, in some regions, agricultural and ecological droughts; an increase in the proportion of intense tropical cyclones; and reductions in Arctic sea ice, snow cover and permafrost; Continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation and the severity of wet and dry events; Many changes due to past and future GHG emissions are irreversible for centuries to millennia, especially changes in the ocean, ice sheets and global sea level; From a physical science perspective, limiting human-induced global warming to a specific level requires limiting cumulative CO2 emissions, reaching at least net zero CO2 emissions, along with strong reductions in other GHG emissions. Strong, rapid and sustained reductions in CH4 emissions would also limit the warming effect resulting from declining aerosol pollution and would improve air quality. 27. On 9 August 2021, the IPCC issued a press release relating to its AR6 report. It states that the report provides new estimates of the chances of crossing the global warming level of 1.5°C in the next decades, and finds that unless there are immediate, rapid and large-scale reductions in GHG emissions, limiting warming to close to 1.5°C or even 2°C will be beyond reach. 28. Also on 9 August 2021, UN Secretary-General António Guterres described the AR6 report as nothing less than "a code red for humanity. The alarm bells are deafening, and the evidence is irrefutable". (emphasis added) 29. Guterres is reported as noting that the internationally agreed threshold of 1.5 degrees above pre-industrial levels of global heating was perilously close, and that we are at imminent risk of hitting this threshold in the near term. Guterres is indicated as advising that the only way	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
to prevent exceeding this threshold, is by urgently stepping up our efforts, and pursuing the most ambitious path. Guterres is reported as stating that solutions are clear: "Inclusive and green economies, prosperity, cleaner air and better health are possible for all, if we respond to this crisis with solidarity and courage". Ahead of the COP26 climate conference in Glasgow in November 2021, Guterres stated that all nations needed to join the net zero emissions coalition, and reinforce their promises on slowing down and reversing global heating "with credible, concrete, and enhanced Nationally Determined Contributions (NDCs)" that lay out detailed steps. 30. In April 2022, Guterres tweeted that '[c]limate activists are sometimes depicted as dangerous radicals. But the truly dangerous radicals are the countries that are increasing the production of fossil fuels. Investing in new fossil fuels infrastructure is moral and economic madness'. Addressing graduate students in May 2022, Guterres expressed the view that investing in fossil fuels is now "a dead end - economically and environmentally. No amount of greenwashing or spin can change that. So, we must put them on notice: Accountability is coming for those who liquidate our future." 31. The 26th Conference of the Parties of the UNFCCC (COP26) was held in Glasgow in the last quarter of 2021. Recognition of the climate 'crisis', as well as the urgent need to increase effort and to accelerate action to address climate change (including by developing nations), are reflected in the outcome of COP26 and recorded in the Glasgow Climate Pact. The Glasgow Climate Pact (among other things): Expresses alarm and utmost concern that human activities have caused around 1.1°C of global warming to date and that impacts are already being felt in every region; Reaffirms the long-term global goal to hold the increase in the global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change; Recognizes that the impacts of climate change will be much lower at the temperature increase of 1.5°C	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
compared with 2°C and resolves to pursue efforts to limit the temperature increase to 1.5°C; Recognizes that limiting global warming to 1.5°C requires rapid, deep and sustained reductions in global GHG emissions, including reducing global carbon dioxide emissions by 45 per cent by 2030 relative to the 2010 level and to net zero around mid-century as well as deep reductions in other GHGs; Also recognizes that this requires accelerated action in this critical decade, on the basis of the best available scientific knowledge and equity, reflecting common but differentiated responsibilities and respective capabilities and in the context of sustainable development and efforts to eradicate poverty; Invites Parties to consider further actions to reduce by 2030 non-carbon dioxide GHG emissions, including methane which has been identified as a driver of climate change and the main polluting emission from natural gas; Calls upon Parties to accelerate the development, deployment and dissemination of technologies, and the adoption of policies, to transition towards low-emission energy systems, including by rapidly scaling up the deployment of clean power generation and energy efficiency measures, including accelerating efforts towards the phasedown of unabated coal power and phase-out of inefficient fossil fuel subsidies, while providing targeted support to the poorest and most vulnerable in line with national circumstances and recognizing the need for support towards a just transition; Emphasizes the importance of protecting, conserving and restoring nature and ecosystems, including forests and other terrestrial and marine ecosystems, to achieve the long-term global goal of the Convention by acting as sinks and reservoirs of GHGs and protecting biodiversity, while ensuring social and environmental safeguards. 32. The climate 'crisis' is also recognised by the International Energy Agency (IEA), of which South Africa is an IEA associated country. During or about July 2021, the IEA published its Net Zero by 2050 – A Roadmap for the Global Energy Sector report. In the foreword to this report, the Executive Director of the IEA states (among	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
other things) as follows: We are approaching a decisive moment for international efforts to tackle the climate crisis - a great challenge of our times. The number of countries that have pledged to reach net - zero emissions by mid - century or soon after continues to grow, but so do global greenhouse gas emissions. This gap between rhetoric and action needs to close if we are to have a fighting chance of reaching net zero by 2050 and limiting the rise in global temperatures to 1.5 °C. Doing so requires nothing short of a total transformation of the energy systems that underpin our economies... Despite the current gap between rhetoric and reality on emissions, our Roadmap shows that there are still pathways to reach net zero by 2050. The one on which we focus is - in our analysis - the most technically feasible, cost - effective and socially acceptable. Even so, that pathway remains narrow and extremely challenging, requiring all stakeholders – governments, businesses, investors and citizens – to take action this year and every year after so that the goal does not slip out of reach. This report sets out clear milestones – more than 400 in total, spanning all sectors and technologies – for what needs to happen, and when, to transform the global economy from one dominated by fossil fuels into one powered predominantly by renewable energy like solar and wind. Our pathway requires vast amounts of investment, innovation, skilful policy design and implementation, technology deployment, infrastructure building, international co - operation and efforts across many other areas. Since the IEA's founding in 1974, one of its core missions has been to promote secure and affordable energy supplies to foster economic growth. This has remained a key concern of our Roadmap, drawing on special analysis carried out with the International Monetary Fund and the International Institute for Applied Systems Analysis. It shows that the enormous challenge of transforming our energy systems is also a huge opportunity for our economies, with the potential to create millions of new jobs and boost economic growth.	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
Another guiding principle of the Roadmap is that clean energy transitions must be fair and inclusive, leaving nobody behind. We have to ensure that developing economies receive the financing and technological know - how they need to continue building their energy systems to meet the needs of their expanding populations and economies in a sustainable way. It is a moral imperative to bring electricity to the hundreds of millions of people who currently re deprived of access to it, the majority in of them in Africa... 33. On fossil fuels used in energy production, the report states that: There is no need for investment in new fossil fuel supply in our net zero pathway. Beyond projects already committed as of 2021, there are no new oil and gas fields approved for development in our pathway, and no new coal mines or mine extensions are required. 34. When natural gas is burned for energy, it releases carbon dioxide into the atmosphere. More importantly, the extraction, processing, transport and use of natural gas cause significant amounts of methane to be released into the atmosphere too. According to the United Nations, methane is a 84-86 times more potent greenhouse gas than carbon dioxide over a 20-year period, and 28-34 times more potent over 100-year period. More research is also showing that methane often leaks during the production, transport and use of natural gas. Therefore, its contribution to climate change is significantly unaccounted for. Drones, laser absorption spectroscopy, and satellites, among other new methane monitoring technologies, have improved the identification and quantification of emissions across the gas lifecycle, leading researchers to conclude that national governments have almost universally underestimated these emissions. 35. If 3,000 megawatts of new gas-to-power plants were built to meet South Africa's 2019 Integrated Resource Plan for Electricity, and the plants were fuelled by imported LNG, the annual emissions from this fuel use would be more than 2.5 million tonnes of CO2e (carbon dioxide equivalent) if the plants ran at 75% capacity. This is the equivalent of driving over half a million gasoline-powered vehicles for a year. For gas or any other fossil fuel, a life-cycle analysis is therefore necessary to	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
quantify the total amounts of GHG emissions (predominantly carbon dioxide and methane) that result from every step in the energy production process: from extracting the fossil fuel at the well or mine to burning it at a power plant or other facility. This is therefore important because all these processes are linked and should not be viewed in isolation. South Africa's international climate change commitments 36. South Africa is a Party to the United Nations Framework Convention on Climate Change (UNFCCC), which enjoins State Parties to take precautionary measures to anticipate, prevent or minimize the causes of climate change (Article 3.3). 37. South Africa, as a Party to the UNFCCC that ratified the Kyoto Protocol and adopted the Paris Agreement, has committed to 'working with others to ensure temperature increases are kept well below 2°C above pre-industrial levels, which could include a further revision of the temperature goal to below 1.5°C in light of emerging science' by reducing GHG emissions. South Africa has also committed (among other things) to: Preparing, communicating and maintaining Nationally Determined Contributions (NDCs) that it intends to achieve reach global peaking of GHG emissions as soon as possible, and to undertake rapid reductions thereafter; and Striving to formulate and communicate long-term GHG emission development strategies. 38. There have been various Conferences of the Parties and meetings since, with decisions related to Nationally Determined Contributions (NDCs) contained in decisions 4/CMA.1 and 18/CMA.1 and their annexes. 39. South Africa submitted its first Intended Nationally Determined Contribution under the Paris Agreement on 25 September 2015, which became the country's first NDC on 1 November 2016. Subsequently, South Africa revised its first NDC in 2021: South Africa's energy sector is estimated at contributing about 84% percent to the country's overall GHG	

Comment	Response
emissions (including Carbon Dioxide and Methane). 40. In February 2020, South Africa submitted to the UNFCCC its first long-term low GHG emission development strategy titled South Africa's Low Emission Development Strategy 2050. It is indicated in the executive summary of this strategy that South Africa, as one of the top 20 global GHG emitters and with a high dependency on fossil fuels, will need to make substantial emission cuts to contribute its fair share to global GHG emission reductions. 41. The draft BAR does not provide any indication (or estimation) of how future GHG emissions (resulting from future exploitation of oil and gas that may be discovered through the exploration drilling project) would impact on South Africa's ability to achieve its GHG emissions targets (as set out in South Africa's NDC) or its updated GHG emissions targets (as set out in South Africa's revised NDC). This is particularly relevant given that the emissions targets for the 2026-2030 period are lower than the targets for the 2021-2025 period, while offshore oil and gas developments could take at least a decade to reach the production stage. This could result in offshore oil and gas investments (as well as associated gas infrastructure developments) in the future becoming unneeded 'stranded assets' and a burden on future generations. There is also a risk that in the future tariffs will be levied on various goods exported by fossil-fuel dependent countries – the European Union is reported to be gradually phasing in its Border Adjustment Mechanism as part of the EU's Green Deal.	
Need for seismic data 42. Under the sub-heading 'Need for seismic data', the draft BAR states that a discussion of the needs and desirability of the project 'would not be complete without understanding the need for acquisition of the seismic data and possible oil and gas exploration and production that could potentially take place in the future as a result of the survey'. 43. Ironically, the draft BAR then quickly goes on to state that '[i]t cannot be said with absolute certainty that exploration drilling, let alone production activities, will be	Please refer to response to items 16-41. The main aim of the Needs and Desirability Section of the BA Report is to determine the need for the activity, and it is argued for that the survey is desirable given the current energy planning of the country, amongst other factors. It is agreed, considering the rapid technological advancements in the energy sector, that there is a need to continually reassess and revise where relevant the energy planning and policy for South Africa. Pending the outcome of an appraisal on the viability of extracting any oil or gas resource, which this seismic

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
undertaken in the future. As such, it is not currently possible to accurately assess the risks associated with these activities, given that the specific details of these potential future activities are not known. While it is acknowledged that the risks mentioned would need assessment, such assessment falls outside of the scope of the current application and would need to be assessed in detail during subsequent Scoping and EIA processes, should exploration drilling or production be proposed. The environmental consequences applicable to the planned survey activities have been identified and assessed in this BA Report'. The views of the Makhanda High Court in this regard (in the context of future production, climate change and the right to food) have been traversed earlier in the Green Connection and Natural Justice's comments (see paragraphs 27 to 30 above) and are not repeated here. The Green Connection and Natural Justice stands by their view that at the very least a broad assessment of the impacts and risks associated with future invasive exploration activities, production activities and use of any discovered oil reserves should be included in the BAR. 44. The draft BAR report then proceeds with a glowing (and one-sided) endorsement of the use of natural gas: The fastest growing sector for the use of natural gas is for the generation of electric power. Natural gas power plants usually generate electricity in gas turbines, directly using the hot exhaust gases from the combustion of the gas... Of the three fossil fuels used for electric power generation (coal, oil and natural gas), natural gas emits the least carbon dioxide per unit of energy produced. Natural gas emits 30% and 45% less carbon dioxide than burning oil and coal, respectively. Burning natural gas also releases lower amounts of nitrogen oxides, sulphur dioxide, particulates and mercury when compared to coal and oil. The increased use of natural gas can, in the short term, serve as a transition fuel on the path to the carbon-neutral goal of the Paris Agreement. In addition to gas as a key transitional fuel reducing reliance on coal, the benefits of oil and gas could include significant amount of job creation, especially if local beneficiation takes place. An increase in domestic natural gas reserves would	survey is likely to inform, due caution will need to be taken to avoid overcommitments and stranded assets associated with the timing of South Africa's prevailing climate change commitments. The potential for methane leaks during resource extraction, processing, and utilisation will need to be assessed as and when such is proposed.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
enable South Africa to take steps to secure the countries' energy supply (through diversification), assist in reducing the emissions of greenhouse gases (by reducing the country's reliance on coal for electricity generation) and reduce the need for the importation of gas. As such, exploration for additional domestic hydrocarbon reserves is considered important and supported by national policy, and any discoveries would be well received by the local market and are consistent with the objectives stated in the 2019 IRP. Natural gas emits 30% and 45% less carbon dioxide than burning oil and coal, respectively, and 65% less carbon dioxide than coal when the increased efficiency of Combined Cycle Gas Turbines versus coal fired power stations is considered. Eskom produces over 200MtCO2/yr, over 40% of South Africa's total. South Africa also has SASOL's Secunda coal to liquids plant, the biggest single source of CO2 in the world at 57MtCO2/yr (~12.5% of South Africa's total) to produce 160k barrels of products per day. Supplying these products from conventional oil production and refining would generate approximately 10% of those emissions, 5 to 6MtCO2/yr. According to the 2019 IRP the availability of gas in the short to medium term is a risk as South Africa does not currently have gas resources. There is also a supply and foreign exchange risk associated with likely increase in gas volumes depending on the energy mix adopted post 2030 when a large number of coal fired power stations are decommissioned. South Africa's economic growth is dependent on the availability of energy, ensuring a sustainable and reliable supply of electricity with sufficient capacity is a key aspect to growing the economy of South Africa in the future. The electricity shortages experienced in South Africa over the past decade are a contributing factor to the significant slowdown in economic growth rate. To enable economic growth within the target rate of between 6% and 8% to be achieved, it will be necessary for Government to continue increasing electricity generating capacity in the country. The use of natural gas for electricity generation is identified in national policy, together with renewable energy technologies, as an alternative in diversifying the domestic energy supply away from its current reliance on coal. Gas is identified in the draft Integrated Resources Plan as significant contributor to South Africa's energy mix in the period up to 2030. Availability of gas also	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
provides an opportunity to convert to Combined Cycle Gas Turbine and run open-cycle gas turbine plants at Ankerlig (Saldanha Bay), Gourikwa (Mossel Bay), Avon (Outside Durban) and Dedisa (Coega IDZ) on gas (IRP 2019). 45. Perhaps concerned that it is making the case that seismic surveys are indeed the 'thin edge of the wedge' that will lead to increased fossil fuel extraction, production and use (with associated climate change impacts), the draft BAR steps back from its natural gas endorsement to repeat the point that '[f]rom a climate change perspective, it is not currently possible to accurately assess the risks associated with oil and gas activities, given that the specific details of these potential future activities are not known and therefore climate change impacts would need to be assessed in detail during any subsequent Scoping and EIA processes for any potential subsequent oil and gas production projects'. 46. The draft BAR then proceeds to argue that: The feasibility of using natural gas for domestic power generation is considered to be dependent on the extent of available domestic reserves of natural gas, as well as the financial cost of importing natural gas should those reserves be insufficient. The acquisition of seismic survey data is therefore considered important with respect to understanding the potential for future oil and gas production as part of the energy mix of the country going forward and the need and desirability of the project is therefore supported from an energy security perspective. 47. Two recent independent studies (among others) challenge the view that fossil gas is necessary for electricity generation and as a transition fuel. 48. The International Institute for Sustainable Development's (IISD) Gas Pressure: Exploring the case for gas-fired power in South Africa (March 2022) report points out that while there used to be a rational view that fossil gas would be necessary either during a transition to low-carbon energy or as part of the long-term energy mix for electricity production: ....revolutions first in renewable energy costs and then in battery storage costs have upended this view. Analysis of	

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
the South African electricity system shows that gas supply is not technically necessary until at least 2035, if ever. In the last few years, either the risks associated with gas have increased, or the understanding of existing risks has increased. Consequently, South Africa may see significant negative outcomes from developing a large gas-to-power system now... the trend toward decarbonization, coupled with cost reductions for renewable energy and storage, creates risks for gas investment. Investment in gas can reasonably be expected to lead to higher costs for consumers, just transition challenges for workers, and losses for investors.	
49. The ISSD report highlights some of the risks associated with gas-to-power investment in South Africa. These risks include significant contributions to climate change (as a consequence of CO2 and methane emissions when gas is burned), increasing international pressure to move away from gas due to climate impacts, financial risks linked with gas-to-power, the risk of reduced security of affordable gas supply, the risk of stranded assets, and the risk of creating an additional just transition burden (future gas workers and communities face a repeat of the transition hardships currently faced by the coal sector).	Please refer to response to Item 16-41. Pending the outcome of an appraisal on the viability of extracting any oil or gas resource, which this seismic survey is likely to inform, due caution will need to be taken to avoid overcommitments and stranded assets associated with the timing of South Africa's prevailing climate change commitments.
50. Meridian Economics' 'Hot Air about Gas – An Economic Analysis of the Scope and Role for Gas-Fired Power Generation in South Africa' (June 2022) report points out that while South Africa's large-scale use of gas appears to be central to current energy policy direction in South Africa, 'this rests on a 2012 vision which pre-dates dramatic reductions in renewable energy costs and carbon emissions space'. The report goes on to state that independent analysis of the power sector across multiple recent studies shows that South Africa's power needs can be met both now and in the future with very little use of gas, and that there is 'no evidence to support the large-scale gas envisaged in the GMP; this is uneconomical even before carbon emissions are considered'. Meridian point out that 'the assumption that gas-fired power generation would replace coal ignores the fact that other technology combinations are now better at replacing coal-fired power than gas, and it is against these technologies that gas-fired generation should actually be compared'. Meridian demonstrate that existing modelling	Please refer to response to Item 16-41. It is agreed, considering the rapid technological advancements in the energy sector, that there is a need to continually reassess and revise where relevant the energy planning and policy for South Africa.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
provides no economic rationale for "big gas" in the power sector, and that 'the impact of using large volumes of gas to generate power will be borne by electricity consumers and will essentially be a subsidy provided by power consumers to otherwise unviable gas use in other sectors'.	
51. The Vital Ambition Report by Meridian Economics in collaboration with the Council for Scientific and Industrial Research ("CSIR") Energy Centre ("Vital Ambition Report") states that gas to power is only justified in the South African energy mix in so far as it is required for low-utilisation flexible capacity (peaker plants) for balancing the system during peak power demand. The report confirms that no investments in gas infrastructure for energy production and generation is needed now or in the near future. Furthermore the 2019 IRP will likely need to be updated in the foreseeable future to align with South Africa's 2021 Nationally Determined Contribution under the Paris Agreement and to keep pace with quickly evolving science and significant reductions in price for solar and wind energy. However, even the 2019 IRP, which is rooted in an outdated and scientifically and economically unsound understanding of the necessity for any gas in the energy mix, only projects the collective contribution of gas and diesel to the 2030 energy mix to be 1.3% combined. 52. According to a recent report prepared by Robert W. Howarth titled "Methane emissions and climate warming risk from hydraulic fracturing and shale gas development: implications for policy" the climate impacts of gas are greater than those of coal per unit of energy produced when evaluated over a 20-year timeframe, the period most relevant for climate change if humans are to avoid catastrophic run-away warming. Though gas emits less carbon dioxide per unit energy than coal, its upstream GHG emissions are more problematic for the climate, as it leaks and vents potent methane throughout its lifecycle; researchers have been able to better detect emissions across the lifecycle of gas ever more accurately thanks to new methodologies and technologies (particularly "top-down" measurements using satellite and aerial assessments).	Refer to response to item 16-41. The potential for methane leaks during resource extraction, processing, and utilisation will need to be assessed as and when such is proposed.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
53. The use of fossil fuels must be phased out quickly due to the urgent need to address global warming. A recent study published in Nature, the world's leading multidisciplinary science journal, discovered that "by 2050, we find that nearly 60% of oil and fossil methane gas, and 90% of coal, must remain unextracted to stay within a 1.5 °C carbon budget." According to the study, "most regions must reach peak production now or within the next decade, making many operational and planned fossil fuel projects unviable." It is common practice that proposed exploration activities such as reconnaissance, only commence months and sometimes years after the need and desirability assessment is undertaken, with extraction and production only commencing years later. According to one study, the world's largest oil and gas fields took an average of 5.5 years from discovery to first production and 17 years to reach peak output. Chevron Corporation's (CVX) Gorgon natural gas development project off the coast of Australia took 30 years to complete, and another six years to begin producing liquefied natural gas. Therefore exploration projects whose objectives are to locate gas deposits for energy companies to exploit through the construction and production of fossil fuels, run the risk of creating risks for such infrastructure to become stranded assets which invariably impacts on the development potential of South Africa in achieving its climate goals. With no economic justification for large-scale gas use in power, such a strategy would result in assets that are stranded before their first kWh of power is generated. Given this, the proposed reconnaissance project in no way provides a remedy nor will address in the immediate future South Africa's current energy insecurity issues	
54. Importantly, seismic surveys to explore for oil and gas will not have any immediate impact on South Africa's energy security, as any oil and gas extracted would not belong to South Africa, but would invariably belong to the companies that extract for profit. Energy companies compete for access to mineral rights granted by governments by either entering a concession agreement, meaning any discovered oil and gas are the property of the producers, or form part of a production-sharing agreement which favours the interest of the producers	The acquisition of seismic survey data is considered important with respect to understanding the potential for future oil and gas production as part of the energy mix of the country going forward. The seismic data will provide information on which future decisions can be made. The South African legislation requires the payment of royalties and taxes to the South African government associated with the extraction of resources. There are further obligations on holders of mineral and petroleum rights to contribute to local economic development. The Draft Upstream Petroleum Resources Development Bill also provides for the state to receive a 20% carried

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
and ultimately diminishing the general interests of the broader South African Republic. 55. The oil and gas that will be eventually extracted by oil and gas companies is ultimately exploited for profit. It is not used to generate a benefit that results in broad based security for energy production nor does it lead to the production of energy for South Africa and its citizens. If oil and gas found following a successful reconnaissance, and that are ultimately exploited, are not used to produce energy for South Africa, this invariably undermines the sole stated goal underpinning the need and desirability of this proposed reconnaissance project—its supposed contribution to energy security for South Africa—and provides no tangible benefit for South Africans.	interest in exploration and production rights.
56. While the increased use of gas as a 'transitional fuel' is promoted by government and vested interest groups, the Green Connection and Natural Justice submit that the increased use of fossil gas (especially in electricity generation) will lead to increased emissions of climate warming GHGs, and methane (CH4) in particular. While natural gas combustion is less carbon-intensive than that of coal, fugitive emissions arising from the production, transport, storage and use of natural gas have a much greater climate impact than CO2. In particular, over a 20-year period (which is particularly relevant since the next 20 years are a critical window for addressing the climate crisis) methane emissions, which make up approximately 70-90% of natural gas emissions, are projected to be 82.5 times as impactful as those of CO2. The desirability of using gas as a 'transitional' fuel is also questionable having regard to volatile international gas prices, as well as the potential risk of Carbon Border Taxes being introduced in the future. This risk will impose restrictions on the export of products with a high carbon footprint, putting South Africa's economy at greater risk of developing gas to power rather than clean renewable alternatives. This invariably diminishes the need and desirability for promoting new gas development projects, as the negative climate impacts and financial risks undermine the potential for gas to represent a viable solution for South Africa's ambitions to address development whilst respecting universal and regional	Refer to response to item 16-41. The potential for methane leaks during resource extraction, processing, and utilisation will need to be assessed as and when such is proposed

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
climate change obligations.	
57. The fundamental outcome of the need and desirability assessment should not be centred on the determination of whether gas technology will ensure security of supply for electricity. Instead, due to the climate crisis, this assessment should be centred on whether South Africa needs, or should rely on, gas to provide security of supply of electricity and whether alternative technologies could meet the same supply objectives with less harm and risk. Renewable energy and/or storage can replace gas to provide reliable and cost-effective generating capacity while greatly reducing the environmental and health risks associated with gas. 58. The call for gas as part of the energy mix set forth in the 2019 IRP does not excuse the decision-maker from taking climate change impacts into account, including as part of the need and desirability assessment. The case for need and desirability must address climate impacts and cannot simply rest on the 2019 IRP as evidence of need or desirability as relied upon by the EAP in the BAR. In the judgment of the High Court in Earthlife Africa, the court expressed that with respect to a decision maker's reliance on the IRP when rendering a decision on an application for environmental authorisation, the following is important to acknowledge: (a) "Policy instruments developed by the Department of Energy cannot alter the requirements of environmental legislation for relevant climate change factors to be considered". (b) Establishing the need and desirability of a proposed project, is a key objective of each stage of scoping and impact assessment and must account for South Africa's 2021 NDC under the Paris Agreement. The EAP must therefore provide a broad and robust analysis of multiple alternative literature on renewable energy resources and make a justifiable and reasonable case for a project's need and desirability having considered the available literature, without relying solely on the 2019 IRP and other policy documents. This invariably assists the decision maker to prioritise the granting of the best decision which will prioritize the integrity of the environment, and the social welfare, health and safety aspects of the socio-economic environment for present	Please refer to Section 5 of the BA Report in regard to the need and desirability for the proposed activities. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's energy planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial in our view that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined. The 2021 NDC's are aligned with the IRP 2019. The GHG emissions and associated climate change impacts associated with the seismic survey would be negligible.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
and future generations.	
Ecological and Economic Risk of a Major Oil Spill 59. The draft BAR states that successful exploitation of oil and gas resources will contribute to economic growth and balance-of-payments relief without addressing the economic growth opportunities presented by the further roll-out of renewable energy options. It also uncritically presents 'ongoing exploration of local natural gas reserves' as a key action required to ensure that natural gas is a viable transitional fuel for use in the national electricity generation mix. 60. It has not, however, addressed the need and appropriateness of exploration well-drilling within the context of environmentally sustainable development, particularly with due consideration of the potential implications for the entire development, including the complete life cycle. To ensure ecological integrity, the need and desirability assessment ought to have considered and discussed an alternative approach to the proposed development (no go option), bearing in mind that development must not exceed natural constraints and suggested individual activities must be weighed against both the short- and long-term public interest in order to support justified social and economic development. Furthermore, a proper assessment should have regard to the long-term effects of developing additional oil and gas fields within the exploration region off the entire South Western coastline, particularly on South Africa's capacity to meet its international climate change commitments. 61. In addition, any catastrophic oil spills that could occur as a result of an uncontrolled wellhead blowout related to future offshore oil and gas exploration and/or production drilling. Oceans play a critical role in regulating the climate and mitigating global warming by absorbing carbon dioxide. Oil spills pose a significant threat to functioning marine ecosystems, to living organisms in South Africa's coastal waters,66 and to communities that depend upon the oceans for their livelihoods. Small-scale fishers and fishing-dependent communities are particularly vulnerable to the negative impacts of a large uncontrolled oil spill which could, among other things, lead to a depletion in the fish stocks	Refer to response to item 16-41. The proposed activities assessed in the EIA do not include oil and gas extraction. The significance of any blow out risk would need to be assessed at the time that such is applied for and on the basis of activity and site-specific studies, and relevant management and mitigation measures applied.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
upon which the livelihoods of these small-scale fishers and fishing communities depend. 62. The Green Connection and Natural Justice submit that it is not in the interests of the broader community (including from an intra- and inter-generational perspective) to expose our oceans and coasts to the increased risk of a potentially catastrophic major oil spill during exploration drilling, or during subsequent production operations (should commercially exploitable oil or gas reserves be discovered through the seismic survey).	
Synthesis 63. The Green Connection and Natural Justice submit that, for the reasons set out above, and having regard to the need to effectively address the climate change crisis and achieve the rapid, deep and sustained reductions in GHG emissions that are required to limit global warming to 1.5°C (including accelerated action in this decade to reduce global carbon dioxide emissions by 45 per cent by 2030 relative to the 2010 level and to net zero around mid-century), further exploration for oil and gas is not needed, nor is it desirable. It follows that the proposed 3D seismic survey is also not needed or desirable, and environmental authorisation should be refused due to the unacceptable likely risks of harm that will arise from activities that contribute towards increasing climate disaster thereby significantly reducing resilience against impacts to human health and the environment more broadly, as well as the inordinately high costs involved in gas power generation for energy.	Please refer to responses provided above. As detailed in the BAR the proposed seismic survey is not anticipated to result in unacceptable environmental harm. Relevant management and mitigation measures have been recommended. The proposed seismic activity will not automatically lead to further exploration, production, and utilisation of petroleum resources. The information to be obtained through the seismic survey will provide information as to whether they may be exploitable resources. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's energy planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial in our view that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
	strategy is defined. Also noted is that TGS is a seismic data acquisition company and is in the business of data acquisition, and they are not an Oil & Gas Exploration or Production company. Data from TGS' seismic libraries are not only used for petroleum and natural gas exploration and development, data may also be used for development of offshore wind, geothermal energy, low-carbon solutions such as carbon capture and storage and also more generally for providing more insight and understanding into the regional geology of the area for scientific purposes.
D. FAILURE TO CONSIDER POLICIES RELEVANT TO NEED AND DESIRABILITY 64. The need for and the desirability of a proposed development forms a key component of any EIA application. The "need and desirability" requires consideration of the broader community's needs and interests as reflected in a credible IDP, SDF and EMF for the area, and as determined by the EIA. A NEMA-focused assessment of need and desirability is critical. It is important that national and provincial policies take cognisance of strategic concerns such as climate change and food security, as well as the sustainability in supply of natural resources and the status of our ecosystem services. Western Cape Climate Change Response Strategy 65. As a starting point, the assessment must consider the relevant context of the climate challenges faced in the Western Cape, taking account of the latest draft climate change response strategy of the Western Cape which sets out the priorities of addressing development amidst the ever-growing challenge of climate change. Consideration of this policy document will inform and substantiate an effective approach to a need and desirability assessment. The response strategy prioritises its attempts to achieve by 2030, a 50% reduction in methane emissions 30% of land and sea areas, especially areas of particular importance for biodiversity and its contributions to people, are conserved. The Western Cape Provincial Government recognised that the Western Cape needs a bold and ambitious, yet realistic, climate strategy that can take the province toward net zero carbon emissions by 2050 with transformative risk reduction and adaptation actions; otherwise, all other development decisions and pathways currently being planned and implemented will be undermined. This has not been considered or addressed in the report. The strategy identifies two crucial transitions that need to	Please refer to responses provided above. The proposed seismic activity will not automatically lead to further exploration, production, and utilisation of petroleum resources. The information to be obtained through the seismic survey will provide information as to whether they may be exploitable resources. The GHG emissions and associated climate change impacts associated with the seismic survey would be negligible. The climate change impacts of any potential future exploration or production activities would have to be assessed as part of the associated and required Environmental Authorisation applications submitted for those projects and consequently aligned with the climate change response strategies and policies referred to. With reference to the West Coast District Municipality Amended IDP 2022-2027, based on the findings of the Basic Assessment Report, it is anticipated that the proposed activity (i.e. seismic survey only) will not significantly affect the four key themes highlighted in item 68, nor influence the proposed interventions and strategies highlighted in item 69, due the far offshore nature of the activity, the fact that Small Scale Fishing is not expected to be impacted by the activity (nor the issuing of fishing rights for the fisherfolk), and the proposed activity will not inhibit the development of renewable energy infrastructure. Should any future exploration or production activities be proposed, the West Coast District Municipality IDP would need to be revisited in order to determine alignment with the policy at that time.

ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
be made that are: "(1) a shift from internal combustion engines to electric mobility and (2) a massive shift from fossil fuel-based energy to renewable energy sources". The response strategy identifies natural climate risks and an imperative of socio-economic resilience: "The Western Cape's biological diversity and natural resources are under threat from pollution, overexploitation, invasion by alien plant species and escalating development – and this translates into a threat to our society and economy. Our land and ocean-based ecosystems are also under threat from climate impacts and need protection through long-term preparedness and forward planning. It is, imperative to address these threats and impacts, as they ultimately impact our economic potential from tourism, agriculture, the blue economy, and freshwater supplies. This affects all aspects of our lives, including industries and the economy at large; success of which are fundamentally resting on the health of our underlying ecosystems. We can no longer make investment and development planning decisions that undermine our natural capital and a new regenerative approach is required". Fossil fuel development is incompatible with the province's objectives of transitioning to net-zero and ensuring development which does not exceed the ecological limits or threaten ecological integrity. 66. We dispute the findings of need and desirability made by the EAP. The proposed seismic activities are incompatible with the Western Cape's Climate Change Response Strategy, which was not considered in the draft BAR. Consequently, the EAP has not taken into account, amongst other things, the carrying capacity restrictions, limits of acceptable change and thresholds that the current marine ecosystem currently maintains. 67. In our view, the proposed activities, premised on the extraction of hydrocarbon resources, will deprive future societies of the same opportunities provided by the ecosystem services of the marine environment, and the development is neither needed nor desirable. West Coast District Municipality Amended IDP 2022-2027 68. According to the West Coast District Municipality Amended IDP, its socio-economic development strategy is premised on a desired state for coastal management. This strategy focuses on facilitating socio-economic development around four key themes: • development of marine aquaculture within the District; • supporting the Small-Scale Fisheries Industry;	

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
• the facilitation of coastal tourism development; and • preparing for the growth of the renewable energy sector. 69. To achieve the above, the municipality has identified a number of key priority interventions/ strategies that will drive the implementation of the four key themes, notably: • assisting communities to benefit from the growing aquaculture industry; • assisting fisher folk communities along the entire West Coast to benefit from the small-scale fishing policy by supporting and facilitating in the prioritization of applications and allocations for permits; and • promoting and supporting renewable energy projects that are being proposed in the WCDM area, provided that environmental sustainability is achieved. 70. Proposed gas exploration and intended exploitation present threats of a catastrophic oil spill and decreased climate resilience, which runs contrary to the Municipality's desired socio-economic development objectives which prioritise the support of marine aquaculture and small-scale fishery initiatives, the tourism sector and the growth of the renewable energy sector, which benefit the local community and economy. These outcomes rely on a healthy and resilient marine ecosystem, which will be threatened by climate change impacts and biodiversity impacts of oil and gas offshore development.	
72. The Pisces Report goes on to state that the highest sensitivities in response to the proposed 3D survey are: • Humpback whales, which migrate through the area between June and November (inclusive); • Sperm whales, beaked whales and other odontocetes that frequent offshore waters; • Large migratory pelagic fish and shark species that show seasonal association with Child's Bank and Tripp Seamount; • Leatherback turtles which frequent offshore waters in low numbers and aggregate around seamounts to feed on jellyfish (according to the Pisces report, Leatherback turtle abundance in the study area is unknown but is expected to be low); and • Various pelagic Albatross, Petrel, Storm Petrel and Shearwater species (the Pisces	Comment noted. The significance of all identified impacts in the marine ecology report are considered to be of low significance once mitigation has been applied.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
report indicates that pelagic seabirds are likely to be relatively frequently encountered in the offshore waters of the Reconnaissance Permit area).	
73. Notwithstanding the above, the report rates the significance of impacts on marine habitats and communities as (mostly) very low to medium before mitigation, and very low to low after mitigation. The draft BAR in turn relies on this (and other significance ratings) to reach the conclusion that: ...there are no environmental fatal flaws that should prevent the proposed project from proceeding, provided that the recommended mitigation and management measures are implemented... it is the opinion of the EIA project team and the EAP that the significance levels of the majority of identified negative impacts can generally be reduced to an acceptable level by implementing the recommended mitigation measures and the project should be authorized.' (emphasis added)	Comment noted. The significance rating for each impact is determined through consideration of the nature, extent, duration, magnitude and probability of each impact. Please refer to section 9.1 of the BAR for an explanation of the assessment methodology utilised.
74. The Pisces Report downplays the impacts of marine seismic surveys by referring to them as 'potential impacts'. This approach stands in stark contrast to the approach taken by our courts in recent seismic survey judgements, where it was accepted that marine seismic surveys do cause harm (i.e. the TGS seismic survey will result in actual impacts), as a result of which mitigation measures are proposed. For example: In the Shell Wild Coast Seismic Survey urgent interdict application judgment, Bloem J stated that implicit in Shell's contention that harm is not irreparable and that mitigation measures are implemented to minimise harm to marine life, 'is an acknowledgment of harm to marine life, hence the mitigation measures'. Regarding the evidence of ten experts put up by the applicants to prove irreparable harm, the court noted that despite the massive body of expert evidence on the harm to marine life, Shell did not adduce any expert evidence to neutralise this evidence. Bloem J stated further that the opinions expressed by these experts 'are based on objective facts contained in their reports and affidavits. There is no reason not to accept their evidence. That evidence establishes that, without intervention by the court, there is a real threat that the marine life would be	The significance of environmental impacts varies depending amongst others on the specific location, prevailing sensitivities, receptors, timing, and extent of the proposed activities. The EAP and the specialists identified and assessed potential environmental impacts (supported by inputs from the public consultation process) and has proposed management and mitigation measures. The impacts are by virtue of the fact that the impact assessment is a predictive assessment regarded as 'potential'. All impacts identified in the process can be reduced to a low or medium significance with the implementation of the management and mitigation measures. All impacts associated with a proposed project are considered potential impacts until the impact actually occurs. The studies undertaken internationally over the past ~70 years on the impacts of noise on marine fauna (of which some 400 peer-reviewed publications have been summarised and cited in the marine faunal specialist study) have concluded that the effects of underwater sounds vary substantially and depend on a wide variety of physical and biological factors. When writing articles on the effects of seismic acquisition on marine fauna it is therefore not difficult to bias the

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
irreparably harmed by the seismic survey'. In the Shell Wild Coast Seismic Survey judgment in the main case, the court referred to applicants' relying on expert reports for their contention that the anticipated harm to marine and bird life is a fundamental consideration, noting that these experts were in agreement that there is a reasonable apprehension of harm to marine and bird life and that the mitigation measures proposed by Shell did not adequately manage the threat of harm. The court also referred to the experts relied upon by Shell to refute the suggestion of possible harm to marine life, and noted that the respondents suggest that the detrimental effect of seismic surveys are not known and that, in so far as there is a possibility of death or stranding of marine animals from exposure to sound from seismic surveys, there are appropriate mitigating and monitoring measures in place. The court went on to point out that '[b]ecause of the apparent dispute between the experts as to the adequacy of the mitigation measures minimising the known effects of seismic surveys, it would be incumbent on the decision-maker to invoke the precautionary principle'. In the Searcher urgent interdict judgment (which Searcher did not seek leave to appeal against), Thulare J pointed out that: Physical damage to marine animals has been directly linked to the kind and level of sound emitted during the nature of seismic survey Searcher is undertaking. This is why Searcher has to mitigate the damage... Some species show physiological stress responses and behavioural changes like moving away rapidly and this increased energy consumption and energy costs which reduced time for foraging and the ability to protect itself. There was a specific concern for beaked whales who were particularly sensitive to anthropogenic noise... The impact on fish assemblages was difficult to interpret and there was a lack of research on confounding effects and multiple stressors were a key concern... Zooplankton was the reason the West coast contained important fishery nursery grounds. As a result, impacts on zooplankton	literature cited to either demonstrate detrimental and irreversible impacts or only very limited impacts, depending on the personal view of the author(s) and/or the targeted readership. The marine faunal assessment has made efforts to present published results objectively, and nowhere claims that acoustic surveys do not result in impacts. Injury is likely at very short range, with behavioural disturbance occurring over greater distances. The final significance ratings are determined using information from the peer-reviewed literature together with the noise modelling results (which put the threshold distances from the source array to mortality and potential mortal injury into perspective), adopting the precautionary principle as is required when undertaking such impact assessments, and taking into account the sensitivity of receptors present in southern African waters. Given all of the evidence, the conclusion reached for the various assessments is that impacts are either of low or very low significance. The Noise impact on plankton is assessed in Section 9.3.1.1.7 of the BA report. The reconnaissance permit area is located far offshore (120 km at its closest point) and therefore beyond the influence of coastal upwelling, which will influence both plankton abundance and the abundance of fish species that depend on plankton as a food source. From Figures 17, 18 and 19 in the marine ecology specialist assessment it is evident that the project area lies well beyond major fish spawning and recruitment area (and therefore zooplankton and ichthyoplankton abundance).

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
could propagate to other groups. Very little was known about the impact of seismic surveys on zooplankton. Existing observations suggested damage to larval and juvenile lobsters of up to... 1.2km from the survey sound source and that zooplankton mortality increased up to three-fold within the survey aera... Snoek will be impacted...a source of food for the impoverished communities of the West Coast and also provided an income to sustain the small-scale communities... Very little is known about the differential impact of seismic activity on young and smaller fish, turtles and cetaceans, and this could impact fish assemblages, abundances and availability. A precautionary approach was necessary.	
75. If one accepts (as the courts have done) that seismic surveys do cause harm to marine species, the question that arises is whether there is sufficient scientific information to predict the extent of this harm with any certainty, and whether the mitigation measures proposed to minimise this harm will be effective.	An EIA is a risk-assessment based study and is a process of evaluating the likely environmental impacts of a proposed project or development. It is not possible to provide conclusive evidence of the fact that impacts will be negligible however it can be stated with regards to the uncertainties and gaps in knowledge, these have specifically been taken into consideration during the assessment of the particular impacts. The confidence level of the rating has been stated and, the level and type of mitigation proposed has followed the clear mitigation hierarchy presented in the Specialist reports and also the EIA Report. Accordingly, the mitigation measures proposed are deemed to be sufficient to account for the eventuality that unforeseen events or organisms responses are encountered during the actual survey operations and will ensure that there is independent oversight and feedback to ensure compliance with the EMPr.
76. In the Searcher urgent interdict seismic survey case,81 the applicants put up a number of expert affidavits and reports to support their contention that there was a reasonable apprehension that the marine seismic survey would cause irreparable harm to marine species and ecosystems, and that the proposed mitigation measures are not effective in addressing this harm. Given that the TGS proposed 3D seismic survey area partially overlaps with the proposed 3D seismic survey area in the 2021 Searcher EMP, the views expressed by these experts also have relevance to the current proposed Searcher multiclient seismic survey (taking into account differences in the extent and	The previous litigation, responses and affidavits from the 2021 EMPr were made available to all the specialists and the EAP at the outset of the project and have been considered.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
location of the 3D seismic survey area). These expert affidavits and reports are accessible through the link provided in the footnote below, and should be read as specifically incorporated into these draft BAR comments for consideration by the EIA consultants and the competent authority.	
77. In their report titled Report on scientific basis for concerns of significant harm inflicted to marine wildlife by 2D and 3D seismic surveys on the South and West Coasts of South Africa, Harris, Olbers and Wright (Harris et al) (attached as Annexure A) conducted a review of peer-reviewed literature on the physiological, behavioural and ecological impacts of the Searcher 2021 proposed 3D seismic survey activities on marine wildlife, with specific attention to the relevance of the information to the context of the application, the vulnerable and endangered species known to occur there, and the proposed timing of the seismic survey in the summer austral months. Harris et al state that having carefully considered the available information: ...it is out opinion that seismic surveys do cause harm to both species and ecosystems, and that significant direct harm to individual animals and harm to populations of endangered species is the most likely scenario... Of specific concern is the impact on humpback whales and southern right whales which are still frequenting the west coast during the summer months (December – February), the impact on critically endangered (leatherback) turtles (migration routes in the area), the critically endangered African Penguin (changes in foraging behaviour and impacts on fitness); and the Cape fur seal (and consideration of current mass die-offs). We conclude that these seismic surveys are inadvisable in the austral summer months due to the presence of these species in the area, the increasing anthropogenic pressures, and the inability of the prescribed mitigation measures preventing harm to individuals/populations. Furthermore, recent literature provides credible concern about ecosystem/food-chain impacts of seismic surveys, that may in turn have impact on fisheries, the severity and localisation of which will depend on coincidences with spawning and juvenile recruitment events. It is strongly recommended that further studies on the	The extent of the TGS survey area is substantively different from that applied for by Searcher in 2021. The TGS Application Area is located further from shore and avoids many of the identified sensitive areas and sensitive times of the year. A team of qualified specialists considered the proposed activity, identified and assessed potential impacts, and where applicable made recommendations to manage and mitigate the impacts. All impacts assessed can be reduced to a medium or low significance with the implementation of management and mitigation measures described in the BA report and accompanying EMPr. Please refer to Section 9.3.1 of the BA Report for the assessment of the potential impact on marine fauna (including impact on humpback whales, southern right whales, leatherback turtles, African penguin, and cape fur seal) in the context of the proposed activity.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
impacts of seismic activities, in the South African context, are carried out in situ before proceeding with further seismic surveys of this nature.	
78. Harris et al go on to explain that marine animals use sound in a variety of ways critical to their lifecycles, with various physical and behavioural responses to acoustic disturbances documented. In their summary of findings, Harris et al point out that, in addition to the physical damage referred to above, 3D seismic surveys are likely to cause harm in multiple ways, as indicated below.:	Please refer to Section 9.3.1 of the BA Report for the assessment of the potential impact on marine fauna in the context of the proposed activity.
Impacts on Marine Life and Birds 79. In their summary of findings, Harris et al conclude that: • Based on peer-reviewed scientific literature, it is clear that physical damage to marine animals, including soft tissue trauma damage, embolisms, damage to organs used in balance and orientation, concussions, haemorrhaging, decompression sickness and both temporary and permanent threshold shifts to hearing ability have been directly linked to the kind and level of sound emitted during this nature of seismic surveys. • There is plausible evidence to suggest that seismic survey activity is likely to affect the conservation status and recovery of populations of vulnerable and threatened species (including IUCN Red list species such as humpback and southern right whales), because sound and the ability to hear and interpret sound is critical for many species to reproduce (both vocalisations on breeding grounds and communications across large distances for mate detection). Therefore, it must therefore be assumed that interference in sound perception or utilisation for communication (temporarily or permanently) has the potential to impact a species at the population level. According to the Pisces report, 'Humpback whales are... likely to be the most frequently encountered baleen whale in the project area...., ranging from the coast out beyond the shelf, with year round presence but number peaking during the northward migration in June - February and a smaller peak with the southern breeding ground around September - October but with	Please refer to Section 9.3.1 of the BA Report for the assessment of the potential impact on marine fauna (including marine mammals) in the context of the proposed activity. The potential impacts on marine fauna at various distances are specifically noted and discussed in the BA Report and associated appendices. Figure 27 in the Marine specialist report illustrates the substantial distance between the African penguin aggregate core areas on the west coast. Acoustic impacts of the proposed survey on coastal seabirds (including Cape cormorant, Cape Gannet, Bank cormorant) is thus highly unlikely. The small pelagic fish species on which these birds feed also typically occur within the 200 m depth contour and well inshore (~150 km at its closest point to the -200 m contour) of the nearshore areas frequented by these prey species. The marine fauna report recommends planning seismic surveys to avoid sensitive areas and periods for some marine fauna: Movement of migratory cetaceans (particularly baleen whales) from their southern feeding grounds into low latitude waters (June/July and late October/November), and their aggregation on the summer feeding grounds between St Helena Bay and Dassen Island from late October to late December and ensure that migration paths are not blocked by seismic operations. If possible, the survey should be undertaken from North to South to avoid these feeding aggregations. A discussion of the migration of various cetaceans is provided in Section 8.4.2.6 of the BA Report. The effects of stress on marine fauna are discussed in detail under section 4.3.1 and 4.3.5 of the marine faunal specialist assessment. Nowhere is it denied that stress does not result in impacts to marine fauna. The Noise impact on plankton is assessed in Section 9.3.1.1.7 of the BA report. The study by McCauley et al. (2017) generated significant public attention, but the paper has not been widely accepted by the scientific expert community as the findings are considered severely flawed. Details on the

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
regular encounters until February associated with subsequent feeding in the Benguela ecosystem'.85 With regard to southern right whales, the Pisces report indicates that '...several hundreds of right whales can be expected to pass through the southern portion of the Reconnaissance Permit Area when migrating southwards from the feeding areas between April and June...'. • Some species have been shown and documented to display physiological stress responses and behavioural changes to seismic activities, such as moving away rapidly, diving or remaining still. These responses are likely to increase their energy consumption and energy costs, reduce their time to forage, and/or affect their vulnerability to predation, thus having negative impacts on the survival of individuals (especially young or compromised animals) as well as the overall population growth and survival of a species (especially for threatened species that are already at risk of extinction). • The impacts of seismic activities are most well studied for marine mammals, and evidence suggests that there are distinct avoidance responses such as leaving the area or ceasing to undertake everyday activities such as feeding in preferred areas. This is likely to negatively impact the "fitness" of an affected animal. • There is genuine conservation concern for beaked whales that are particularly sensitive to anthropogenic noise, including seismic surveys. It has been demonstrated that even minor, non-lethal disturbances, resulting in changes in behaviour such as displacement from preferred habitats, could impact a population. • The only existing field study in South Africa (that the authors could find) on the impacts of seismic activities in South African waters presents clear evidence that the endangered, endemic African penguin avoided preferred feeding sites when a seismic survey was active nearby. This is particularly of concern for a species which has had a 70% decrease in numbers over the past decade, is stressed by prey depletion creating a greater demand for	independent reviews are the paper are provided in the EnerGeo response to a publication by the Scientific Advisory Group on Emergencies (SAGE). Follow-up studies by Richardson et al (2017) failed to conclusively demonstrate discernible effects on zooplankton biomass on a regional scale and Fields et al. (2019) detected no significant behavioural differences in the copepod species *Calanus finmarchius* based on distance to the source or control vs. exposed groups. Section 9.3.1.1.2 of the BA Report identifies and assesses the potential impact on Cape Fur Seals. Figure 37 in the marine ecology specialist assessment illustrates the foraging ranges of seals on the West Coast from tracking data. From this it is evident that the survey area lies offshore of these foraging ranges. Avoidance effects or behavioural alterations from seismic surveys involving many fish species do not automatically imply risk factors and thus do not necessarily cause a disturbance to the fishery (McCauley et al., 2000). A recent large-scale experiment conducted by Meekan et al. (2021) in Australia showed no short-term or long-term effects on the abundance or behaviour of demersal fish assemblages in response to a commercial seismic source. This suggests that seismic surveys have little impact on demersal fishes. Other studies that found no evidence of significant changes in catch rates or fish abundance include Hassel et al. 2004, Picket et al. 1994, Miler and Cripps 2013 and Thomson et al. 2014. Noise modelling was undertaken for the proposed survey and the transmission of sound at various threshold levels was taken into account. As stated in Section 6.2 of the BA Report, CBA 1 indicates irreplaceable or near-irreplaceable sites that are required to meet biodiversity targets with limited, if any, option to meet targets elsewhere, whereas CBA 2 are "best design sites" and there are often alternative areas where feature targets can be met; however, these will be of higher cost to other sectors and / or will be larger areas. Activities within these management zones are classified into those that are "compatible", those that are "not compatible", and those that have "restricted compatibility". Non-invasive (e.g. seismic surveys) and invasive (e.g. exploration wells) exploration activities are classified as having "restricted compatibility". Activities with restricted compatibility require a detailed assessment to determine whether the recommendation is that they should be permitted (general), permitted subject to additional regulations (consent), or prohibited, depending on a variety of factors. Petroleum production is, however, classified as "not compatible" in CBAs, but may be compatible, subject to certain conditions, in ESAs. Seismic surveying is not only used for petroleum and

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
them to forage further afield, and for which the prospect of extinction is significant. • The phenomenon of energy-cost (from stress and avoidance behaviour) is of particular concern for some of the species expected to be encountered in the survey area in question, particularly the humpback whales and southern right whales who are at risk of the airgun noise affecting their behaviour or interfering with the communication between mother and calf. Any impact on their energy reserves could impact on their condition (weight-loss and physiological condition) and affect survival of the animals during a vulnerable time (especially for lactating mothers and their calves) on their long migration to feeding grounds in Antarctica. • Recent research (2017) has shown significant mortality in zooplankton up to 1.2 km from a seismic survey array. Zooplankton forms the base of many important food webs in the marine environment. Depletion of zooplankton could thus have an impact on food for their predators (such as fish) as well as impact fish eggs and larvae (Ichthyoplankton) with potential local impacts on species important in fisheries. This damage to zooplankton over 1km away from the survey array raises concern that a 500m buffer for other animals that are unable to move away from the sound, is far too small to ensure that damage is not inflicted (even if they were able to evade it). • The impact on fish assemblages is difficult to interpret, due to multiple factors at play including but not limited to the ability of a species to move from an area as well as the receiving habitat. A global review of the effect of seismic activities on fish and invertebrates acknowledged the limits of the current research due to experimental designs used or due to the focus on single species during investigations. A key concern is a lack of research focused on confounding effects and multiple stressors, therefore potential impacts of seismic surveys that have been previously identified may be reflective of underestimation or overestimation and would depend on the type of interaction (synergistic, additive, or	natural gas exploration and development. It is also used for development of offshore wind, geothermal energy, and low-carbon solutions such as carbon capture and storage and also more generally for providing more insight and understanding into the regional geology of the area for scientific purposes therefore the CBA areas are not considered no-go areas for the purposes of seismic survey activities. In addition, according to the National Coastal and Marine Spatial Biodiversity Plan for the coast and ocean around the South African mainland states that petroleum production may be possible in CBAs using lateral drilling or other techniques that do not result in biodiversity impacts. According to the plan if significant petroleum resources are identified in these areas the selection of the site as a CBA could be re-evaluated, although this would require alternative CBAs to be identified to meet biodiversity targets. The 3D survey area overlaps with areas mapped as Critical Biodiversity Area 1 (CBA 1): Natural and Critical Biodiversity Area 2: (CBA 2) Natural. The CBA areas are not considered no-go areas for the purposes of seismic survey activities The NBA 2018 has rated the South Atlantic bathyal and abyssal unconsolidated habitat types that characterise depths beyond 500 m, as being of 'Least concern', reflecting the great extent of these habitats in the South African Exclusive Economic Zone (EEZ). The CBAs within the reconnaissance permit area would therefore not be protecting benthic ecosystem types, with protection likely to apply primarily to pelagic features. The area falls within pelagic habitat types Bb1 and Bb2 characterised by consistently low productivity, chlorophyll and temperature, with low frequency of sea surface temperature fronts (NBA 2012). Using the distribution maps in Harris et al. 2022 used to delineate the CBAs, there is some overlap of the survey area with: • Leatherback migration routes • Atlantic Yellow-nosed Albatross • Wandering albatross • Spotted gully shark (summer) • Stability with respect to climate change The mitigation measures proposed in the marine fauna report are considered to be adequate to protect the first four of these, with direct climate change effects due to a seismic survey being negligible.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
antagonistic). • In South Africa, since October 2021, thousands of dead and/or dying Cape fur seals, have washed ashore along the south and west coasts. The cause of these die-offs remains unknown but avian flu has been ruled out and malnourishment appears to be the most widely accepted reason. It is of concern that although the cape fur seal population within South Africa is relatively healthy, they too are under pressure from various anthropogenic pressures. Additional stress from seismic activity at this time is inadvisable. • The authors are of the opinion that the proposed seismic survey activities are highly likely to both disturb and have an adverse effect on (amongst others) Critical Biodiversity Areas (CBAs) and their associated fauna, which areas are ignored (thus giving no consideration to the biological importance of these areas or the likely impact at such close range). In the TGS draft BAR, while it is indicated that there are six offshore Marine Protected Areas (MPAs) in the general project area, none of these fall within the application area. However, there is some overlap of the reconnaissance permit area with the Orange Seamount and Canyon Complex Ecologically and Biologically Significant Areas (EBSAs), while CBAs found within the reconnaissance permit and 3D survey areas include (among others) both CBA1: natural and CBA2: natural areas.	
80. In her expert affidavit filed in support of the Searcher urgent interdict seismic survey case, marine ecologist and Associate Professor (Department of Biological Sciences, UCT) Colleen Maloney points out that the ecosystem off the west coast of South Africa is one of the world's most productive marine environments, and that: This region is fertilised on a large scale and an almost continuous basis by the transport of water rich in nutrients (e.g. nitrogen and phosphorous) from depth to the well-lit surface waters where photosynthesis can occur. This results in a proliferation of microscopic phytoplankton (photosynthetic organisms) and small zooplankton, which feed on phytoplankton and which themselves are food for fishes. The west coast thus has several nursery grounds for fishes, including species that	Section 8 of the BAR describes the nature and sensitivity of the receiving environment, including the nutrient upwelling, phytoplankton, broader marine fauna, and the associated fish nursery grounds, amongst others. The Noise impact on plankton is assessed in Section 9.3.1.1.7 of the BA report. The reconnaissance permit area is located far offshore (120 km at its closest point) and therefore beyond the influence of coastal upwelling, which will influence both plankton abundance and the abundance of fish species that depend on plankton as a food source. From Figures 17, 18 and 19 in the marine ecology specialist assessment it is evident that the project area lies well beyond major fish spawning and recruitment area (and therefore zooplankton and ichthyoplankton abundance).

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
are commercially exploited and non-commercial species. The large abundances of fishes, large crustacean zooplankton and squids also support top predator populations, such as seabirds and marine mammals... As examples of measured short-term impacts, larval and juvenile lobsters in an Australian study were damaged up to 500 m from a seismic survey sound source... South Africa's west coast has a large abundance of marine organisms, with much spatial and temporal heterogeneity in the environment, such that impacts need to be understood in the context of localised patches of enhanced abundance and dense aggregations of marine organisms. In conclusion, current understanding of impacts associated with seismic surveys on zooplankton is too sparse and localised to allow definitive conclusions to be drawn about the extend and ecosystem impact of these surveys off the west coast of South Africa. (emphasis added) As plankton (which includes larval fish and rock lobsters) are the basis for the food chain, providing food for other species, the impacts of seismic surveys on plankton will have knock-on impacts on the rest of the ecosystem, including juvenile fish, rock lobster and others. It is noted that the Pisces report indicates that potential impacts of seismic pulses on plankton, fish eggs and larvae would include mortality or physiological injury in the immediate vicinity of the airgun sound source. The report indicates further that while phytoplankton and zooplankton abundance in the clear offshore waters of the Benguela Current area expected to be low, seasonal peaks may occur associated with Child's Bank and Tripp Seamount.	
81. In her expert affidavit filed in support of the Searcher urgent interdict seismic survey case, Principal Researcher Lynne Shannon points out that the marine ecosystem off the West Coast of South Africa is unique and highly productive. It includes the southern sub-system of the Benguela Upwelling ecosystem. Upwelling systems cover less than 1% of the world's ocean area but support about one fifth of the world's marine fish catches. Shannon points out that the ecosystem is heavily influenced by anthropogenic pressures. Shannon states that the 3D seismic survey proposed by Searcher will further endanger the already endangered African penguin that frequents the West Coast. Shannon points out that these penguins have been shown to suffer disrupted foraging within a 100km radius of seismic activity. Shannon notes	The extent of the TGS survey area is substantively different from that applied for by Searcher in 2021. The TGS application area is located further from shore and avoids many of the identified sensitive areas and sensitive times of the year. Section 8 of the BAR describes the nature and sensitivity of the receiving environment, including the nutrient upwelling, phytoplankton, broader marine fauna, and the associated fish nursery grounds, amongst others. The productivity and sensitivity of the West Coast in general is comprehensively discussed in the BAR. The spatial extent of these sensitivities are also discussed and the impact there on assessed in the context of the specific location of the proposed TGS seismic activities.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
that, while the penguins returned to their favoured foraging areas once seismic activities ceased, the longer-term impacts on the penguins (stress levels, behaviour and implications of increased foraging effort required to fulfil nutritional requirements, and ultimately the influence these factors have on breeding success and survival) is not known. Shannon concludes that the poor knowledge available as to the extent of both species-level and ecosystem-level impacts of seismic surveys makes the adoption of the precautionary principal appropriate. It is noted that the Pisces report indicates that African Penguins have been recorded as far as 60km offshore, and that the proposed 3D seismic survey area lies well offshore of the aggregate core ranges of the African Penguin, while overlapping with foraging areas of the Wandering Albatross and Yellow-nosed Albatross.	Figure 27 in the Marine specialist report illustrates the substantial distance between the African penguin aggregate core areas on the west coast. The survey area thus lies well beyond the somewhat unrealistic 100 km buffer to the centroid of the seismic survey as recommended by Pichegru around penguin breeding colonies. Acoustic impacts of the proposed survey on coastal seabirds (including Cape cormorant, Cape Gannet, Bank cormorant) is thus highly unlikely. The small pelagic fish species on which these birds feed also typically occur within the 200 m depth contour and well inshore (~150 km at its closest point to the -200 m contour) of the nearshore areas frequented by these prey species.
82. In his expert affidavit filed in support of the Searcher seismic survey case, Dr Alexander Claus Winkler comments on the likely effects of seismic surveys on line-fish. Winkler points to a study published in 2021 that highlights the direct lasting behavioural effects of seismic surveys on the rhythmic behavioural foraging patterns of cod in the North Sea. He points out that both hake and snoek perform rhythmic diel foraging migrations off the seafloor at night and onto the seabed during the day. Given that seismic surveys are conducted both during the day and night, it is likely that these benthic fish species will migrate higher up the water column at night, bringing them within distances that may expose them to direct injury and mortality impacts from seismic surveys. It is noted that the Pisces report indicates that species most likely to be found in the area of interest include large migratory fish (such as tuna, billfish and sharks), many of which are considered threatened by the IUCN due to overfishing	The comment relates to the previous Searcher application, which is substantively different in terms of location and spatial extent to the current application under consideration. Please refer to Section 9.3.1 of the BA Report for the assessment of the potential impact on marine fauna in the context of the proposed activity. Zones of impact are conservatively determined in the technical noise by using the maximum predicted noise level across the water column to determine the zone of impact. Since noise levels vary with depth at any location, there will be areas in the water column within the identified zone of impact that are exposed to lower noise levels than implied by the identified zones of impact, which represent the worst case. The technical noise report was used to inform the impacts on fisheries and marine fauna. Ramp-up of the sound source over a minimum 20-minute period is a mitigation measure that is implemented in order to allow animals to swim away from the immediate vicinity of the sound source (the sound source is towed directly behind the vessel and at a depth of approximately 8 m below the water surface). This is a standard practice recommendation by the JNCC (UK-regulatory body) and is considered sufficient in terms of reducing the potential impact of physiological harm to mobile finfish species, such as those targeted by the pelagic longline fishery. With respect to demersal species such as hake – there is no overlap of the reconnaissance permit area with the distribution of hake or the spatial footprint of demersal trawling activity. Hake would not be expected to travel to the water surface or to be exposed to the zone of potential direct or mortal injury (this being the area within metres of the airguns).

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
Inefficacy of proposed mitigation measures 83. With regard to the efficacy of the mitigation proposed mitigation measures relating to the acoustic impacts of seismic surveys, Harris et al state as follows in their summary of findings: • While "Soft starts" mitigation for seismic impacts are likely to reduce the impact for highly mobile large animals, this is unlikely to be adequate for the many species that are prevalent in the area over the austral summer months and are unable to avoid the array or leave the area due to their lower mobility, such as smaller turtles, penguins, invertebrates, some fish species and zooplankton. • The finding of observer efficiency (from a scientific monitoring study conducted during the 2018/19 and 2019/2020 seasons on the humpback whales on the east coast) suggests that even with trained observers up to 44% of humpback whales in an area went undetected. This casts doubt on the effectiveness and success of Marine Mammal Observer (MMO) sightings of the largest species (humpbacks) as a mitigation measure, indicating that it is most likely that whales go undetected. Furthermore, the detection rate for smaller species, such as dolphins, seals, turtles and flightless birds (penguins), would be expected to be much lower, obviating the effectiveness of visual observations to prevent harm to these species. • Also of concern, is that the efficacy of a MMO is likely to be low due to the nature of the offshore marine environment in the survey area (frequent high swells and winds affecting surface visibility), putting species who are missed by MMOs and PAM operators at extreme risk, particularly at night or during adverse weather conditions. • Furthermore, the reliance on observers to do visual sightings to supplement the PAM monitoring during the day, as a mandated mitigation measure, necessitates questioning the acceptability of continuing with survey activities at night. If the visual observations are useful (perhaps sighting large animals around 65% of the time) in	The reconnaissance permit area is located far offshore (120 km at its closest point) and therefore beyond the influence of coastal upwelling, which will influence both plankton abundance and the abundance of fish species that depend on plankton as a food source. From Figures 17, 18 and 19 in the marine ecology specialist assessment it is evident that the project area lies well beyond major fish spawning and recruitment area (and therefore zooplankton and ichthyoplankton abundance); Figure 27 shows the area in relation to Cape Gannet and African Penguin distribution; Figure 37 shows the area in relation to seal foraging areas and Figure 47 shows the area in relation to virtual turtle hatchling trajectories. The survey area in relation to various marine mammal distributions is also provided and in all cases it is evident that interaction with marine fauna in those offshore waters should be minimal. The impact assessment shows that these impacts are of a medium-low significance even before any mitigation measures are applied. Regarding the supplementation with respect to the operating hours of the PAM monitoring: This would require the survey to likely run over two (or more) seasons. This is not only not cost effective for the seismic operator, but would extend the duration of the acoustic impacts (and others) associated with surveying. Considering that the survey area is located within the major shipping lanes and that ambient sound levels (dominated by the noise of vessels) will be persistent throughout the day and night, it seems more appropriate to undertake the survey in as short a time as possible, in which case night-time operations are necessary. The studies undertaken internationally over the past ~70 years on the impacts of noise on marine fauna (of which some 400 peer-reviewed publications have been summarised and cited in the marine faunal specialist study) have concluded that the effects of underwater sounds vary substantially and depend on a wide variety of physical and biological factors. When writing articles on the effects of seismic acquisition on marine fauna it is therefore not difficult to bias the literature cited to either demonstrate detrimental and irreversible impacts or only very limited impacts, depending on the personal view of the author(s) and/or the targeted readership. The marine faunal assessment has made efforts to present published results objectively, and nowhere claims that acoustic surveys do not result in impacts. Injury is likely at very short range, with behavioural disturbance occurring over greater distances. The final significance ratings are determined using information from the peer-

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
addition to PAM, then relying on PAM alone at night cannot be an effective mitigation measure. The authors express the opinion that surveys should not occur between sunset and sunrise each day if a real attempt of maximum avoidance of cetaceans is the objective of this mitigation measure.	reviewed literature together with the noise modelling results (which put the threshold distances from the source array to mortality and potential mortal injury into perspective), adopting the precautionary principle as is required when undertaking such impact assessments, and taking into account the sensitivity of receptors present in southern African waters. Given all of the evidence, the conclusion reached for the various assessments is that impacts are either of low or very low significance. It is not disputed that MMO sightings are not 100% efficient. Various approaches have been adopted over the years to improve observer efficiency, particularly at night, with infra-red binoculars and mast-mounted infra-red (IR) cameras being tested. These have, however, not proven as effective as initially anticipated, due to lack of detectable temperature differences, resulting in the implementation of the 24/7 PAM surveillance. From a seismic operator's perspective, it is not feasible or cost-effective to cease airgun operations at night as this would prolong the duration of the survey possibly requiring multiple seasons to complete the acquisition. This would also add substantially to the overall survey duration and cumulative impacts.
Synthesis 84. The Green Connection and Natural Justice submit that the proposed 3D seismic survey will cause physiological, behavioural and ecological impacts on marine wildlife (including vulnerable and threatened species), and that the proposed mitigation measures are not all effective in preventing or minimising this harm (especially in relation to species that are unable to avoid the seismic array, and at night given that PAM does not detect all species). The Green Connection and Natural Justice submit that the overwhelming majority of peer-reviewed published scientific studies shows that harm is cause or is the most likely scenario. As a consequence, the Green Connection and Natural Justice are of the view that a precautionary approach should be followed. In an expert report prepared for the Green Connection in relation to the TOSACO EIA appeal (see Annexure B), Harris et al expressed it thus: The body of scientific evidence and literature on seismic surveys has grown over the last few decades in response to significant concern about the impacts of seismic surveys on marine wildlife. Although scientists may debate the nature, magnitude and reach (distance away from the source of seismic blasts) of negative impacts of seismic surveys on marine fauna, the overwhelming majority of the multitude of peer-reviewed published	A team of qualified specialists considered the proposed activity, identified and assessed potential impacts, and where applicable made recommendations to manage and mitigate the impacts. All impacts assessed can be reduced to a medium or low significance with the implementation of management and mitigation measures described in the BA report and accompanying EMPr. The studies undertaken internationally over the past ~70 years on the impacts of noise on marine fauna (of which some 400 peer-reviewed publications have been summarised and cited in the marine faunal specialist study) have concluded that the effects of underwater sounds vary substantially and depend on a wide variety of physical and biological factors. When writing articles on the effects of seismic acquisition on marine fauna it is therefore not difficult to bias the literature cited to either demonstrate detrimental and irreversible impacts or only very limited impacts, depending on the personal view of the author(s) and/or the targeted readership. The marine faunal assessment has made efforts to present published results objectively, and nowhere claims that acoustic surveys do not result in impacts. Injury is likely at very short range, with behavioural disturbance occurring over greater distances. The final significance ratings are determined using information from the peer-reviewed literature together with the noise modelling

DEA

Comment	Response
scientific studies (over 538 studies on ocean noise, where the majority found negative effects on marine mammals, and/or adverse impacts on fish and invertebrates) demonstrates that harm is caused or is the most likely scenario. This is a tangible cause for concern and warrants a precautionary approach. The issue at hand is not whether harm will be caused but rather what the magnitude of that harm will be, and whether measures that would prevent or effectively mitigate this harm are in place and effective.	results (which put the threshold distances from the source array to mortality and potential mortal injury into perspective), adopting the precautionary principle as is required when undertaking such impact assessments, and taking into account the sensitivity of receptors present in southern African waters. Given all of the evidence, the conclusion reached for the various assessments is that impacts are either of low or very low significance.
85. In light of the above and the prevailing lack of information regarding in particular the broader marine ecosystem impacts of marine seismic surveys; the Green Connection and Natural Justice disagree with the draft BAR in respect of the conclusion that there are no environmental fatal flaws and that the project should be authorised. The Green Connection and Natural Justice submit that a precautionary approach should be adopted, and that the proposed seismic survey (as well as other seismic survey applications) should be refused until such time as further studies on the impacts of seismic activities in the South African context are carried out in situ and provide credible scientific evidence that seismic surveys do not pose a risk of unacceptable or irreparable harm to marine species and ecosystems.	The final significance ratings are determined using information from the peer-reviewed literature together with the noise modelling results (which put the threshold distances from the source array to mortality and potential mortal injury into perspective), adopting the precautionary principle as is required when undertaking such impact assessments, and taking into account the sensitivity of receptors present in southern African waters. Given all of the evidence, the conclusion reached for the various assessments is that impacts are either of medium, low or very low significance. Assumptions and limitations are included in Section 12 of the BA Report. Keeping these information gaps in mind, the assessment of impacts has adopted a strongly precautionary approach. It is acknowledged that information on deep-water habitats and their associated biota is lacking. Even given these information gaps the level of certainty (confidence rating) of the impact predictions in the marine fauna report is considered high.
F. CUMULATIVE IMPACTS 86. It is noted that the draft BAR acknowledges that should other seismic survey campaigns be undertaken concurrently with TGS's proposed survey programme, cumulative impacts may be likely and there would be a need for alignment in planning of such concurrent operations to reduce cumulative noise impacts to an acceptable significance.96 The draft BAR notes that there are two current pending applications with PASA (Searcher Geodata and GX Technology Corporation) which both overlap the proposed TGS 3D seismic survey area, as depicted in the diagram below:	Comment noted.
87. The draft BAR states that despite the difficulty in undertaking a reliable assessment of the potential cumulative environmental impacts of future seismic	Comment noted. However, it is unlikely that concurrent seismic surveys will be undertaken in the same area during the same survey window. However, the

5428

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
acquisition in the Deep Water Orange Basin (due to likely variation in the scope, extent and duration of proposed surveys), the cumulative impacts of three potential surveys occurring concurrently needs to be considered. The draft BAR thus includes a cumulative assessment which assumes that the three surveys (Searcher, TGS and GX Technologies) occur simultaneously during the summer survey window in 2022/23.	cumulative impacts associated with multiple surveys needs and was assessed. The decision-making authority will need to make the decision regarding whether concurrent surveys can take place.
88. In this event, the draft BAR indicates that: associated impacts to marine fauna would be of high intensity and extend regionally, over the short-term (assuming they take place over the same summer survey window). The impact consequence for cumulative surveys is therefore considered medium. Concurrent activities could also add to the cumulative impact on fisheries. Simultaneous survey operations would result in an increase in the extent and magnitude of the impact on the large pelagic longline sector. The impact duration would remain unchanged. Three seismic surveys of regional extent, undertaken simultaneously, could be expected to result in an impact of medium negative significance on the large pelagic longline sector, both with and without the application of mitigation measures.	Comment noted.
89. Curiously, the draft BAR impact table combines cumulative impacts on marine fauna and fisheries and rates the pre-mitigation environmental significance as 'medium' and the post-mitigation impact as 'low'. This does not reconcile with the preceding paragraphs which indicate with regard to cumulative impacts of three concurrent seismic surveys, an impact of medium negative significance on the large pelagic sector could be expected 'both with and without the application of mitigation measures'.	Section 9.3.5 of the BA Report states that "three seismic surveys of regional extent, undertaken simultaneously, could be expected to result in an impact of medium negative significance on the large pelagic longline sector, both with and without the application of mitigation measures. This relates to the large pelagic long-line sector only, and only in the event that all three surveys are undertaken simultaneously. Other cumulative impacts are all expected to be low after mitigation is applied – therefore overall cumulative impacts are considered low post-mitigation.
90. The draft BAR states regarding confounding and cumulative effects that the assessments of impacts of seismic sounds provided in the scientific literature usually consider short-term responses at the level of individual animals only, as the understanding of how such short-	Comment noted.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
term effects relate to adverse residual effects at the population level is limited. The report goes on to state that data on behavioural reactions to seismic noise acquired over the short-term could, however, easily be misinterpreted as being less significant than the cumulative effects over the long-term (i.e. what is initially interpreted as an impact not having a detrimental effect and thus being of low significance, may turn out to result in a long-term decline in the population, particularly when combined with other stressors such as temperature, competition for food, and shipping noise). The report notes that confounding effects are, however, difficult to separate from those due to seismic surveys.	
91. The draft BAR also states that the potential cumulative impacts on individuals and populations as a result of other seismic surveys undertaken either previously, concurrently or subsequently are difficult to assess. The report indicates that a significant adverse residual environmental effect is considered one that affects marine biota by causing a decline in abundance or change in distribution of a population(s) over more than one generation within an area. The report makes reference to numerous 2D and 3D seismic surveys having been undertaken off the West Coast over the past 17 years, and relies on reported increases in the southern right whale and humpback whale populations over a time when seismic surveying frequency has increased as 'suggesting that, for these populations at least, there is no evidence of long-term negative change to population size as a direct result of seismic survey activities'. The Green Connection and Natural Justice question the assumption made that an increase in whale populations suggests that there is no evidence of long-term negative change to population sizes as a direct result of seismic activities. This is an assumption that cannot be inferred from the facts (the increase could be as a result of any number of other external factors). 92. The Green Connection and Natural Justice submits that it cannot simply be assumed the lack of evidence of long-term negative population changes as a direct result of seismic survey activities means that there are no negative impacts (including potentially significant impacts). In their report relating to the TOSACO EIA appeal, Harris et al point out that although the humpback whale population is increasing, there is evidence to suggest that cetaceans in South African waters are being affected by changes in their ecosystem and it is not well	The marine faunal assessment has made efforts to present published results objectively, and nowhere claims that acoustic surveys do not result in impacts. The inference is that, for these whale populations, there is no direct evidence to link the long-term negative change to population size directly to seismic survey activities. The statement is only one regarding the "lack of evidence" with respect to certain whale populations and seismic surveys. The marine fauna report recommends planning seismic surveys to avoid sensitive areas and periods for some marine fauna: Movement of migratory cetaceans (particularly baleen whales) from their southern feeding grounds into low latitude waters (June/July and late October/November), and their aggregation on the summer feeding grounds between St Helena Bay and Dassen Island from late October to late December and ensure that migration paths are not blocked by seismic operations. If possible, the survey should be undertaken from North to South to avoid these feeding aggregations. A discussion of the migration of various cetaceans is provided in Section 8.4.3.6 of the BA Report.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
understood yet what is driving these changes and what the long terms effects could potentially be to populations. Concerns noted in the report include an observed decrease in southern right whale calving success of the South African population and a strong link between foraging success and reproduction. They suggest an investigation into possible decreases and/or spatial or temporal shifts in their prey availability at higher latitudes due to environmental variability. They also highlight a concern of the continued low numbers of unaccompanied adults along the South African coast which could potentially have serious consequences for cow-calf pairs in relation to the country's whale-watching industry in the future.	
93. The draft BAR states that in the 'unlikely' event that multiple surveys would take place at the same time within the same survey area, 'the risk of cumulative noise impact must be considered and is suggested to be managed'. The draft BAR suggests that mitigation should include maintaining a distance of at least 40 km between survey vessels 'until sufficient objective evidence is obtained that a reduced buffer distance is acceptable'. Where this 40 km buffer distance cannot be maintained, the draft BAR suggests that each of the additional activities to those described in the technical noise report should be modelled or otherwise considered in terms of the cumulative noise level and with reference to the criteria described in the report.	Comment noted.
94. The Green Connection and Natural Justice submit that given the lack of certainty regarding cumulative impacts of concurrent 3D seismic survey areas, a risk averse and cautious approach should be applied by not authorising concurrent surveys and suggests that should the decision-maker be inclined to grant environmental authorisation (which the Green Connection and Natural Justice submit should not be granted). A prohibition against concurrent surveys should be included as a condition of any environmental authorisation. There is simply no need to take the risk of conducting concurrent 3D seismic surveys which, on the face of it, is an unnecessary and unneeded duplication.	It is unlikely that concurrent seismic surveys will be undertaken in the same area during the same survey window however the cumulative impacts associated with multiple surveys needs to be, and was, assessed. The decision-making authority will need to make the decision regarding whether concurrent surveys can take place.
95. In addition, the draft BAR does not consider the cumulative impacts of other proposed offshore oil and	Please refer to responses provided above. The proposed seismic activity will not automatically lead to further

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
gas seismic surveys, exploration and production in other Blocks within South Africa's exclusive economic zone. Having regard to the global Climate Emergency and South Africa's international commitment to 'working with others to ensure temperature increases are kept well below 2°C above pre-industrial levels, which could include a further revision of the temperature goal to below 1.5°C in light of emerging science' by reducing greenhouse gas (GHG) emissions, TGS's proposed 3D seismic survey would, if additional commercially viable resources are identified and developed through to production phase, inevitably add to South Africa's overall GHG emissions (South Africa's energy sector currently contributes an estimated 84% percent to the country's overall GHG emissions). As a reasonably foreseeable future impact that may become more significant, especially in combination with impacts arising from similar offshore oil and gas exploration and production activities, it is submitted that the cumulative impacts of such GHG emissions need to be identified and assessed.	exploration, production, and utilisation of petroleum resources. The information to be obtained through the seismic survey will provide information as to whether they may be exploitable resources. The climate change impacts of any potential future exploration or production activities would have to be assessed as part of the associated and required Environmental Authorisation applications submitted for those projects, with due consideration of the other climate affecting activities proposed or in place at the time.
G. EBSAs and CBAs 96. The underwater Sound Transmission Loss Modelling report conducted for the draft BAR indicates that the proposed survey areas are adjacent to a few Ecologically or Biologically Significant Marine Areas (EBSAs), and Marine Protected Areas (MPAs) including Childs Bank and Shelf Edge, and Cape Canyon and Associated Islands, Bays and Lagoon. No reference is made to Critical Biodiversity Areas in this report. 97. The statement that the proposed survey areas are adjacent to a few EBSAs is however contradicted by the Biodiversity and Ecosystem Assessment Report (Pisces Report), which states that '[th]ere is some overlap of the Reconnaissance Permit Area with the Orange Seamount and Canyon Complex Ecologically and Biologically Significant Areas (EBSAs)'. The Pisces report also points out that 'Critical Biodiversity Areas'(CBAs) within the Reconnaissance Permit area include both CBA1: natural and CBA2: natural areas, with a small section of CBA2: restore being located in the north.'	Section 8.6 of the BA Report presents the proximity of the planned activities in relation to ecologically or biologically significant areas. There is one Ecologically or Biologically Significant Marine Area (EBSA) overlapping the application area, and this was considered through the selection of the L1 point in order to gauge the effects on the Tripp Seamount to the north. A number of Marine Protected Areas (MPAs) are located adjacent to the proposed survey areas.
98. The draft BAR indicates that EBSAs were identified by the Benguela Current Commission (BCC) as part of a regional Marine Spatial Management and Governance Programme (MARISMA 2014-2020). Three transboundary	Comment noted.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
EBSAs are shared with Namibia, while South Africa has a further 11 EBSAs within its jurisdiction, with a further four having recently been proposed. The draft BAR states the principal objective of these EBSAs is identification of features of higher ecological value that may require enhanced conservation and management measures, and that they currently carry no legal status. The draft BAR suggests that '[t]he impact management and conservation zones within the EBSAs are under review and currently constitute a subset of the biodiversity priority areas map...; EBSA conservation zones equate to [CBAs], whereas impact management zones equate to Ecological Support Area (ESAs). The relevant sea-use guidelines accompanying the CBA areas would apply'	
99. The draft BAR indicates that approximately 32.25 % of the proposed 3D acquisition area is covered by CBA 1 and CBA 2 Natural, 0.22% by CBA 1 and CBA 2 Restore, and 1.75% by ESA. According to the draft BAR, 'CBA 1 indicates irreplaceable or near-irreplaceable sites that are required to meet biodiversity targets with limited, if any, option to meet targets elsewhere, whereas CBA 2 are "best design sites" and there often alternative areas where feature targets can be met; however, these will be of higher cost to other sectors and / or will be larger areas' and that 'ESAs include all portions of EBSAs that are not already within MPAs or CBAs'. 100. The draft BAR goes on to state that exploration activities (such as seismic surveys and exploration well drilling) are classified as having 'restricted compatibility' with CBA1 and CBA2 natural areas, while petroleum production is classified as 'not compatible' in these areas. It is pointed out in the recent Searcher draft BAR that the National Coastal and Marine Spatial Biodiversity Plan states that petroleum production may be possible in CBAs using lateral drilling or other techniques that do not result in biodiversity impacts. According to the plan, if significant petroleum resources are identified in these areas the selection of the site as a CBA could also be re-evaluated, although this would require alternative CBAs to be identified to meet biodiversity targets. 101. Notwithstanding that the National Coastal and Marine Spatial Biodiversity Plan states that seismic surveys are classified as having 'restricted compatibility' (i.e., recommended to be a consent activity) with CBA natural areas, the Green Connection and Natural Justice submit that the decision-maker has the discretion to (and – properly applying a precautionary approach in this BA application – should) refuse consent for TGS to conduct seismic surveys in these areas. The Green Connection and Natural Justice submit further that, given that the main	As stated in Section 6.2 of the BAR, CBA 1 indicates irreplaceable or near-irreplaceable sites that are required to meet biodiversity targets with limited, if any, option to meet targets elsewhere, whereas CBA 2 are "best design sites" and there are often alternative areas where feature targets can be met; however, these will be of higher cost to other sectors and / or will be larger areas. Activities within these management zones are classified into those that are "compatible", those that are "not compatible", and those that have "restricted compatibility". Non-invasive (e.g. seismic surveys) and invasive (e.g. exploration wells) exploration activities are classified as having "restricted compatibility". Activities with restricted compatibility require a detailed assessment to determine whether the recommendation is that they should be permitted (general), permitted subject to additional regulations (consent), or prohibited, depending on a variety of factors. Petroleum production is, however, classified as "not compatible" in CBAs, but may be compatible, subject to certain conditions, in ESAs. Seismic surveying is not only used for petroleum and natural gas exploration and development. It is also used for development of offshore wind, geothermal energy, and low-carbon solutions such as carbon capture and storage and also more generally for providing more insight and understanding into the regional geology of the area for scientific purposes therefore the CBA areas are not considered no-go areas for the purposes of seismic survey activities. In addition, according to the National Coastal and Marine Spatial Biodiversity Plan for the coast and ocean around the South African mainland states that petroleum production may be possible in CBAs using lateral drilling or other techniques that do not result in biodiversity impacts. According to the plan if significant petroleum resources are identified in these areas the selection of the site as a CBA could be re-evaluated, although this would require alternative CBAs

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
objective of the seismic survey is to identify commercially exploitable oil and gas reserves, and given that petroleum production is incompatible with CBA natural areas (CBAs have been identified as conservation worthy and could in the future be declared Marine Protected Areas), authorising the seismic survey to be undertaken in an area with 32.25% coverage by CBA1 and CBA2 natural areas would compromise the protection of these critical biodiversity areas.	to be identified to meet biodiversity targets. The 3D survey area overlaps with areas mapped as Critical Biodiversity Area 1 (CBA 1): Natural and Critical Biodiversity Area 2: (CBA 2) Natural. Approximately 32.25 % of the proposed 3D survey area is covered by CBA 1 and CBA 2. The CBA areas are not considered no-go areas for the purposes of seismic survey activities. The potential impact on MPAs, CBA's and EBSA's is specifically noted in the BA Report. A buffer of at least 5 km is recommended around MPAs, as stated in the EMPr. No buffer requirements are proposed by the marine fauna specialist for CBAs or ESBAs as the impact on these areas is expected to be low – negligible. The NBA 2018 has rated the South Atlantic bathyal and abyssal unconsolidated habitat types that characterise depths beyond 500 m, as being of 'Least concern', reflecting the great extent of these habitats in the South African Exclusive Economic Zone (EEZ). The CBAs within the reconnaissance permit area would therefore not be protecting benthic ecosystem types, with protection likely to apply primarily to pelagic features. The area falls within pelagic habitat types Bb1 and Bb2 characterised by consistently low productivity, chlorophyll and temperature, with low frequency of sea surface temperature fronts (NBA 2012). Using the distribution maps in Harris et al. 2022 used to delineate the CBAs, there is some overlap of the survey area with: • Leatherback migration routes • Atlantic Yellow-nosed Albatross • Wandering albatross • Spotted gully shark (summer) • Stability with respect to climate change The mitigation measures proposed in the report are considered adequate to protect the first four of these, with direct climate change effects due to a seismic survey being negligible.
H. UNDERWATER NOISE MODELLING 102. It is noted that the draft BAR includes an underwater noise modelling study, but that this is largely a desktop exercise. 103. The Green Connection and Natural Justice submit that the underwater noise modelling should include in situ testing to 'ground truth' the modelling and accurately determine the potential noise impacts associated with various aspects of the proposed 3D seismic survey (sound in the ocean is affected by pressure, salinity, temperature and temperature	The technical noise report relies on predictive modelling to predict the noise impacts associated with the seismic survey. In order to refine and confirm this information, the underwater noise modelling study recommends that "Baseline noise measurements can provide useful information (prior to operations) when interpreting underwater noise predictions for the introduction of a new noise source. As such, it is recommended that underwater noise measurements be implemented that would include the deployment of underwater sound monitoring equipment to establish an actual baseline

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
gradients, and can travel many kilometres from the source). The Green Connection and Natural Justice submit further that the impacts of noise on all species should be assessed (different species have different sensitivities to noise) during the environmental impact assessment process (not *ex post factor*). The assessment should include (but not be limited to) potential impacts on the migration of snoek (a species that is important to the livelihoods of small-scale fishers) and juvenile turtles (which are significant from a biodiversity perspective given their endangered status) that are in turn dependent on other species.	prior to the commencement of the survey and then operational levels of noise during the survey." The migration of snoek has been described in Section 8.5.3.10 of the BA Report. Additionally, the impact of the proposed activity on juvenile turtles is described detail in Section 4.3.3 (Impacts of Seismic Noise on Turtles) of the Marine Ecological Assessment. It is also already recommended in Section 9.3.4.2 of the BA Report as well as the EMPr that TGS should contribute to assisting with collaboration on independent research on how fish species on the West Coast such as snoek respond to seismic surveying. TGS will further contact relevant scientific research institutions to offer the potential of collaborating in independent on-water research during the survey.
I. ALTERNATIVES Location Alternatives 104. The draft BAR indicates that no location alternatives are considered feasible, that the proposed survey area was carefully selected due to the high likelihood of containing significant hydrocarbon reserves, and that the area is considered an optimal area for a seismic survey as it is located well offshore and outside the ringfenced fisheries area. 105. This assessment is incomplete, as the draft BAR as failed to comply with the requirement of setting out a full description of the process it has followed to reach the proposed preferred activity (offshore oil and gas reconnaissance that will likely lead to exploratory drilling and production). The assessment should discuss the positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected; focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects. Where relevant, different operating scenarios (as well as probability of occurrence) should be identified, including normal and worst-case scenarios to ensure that these are taken into account in the impact assessment and decision making on alternative locations, and alternative technology considerations. Not only does the BAR Report fail to indicate whether alternative activities apart from offshore oil and gas exploratory drilling were considered, but it also fails to provide adequate analysis of the environmental harm the proposed drilling may have on the geographical area in question—particularly with respect to climate change vulnerability. 106. The BAR ought to have factored into its assessment of alternative locations whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and	Please refer to the response to item 99 above. The description of the identification of the relevant alternatives (i.e. "different means of meeting the general purpose and requirements of the activity") and the rationale for each of the alternatives considered or not considering of specific types of alternatives further are presented in Section 6 of the BAR. The positive and negative impacts are detailed in Section 9 of the BAR. No drilling has been proposed as part of this project. In term of the alternative locations with respect to coastal public property, the coastal protection zone or coastal access land – this application area is located well offshore – ~120 km.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
protecting those areas. In doing so, the EAP would have actively considered alternative options which would factored in the appropriateness of seismic survey technologies and whether such activities would be consistent with the purpose of establishing protective zones within those areas.	
107. It is submitted that that it would therefore be short sighted to have only considered the immediate impact of seismic surveys in an assessment of alternatives with regards to location. Long term harms in the ocean have downstream marine implications, which also bear noting within the consideration of alternatives. We cannot assess potential thresholds of harm and mitigate associated risks if we have a poor understanding of what we could be harming and how different species will suffer harm. As part of its alternative assessments, the Basic Assessment ought to have assessed risk by considering the impact of seismic surveys on all marine life, including those in bathyal and abyssal environments and appropriately assessing the feasibility of alternatives in light of those risks. Regardless of commercial value, all species found in critical biodiversity areas and ecological support areas, play an important role in the ecosystem value chain. As we are still unaware of the future impact of seismic surveys in South Africa, considering the feasibility of adopting alternatives such as utilizing renewable technology and weighing the unknown risks of the upstream component of the hydrocarbon sector – a precursor to extraction and consumption – becomes necessary when attempting to guard against potential disruptions to marine ecosystems.	Please refer to the responses to items 63 and 77 above. The findings of the specialist studies conclude that there are no environmental fatal flaws that should prevent the proposed project from proceeding, provided that the recommended mitigation and management measures are implemented. Based on the nature and extent of the proposed project, the level of disturbance predicted as a result of the reconnaissance activities, the findings of the specialist studies, and the understanding of the significance level of potential environmental impacts, it is the opinion of the EIA project team and the EAP that the significance levels of the majority of identified negative impacts can be reduced to an acceptable level by implementing the recommended mitigation measures. Also please note that the CBA areas are not considered no-go areas for the purposes of seismic survey activities.
108. The Green Connection and Natural Justice submit that it is therefore feasible to identify location alternatives, in particular to restrict the proposed seismic survey to those parts of the proposed seismic survey area (approximately 67.75% thereof) that are not classified as CBA1 and CBA2 natural areas. The Green Connection and Natural Justice thus recommend that, in the event that environmental authorisation is granted (which authorisation the Green Connection and Natural Justice do not support), a condition should be included in the environmental authorisation restricting the seismic survey to that portion of the proposed survey area that does not contain EBSCA or CBA1 and CBA2 natural areas.	The NBA 2018 has rated the South Atlantic bathyal and abyssal unconsolidated habitat types that characterise depths beyond 500 m, as being of 'Least concern', reflecting the great extent of these habitats in the South African Exclusive Economic Zone (EEZ). The CBAs within the reconnaissance permit area would therefore not be protecting benthic ecosystem types, with protection likely to apply primarily to pelagic features. The area falls within pelagic habitat types Bb1 and Bb2 characterised by consistently low productivity, chlorophyll and temperature, with low frequency of sea surface temperature fronts (NBA 2012). Using the distribution maps in Harris et al. 2022 used to delineate the CBAs, there is some overlap of the survey area with: • Leatherback migration routes • Atlantic Yellow-nosed Albatross • Wandering albatross

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
	• Spotted gully shark (summer) • Stability with respect to climate change The mitigation measures proposed in the report are considered adequate to protect the first four of these, with direct climate change effects due to a seismic survey being negligible.
Technology Alternatives 109. The draft BAR also includes discussion on technology alternatives, and states that TGS must define and enforce the use of the lowest practicable seismic source volume for production, and design arrays to maximise downward propagation, minimise horizontal propagation and minimise high frequencies in seismic source pulses. The draft EMPr (Annexure E to the draft BAR) includes the following as a 'Technical or Management Option' under 'Key Equipment': 'Define and enforce the use of the lowest practical seismic source volume for production. Design arrays to maximise downward propagation, minimise horizontal propagation and minimise high frequencies in seismic source pulses'. 110. The Green Connection and Natural Justice submit that this 'Technical or Management Option' should, in the event that the seismic survey is authorised (which authorisation the Green Connection and Natural Justice do not agree with), be made a mandatory obligation as a condition to any environmental authorisation granted.	This is already listed as a key recommendation for inclusion in the EA in Section 11.4 of the BA Report and is included in Section 13.14 of the EMPr as a requirement.
111. The Green Connection and Natural Justice point out further that the draft BAR also fails to include other mitigation alternatives, such as requiring the appointment of sufficient numbers of on-board MMOs to ensure 24-hour and 360-degree visual monitoring, and the use of infra-red equipment to improve the likelihood of observing species as night that do not vocalise (and would thus not be detected by the PAM) and would not be seen by any MMOs.	It is understood that the Marine Mammal Observers (MMOs) are able utilise infra-red cameras in order to observe mammals at night. Furthermore, the need for sufficient MMOs must be on watch to cover all least all hours have been added to account for the day and night observations. These conditions have been added to the EMPr and Section 11.4 of the BAR.
No-Go Alternative 112. The draft BAR states the following regarding the no-go alternative: The no go alternative would imply that no seismic survey activities are undertaken. As a result, the opportunity to identify potential oil and gas resources within the survey area would not exist. This will negate the potential negative and positive impacts associated with the proposed survey activities. 113. The Green Connection and Natural Justice submit that the no-go alternative has not been adequately	EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant. Any subsequent authorisation would be restricted to these specifically assessed activities. Should the applicant or other applicants wish to undertake any additional exploration activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a consequent need to apply for the relevant permissions. These would include a formal application for an Exploration or Production Right as well as a new EA. The impacts of such proposed activities would consequently require specific assessment and public consultation prior to approval. It is premature to

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
assessed nor supported by any credible findings, and that the BAR should consider the negative implications of potential future oil and gas development, including attendant economic and social costs that will or may result. This would necessarily include the economic and social costs of GHG emissions that would result from future oil and gas development generally, and from a major oil spill arising from an uncontrolled wellhead blow-out (during any subsequent exploration or production well drilling). 114. The Green Connection and Natural Justice also submit that a proper assessment should identify and assess the potential ecological and socio-economic benefits of the no-go option for small-scale fishers and fishing dependent communities. The assessment should also consider alternative means to generate energy and provide sustainable feedstocks for associated industrial applications, including renewable energy alternatives that do not pose a significant inter-generational ecological and socio-economic risk.	assess the likely impacts of further invasive exploration activities or production activities as the extent, duration, location, and magnitude applicable to these activities are unknown at this stage. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, and production activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed on their merits as and when they are proposed. Please refer to Section 5 of the BA Report in regard to the need and desirability for the proposed activities. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's energy planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial in our view that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined.
J. SOCIAL IMPACT ASSESSMENT 115. The draft BAR includes a Social Impact Assessment. It is noted that this report states that communities feel that there are significant gaps in the available data, and that from a social perspective the non-technical or social risks can potentially cause significant impacts. The report highlights that potential social impacts identified include: • Uncertainty; • Further marginalisation of vulnerable groups; • Concerns about cumulative impacts; • Impact on livelihoods; • Impacts on sense and spirit of place; • Impacts on social license to operate; • Community expectations; and • Social unrest.	With reference to Section 7 and Appendix 2 of the BA Report, EIMS has undertaken the public participation and consultation processes in accordance with the requirements of the NEMA EIA Regulations. This process included notification and communication in three different languages, via Radio and Newspaper advertisements, site notices, posters, and direct notification; as well as public and focus group meetings within the potentially affected communities. Opportunity was provided to review and comment on the BA Report and associated documentation to be submitted to the decision maker. It should further be noted that detailed consultations with community members and leadership were conducted by the Social and Heritage Specialists to obtain the views of project affected communities and the potential social and heritage impacts of the proposed project. The public participation

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
116. The report points out that seismic reconnaissance projects are controversial in South Africa, and that while for many stakeholders it is an emotional matter, for others the potential of impacting on their livelihoods is the biggest fear. The report indicates that some stakeholders feel that the exploration for fossil fuels is not in line with sustainable development and the fight against climate change, while other stakeholders feel that it is imperative for the growth and development of the South African economy to engage in these investigations. The expert describes this as a 'complex and wicked problem'. 117. The report goes on to state that from a social perspective, it is clear that the communities and the majority of local people are opposed to the project, and that because the project does not happen in a social vacuum, the social environment is much wider than the footprint of the project area. The report states further that: If the social risks and potential damage to cultural and indigenous rights are considered the impact on the social fabric of already vulnerable communities may be significant. At this stage communities feel that they cannot make informed decisions. (emphasis added) 118. Curiously, while this TGS SIA is almost identical to the SIA submitted in the Searcher draft BAR (ref. 1518), the TGS version omits the following sentence from the above paragraph: From [a] social perspective the project can only be recommended after meaningful consultation, local research, education, and awareness raising has been done in the project affected communities. (emphasis added) Instead, the TGS SIA report makes the following recommendation: From a social perspective it is recommended that the project proceed subject to the mitigation measures (i.e. meaningful consultation, local research, education, and awareness raising in the project-affected communities) forming part of the conditions for authorisation and being implemented prior to the commencement of the actual survey. 119. This recommendation is strikingly different to the recommendation made in the Searcher draft BAR SIA, which stated as follows: The recommendation is therefore that the project can only proceed once the social mitigation measures have been implemented and the community are sufficiently informed and educated to [be] able to engage in a meaningful manner. (emphasis added) 120. The Green Connection and Natural Justice submit that recommending that the project proceed subject to meaningful consultation being undertaken – and included as a mitigation measure in the environmental authorisation and implemented prior to the conclusion of the 'actual survey' – is highly irregular within the context of an environmental impact assessment. There	requirements and obligations of the NEMA EIA Regulations has been complied with. The recommendation of the SIA is that, should the project be approved a representative from TGS must consult with leadership of the community to determine how the communities should be consulted with in future – that is, what is the way the community members prefer to be consulted with for provision of commencement notification and/or daily updates to advise on survey schedules, communication in respect of the proposed research outcomes, etc. The recommendation to include further consultation as part of the conditions of authorisation intends to ensure that the consultation process goes further than just the EIA process, but is continued throughout the entire process, regardless of the outcome. This will assist communities and people on the ground to make informed decisions about technical matters. The intention of the recommendation is not for this condition to be suspensive or determinant on the ultimate decision but rather to function as an additional management/ mitigation measure to be implemented post approval to reduce the significance of the identified impacts and further enhance the community engagements during implementation, should the project be implemented. The SIA specialist has made a reasoned opinion that the project can be approved on the basis of the outcomes of the consultations already undertaken. Communities are diverse and there are community members who are supportive of this type of development, as much as there are community members against the development. Communities were asked to suggest mitigation measures that the specialists should consider, and this influenced some of the recommendations made in the SIA. All perspectives were considered during the EIA process and the social impact analysis. The SIA report makes detailed recommendations about further engagement with the communities, and other mitigation and management measures. The mitigation and management measures should be considered in its entirety within the context of the report. Efficient engagement with a community involves more than merely setting up a meeting and inviting people. In many communities there is an expectation that outsiders should enter the community via the leadership before a community meeting can take place. TGS needs to determine what the most appropriate way would be to interact, and this may differ between communities, in order to engage with the individuals and communities in a decolonised way. Once this is done, TGS can proceed with engaging with the communities as a whole in an

JK28

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
is no legal basis for meaningful consultation to be undertaken after an environmental authorisation is granted, and including such a recommendation as a condition of authorisation undermines the regulatory scheme for prior impact assessment that is subjected to public consultation. Such an approach would violate the principles of fair administrative decision-making and the right of interested and affected communities to be meaningfully consulted prior to a decision on authorisation being made. Further, this approach would be inconsistent with section 2(4)(f) of NEMA, which stipulates that the participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured. It would also be inconsistent with section 2(4)(g) of NEMA, which requires that decisions must take into account the interests, needs and values of all interested and affected parties, and this includes recognising all forms of knowledge, including traditional and ordinary knowledge.	appropriate way. Education is suggested as a mitigation measure to empower community members to make informed decisions where they are in a position to weigh up the pros and cons for themselves, as was requested by community members during the public meetings.
121. In addition, the Green Connection and Natural Justice note that the Social Impact Assessment indicates that TGS and other seismic survey companies do not currently have a social license to operate (in large part due to a lack of meaningful consultation from a community perspective, which 'from a community and social risk perspective is not negotiable'), and that the seismic survey industry should reassess their position and social license to operate as an industry in the South African context and should conduct a strategic environmental assessment of the impact of the industry. Notwithstanding this, the report makes a one-side assumption that the discovery of commercially exploitable fossil oil or gas resources would be beneficial to the economic development of South Africa: 'Potential future benefits and the economic development of the country should the surveys find any significant resources are not disputed'. The Green Connection and Natural Justice submit that the Social Impact Assessment should also reflect the many negative socio-economic impacts that could or are likely to manifest should commercially exploitable reserves be found and developed through to production and use (including but not limited to the socio-economic costs of climate change130). The Green Connection and Natural Justice refer the EIA consultants and the decision-maker to the report the Green Connection commissioned titled 'A Literature Review of the Socioeconomic Consequences of Offshore Oil and Gas	A team of qualified specialists considered the proposed activity, identified and assessed potential impacts, and where applicable made recommendations to manage and mitigate the impacts. All impacts assessed can be reduced to a medium or low significance with the implementation of management and mitigation measures described in the BA report and accompanying EMPr. EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant. Any subsequent authorisation would be restricted to these specifically assessed activities. Should the applicant or other applicants wish to undertake any additional exploration activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a consequent need to apply for the relevant permissions. These would include a formal application for an Exploration or Production Right as well as a new EA. The impacts of such proposed activities would consequently require specific assessment and public consultation prior to approval. It is premature to assess the likely impacts of further invasive exploration activities or production activities as the extent, duration, location, and magnitude applicable to these activities are unknown at this stage. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, and production activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed on

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment	Response
Activities on South Africa', which should be read as specifically incorporated into the Green Connection and Natural Justice's comments on the draft BAR to be considered by the competent authority when considering its decision on authorisation.	their merits as and when they are proposed. Please refer to Section 5 of the BA Report in regard to the need and desirability for the proposed activities. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's energy planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial in our view that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined.
K. CONCLUSION 122. The Green Connection and Natural Justice submit that for the reasons set out above, TGS's application for environmental authorisation to conduct a speculative multiclient 3D seismic survey over various petroleum licensing Blocks located off the West Coast of South Africa should be refused.	Refer to responses provided above.

Sincerely,

EIMS Public Participation Team

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

6 December, 2022

Our ref: GPK/as/1520

Ms Jackie Sunde

Dear Madam

RESPONSE TO COMMENTS ON THE ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS ORANGE BASIN SEISMIC RECONNAISSANCE BASIC ASSESSMENT PROCESS

Please refer to the table below for responses to the comments raised.

Comment/ Recommendation	Response
Cover Letter **Attached please find my comments on the TGS Basic Assessment Report (BAR) Ref 1520. I make this submission as a researcher with more than 20 years' experience working with small-scale fishing communities in South Africa.**	Comment noted. We would like to thank you for your comments and participation in our process for this project. All objections, comments and responses will be submitted, together with the Basic Assessment Report and associated appendices to the Competent Authority for consideration in the decision-making process.
TGS is in the process of applying to undertake a 3D seismic survey off the West Coast of South Africa. This draft Basic Assessment Report (BAR) has been prepared as part of the environmental impact assessment (EIA) process being undertaken for this application for environmental authorisation to conduct the survey. **I submit that this BAR does not provide an adequate assessment of the potential environmental impact assessment and does not meet the NEMA requirements for an environmental authorisation on the following grounds:**	Comments noted.
1. Need and Desirability and related Climate Change cost analysis **The draft BAR fails to motivate adequately for the need and desirability of this survey activity.** **The draft BAR states that the proposed project** ***'aims to identify oil and gas resources to be used in... energy production and/or processing or manufacturing of materials'*.1 It is stated further that *'[a]s a result of the fact that this project entails only survey activities, it is anticipated that this***	With reference to the quoted sections of the Makhanda Judgment, we would like to reiterate that the NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, production, and combustion activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed prior to implementation on their merits as and when they are proposed. It is not accurate to state that the Reconnaissance will necessarily lead to exploration, or production. EIMS has conducted the impact assessment on the basis of the

8 Dalmeny Road, Pine Park, 2194 | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | **F** (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | **F** (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
project will not lead to a significant impact on the receiving environment'.2 **In line with this, the draft BAR does not consider or assess the potential climate impacts of subsequent oil and gas exploration, production and use. This does not provide sufficient evidence of the need or desirability of this project, and it prevents a full assessment of the project. In the recent judgement in the Makhanda High Court, *Sustaining the Wild Coast NPO and Others versus the Minister and Others* (3491/2021), the Judge confirmed that the entire process of the intended project must be considered and must indicate the impact on climate change. The Judge went on to note that had this been included, the need and desirability of the project might have been very different. Drawing on the authority of the *Save the Vaal* case,3 the judgement states that the** ***'processes are discrete stages in a single process that culminates in the production and combustion of oil and gas, and the emission of greenhouse gases that will exacerbate the climate crisis and impact communities' livelihoods and access to food'.4*** **The court went on to state that the respondent's thesis does not find support in *Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others* either and quoted this judgement:** **The absence of express provision in the statute requiring a climate change impact assessment does not entail that there is no legal duty to consider climate change as a relevant consideration and does not answer the interpretative question of whether such a duty exists in administrative law. Allowing for the respondents' argument that no empowering vision in NEMA or the regulations explicitly prescribes a mandatory procedure or condition to conduct a formal climate change assessment, the climate change impacts are undoubtedly a relevant consideration as contemplated by section 24O of NEMA for the reasons already discussed. A formal expert report on climate change impacts will be the best evidentiary means of establishing that this relevant factor in its multifaceted dimensions was indeed considered, while the absence of one will be symptomatic of the fact that it was not.5** **This report fails to include a full cost analysis of this project for climate change. Hence it cannot be considered adequate in terms of the NEMA requirements and it does not make it possible to consider the need and desirability of the**	activities proposed by the applicant, namely seismic surveys, i.e. for reconnaissance only. Any subsequent authorization would be restricted to these specifically assessed activities. The proposed activities do not include any other exploration, production or combustion of any natural gas or oil resources. There are no significant GHG emissions directly related to the proposed activity nor are there significant climate change vulnerability risks. Should the applicant or other applicants wish to undertake any additional exploration, production, or combustion activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a need to apply for the relevant permissions. These would include a formal application for new EA and where relevant an exploration and production right, informed by a comprehensive Environmental Impact Assessment and stakeholder consultation assessing the merits of these specific activities. The impacts of such proposed activities would consequently require specific assessment of the associated impacts and public consultation prior to approval. Given that this project seeks to undertake reconnaissance only, and would not provide authorization for potential future exploration or production activities, it is our view that it is premature to assess the likely impacts (including climate change) of further future speculative invasive exploration activities or production activities or future utilization of any resource, as the extent, duration, location, and magnitude of potential impacts, all of which are crucial to be able to assess the likely environmental impact, are unknown at this stage. Any such assessment is unlikely to be realistic and would consequently be subject to challenge.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
project in the light of the current climate emergency and our international obligations to reduce carbon emissions.	
2. The Draft Basic Assessment Report and CapMarine Expert Fisheries Report contain inaccuracies that lead to a fatal flaw. The Report acknowledges that there may be an impact on the Tuna Pole sector but with regards to the Small-scale Sector, it states **"Note that small-scale fishers are not permitted to target tuna (i.e. the species is not part of the basket allocation), thus would not be expected to operate at the Cape Canyon. There is no overlap of fishing grounds with the Reconnaissance Permit application area, which is situated at least 120 km offshore and at least 100 km from fishing grounds targeted by the linefish sector (page 49).** **This is factually flawed and incorrect. The small-scale sector does have tuna in their basket and so do the Interim Relief fishers of the West Coast and they are allowed to catch it and sell it on a commercial basis. See Annexure 1 and 2. Annexure 1 is the Permit for the Port Nolloth Small-scale Fisheries Cooperative and Annexure 2 is the Permit conditions for the Interim Relief line fishers which applies to all the line fishers along the West Coast including Saldanha, St Helena Bay etc.** **This error impacts the rating of the impact and the mitigation measures required for the project. It is clear from several other instances in the Fisheries Expert Report that the Fisheries Experts do not understand or have knowledge of the Interim Relief fishers. For this reason they are not qualified to assess the impact of the project on them and this report should be withdrawn.**	Please refer to Section 3.3.10 (SMALL-SCALE FISHERIES) of the Fisheries Impact Assessment Report, which accounts for the variability in the distances over which SSF catch from the coast, as well as the actual species targeted. Section 3.3.10 states that *"Small-scale fishermen along the Northern Cape and Western Cape coastlines are unlikely to range beyond 20 km from the coastline; thus, inshore of the Reconnaissance Permit area (refer to Figure 3.42). This assessment is however cognisant of the ongoing issues related to the perceived areas fished and species targeted by SSF off the West Coast of South Africa e.g. that cultural practice of SSF may occur to 55 km offshore. While SSF regulations clearly specify that fishing is required to take place "nearshore" the actual differentiation between SSF and other fishing operations that might include SSF, such as the commercial "traditional linefish" and "pole and line" and the extent to which these commercial fisheries might include SSF, remains unclear. As such the offshore extent to which SSF may operate requires a precautionary approach in this assessment and consideration that the possibility exists (albeit a remote possibility that cannot be verified through the information made available on these fisheries), that SSF may have occurred historically and potentially in the future further offshore than suggested by the information made available for this assessment i.e. there is a remote possibility that some SSF may have targeted certain species (of which tuna and snoek are the main candidate species) further offshore than 20 km. The distance fished offshore by SSF and the associated risks determined in this assessment further necessarily considers practical aspects, notably that bottom fishing is impractical in waters deeper than 100 m and as such any bottom fishing, whether SSF or commercial, is highly unlikely beyond a precautionary depth being the 100 m depth contour. Further, in regard to migratory species, such as longfin tuna and snoek, economic and regulatory aspects relating to distances fished offshore is pertinent [i.e. such as the requirements of the South African Maritime Safety Authority (SAMSA)] in particular that most SSF are not likely to be "B" class certified (i.e. can operate up to 40 nm offshore and are longer than 9m) are likely limited to "C" class being mainly vessels of <9 m permitted to only operate < 15 nm offshore."* Furthermore, it should be noted that with reference to the two sets of permits (supplied) the following: The permit on SSF provided is specific for Zone A and applies to "Traditional Linefish". The second permit also referred to the "Interim Relief 15 Dispensation Permit Conditions" dispensation also refers and would apply to Zone A in this case. The Interim Relief section 2 states that the permit shall not be valid if a SSF permit has been granted (See Para. 2 subsection 2.2c). Section 3 (Fishing Area) then states that in Zone A fishers may only fish for yellowtail and snoek. These confusions between permits issued by DFFE are not helpful. The Fisheries Report assumed Interim Relief does not apply to Port Nolloth SSF. Given the above, it is anticipated that the impact on the SSF has been adequately assessed.
3. The Report fails to adequately rate the evidence	The significance of environmental impacts varies depending

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
of significant harm caused by the seismic survey to marine life and biodiversity The draft BAR *Biodiversity and Ecosystem Services Assessment Report* ('Pisces Report') indicates the that potential impacts to the marine fauna as a result of the proposed 3D seismic acquisition include: • Physiological injury and/or mortality; • Behavioural avoidance; • Reduced reproductive success/spawning; • Masking of environmental sounds and communication; • Collision of turtles/marine mammals with the survey and support vessels or entanglement in towed acoustic apparatus; and • Indirect impacts on piscivorous predators due to seismic effects on prey species. 1. The report goes on to state that the highest sensitivities in response to the proposed 3D survey are: • Humpback whales, which migrate through the area between June and November (inclusive); • Sperm whales, beaked whales and other odontocetes that frequent offshore waters; • Large migratory pelagic fish and shark species that show seasonal association with Child's Bank and Tripp Seamount; • Leatherback turtles which frequent offshore waters in low numbers and aggregate around seamounts to feed on jellyfish (according to the Pisces report, Leatherback turtle abundance in the study area is unknown but is expected to be low)6; and • Various pelagic Albatross, Petrel, Storm Petrel and Shearwater species (the Pisces report indicates that pelagic seabirds are likely to be relatively frequently encountered in the offshore waters of the Reconnaissance Permit area). Notwithstanding the above, the report rates the significance of impacts on marine habitats and communities as (mostly) very low to medium before mitigation, and very low to low after	amongst others on the specific location, prevailing sensitivities, receptors, timing, and extent of the proposed activities. The EAP and the specialists identified and assessed potential environmental impacts (supported by inputs from the public consultation process) and has proposed management and mitigation measures. All impacts identified in the process can be reduced to a low or medium significance with the implementation of the management and mitigation measures. All impacts associated with a proposed project are considered potential impacts until the impact actually occurs. The studies undertaken internationally over the past ~70 years on the impacts of noise on marine fauna (of which some 400 peer-reviewed publications have been summarised and cited in the marine faunal specialist study) have concluded that the effects of underwater sounds vary substantially and depend on a wide variety of physical and biological factors. When writing articles on the effects of seismic acquisition on marine fauna it is therefore not difficult to bias the literature cited to either demonstrate detrimental and irreversible impacts or only very limited impacts, depending on the personal view of the author(s) and/or the targeted readership. The marine faunal assessment has made efforts to present published results objectively, and nowhere claims that acoustic surveys do not result in impacts. Injury is likely at very short range, with behavioural disturbance occurring over greater distances. The final significance ratings are determined using information from the peer-reviewed literature together with the noise modelling results (which put the threshold distances from the source array to mortality and potential mortal injury into perspective), adopting the precautionary principle as is required when undertaking such impact assessments, and taking into account the sensitivity of receptors present in southern African waters. Given all of the evidence, the conclusion reached for the various assessments is that impacts are either of low or very low significance.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
mitigation. The draft BAR in turn relies on this (and other significance ratings) to reach the conclusion that: ...there are no environmental fatal flaws that should prevent the proposed project from proceeding, provided that the recommended mitigation and management measures are implemented... it is the opinion of the EIA project team and the EAP that the significance levels of the majority of identified negative impacts can generally be reduced to an acceptable level by implementing the recommended mitigation measures and the project should be authorized.' (emphasis added) 2. The Pisces Report downplays the impacts of marine seismic surveys by referring to them as 'potential impacts'. This approach stands in stark contrast to the approach taken by our courts in recent seismic survey judgements, where it was accepted that marine seismic surveys do cause harm (i.e. the TGS seismic survey will result in actual impacts), as a result of which mitigation measures are proposed (Bloem Judgement, Sustaining the Wild Coast and Others, Thulare in the Searcher case in the Cape Town High Court). 4. Given the known impacts and the remaining uncertainties, it is clear that a precautionary approach is required in this instance.	
5. Errors in the baseline information available to the Social Impact Assessment and the Heritage Assessment Both the Heritage Assessment and the Social Impact Assessment base the basis for their assessment of impacts on the information provided by the Expert Fisheries Report. Given the fatal error noted in Point 2 above, it is argued that both of these assessments need to re-consider their Ratings of Impact.	With reference to the response provided to Point 2 above, it is anticipated that the impact on the SSF has been adequately assessed, and that the ratings of the heritage and social specialist reports remain valid.
6. Unacceptable social risk and absence of a social license to operate The Social Impact Assessment conducted for this study is very clear. It states *"TGS, as well as other companies that want to do surveys or exploration in the area, currently do not have social license to operate. A large part of this is due to a lack of meaningful consultation by previous applicants from a community perspective. If TGS or any other seismic survey company wants to proceed with the project, they*	It should be noted that detailed consultations with community members and leadership were conducted by the Social and Heritage Specialists to obtain the views of project affected communities and the potential social and heritage impacts of the proposed project. The public participation requirements and obligations of the NEMA EIA Regulations has been complied with. The recommendation of the SIA is that, should the project be approved a representative from TGS must consult with leadership of the community to determine how the communities should be consulted with in future – that is, what is the way the community members prefer to be consulted with for provision of

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
will need to engage in meaningful conversation with the communities and try to restore relationships. From a community and social risk perspective this is not negotiable" **(Equispectives SIA September 2022, pp 108).** **This statement makes it very unclear that until such time as TGS engages with the communities further, in a meaningful way, there will be great community and social risk and they will not have a social license to operate". This Draft BAR cannot pre-empt the outcomes of any future community engagements but makes this clear – there needs to be further engagements before the project can be considered to have an acceptable risk level.**	commencement notification and/or daily updates to advise on survey schedules, communication in respect of the proposed research outcomes, etc. The recommendation to include further consultation as part of the conditions of authorisation intends to ensure that the consultation process goes further than just the EIA process, but is continued throughout the entire process, regardless of the outcome. This will assist communities and people on the ground to make informed decisions about technical matters. The intention of the recommendation is not for this condition to be suspensive or determinant on the ultimate decision but rather to function as an additional management/ mitigation measure to be implemented post approval to reduce the significance of the identified impacts and further enhance the community engagements during implementation, should the project be implemented. The SIA specialist has made a reasoned opinion that the project can be approved on the basis of the outcomes of the consultations already undertaken. Communities are diverse and there are community members who are supportive of this type of development, as much as there are community members against the development. Communities were asked to suggest mitigation measures that the specialists should consider, and this influenced some of the recommendations made in the SIA. All perspectives were considered during the EIA process and the social impact analysis. The SIA report makes detailed recommendations about further engagement with the communities, and other mitigation and management measures. The mitigation and management measures should be considered in its entirety within the context of the report. Efficient engagement with a community involves more than merely setting up a meeting and inviting people. In many communities there is an expectation that outsiders should enter the community via the leadership before a community meeting can take place. TGS needs to determine what the most appropriate way would be to interact, and this may differ between communities, in order to engage with the individuals and communities in a decolonised way. Once this is done, TGS can proceed with engaging with the communities as a whole in an appropriate way. Education is suggested as a mitigation measure to empower community members to make informed decisions where they are in a position to weigh up the pros and cons for themselves, as was requested by community members during the public meetings.
7. The Heritage Assessment recognition of intangible culture and rating of impact **The Heritage Report provides a detailed description and analysis of the cultural rights of the West Coast fisher communities. It argues that culture is more than just the tangible but is also**	As stated above, the recommendation of the SIA is that, if the project is approved a representative from TGS should consult with leadership of the community to determine how the communities should be consulted with in future – that is, what is the way the community members prefer to be consulted with for provision of commencement notification and/or daily updates to advise on

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
"shared beliefs, values, language, traditions, functionality, meaning and community connections". *"Considering the various values and heritage significance as listed in section 3(3) of the NHRA, the cultural and living heritage associated with the communities and indigenous people along the southwestern and west coast of South Africa holds heritage significance. It is part of the national estate and holds importance as a way of life for small-scale fishers and Khoisan descendants alike. The physical and spiritual interaction with the ocean and the shorelines through millennia resulted in a maritimity that developed into the cultural fabric as they experience it today.* ***The significance of such intangible and living cultural heritage features can potentially have a combined heritage grading of Grade II or even Grade I through further research".*** Given the recognition of the significance of intangible and living cultural features, it is necessary for the project to consider the impacts on these heritages. By relying on the Social Impact Assessment recommendations, the Heritage Report reinforces the need to put this Draft BAR aside until such time as the recommended engagements with communities have been undertaken and it is possible to ensure that they are in to mitigate the impacts on their cultural heritage. In the interim, the uncertainty about the social impacts and risks described in the SIA demand a precautionary approach that does not go ahead until these necessary socio-cultural processes can be confirmed.	survey schedules. This is only one of a number of community engagements that is recommended by the SIA. Efficient engagement with a community involves more than merely setting up a meeting and inviting people. In many communities there is an expectation that outsiders should enter the community via the leadership before a community meeting can take place. TGS needs to determine what the most appropriate way would be to interact, and this may differ between communities, in order to engage with the individuals and communities in a decolonised way. Once this is done, TGS can proceed with engaging with the communities as a whole in an appropriate way. Education is suggested as a mitigation measure to empower community members to make informed decisions where they are in a position to weigh up the pros and cons for themselves, as was requested by community members during the public meetings. As per Section 9.2 of the Cultural Heritage Assessment, it was concluded that: *"The scientific studies conducted for this project identified impacts on fishing stock as low for all species. By inference, a potential impact on fishing yield could be expected and thus potential economic impact on communities due to reduced caught fish volumes. The recommended mitigation measures, as listed in the specialist reports for the project, focus on the reduction of impacts on fish species and the projected reduction of the impact on the commercial and small-scale fishery catch yield. These mitigation measures should then indirectly positively impact the potential negative impacts on the cultural heritage of the communities to be impacted.* *A pre-mitigation negative impact on a regional scale over the long term with a moderate intensity is predicted due to the potential indirect impact on the communities and, ultimately, their heritage, with a high probability of this impact occurring. The pre-mitigation impact on heritage resources is rated as MEDIUM. The potential residual impact on heritage resources, with mitigation measures from the scientific studies, is projected as LOW with a medium confidence factor.* *Considering the assessment based on the findings of the fieldwork as well as the scientific studies relating to the impact on fisheries, the specialist is of the opinion that the impact of the proposed project on the cultural heritage resources can be mitigated through the implementation of the recommendations in this report."* Additionally, when considering the impact of the project on livelihoods, the Social Impact Assessment (Appendix 3 of the BAR), Section 8.3.4 concluded that: *"Livelihoods are already compromised due to the fishing quota system, over-fishing, lack of employment opportunities, pollution, effects of climate change and the recent Covid 19 pandemic.*

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	However, with reference to the assessment of the impacts on the catch rates from the fisheries assessment undertaken by CapMarine (2022), the impact on livelihoods is not because of the actual impact on catch rates, but because of the perceived impact of the oil/gas industry on fishing industry." Furthermore, Section 9 of the Social Impact Assessment concluded that: *"From a social perspective it is clear that the communities and majority of local people are opposed to the project. If the project is considered in isolation, the impacts are negligible. However, the project does not happen in a vacuum, and the social environment is much wider than the footprint of the project. If the social risks and potential damage to cultural and indigenous rights are considered the impact on the social fabric of already vulnerable communities may be significant. At this stage communities feel that they cannot make informed decisions. Although all legal processes have been followed, the seismic survey industry is not moving at the pace of the community, and in the long run this will be detrimental to the industry. Potential future benefits and the economic development of the country should the surveys find any significant resources are not disputed. From a social perspective it is recommended that the project proceed subject to the mitigation measures (i.e. meaningful consultation, local research, education, and awareness raising in the project-affected communities) forming part of the conditions for authorisation and being implemented prior to the commencement of the actual survey."*
Given these critical issues that speak to the impact of the activities on the human rights of small-scale fishers and coastal communities have yet to be properly addressed, this submission argues for a precautionary approach that withdraws this application until these recommendations are adequately fulfilled.	Please refer to Section 8.3.2 (Further marginalisation of vulnerable groups) of the SIA which details the aspects related to the human rights of the coastal communities, small scale fishers and the traditional people.

Sincerely,

EIMS Public Participation Team

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	There are no significant GHG emissions directly related to the proposed activity nor significant climate change vulnerability risks. The impact of the project on plankton was assessed in Section 9.3.1.1.7 ("NOISE IMPACT ON PLANKTON") of the Basic Assessment Report. It was concluded that the potential impact of seismic noise on phytoplankton and zooplankton, considering the medium sensitivity and very low consequence, is thus deemed to be of VERY LOW significance both with and without mitigation. Due to the medium consequence and medium sensitivity of ichthyoplankton, but the low likelihood of the impact occurring in offshore waters, the impacts are deemed to be of MEDIUM significance pre-mitigation. The application area avoids the key "ring fenced" fishing and spawning areas in the south-east of the reconnaissance permit area identified during previous consultation with the commercial fishing sector. No other direct mitigation measures for potential impacts on plankton and fish egg and larval stages are feasible or deemed necessary. It was concluded that the implementation of the mitigation measure above would result in a residual impact of VERY LOW significance.
3. Drilling could run a risk of a oil spill as a result of an uncontrolled wellhead blowout, this oil pollution would threaten the marine ecosystem on which the coastal community like fishers depend on for their livelihoods.	3. EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant, namely seismic surveys, i.e. **for reconnaissance only**. Any subsequent authorization would be restricted to these specifically assessed activities. The proposed activities do not include any other exploration, production or combustion of any natural gas or oil resources. The activity for which authorisation is being applied for does not include drilling. Should the applicant or other applicants wish to undertake any additional exploration, production, or combustion activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a need to apply for the relevant permissions. These would include a formal application for new EA and where relevant an exploration and production Right, informed by a comprehensive Environmental Impact Assessment and stakeholder consultation assessing the merits of these specific activities. The impacts of such proposed activities would consequently require specific assessment of the associated impacts and public consultation prior to approval.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
4. Seismic surveys do cause harm and mitigation measures are not good enough. Observers cannot see whales or other animals at night, but seismic surveys are proposed to happen at night. Zooplankton including larval fish and rock lobster can be damaged by seismic blasts and Snoek will also be impacted. These blasting may affect their feeding grounds and also their reproductive behaviours. 7. This seismic survey supposed to happen directly in the path of the Snoek. The Snoek migrate from west (in the deep) to east (in die wal) and also from east to south and vice versa. Therefore if we allow this to happen than we will be left with no Snoek to catch. 8. Snoek provides employment for all sectors of our society. More than 2000 fishers are active on any given day during the Snoek run, 200 buyers, men and women. Plus the processing of Snoek provides for a further 1000 men and women.	4. The mitigation measures have been prepared based on the international best practice and are also included in the Environmental Management Programme (EMPr), which will be subject to auditing and oversight by the environmental authorities, with severe penalties provided for in the National Environmental Management Act (Act No 107 of 1998 – NEMA) for non-compliance, should the project be authorized. It is understood that the Marine Mammal Observers (MMOs) are able utilise infra-red cameras in order to observe mammals at night. This condition has been added to the EMPr and Section 11.4 of the BAR. Please refer to the description and mitigation of the impacts on ichthyoplankton described above. With reference to the impact of the noise on the rock lobster, please refer to Section 3.3.9 (WEST COAST ROCK LOBSTER) of the Fisheries Impact Assessment Report, it was found that "The Reconnaissance Permit area is situated at least 115 km from the closest rock lobster fishing grounds and there is no spatial overlap (see Figure 3.40)." With reference to Table 3.14 of the Fisheries Impact Assessment Report (Appendix 3 of the BAR), it was concluded that there would be no impact on the West Coast Rock Lobster. Furthermore, Section 3.3.3.1 (Plankton) of the Marine Ecology Report (Appendix 3 of the BAR) highlights that although ichthyoplankton (fish eggs and larvae) comprise a minor component of the overall plankton, it remains significant due to the commercial importance of the overall fishery in the region. Various pelagic and demersal fish species are known to spawn in the inshore regions of the southern Benguela, including pilchard, round herring, chub mackerel lanternfish and hakes, and their eggs and larvae form an important contribution to the ichthyoplankton in the region. Spawning of key species is presented below. Hake, snoek and round herring move to the western Agulhas Bank and southern west coast to spawn in late winter and early spring (key period), when offshore Ekman losses are at a minimum and their eggs and larvae drift northwards and inshore to the west coast nursery grounds. Snoek spawn along the shelf break (150-400 m) of the western Agulhas Bank and the West Coast between June and October. The Basic Assessment includes a recommendation that the survey does not take place during these periods. Furthermore, the distribution of snoek was described in

EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	Section 3.3.3.3 (Pelagic Fish) of the Marine Ecology Report (Appendix 3 of the BAR). Two species that migrate along the West Coast following the shoals of anchovy and pilchards are snoek Thyrsites atun and chub mackerel Scomber japonicas. Both these species have been rated as 'Least concern' on the national assessment. On the West Coast, snoek move offshore to spawn and there is some southward dispersion as the spawning season progresses, with females on the West Coast moving inshore to feed between spawning events as spawning progresses. In contrast, those found further south along the western Agulhas Bank remain on the spawning grounds throughout the spawning season. The distribution of snoek and chub mackerel therefore lies well inshore of the Reconnaissance Permit Area. Furthermore, Section 3.3.7 of the Fisheries Impact Assessment Report (Appendix 3 of the BAR) stated that snoek-directed fishing activity is coastal and seasonal in nature – taking place inshore of the 100 m depth contour during the period March to July, with a peak in activity during the months of April and May. Snoek-directed fishing activity is situated at least 140 km inshore of the application area and there is therefore no overlap of the survey expected with snoek-directed fishing activity. As detailed on Section 4.2 (IMPACT OF SOUND ON CATCH RATES) of the Fisheries Impact Assessment Report (Appendix 3 of the BAR), due to the location of the Reconnaissance Permit area in the deepwater environment, sound generated during the survey is not expected to influence the spawning behaviour or migration route of snoek (a species of key importance to the linefish and smallscale fisheries sectors). The Reconnaissance Permit area is situated well offshore of the shelf break which is where snoek are known to spawn during winter-spring. Additionally, a Social Impact Assessment (Appendix 3 of the BAR) was undertaken and the impact on the livelihoods assessed to be of Medium significance. To this end, Section 8.3.4 of the Social Impact Assessment concluded that: "Livelihoods are already compromised due to the fishing quota system, over-fishing, lack of employment opportunities, pollution, effects of climate change and the recent Covid 19 pandemic. However, with reference to the assessment of the impacts on the catch rates from the fisheries assessment undertaken by CapMarine (2022), the impact on livelihoods is

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	not because of the actual impact on catch rates, but because of the perceived impact of the oil/gas industry on fishing industry."
6. Communities are opposed to the project's social risks as well as potential damage to cultural and indigenous rights may be significant.	6. Social Impact Assessment was undertaken. It was concluded that: *"From a social perspective it is clear that the communities and majority of local people are opposed to the project. If the project is considered in isolation, the impacts are negligible. However, the project does not happen in a vacuum, and the social environment is much wider than the footprint of the project. If the social risks and potential damage to cultural and indigenous rights are considered the impact on the social fabric of already vulnerable communities may be significant. At this stage communities feel that they cannot make informed decisions. Although all legal processes have been followed, the seismic survey industry is not moving at the pace of the community, and in the long run this will be detrimental to the industry. Potential future benefits and the economic development of the country should the surveys find any significant resources are not disputed. From a social perspective it is recommended that the project proceed subject to the mitigation measures (i.e. meaningful consultation, local research, education, and awareness raising in the project-affected communities) forming part of the conditions for authorisation and being implemented prior to the commencement of the actual survey."*
IN THE LIGHT OF THE ABOVE, WE, THE SOUTH AFRICAN COLLECTIVE, A NATIONAL ORGANISATION REPRESENTING FISHERS FROM AROUND THE COAST, REJECT THIS APPLICATION AND REQUEST THAT IT BE WITHDRAWN.	Comment noted. We would like to thank you for your comments and participation in our process for this project. All comments and responses will be submitted, together with the Basic Assessment Report and associated appendices to the Competent Authority for consideration in the decision-making process.

Sincerely,

EIMS Public Participation Team

8223

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

6 December, 2022

Our ref: GPK/as/1520

Mr Anthony Andrews

Dear Sir

RESPONSE TO COMMENTS ON THE ENVIRONMENTAL AUTHORISATION APPLICATION PROCESS FOR THE PROPOSED TGS ORANGE BASIN SEISMIC RECONNAISSANCE BASIC ASSESSMENT PROCESS

Please refer to the table below for responses to the comments raised.

Comment/ Recommendation	Response
We are the West coast Guriqua Council, representing the forgotten Guriqua |SAN Bloodline Families in the west coast of South Africa. We already started with our Bio Cultural Community Protocols in September 2017 in our Lamberts Bay village. We outlined our Living Customary Laws, Indigenous Tenure Rights, Heritage Sites, Sacred Sites, and our territory. Natural Justice helped us with our BCP process. **We are also registered with the CRL Rights Commission as a Cultural Council. Emeritus Professor John Parkington (UCT) already recognized and acknowledged us as the descendants of the Guriqua |SAN Tribe. The UNDRIP Preamble clearly stated that there is the recognition of collective rights as well as in the operative Articles reflecting the paramount importance of collective rights to protect the culture, identity, and existence of Indigenous Peoples.**	Comment noted. The Guriqua Council has been recognised early on in the process and has been registered as a Key Interested and Affected Party.
The Ocean and coastal living are the only dependable source of income and food supply for the indigenous communities for centuries, that's the only way of life to us, hindering these cultural traditions through seismic survey testing's and the impacts of climate change will have serious and devastating impacts on our ecological system and on our customary rituals. Our communities are subsisting on fishing and other marine resources to supplement our livelihoods. **Our voices as indigenous communities are not taken seriously within these contexts when trying to get public participation done with reports that cannot clearly provides the**	EIMS understands that the indigenous and fishing communities along the West Coast of South Africa have utilised and rely on the ocean for income and that there is a strong cultural connection to the ocean. This is specifically acknowledged and considered in the Basic Assessment Report. With reference to Section 7 and Appendix 2 of the BA Report, EIMS has undertaken the public participation and consultation processes in accordance with the requirements of the NEMA EIA Regulations. This process included notification and communication in three different languages, via Radio and Newspaper advertisements, site notices, posters, and direct notification; as well as public and focus group meetings within the potentially affected communities. Opportunity was provided to review and

8 Dalmeny Road, Pine Park, 2194 | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | F (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | F (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
impacts on our Oceans and environment its always a 'possible' not conclusive answer that we get. Our indigenous knowledge has been neglected as we are the custodians of our natural resources for centuries now. **We also feel that the dangers and threats that such operations could bring to communities will be devastating and that no time is been spent on informing us about that, it's just like a political tick box for proceeding with this devastation if it benefits a few rich people and not the whole communities. There is no energy crisis in South Africa but only mismanagement, corruption and sabotaging to give power to privatization.** **Investigations and conducted studies concluded did not once make mention unleased the identities of our indigenous communities in the West Coast such a cultural denial and ignorance to the fact that we have been here for centuries, now been classified as rural poor and stigmatized, our free and prior and informed consent is needed for efficient consultation so that our voices can also be heard.** **We as the West Coast Guriqua indigenous communities are opposed to the project, the social risks associated and the potential damage to cultural and indigenous rights are at risk. any further prospecting in the proposed areas is not imaginable as the west coast is a heritage site for our indigenous communities.**	comment on the BA Report and associated documentation to be submitted to the decision maker. It should further be noted that detailed consultations were conducted by the Social and Heritage Specialists with communities along the West Coast – including members of indigenous communities – to obtain their views and the potential social and heritage impacts of the proposed project. The inputs received from the I&Aps throughout the process have been considered and incorporated into the Basic Assessment Report. EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant, namely seismic surveys, i.e. for reconnaissance only. With reference to Section 9.3 of the Basic Assessment Report, it is not anticipated that the proposed seismic activities will result in any highly significant or devastating environmental impacts. Any subsequent authorization would be restricted to these specifically assessed activities, namely the seismic survey. The proposed activities do not include any other exploration, production or combustion of any natural gas or oil resources. There are no significant GHG emissions directly related to the proposed activity nor are there significant climate change vulnerability risks. The Marine Ecological Assessment (Appendix 3 of the BAR) included an assessment of all the trophic levels in the marine environment and did not only assess the impact on whales and dolphins. With the implementation of the mitigation measures, the impacts on each of the organism groups were found to be low/ negligible. It was concluded that *"The proposed survey activities to be undertaken by TGS are expected to result in impacts on marine invertebrate fauna in the Orange Basin, ranging from negligible to very low significance. Only in the case of potential impacts to turtles and marine mammals are impacts of low significance expected. If all environmental guidelines, and appropriate mitigation measures recommended in this report are implemented, there is no reason why the proposed seismic survey programme should not proceed."* In order to assess this, a Cultural Heritage Assessment (Appendix 3 of the BAR) was undertaken and specifically addressed the impact of intangible heritage for the adjacent communities. As per Section 9.2 of the Cultural Heritage Assessment, it was concluded that: *"The scientific studies conducted for this project identified impacts on fishing stock as low for all species. By inference, a potential impact on fishing yield could be expected and thus potential economic impact on communities due to reduced caught fish volumes. The recommended mitigation measures, as listed in the specialist reports for the project, focus on the reduction of impacts on fish species and the projected reduction of the impact on the commercial and small-scale fishery catch yield. These mitigation measures should then indirectly positively impact the potential*

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	negative impacts on the cultural heritage of the communities to be impacted. *A pre-mitigation negative impact on a regional scale over the long term with a moderate intensity is predicted due to the potential indirect impact on the communities and, ultimately, their heritage, with a high probability of this impact occurring. The pre-mitigation impact on heritage resources is rated as MEDIUM. The potential residual impact on heritage resources, with mitigation measures from the scientific studies, is projected as LOW with a medium confidence factor.* *Considering the assessment based on the findings of the fieldwork as well as the scientific studies relating to the impact on fisheries, the specialist is of the opinion that the impact of the proposed project on the cultural heritage resources can be mitigated through the implementation of the recommendations in this report."* Additionally, a Social Impact Assessment (Appendix 3 of the BAR) was undertaken and the impact on the livelihoods assessed to be of Medium significance. To this end, Section 8.3.4 of the Social Impact Assessment concluded that: *"Livelihoods are already compromised due to the fishing quota system, over-fishing, lack of employment opportunities, pollution, effects of climate change and the recent Covid 19 pandemic. However, with reference to the assessment of the impacts on the catch rates from the fisheries assessment undertaken by CapMarine (2022), the impact on livelihoods is not because of the actual impact on catch rates, but because of the perceived impact of the oil/gas industry on fishing industry."* Additionally, the Social Impact Assessment further specifically addressed the impact of further marginalisation of vulnerable groups. As per Section 9 of the Social Impact Assessment, it was concluded that: *"From a social perspective it is clear that the communities and majority of local people are opposed to the project. If the project is considered in isolation, the impacts are negligible. However, the project does not happen in a vacuum, and the social environment is much wider than the footprint of the project. If the social risks and potential damage to cultural and indigenous rights are considered the impact on the social fabric of already vulnerable communities may be significant. At this stage communities feel that they cannot make informed decisions. Although all legal processes have been followed, the seismic survey industry is not moving at the pace of the community, and in the long run this will be detrimental to the industry. Potential future benefits and the economic development of the country should the surveys find any significant resources are not disputed. From a social perspective it is recommended that the project proceed subject to the mitigation measures (i.e. meaningful consultation, local research, education, and awareness raising in the project-affected communities)*

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	forming part of the conditions for authorisation and being implemented prior to the commencement of the actual survey." Furthermore, please note that the identity of the Guriqua/ SAN were specifically targeted and included in our assessments. With Reference to Sections 4.1.7, 4.1.8 and 6.1.5 of the Heritage Impact Assessment, the cultural identity of the indigenous Guriqua (and other indigenous people) was discussed.
We have already said no as well as the Makhanda judgement on the East Coast, why the persistence with drilling for oil and gas after the Paris agreement and the decision that no new oil and gas fields should be develop as of 2021, to reduce our carbon dioxide footprint in the world.	EIMS has reviewed and considered the Makhanda Judgement in the compilation of the Basic Assessment Report and specifically in the context of this specific proposed activity and receiving environment. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's energy planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial in our view that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined. EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant, namely seismic surveys, i.e. for reconnaissance only. Any subsequent authorization would be restricted to these specifically assessed activities. The proposed activities do not include any other exploration, production or combustion of any natural gas or oil resources. The proposed activities do not include any drilling for oil and/ or gas. There are no significant GHG emissions directly related to the proposed activity nor significant climate change vulnerability risks.
Seismic surveys do cause harm and mitigation measures are not conducive enough and our rock lobsters and snoek will be heavily impacted.	Reconnaissance is listed as an activity that has the potential to have an impact on the receiving environment in terms of the EIA Regulations, 2014. The significance of environmental impacts varies depending amongst others on the specific location,

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	prevailing sensitivities, receptors, timing, and extent of the proposed activities. The EAP and the specialists identified and assessed potential environmental impacts (supported by inputs from the public consultation process) and has proposed management and mitigation measures. All impacts identified in the process can be reduced to a low or medium significance with the implementation of the management and mitigation measures. The distribution of snoek was described in Section 3.3.3.3 (Pelagic Fish) of the Marine Ecology Report (Appendix 3 of the BAR). Two species that migrate along the West Coast following the shoals of anchovy and pilchards are snoek *Thyrsites atun* and chub mackerel *Scomber japonicas*. Both these species have been rated as 'Least concern' on the national assessment. On the West Coast, snoek move offshore to spawn and there is some southward dispersion as the spawning season progresses, with females on the West Coast moving inshore to feed between spawning events as spawning progresses. In contrast, those found further south along the western Agulhas Bank remain on the spawning grounds throughout the spawning season. The distribution of snoek and chub mackerel therefore lies well inshore of the Reconnaissance Permit Area. Furthermore, Section 3.3.7 of the Fisheries Impact Assessment Report (Appendix 3 of the BAR) stated that snoek-directed fishing activity is coastal and seasonal in nature – taking place inshore of the 100 m depth contour during the period March to July, with a peak in activity during the months of April and May. Snoek-directed fishing activity is situated at least 140 km inshore of the application area and there is therefore no overlap of the survey expected with snoek-directed fishing activity. As detailed on Section 4.2 (IMPACT OF SOUND ON CATCH RATES) of the Fisheries Impact Assessment Report (Appendix 3 of the BAR), due to the location of the Reconnaissance Permit area in the deepwater environment, sound generated during the survey is not expected to influence the spawning behaviour or migration route of snoek (a species of key importance to the linefish and smallscale fisheries sectors). The Reconnaissance Permit area is situated well offshore of the shelf break which is where snoek are known to spawn during winter-spring. With reference to the impact of the noise on the rock lobster, please refer to Section 3.3.9 (WEST COAST ROCK LOBSTER) of the Fisheries Impact Assessment Report, it was found that *"The Reconnaissance Permit area is situated at least 115 km from the closest rock lobster fishing grounds and there is no spatial overlap (see Figure 3.40)."* Furthermore, with reference to Table 3.14 of the Fisheries Impact Assessment Report (Appendix 3 of the BAR), it was concluded that there would be no impact on the West Coast Rock Lobster.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

6 December, 2022

Our ref: GPK/as/1520

16/3/3/6/4/1/1/F4/20/1453/22 (Development Management)

18/2/3/2022-2023 (Development Facilitation)

17/1/8 (CMU 058/2022) (Biodiversity and Coastal Management)

Ms Thea Jordan

Director: Development Facilitation

Department of Environmental Affairs and Development Planning

Western Cape Government

11th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000

Dear Madam

RESPONSE TO COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED TGS 3D SEISMIC SURVEY PROJECT REQUIRING A RECONNAISSANCE PERMIT IN THE ORANGE BASIN, EXTENDING FROM APPROXIMATELY 120KM OFFSHORE OF ST HELENA BAY TO 230KM OFFSHORE OF HONDEKLIP BAY, OFF THE WEST COAST OF SOUTH AFRICA (PASA REF: 12/1/040)

EIMS acknowledges receipt of your comments on 25 November 2022. Please refer to the table below for responses to the comments raised.

Comment/ Recommendation	Response
1. The initial notification of 22 August 2022 informing potential interested and affected parties ("I&APs") of the proposed TGS seismic survey project, the Department's acknowledgement of receipt of the notification and registration as a commenting authority sent via email on 24 August 2022, the email notification of 29 August 2022 reminding I&APs of the dates for the public meetings, and the email notification of 25 October 2022 regarding the availability of a Draft Basic Assessment Report ("BAR") for comment, refer	Comment noted.
2. Thank you for the opportunity to participate in the basic assessment process. Please find consolidated comment from various directorates within the Department on the Draft BAR dated 06 October 2022 that was available for download from	Comment noted.

8 Dalmeny Road, Pine Park, 2194 | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | **F** (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | **F** (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
the website of the environmental assessment practitioner.	
3. Directorate: Development Management (Region 1) – Ms Lorretta Osborne (Email: Loretta.Osborne@westerncape.gov.za; Tel.: (021) 483 3696): 3.1. The cumulative impacts of seismic surveying are purely speculative at this stage. Therefore, the recommendation that a Strategic Environmental Assessment ("SEA") be undertaken is supported, from an environmental, social and economic perspective, but this should be instituted at the earliest possible opportunity. 3.2. Taking the above into consideration, it is recommended that the competent authority follow a precautionary and risk-averse approach and undertake a SEA and/or request that a SEA be undertaken to ascertain the cumulative impacts of seismic surveying along the provincial coastal area, and not consider each application for seismic surveying in isolation of each other	It is unlikely that concurrent seismic surveys will be undertaken in the same area during the same survey window however the cumulative impacts associated with multiple surveys needs and was assessed. Further as stated in Section 8.3.10 (Mitigation and management) of the Social Impact assessment Report, assessing all cumulative impacts of the seismic survey industry on the livelihoods of communities, addressing perceptions and alleviating fear from a strategic perspective is not TGS' responsibility and falls outside the scope of one environmental impact assessment. It is the responsibility of the relevant authorities and the industry. However, the seismic survey industry should reassess their position and social licence to operate as an industry in a South African context and conduct a strategic environmental assessment of the impact of the industry and embark on an awareness raising and education campaign. Having meetings will not be sufficient. Participatory processes and workshops where communities can engage in experiential learning should be considered. If the seismic survey industry fails to address the community's need for education and cooperation it will result in significant delays and increase the risk for social unrest. TGS are therefore looking into potential ways to initiate discussion within the industry.
3.3. Strict adherence to the mitigation measures contained in the Environmental Management Programme is essential to mitigate potential impacts on the biophysical environment.	Comment noted.
3.4. Should environmental authorisation be granted, it is essential that consideration be given to restricting the seismic survey outside the non-mating/ breeding season of marine mammals.	Comment noted. With reference to Section 6.4 (Scheduling Alternatives) of the Basic Assessment Report, it has been recommended that "Based on the findings of the Acoustics, Marine Ecology and Fisheries recommendations, it is recommended that the survey window of January – May be utilised in order to: Avoid sensitive areas and periods for some marine fauna: Movement of migratory cetaceans (particularly baleen whales) from their southern feeding grounds into low latitude waters (June/July and late October/November), and their aggregation on the summer feeding grounds between St Helena Bay and Dassen Island from late October to late December and ensure that migration paths are not blocked by seismic operations;

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
	Avoid periods of peak fishing activity during June and July in order to reduce the probability of disruption to the large pelagic longline fishing sector and tuna pole line fishing sector."
3.5. All comments received from I&APs and organs of state must be incorporated in a Comments and Response Report	All objections, comments and responses will be submitted, together with the Basic Assessment Report and associated appendices to the Competent Authority for consideration in the decision-making process.
4. Directorate: Development Facilitation – Ms Adri La Meyer (Email: Adri.LaMeyer@westerncape.gov.za; Tel.: (021) 483 2887): 4.1. This Directorate acknowledges the thorough manner how public consultation has been managed to date, including the provision of the virtual and public meetings.	Comment noted.
4.2. The National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") requires the consideration of all relevant factors for sustainable development, including that a risk-averse and cautious approach be applied that considers the limits of current knowledge about the consequences of decisions and actions. In the absence of a much-needed SEA to address incremental decision making, this Directorate advises that the competent authority adopt a risk-averse and cautious approach in its decision-making.	Comment noted. For the Competent Authority to note.
5. Directorate: Biodiversity and Coastal Management – Mr Ryan Apolles (Email: Ryan.Apolles@westerncape.gov.za; Tel.: (021) 483 2817): 5.1. It is acknowledged that pre-emptive mitigation measures are proposed to mitigate potential impacts caused by the acoustic blasts. Presently, it seems the conclusiveness of scientific knowledge is currently being contested, as considered in the Western Cape High Court Judgement in the case of Christian John Adams & Others v Minister of Mineral Resources and Energy & Others (case number: 1306/22) where applicants in this matter presented the argument that cumulative impacts of seismic	Assumptions and limitations, including knowledge gaps are included in the BA Report. Keeping these information gaps in mind, the assessment of impacts has adopted a strongly precautionary approach. It is acknowledged that information on deep-water habitats and their associated biota is lacking. This is primarily due to the difficulties and high costs associated with sampling beyond the inner continental shelf. Virtually all of the very scant information available has been obtained during hydrocarbon exploration projects, which in themselves provide good opportunity for collecting baseline data at depths beyond which commercial fisheries operate in. Information from such ecological baseline surveys is however not always made publicly available as it is often considered proprietary information. Even given these information gaps

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
surveys have not been studied in South Africa, and that the impact on fish assemblages was difficult to interpre	the level of certainty (confidence rating) of the impact predictions in the marine fauna report is considered high. This project may be able to contribute to assisting with collaboration on conducting independent research on how fish species on the West Coast such as snoek respond to seismic surveying. Bearing in mind that the location of this particular survey is far offshore and impacts on the biophysical environment are expected to be relatively low this project is seen as a good opportunity to obtain local data and conduct local research which could be useful for similar projects and applications that may take place in the future. TGS will further liaise with relevant scientific research institutions to offer the potential of collaborating in independent on-water research during the survey, as recommended in the Basic Assessment Report.
5.2. It is recommended that a SEA, based on spatial planning principles, be undertaken to assess and manage potential cumulative impacts in a holistic manner and to identify and implement regional level mitigation measures. The competent authority must take cognisance of this recommendation to undertake a SEA to assist specialists and EAPs to accurately assess cumulative impacts. 5.3. This Directorate does not support further reconnaissance, exploration, prospecting, or mining activities of the sea floor until such time that sufficient and strategic level information is available on the cumulative impacts of these activities so that this Directorate is able to apply its mind and provide informed comments on such applications.	Comment noted. Please refer to the response to Comment 3.1 above.
6. The applicant is reminded of its "general duty of care towards the environment" as prescribed in section 28 of the NEMA, 1998 which states that "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment", read together with section 58 of the National Environmental Management:	Comment noted. The Basic Assessment Report presents the findings of a team of qualified environmental specialists. The team considered the proposed activity (seismic survey), identified and assessed potential environmental impacts (supported by inputs from the public consultation process), and has proposed management and mitigation measures. All impacts identified in the process can be reduced to a medium or low significance with the implementation of the management and mitigation measures.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

Comment/ Recommendation	Response
Integrated Coastal Management Act, 2008 (Act No. 24 of 2008),which refers to one's duty to avoid causing adverse effects on the coastal environment. The Department reserves the right to revise initial comments and request further information based on any or new information received.	

Sincerely,

EIMS Public Participation Team

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

6 December, 2022

Our ref: GPK/as/1520

Prof. Patrick Bond

University of Johannesburg Department of Sociology

Auckland Park Kingsway Campus, P.O. Box 524, Johannesburg, 2006

Dear Sir

RESPONSE TO COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED TGS 3D SEISMIC SURVEY PROJECT REQUIRING A RECONNAISSANCE PERMIT IN THE ORANGE BASIN, EXTENDING FROM APPROXIMATELY 120KM OFFSHORE OF ST HELENA BAY TO 230KM OFFSHORE OF HONDEKLIP BAY, OFF THE WEST COAST OF SOUTH AFRICA (PASA REF: 12/1/040)

EIMS acknowledges receipt of your comments on 25 November 2022. Please refer to the table below for responses to the comments raised.

Comment/ Recommendation
I am a University of Johannesburg sociologist (a distinguished professor), specialising in public policy and environmental economics. I am writing in particular about the implications of the proposed 3D seismic survey for South Africa's climate politics. (The views expressed below are personal, not institutional.) I hold a PhD in Geography and Environmental Engineering from Johns Hopkins University (1993), having earlier studied economics at Swarthmore College and the University of Pennsylvania Wharton School of Finance. I also have engaged in many South African policy processes, having drafted the Reconstruction and Development Programme White Paper (1994) and many others. I also work closely with civil society organisations in South Africa, Africa and across the world. I am particularly interested and affected, as are all South Africans, and indeed the world's citizens, by the climate components of the seismic survey. Even the proposal and background paperwork – https://www.eims.co.za/2022/10/25/1520-proposed-tgs-seismic-reconnaissance/ – require drastic, urgent improvement. The adverse economic impacts are especially notable, and must be factored in, consistent with the National Environmental Management Act's "polluter pays" foundational principle. No effort has been made to properly cost the seismic survey given its implications for gas or oil extraction, by including the troubling levels of greenhouse gas emissions. The following pages assume gas condensate deposits will be found – because if there was not a strong possibility of that outcome, there would be no survey. (While it is possible that the survey will be unsuccessful, the Precautionary Principle embedded in South African environmental law and policy implies that the potential gas deposits will be impressive.) Failure to calculate climate implications through gas life-cycle analysis As is well known, methane – the main ingredient (usually 90%) in Liquefied Natural Gas (LNG) – is released during a wide variety of processes between exploratory drilling and final combustion. The seismic survey proposal is, in essence, climate-denialist by failing to recognise this basic reality. In short, the life-cycle of natural gas is vital to account for, so as to quantify the total emissions in at least five stages: • "upstream" gas production, including exploratory drilling, extraction, processing and pipeline transport; • liquefaction; • tanker transport; • regasification; and • power plant operations when the gas is burned to generate electricity.

8 Dalmeny Road, Pine Park, 2194 | **PO** Box 2083, Pinegowrie 2123, South Africa
T (011) 789-7170 | **F** (086) 571- 9047

A Regus Business Centre, 14 Stewart Drive, Berea, East London
T (043) 783-9826 | **F** (086) 571- 9047

W www.eims.co.za | **E** mail@eims.co.za | **Co Reg** 1992/005927/07| **VAT** 489 013 9027

Directors: L Whitlow, A Smith.

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

The Natural Resources Defense Council illustrates these steps as follows:
What the seismic survey must do, to have credibility, is estimate emissions associated with gas in these stages:
UPSTREAM: Extraction of gas at the well, processing, and domestic pipeline transport; occurs in exporting country; greenhouse gas emitted: predominantly methane.
LIQUEFACTION: Gas is cooled to -162 degrees Celsius to reduce its volume and convert it to liquid form; occurs in exporting country; greenhouse gas emitted: almost all carbon dioxide.
TANKER TRANSPORT: Liquefied natural gas is loaded onto an LNG tanker and transported to its destination port; occurs on the high seas; greenhouse gas emitted: mostly carbon dioxide.
REGASIFICATION: Liquefied natural gas is re-warmed to convert it to a gas; occurs in importing country; greenhouse gas emitted: mostly methane.
POWER PLANT OPERATIONS: Gas is burned in a power plant to generate electricity; occurs in importing country; greenhouse gas emitted: almost all carbon dioxide.
How dangerous are emissions typically associated with not only combustion, but also the leakage at well heads, in storage, and in transport through pipelines that in this region are often poorly maintained or subject to vandalism and petroleum-product theft? While the U.S. Environmental Protection Agency regularly made estimates about greenhouse gas emissions from such sources, in August 2021 new research showed that the source-based estimates were only half the amount of methane release that were picked up in satellite imaging and atmospheric measurement. Stanford University analysts wrote in Nature Communications (https://www.nature.com/articles/s41467-021-25017-4).
Full economic costing
The seismic survey makes estimates as to how much methane gas is potentially available in the relevant blocks, but has no information about the market value, and the environmental costs of likely externalities. Below are rough estimations that can guide answers to these questions.
The extremely large gas reserves anticipated to be found both offshore and onshore South Africa, should be considered as a major potential source of greenhouse gas emissions, especially if more than 13 trillion cubic feet (tcf) of gas are capable of being extracted:

- 8 tcf in the Orange Basin
- 2 tcf in the Bredasdorp Basin
- 3 tcf in the Outeniqua Basin
- discoveries that are likely in the Witwatersrand and Durban-Zululand basins

To illustrate the costs that are associated with just one particular site with many equivalent characteristics to the TGS proposal for the Atlantic Ocean, the Transkei-Algoa blocks on the Indian Ocean, consider three factors: the oil-barrel equivalent of estimated gas reserves; the market value price of that gas; and the estimated Social Cost of Carbon associated with these amounts.
1) First, there may be the equivalent of a billion barrels of oil in the Transkei-Algoa blocks: Impact CEO: "We would not be investing in the way that we are looking to invest in the area if we could not see a billion-barrel potential." Source: https://www.africaenergy.com/article/south-africa-shell-takes-stake-impacts-transkeialgoa- offshoreblocks
2) Second, the international market value of natural gas has zigzagged dramatically, ranging in 2022 from $3.80 to $9.30 per million British thermal units (MMBtu), and in November 2022 priced at around $7.20/MMBtu.
Source: https://tradingeconomics.com/commodity/natural-gas?user=analyst14639
There are 4.5 MMBtu per barrel-equivalent. If in the Transkei-Algoa blocks there are a billion barrels of oil (equivalent) to be extracted, the 4.5 billion MMBtus would be worth $32.7 billion, or R570 billion (i.e., nearly 10% of annual 2021 GDP of $320 billion). That would be potential gross income. But as for net income, there are major costs to extraction, still to be determined by local drilling conditions, fixed capital costs, operating expenses, liabilities for local ecological damage, taxes and royalties.
3) Local ecological damage can be considered priceless, especially in the event not only of seismic exploration blasting, but a drilling platform or pipeline rupture in the Agulhas Current, so it is difficult to estimate such costs. However, we do have some estimates of greenhouse gas damage to apply.
The main ingredient in natural gas is methane, which as a greenhouse gas is 80 times more potent in a 20-year period than CO2. Indeed the biggest externalised environmental cost of all is the impact of the combustion of methane on climate. A barrel of gas generates 236 kg of CO2-equivalents when burned, or 0.26 tons. So if there are a billion barrels of gas available in the Transkei-Algoa blocks, we can assume something close to 260 million ton-equivalents of greenhouse gas emissions. The Social Cost of Carbon – i.e. an assessment of damages per ton – is hotly contested. Barack Obama's administration assessed it at $51/ton but that is expected to rise dramatically in 2022 revisions. The

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

IMF estimates $60/ton. The European Union currently has an Emissions Trading Scheme price closer to $100/ton. But the latest research by scientists suggests $3000/ton is more accurate.
Source: https://www.ucl.ac.uk/news/2021/sep/economic-cost-climate-change-could-besixtimes-higher-previously-thought.
If we set the Social Cost of Carbon at $3000/ton, and there are 260 million tons of CO2-equivalents that could be released from all the gas to be extracted in Transkei-Algoa alone, the Social Cost of Carbon would be $780 billion. Set against the gross (not net) income from a billion barrels claimed by the Impact CEO above, valued at $32.7 billion (before costs are subtracted), this extraction obviously doesn't make sense if we take seriously full cost accounting.
Comparisons in this exercise, where the applicant was honest enough to admit likely deposits of a billion barrels, are appropriate for the area TGS intends to drill: "The proposed project area is located between approximately 120 km offshore of St Helena Bay, extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay over a number of petroleum licence blocks. The Application Area for the proposed 3D seismic survey is approximately 57 400 km2 in extent." If there are many multiple times as many tcfs in this zone, as in the much smaller Transkei-Algoa blocks, then likewise the multiples of Social Costs of Carbon also rise accordingly.
Further calculations not yet undertaken in the seismic survey proposal
In addition to a missing Social Cost of Carbon estimate, other shortcomings are obvious. Natural capital accounting and the National Environmental Management Act's commitment to the polluter pays principle are not referenced. It is imperative for the TGS proposal to undertake full cost accounting on even the roughly-estimated CO2-equivalent emissions that are implied by any oil and gas exploration. No such estimates are attempted.
The climate-sanctions implications of ignoring full cost accounting
One simple reason to carry out such accounting is the point made by President Cyril Ramaphosa on October 11, 2021, explaining the danger to the economy of further fossil fuel development. Ramaphosa referenced the "Carbon Border Adjustment Mechanism" (CBAM) that will be imposed by Western importers of South African goods, in his Presidential letter advocating a low-carbon economy and Just Transition for affected workers and communities:
"As our trading partners pursue the goal of net-zero carbon emissions, they are likely to increase restrictions on the import of goods produced using carbon-intensive energy. Because so much of our industry depends on coal-generated electricity, we are likely to find that the products we export to various countries face trade barriers and, in addition, consumers in those countries may be less willing to buy our products."
Source: http://www.thepresidency.gov.za/from-the-desk-of-the-president/deskpresident%2Cmonday% 2C-11-october-2021
Climate-related trade disincentives will include increased carbon taxation based on high-CO2 components of local production as well as the distance travelled by goods either through shipping or air transport. The Treasury recognised this in an August 2021 briefing to parliament, in which several sectors were identified as especially vulnerable: iron and steel, cement, fertiliser, aluminium and electricity.
In each case, South African economic development requires full cost accounting to assess whether, at a time coal-fired power plants are going to be retired early, their replacement by methane gas may exacerbate South Africa's vulnerabilities. Bearing in mind the likelihood of climate sanctions if our economy remains reliant upon fossil fuels, the Social Cost of Carbon is the most appropriate polluter-pays metric to judge the full costs of the proposed exploration to be followed by exploitation and combustion.
The U.S. precedent for incorporating climate-related costs (January 2022)
In January 2022, Judge Rudolph Contrera of the Washington, DC U.S. District Court insisted that the full-cost accounting was not complete in the Trump administration's permission to drill for offshore oil and gas. The Biden administration, had according to Judge Contrera, admitted that *"current programs fail to adequately incorporate consideration of climate impacts into leasing decisions or reflect the social costs of greenhouse gas emissions."* Moreover, the judge found that Trump's administration had ignored "new evidence demonstrat[ing] that existing operations in the Gulf of Mexico emit twice the amount of methane than previously thought."
Source: https://int.nyt.com/data/documenttools/78-memorandum-opinion-1-27/b0903c94e57b0cb5/full.pdf
The Makhanda High Court precedent in Sustaining the Wild Coast et al versus Shell et al
The most glaring shortcoming of the TGS seismic survey proposal is its failure to incorporate the 1 September 2022 judgement in a very similar court case. The climate-relate findings by three High Court judges are in the box below (with emphasis added in bold).
IN THE HIGH COURT OF SOUTH AFRICA (EASTERN CAPE DIVISION, MAKHANDA)
CASE NO: 3491/2021
Reportable

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

In the matter between:
SUSTAINING THE WILD COAST NPC MASHONA WETU DLAMINI
DWESA-CWEBE COMMUNAL PROPERTY ASSOCIATION
NTSINDISO NONGCA VU SAZISE MAXWELL PEKAYO CAMERON THORPE
ALL RISE ATTORNEYS FOR CLIMATE AND THE ENVIRONMENT NPC
NATURAL JUSTICE
GREENPEACE ENVIRONMENTAL ORGANIZATION
and
MINISTER OF MINERAL RESOURCES AND ENERGY MINISTER OF ENVIRONMENT, FORESTRY AND FISHERIES
SHELL EXPLORATION AND PRODUCTION SOUTH AFRICA B V
1st Applicant 2nd Applicant 3rd Applicant
4th Applicant 5th Applicant 6th Applicant 7th Applicant
8th Applicant 9th Applicant
1st Respondent 2nd Respondent
3rd Respondent
IMPACT AFRICA LIMITED
BG INTERNATIONAL LIMITED
4th Respondent 51h Respondent
JUDGMENT
...
[109] The intervening parties' contention that the decision-maker gave no proper consideration to the climate change impacts of the decision to grant the exploration right is an important factor to be considered in the process of granting an exploration right.
[110] Reliance for this contention, by the intervening parties, is placed on expert testimony113 showing that most of the discovered reserves of oil and gas cannot be burnt if we are to stay on the pathway to keep global average temperature increases below 1.5 degrees Celsius. Authorising new oil and gas exploration, with its goal of finding exploitable oil and/or gas reserves and consequently leading to production, is not consistent with South Africa complying with its international climate change commitments.
[111] According to the respondents, climate change considerations and the right to access food and livelihood are irrelevant when considering an application for an exploration right; these considerations are premature because they fall to be considered at a much later stage.
[112] On the authority of Director: Mineral Development, Gauteng Region and Another v Save the Vaal Environment and Others114 the processes are discrete stages in a single process that culminates in the production and combustion of oil and gas, and the emission of greenhouse gases that will exacerbate the climate crisis and impact communities' livelihoods and access to food.
[113] The respondents' thesis does not find support from Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others,115 either, where Murphy J said:
'The absence of express provision in the statute requiring a climate change impact assessment does not entail that there is no legal duty to consider climate change as a relevant consideration and does not answer the interpretative question of whether such a duty exists in administrative law. Allowing for the respondents' argument that no empowering vision in NEMA or the regulations explicitly prescribes a mandatory procedure or condition to conduct a formal climate change assessment, the climate change impacts are undoubtedly a relevant consideration as contemplated by section 240 of NEMA for the reasons already discussed. A formal expert report on climate change impacts will be the best evidentiary means of establishing that this relevant factor in its multifaceted dimensions was indeed considered, while the absence of one will be symptomatic of the fact that it was not.116'
[114] It seems clear from the aforegoing, even taking into account the contentions raised by the respondents, that, had the decision-maker had the benefit of considering a comprehensive assessment of the need and desirability of exploring for new oil and gas reserves for climate change and the right to food perspective, the decision-maker may very well have concluded that the proposed exploration is neither needed nor desirable...
113 Professor New.
114 (133/98) [1999] ZASCA 9 (12 March 1999).
115 (2017) JOL 37526 (GNP); [2017] ZAGPPHC (GP); [2017] 2 All SA 519 (GP).
116 Para 88.
The most important aspect of this judgement is that the seismic survey and exploration stages cannot be seen as

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

discrete, disconnected aspects of what should, in reality, be understood as an integrated process of fossil fuel exploitation.

Conclusion

Due to the failure of the seismic survey proposal to properly consider the full cost accounting required for such a vital natural resource (one that should also entail rudimentary natural capital accounting), and due to the adverse impact on the rest of the economy as climate sanctions are imposed, and finally due to the new precedents in which precisely such calculations led to cancellation of gas and oil offshore exploration in the United States and South Africa's Indian Ocean, the TGS seismic survey proposal team must take responsibility for redoing the work. They should, in the process, reconsider making South Africa yet more greenhouse gas dependent.

EIMS RESPONSE

Thank you for your comments.

The BA Report presents the findings of a team of qualified environmental specialists. The team considered the proposed activity (seismic survey), identified and assessed potential environmental impacts (supported by inputs from the public consultation process), and has proposed management and mitigation measures. All impacts identified in the process can be reduced to a medium or low significance with the implementation of the management and mitigation measures. The proposed seismic survey is not anticipated to cause significant pollution or degradation of the environment.

EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant. Whilst it is acknowledged that any future exploration drilling, extraction, production and utilisation of natural gas and oil has the potential to release significant greenhouse gases, the proposed seismic surveys, which are the subject of this application, are not expected to release any significant greenhouse gases. Any subsequent authorization would be restricted to these specifically assessed activities, namely seismic survey.

Should the applicant or any other applicants wish to undertake any additional exploration activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a consequent need to apply for the relevant permissions. These would include a formal application for an Exploration or Production Right as well as a new EA. The impacts of such proposed activities would consequently require specific assessment and public consultation prior to approval. It is premature to assess the likely impacts of further invasive exploration activities or production activities or future utilization of any resource as the extent, duration, location, and magnitude applicable to these activities (and all other directly associated activities) are unknown at this stage. Consequently, it is not possible to ascertain whether any of these impacts constitutes a fatal flaw or the extent to which such impacts can be managed or mitigated. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, and production activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed prior to implementation on their merits as and when they are proposed.

Please refer to Section 5 of the BA Report in regard to the need and desirability for the proposed activities. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's energy planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments in the pathway to keep global average temperature increases below 1.5 degrees Celsius. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial in our

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

view that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined.

TGS is a geoscience data acquisition company and does not undertake exploration or production activities. Data from TGS' seismic libraries are not only used for petroleum and natural gas exploration and development, data may also be used for development of offshore wind, geothermal energy, low-carbon solutions such as carbon capture and storage and also more generally for providing more insight and understanding into the regional geology of the area for scientific purposes.

As stated in Section 5.2 of the BA Report, the feasibility of using natural gas for domestic power generation is considered to be dependent in part on the extent of available domestic reserves of natural gas, as well as the financial cost of importing natural gas should those reserves be insufficient. The acquisition of seismic survey data is therefore considered important with respect to understanding the potential for future oil and gas production as part of the energy mix of the country going forward.

Just Transition and Climate Pathways Study for South Africa – The Role of Gas in South Africa's Path to Net-Zero (NBI, 2021) shows that gas is set to play a major role in South Africa's path to net-zero emissions. The report by the National Business Initiative, Business Unity South Africa and the Boston Consulting Group shows that a lack of supply threatens the country's decarbonisation strategy. This report unpacks the impact of including gas in the country's plans to reduce emissions from carbon-heavy sectors such as electricity, transport and industrial. It is envisioned that natural gas will replace coal and diesel fuel sources, which are more emissions intensive. Eventually, gas would be phased out by 2050 and replaced by greener alternatives like green hydrogen once the latter is developed and becomes more affordable. The study warns that without additional gas, there would be more emissions in the long run because the synfuels, power and industrial sectors would rely on carbon-intensive fuels like coal and diesel for longer.

Sincerely,

EIMS Public Participation Team

forestry, fisheri-
& the en-
Pr-

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002

Email: Appeals@dffe.gov.za

APPEAL RESPONSE REPORT

PROJECT NAME/TITLE:	Proposed TGS Orange Basin Reconnaissance Permit Project
PROJECT LOCATION:	Located Offshore Off the West Coast, South Africa.
PROJECT REFERENCE NUMBER:	PASA Ref: 12/1/040
DATE PROJECT/ACTIVITY AUTHORISED:	17 April 2023
DATE OF NOTIFICATION OF THE DEPARTMENTS DECISION:	26 April 2023

JWS8

Initial/s:

2928

DETAILS OF THE APPELLANT	DETAILS OF THE APPLICANT
Name of appellant: Department of Environmental Affairs and Development Planning	**Name of applicant:** TGS Geophysical Company (UK) Limited
Appellant's representative (if applicable): Head of Department: Mr. Gerhard Gerber	**Applicant's representative (if applicable):** Environmental Impact Management Services (Pty) Ltd
Postal address: 1 Dorp Street, Utilitas Building, Cape Town, 8001	**Postal Address:** P.O. Box 2083 Pinegowrie 2123
Email Address: Gerhard.Gerber@westerncape.gov.za	**Email Address:** tgs@eims.co.za
Telephone number: (021) 483 2787	**Telephone number:** (011) 789 7170
Fax Number: n/a	**Fax number:** (086) 571 9047

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
1. State of scientific knowledge on impacts of seismic acoustic blasts uncertain- escalating the possible risk on the marine environment The impacts of the proposed activities i.e. seismic acoustic blasts are currently not conclusive which presents an environmental risk to the marine environment if undertaken. NEMA section 2 applies in terms of the "precautionary principle", regardless of other countries national policies, South Africa's policy and legal framework requires more conclusive evidence to support an activity with a potential significant impact over a large area. Further combined and cumulative impacts of reconnaissance, exploration and mining and drilling activities have not been assessed and evaluated in the context of the impacts on other marine and coastal-based economic activities. In the Departments comments submitted on 25 November 2022 with regard to the Draft Basic Assessment Report, the inconclusiveness of	The Assumptions and limitations, including knowledge gaps, are included in the Basic Assessment Report (BAR). Keeping these information gaps in mind, the assessment of impacts adopted a strongly precautionary approach. It is acknowledged that information on deep-water habitats and their associated biota is lacking. This is primarily due to the difficulties and high costs associated with sampling beyond the inner continental shelf. Virtually all of the very scant information available has been obtained during hydrocarbon exploration projects, which in themselves provide good opportunity for collecting baseline data at depths beyond which commercial fisheries operate in. Information from such ecological baseline surveys is howevernot always made publicly available as it is often considered proprietary information.	It is the Agency `s view that the precautionary approach principle was considered and followed throughout the undertaking of the Environmental Impact Assessment (EIA) process. This process assessed potential and cumulative impacts of the proposed activity and recommended mitigation measures. The recommendations and implementation of the mitigation measures for potential impacts is a precautionary measure. Gaps in knowledge and limitations in experiments on marine species are acknowledged and precautionary measures are put in place to manage potential impacts. It should be noted that the limitations in experiments are because the experiments were conducted in controlled environments and therefore, the impacts were noted early and were exaggerated. The literature indicates that the behavior of the tested species would differ in their natural environment. Seismic surveys are undertaken globally with standard and specific mitigation measures without any evidence of injuries and behavioral changes of species that were related to the operations. It can

Initial/s:

scientific knowledge of the impacts of seismic surveys incorporating acoustic blasts on the marine environment was raised, stating that the state of scientific knowledge was contested, as	Even given these information gaps, the level of certainty (confidence rating) of the impact predictions in the marine fauna report is considered high. This project	therefore be said that the implementation of recommended globally used mitigation measures minimize impacts on marine species.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
considered in the Western Cape High court judgement in the case of Christian John Adams & Others v Minister of Mineral Resources and Energy & Others (case number: 1306/22) where applicants in this matter presented the argument that cumulative impacts of seismic surveys have not been studied in South Africa and that the impact on fish assemblages was difficult to interpret. (See attached a copy of the court judgment- case number 1306/22 as Appendix 5).	may be able to contribute to assisting with collaboration on conducting independent research on how fish species on the West Coast such as snoek respond to seismic surveying. Bearing in mind that the location of this particular survey is far offshore and impacts on the biophysical environment are expected to be relatively low, this project is seen as a good opportunity to obtain local data and conduct local research that could be useful for similar projects and applications that may take place in the future. TGS will further liaise with relevant scientific research institutions to investigate the potential of collaborating in independent on-water research during the survey, as recommended in the BAR. It should further be noted that the project involving Searcher that was the subject of the Christian John Adams & Others v Minister of Mineral Resources and Energy	

Initial/s:

	& Others (case number: 1306/22) case cannot be directly compared to this Application for Environmental Authorisation (EA) by TGS mainly due to the extent of proposed TGS Application	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
	Area, which is significantly smaller and is located approximately 200 km offshore. As a result, the extent of sensitive environments within the TGS Application Area is substantially smaller and will affect a substantially smaller number of users. For both technical and commercial reasons, it is unlikely that concurrent seismic surveys will be undertaken in the same area during the same survey window. However, the cumulative impacts associated with multiple surveys was assessed and detailed in Section 9.3.5 of the BAR. It should further be noted that the cumulative impacts were considered as part of each of the impacts identified for the entire project, and these are detailed and described where relevant in Section 9.3 of the BAR. Please refer to the EIMS Methodology described in Section 9.1 of the BAR.	

Initial/s:

2. Activities approved in the absence of Strategic Environmental Assessment These activities are being approved without a Strategic Environmental Assessment which would serve to coherently plan/ co-ordinate	For both technical and commercial reasons, it is unlikely that concurrent seismic surveys will be undertaken in the same area during the same survey window. However, the cumulative impacts	The Department of Mineral Resources and Energy is not responsible for conducting Strategic Environmental Assessment. Furthermore, the authorised activity followed and met the minimum requirements of the current relevant legislation. Hence, it was approved.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
these activities to manage the cumulative impacts. Thus these piece-meal decisions do not ensure that "the nation's mineral and petroleum resources are developed in anorderly and ecologically sustainable manner while promoting justifiable social and economic development" as per the objectives set out in section 2(h) of the MPRDA.	associated with multiple surveys was assessed and detailed in Section 9.3.5 of the BAR. It should further be noted that the cumulative impacts were considered as part of each of the impacts identified for the entire project, and these are detailed and described where relevant in Section 9.3 of the BAR. Please refer to the EIMS Methodology described in Section 9.1 of the BAR. It is also important to consider that the offshore activities are proposed and authorised within a framework of existing legislation, policies and management plans, such as those described in detail in Sections 4 and 8.6 of the BAR. The current legislation in South Africa does not prescribe a Strategic Environmental Assessment (SEA) to be undertaken as a precursor to a project receiving EA. It should further be noted that this project does not relate directly to the	

Initial/s:

	development of the resource that may potentially be located offshore, but the reconnaissance for such resource. While a SEA would provide an additional framework within which the potential	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
	future development of the resources should be considered, such a SEA would rely on the outcome of the exploration to define the nature and extent of the potential resource. Without this information an SEA for development of the resource would be purely speculative. Further, as stated in Section 8.3.10 (Mitigation and management) of the Social Impact assessment Report, assessing all cumulative impacts of the seismic survey industry on the livelihoods of communities, addressing perceptions and alleviating fear from a strategic perspective is not TGS' responsibility and falls outside the scope of one environmental impact assessment. It isthe responsibility of the relevant authorities and the industry. However, the seismic survey industry as a whole has and should continue to assess on an ongoing basis its position and social licence to operate as	

Initial/s:

	an industry in aSouth African context and work with stakeholders to conduct an SEA of the impact of the industry and embark on an awareness raising and education	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
	campaign. Having meetings will not be sufficient. Participatory processes and workshops where communities can engage in experiential learning should be considered. If the seismic survey industry fails to address the community's need for education and cooperation, it will result in significant delays and increase the risk for social unrest. TGS has already begun working with the energy industry alliance, EnerGeo, and with PASA to initiate discussion within the industry. EnerGeo has also been engaged in the consultation process on PASA's new community consultation guidelines.	

Initial/s:

ARR comments by Case Officer

Name & Surname: Sinazo Mnyaka

Date: 10/11/2023

Signature:

.....

Approved by Supervisor

Name & Surname: Natasha Thomas

Date:10/11/2023

Signature:

.....

Initial/s:

forestry, fisheri-
& the en-

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002

Email: Appeals@dffe.gov.za

APPEAL RESPONSE REPORT

PROJECT NAME/TITLE:	Proposed TGS Orange Basin Reconnaissance Permit Project
PROJECT LOCATION:	Located Offshore Off the West Coast, South Africa.
PROJECT REFERENCE NUMBER:	PASA Ref: 12/1/040
DATE PROJECT/ACTIVITY AUTHORISED:	17 April 2023
DATE OF NOTIFICATION OF THE DEPARTMENTS DECISION:	26 April 2023

JSW9

Initial/s:

DETAILS OF THE APPELLANT	DETAILS OF THE APPLICANT
Name of appellant: Aukotowa Fisheries Primary Cooperative Ltd	**Name of applicant:** TGS Geophysical Company (UK) Limited
Appellant's representative (if applicable): Renthia van Wyk	**Applicant's representative (if applicable):** Environmental Impact Management Services (Pty) Ltd
Postal address: Joos Engelbrecht Street, Port Nolloth, 8280	**Postal Address:** P.O. Box 2083 Pinegowrie 2123
Email Address: aukotowafisheries@gmail.com	**Email Address:** tgs@eims.co.za
Telephone number: 063 721 9428	**Telephone number:** (011) 789 7170
Fax Number:	**Fax number:** (086) 571 9047

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
1. Issues with the consultation process. The co-op believes the consultation processwas not done correctly, we do not believe that the information that was presented is accurate. We know that the government is for oil and gas,but as a community and a small-scale fisher organization we are against it. We have seen this happen in other countries, and it has messed the whole sea life up. That's why we see foreign boats in our waters. We say no but the government says yes. In a few years time we'll be like all the other countries with nothing in our waters and nothing for the generation behind us. We strongly say no to seismic surveys and oil and gas development.	It is our opinion that the Public Participation Process was conducted in line with and exceeded the requirements of the Environmental Impact Assessment (EIA) Regulations (2014), as amended. It should be noted that the Aukotowa Fisheries Primary Co-op (hereafter Aukotowa) was specifically identified as a key Interested and Affected Party (I&AP) and included in the Public Participation throughout the Basic Assessment Process. It should further be noted that a public meeting is scheduled during the pre-application phase with the Interested and Affected Parties (I&APs). The purpose of the meeting was to capture the initial concerns of the members of the public and key I&APs. The community showed up with placards and initially attended the meeting but refused to sign the attendance register. The Environmental Assessment Practitioner (EAP) tried to explain to them why it was important to sign the register and that it would not consent to the project, they decided to leave the meeting before any presentation	It is the Agency`s view that the public participation process (PPP) undertaken was in line with the Public Participation Guideline and therefore met the minimum requirements of the National Environmental Management Act (NEMA). The appellant was involved in the PPP from the start of the process and was listed as a pre-identified stakeholder, which received the first notification and information about the proposed project. The information presented during the PPP was based on the proposed activity and the general relevant oil and gas South African and global information. It is not clear what information the appellant is referring to; therefore, it is not possible to provide a clear response to this point. The oil and gas projects are undertaken in a sustainable manner. This is ensured by following NEMA requirements. The Environmental Impact Assessment (EIA) process is undertaken to ensure that the process will be undertaken in a sustainable manner.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
	could be made. A second round of public meetings were held in Port Nolloth during the BAR review phase, where members of the co-op did attend and were given opportunity to present their views and interact with the EAP and specialists. Please refer to the Public Participation Report (Appendices 2-6 & 2-9) for minutes of the meetings held in this regard. The information that was presented in the Basic Assessment Report (BAR), is considered to be accurate based on the latest information available and a comprehensive body of research, as is evidenced by the extensive research presented in the Specialist Studies in Appendix 3 of the BAR and Section 8 and 9 of the BAR. From the Appeal received, it is not clear which other countries or pollution events are being referred to, and it is therefore not clear if accurate or analogous inferences have been made by Aukutowa in this regard.	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
	Furthermore, the proposed project will not add significantly to the amount of international marine traffic in South African waters as it will only involve 2 vessels – refer to Section 8.7.2 and Figure 112 of the BAR. While there may have been pollution events and degradation of the marine environment in other countries, the lessons learnt from these incidents and case studies have been incorporated over time into the internationally accepted and implemented best practice, which have been captured in the BAR as the Mitigation Hierarchy and the mitigation measures related to each impact identified. These mitigation measures have been clearly set out in the Environmental Management Programme (EMPr) approved as part of the issuing of the Environmental Authorisation (EA). TGS and its subcontractors go to great lengths to prevent any unplanned spills into the marine environment, in compliance with the MARPOL	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
	regulations. The vast majority of exploration industry related pollution events have been down to drilling/extraction activities rather than surveying activities. Since the start of 2022, TGS has conducted 14 3D surveys and 1 regional 2D survey. These surveys have covered a total of 175,000 sq km of the world's oceans. In this time, we have only recorded 2 instances of fluid spill into the marine environment from our survey vessels with the total amount of spilled fluid being 255 millilitres. The findings of the specialist studies concluded that there are no environmental fatal flaws that should prevent the proposed project from proceeding, provided that the recommended mitigation and management measures are implemented. Based on the nature and extent of the proposed project, the local level of disturbance predicted as a result of the reconnaissance activities, the findings of the specialist studies, and the understanding of the significance level of	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
	potential environmental impacts, it wasthe opinion of the EIA project team and the EAP that the significance levels of the majority of identified negative impacts can generally be reduced to an acceptable level by implementing the recommended mitigation measures.	
2. It is not an open and transparent participatory process according to NEMA. We go and listen to the consultations but do not consent to a seismic survey. TGS states that a mitigation measure is to "consult with communities on potential ways in which to make a positive contribution to the communities." Why isn't this part of the consultation process? The private sector and the government should be coming to affected communities such as Port Nolloth with this question, instead of coming with only one option – either seismic surveys or exploration drilling. Why has nobody asked what the Port Nolloth community wants for development? Why would we agree to something that has absolutely no benefit for us? Meaningful consultation should allow us to decide what we want, not being told something	The EAP carried out the process as required by the NEMA and provided all relevant information in an open and transparent manner as is evidenced by the documentation made available, the public meetings held, as well as the other efforts of the PP process as described in the Public Participation Report (Appendix 2 of the BAR). It should be noted that the purpose of the consultations is not necessarily to ask for consent for the activity to proceed. For the consultations to be meaningful, it should aim to reflect the comments and concerns that were raised by the communities potentially affected by a proposed project and considered as part of the EIA, and to make these available to the relevant decision makers. This was done.	The PPP is undertaken for proposed projects or activity. In the case of the application in question, seismic survey was the proposed activity. Therefore, the applicant cannot undertake development activities proposed by communities. The communities are therefore requested or consulted to partake in the PPP by either, raising their concerns, views, objections, and any other matter that might help in minimizing the impacts of the planned activity. It is also important to note that the proposed project as a potential to produce long-term benefits to South Africa, even though immediate benefits are limited. According to the results of the EIA process, the proposed activity will not result in detrimental impacts to the receiving environment.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
that has the potential to destroy our livelihood and that is so significant to our culture.	In terms of the National Environmental Management Act (Act No. 107 of 1998 – NEMA) and the associated EIA Regulations, the authority for the issuing of authorisations rests with the Competent Authority, in this case the Department of Mineral Resources and Energy (DMRE). The recommendation for consultation referred to by the appellant , was included as a mitigation measure and it was considered by the Social Specialists that further consultation would be required, but that this could take place after Authorisation and prior to the actual undertaking of the activity. It should further be noted that the use of the offshore environment is notexclusively for fishing, but includes a widevariety of uses, as was highlighted in Section 8 of the BAR. It has been made clear throughout many similar processes that the fishing community are not in favour of the oil and gas sector. However, as per the impact assessments undertaken, with the implementation of mitigation measures as	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
	detailed in the EMPr, it was deemed that the impact's significance could bereduced to acceptable levels, that would not lead to significant impacts on other users of the same environment, in terms of the biological and socio-economic environment. It was thus concluded that the proposed project would not lead to a destruction of small scale fishing communities' livelihoods. In particular, this acoustic survey is based in water depths beyond the habitable zone of the rock lobster that constitutes the majority of the appellant's trade.	
3. TGS states there is a "perceived impact" of the oil/gas industry on the fishing industry, not the actual impact on catch rates. We do not believe this to be true, as there have been studies and evidence of the harms of seismic surveys and issues with oil and gas developments, e.g., blowouts, that impact fish for years to come. For example, after the Deepwater Horizon blowout in 2010 in the Gulf of Mexico, fish and dolphins are still testing	The Basic Assessment has been undertaken in line with the requirements of the NEMA and the EIA Regulations, 2014. As part of this process, EIMS and the specialist team have taken into consideration the scientific research available (including the research that detailed potential negative effects of seismic surveys) and used this as the basis for the impact assessment in the context of the proposed activity. The nature of the proposed activity and the	The impacts on fishing sector were assessed, including impacts of catch rates. It was found that the significance of impacts will be on low negative. Mitigation measures such as avoidance of the peak fishing season for affected sectors were recommended in the specialist report and formed part of the conditions of the Environmental Authorisation (EA). Blowouts are not expected during the proposed activity. It is important to note that Deepwater Horizon incident has led to great improvements in terms of safety during the undertaking on oil and gas activities globally. However, the proposed activities vary from the activities undertaken in the area of the referenced incident. Therefore, the potential impacts will also differ.

Initial/s:

		It is not clear as to what scientific reports and information referred to in the ground of appeal, and therefore the Agency is unable to respond to this point.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
positive for the chemicals found in the oil that spilled. There are scientific reports that were not included in the EIA that show different impacts on species from the noise of air guns used in seismic surveys. The difference in scientific information that is presented in theconsultations and EIAs is concerning. Further, we are concerned about who is going to monitor the impacts of the seismic survey, and how will fishers and other coastal livelihoods be compensated if there is harm to marine life as a result of the survey.	outcomes of the impact assessment were objectively and truthfully presented during the consultation processes. A comprehensive list of publications and research referenced in the studies are provided in the BAR. The Appellant does not cite specific studies or evidence to be considered. It should further be noted that EIMS has conducted the impact assessment on the basis of the activities proposed, namely seismic surveys, i.e. for reconnaissance only. Any subsequent authorization would be restricted to these specifically assessed activities. The proposed activities do not include any other exploration, production or combustion of any natural gas or oil resources. Should the applicant or other applicants wish to undertake any additional exploration, production, or combustion activities which are not addressed in the current EA application, there would be a need to apply for the relevant permissions. These would include a formal application for new EA and where relevant an exploration and production	An Environmental Officer will be appointed by the operator to ensure implementation of the approved EMPr. The Marine Mammal Observer and Passive Operator are responsible for monitoring movements of marine species and advising the crew on actions to take. The Fisheries Liaison Officer is responsible for monitoring impacts on marine fauna and communications with maritime vessels. The authorised activities will not result in detrimental impacts on the receiving environments and therefore, the need for compensation is not expected. It should also be noted that the application area is an open space and therefore, the important action would be to clean up the area and make it safe for the activities to continue, should the be a need.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
	Right, informed by a comprehensive Environmental Impact Assessment and stakeholder consultation assessing the merits of these specific activities. The impacts of such proposed activities would consequently require specific assessment of the associated impacts and public consultation prior to approval.	
4. Does not meet South Africa's climate change goals, e.g., Paris Agreement and Kyoto Protocol, and effort to achieve net zero. The push for oil and gas does not align with South Africa's climate change goals, where the country is a signatory to meeting these challenges and reducing its carbon footprint. We believe that this seismic survey violates these agreements and our Constitutional right to Section 24 on the Environment. It violates our right to health and well-being as it affects our livelihood and food security. This survey has a direct impact on pollution and ecological degredation, does not promote conservation, and is not promoting justifiable economic and social development. There are no economic	The appellants statement that the project does not meet the national climate change goals is incorrect. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's electricity planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition or peaking fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve South Africa's national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African	The need and desirability section discusses the need for energy mix in South Africa. It also references various policies that provide for minimization of climate change impacts. The nature and the duration of the planned activities make it impossible to assess the impacts on climate change. According to the results of the EIA process, the proposed activity will not result in detrimental impacts on the receiving environment. There are no immediate benefits anticipated from the proposed activity, however, dependent on the success of the proposed project, there might be future benefits.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
benefits of oil and gas to the Port Nolloth community.	policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined. As mentioned above, EIMS has conducted the impact assessment on the basis of the activities proposed, namely seismic surveys, i.e. for reconnaissance only. While impacts associated with unplanned release of pollutants have been identified (as detailed in Section 9 of the BAR), the likelihood of such events are unlikely with the implementation of the proposed mitigation measures. It was further determined that the proposed	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
	survey would not lead to significant ecological degradation, as detailed in the Marine Ecological Assessment and the Acoustic Assessment (Section 9 and Appendix 3 of the BAR. It was further concluded by the Fisheries Assessment and Social Assessment that the proposed activity could proceed with the implementation of the recommended mitigation measures. Throughout the Basic Assessment Process, it was clearly stated that the opportunities for job creation and local economic or social benefits would be low to negligible. Potential socio-economic benefits may only be realised in potential future exploration or production activities. Although the reconnaissance activities may not directly promote conservation,the mitigation measures that have to be implemented as part of this EA and EMPr have the potential to broaden the knowledge of the receiving environment (e.g. further research, implementation of the SEA, etc.), and to strengthen the relationships within the local communities	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
	through further and meaningful consultation.	
5. The government is allowing permits for activities that harm the ocean yet are diminishing quotas. We as small-scale fishers do not harm the ocean, yet are severely impacted by seismic survey activities. As TGS states, our livelihoods are "already compromised due to the fishing quota system, over-fishing, lack of employment opportunities, pollution, effects of climate change and the recent Covid pandemic." The government is not alleviating any of these challenges by allowing a seismic survey and oil and gas development. Even though this seismic survey is not in the exact boundary of our fishing grounds, we are still concerned that it will affect the migration patterns of the fish. Climate change and overfishing is already impacting those patterns and the amount of fish in the ocean, so please we do not want another activity that will harm the fish we depend on for our livelihood.	As mentioned above, the findings of the specialist studies concluded that there are no environmental fatal flaws that should prevent the proposed project from proceeding, provided that the recommended mitigation and management measures are implemented. Based on the nature and extent of the proposed project, the local level of disturbance predicted as a result of the reconnaissance activities, the findings of the specialist studies, and the understanding of the significance level of potential environmental impacts, it wasthe opinion of the EIA project team and the EAP that the significance levels of the majority of identified negative impacts can generally be reduced to an acceptable level by implementing the recommended mitigation measures. While the BAR acknowledged that the communities are "already compromised due to the fishing quota system, over-fishing, lack of employment opportunities,	Kindly refer to the previous responses regarding potential impacts on fishing industry and climate change.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
	pollution, effects of climate change and the recent COVID pandemic" the existing and cumulative impacts described interms of this were duly considered and assesses as part of the Basic Assessmentand it was concluded that the project could still proceed with the implementation of the recommended mitigation measures. The potential impact of the seismic survey migration patterns of fish, was considered by the marine ecologist and is detailed and assessed specifically in Sections 8.4.3 and 9.3.1.1.5 of the BAR and Appendix 3. With the implementation of the proposed mitigation measures, the impact was deemed to be of LOW significance. The location and seasonality of migration routes of a large number of species were considered in the BAR. With reference to Section 6.4 (Scheduling Alternatives) of the BAR, it has been recommended that "Based on the findings of the Acoustics, Marine Ecology and Fisheries recommendations, it is recommended that	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
	the survey window of January – May be utilised in order to: • Avoid sensitive areas and periods for some marine fauna: Movement of migratory cetaceans (particularly baleen whales) from their southern feeding grounds into low latitude waters (June/July and late October/November), and their aggregation on the summer feeding grounds between St Helena Bay and Dassen Island from late October to late December and ensure that migration paths are not blocked by seismic operations; • Avoid periods of peak fishing activity during June and July in order to reduce the probability of disruption to the large pelagic longline fishing sector and tuna pole line fishing sector."	

ARR comments by Case Officer

Name & Surname: Sinazo Mnyaka

Date: 26-06-2023

Signature:



.....

Approved by Supervior

Name & Surname:P Ngesi

Date:26/06/2023

Signature:



.....

Initial/s:

JWS10

ANNEXURE A

APPEAL QUESTIONNAIRE

An electronic copy of this questionnaire may be obtained from:

Mr Z Hassam at telephone: 012 399 9356 or e-mail:

AppealsDirectorate@environment.gov.za

Once completed, this document must be forwarded to:

E-mail: AppealsDirectorate@environment.gov.za

Physical Address: Department of Environmental Affairs, 473 Steve Biko Road, Environment House,Arcadia, Pretoria, 0002

Appellant's contact information:

Name: Angila Jumbert

Address: Bergrivier municipality
134 Voortrekker Road
Velddrif, 7365

Phone: (022) 783 1112

Cell: 082 783 7643

Email: jumbert A @ bergmun.org.za

Project information:

Project name: TGS Geophysical Company (UK) Limited, Seismic Surveys

Authorisation register number as on environmental authorisation:
Application reference no: 12/1/040

Authorisation date as on environmental authorisation:
17/04/2023

IMPORTANT! Please note:

- *The decision of the department is reflected in the letter of authorisation or rejection. The conditions of approval are contained in the environmental authorisation document, attached to the authorisation letter.*
- *The appeal must be accompanied by all relevant supporting documents or copies of these that are certified as true by a commissioner of oaths.*
- *The grounds of your appeal and the facts upon which they rest must be set out. You should formulate your objections or concerns as averments and not as questions about the project. Please therefore refrain from material or remarks that do not contribute to the merits of your appeal.*
- *To assist in this regard, the following questions are listed as a guideline only – more space may be used if necessary:*

8/23

1. Are you lodging this appeal as an individual or on behalf of a community/organisation?

Individual	Community/ organisation
	X

If on behalf of a community or organisation, please provide proof of mandate to do so.

Environmental Planning Management Officer for Bergrivier Municipality.

2. Is your appeal based on factors associated with the process that was followed by the applicant in obtaining authorisation?

Yes	No
X	

Please provide reasons:

No in depth studies were done on the impact of the acoustic instruments on the sea bed and marine organisms, as this is towed behind vessels below the sea surface. The long term impact of the seismic signals was also not determined that it would have on the marine organisms and especially migratory species / mammals.

3. Is your appeal based on factors associated with environmental impacts not taken into account by the department in refusing or authorising the application?

Yes	No
X	

Please provide reasons:

The impacts of 2D and 3D seismic surveys and the sound impulses being released on the marine community and environment is significantly high and

603

detrimental to their well being, survival and functioning.

4. Would you agree to the activity proceeding if your concerns can be addressed by rectifying the process or mitigating or eliminating the impacts of the activity?

Yes	No
	X

Please provide reasons:

As more research and studies are required as the impacts on marine environment and marine life remains unknown. unknown. The foreseen impacts will be to high and significance.

5. Are you fundamentally opposed to any development activity on the site?

Yes	No
X	

Please provide reasons:

The sound releases and impacts will affect the marine mammals and species in their own ability to percieve and move and survive. Behavioural patterns will be altered & mortality rates may increase.

6. Do you have an objection in principle against the development?

Yes	No
X	

Please provide reasons:

This will have too serve impacts on the marine environment and marine organisms and the survival of marine species (fauna & flora).

5/23

7. Does your appeal contain any new information that was not submitted to the environmental consultant or department prior to the department's consideration of the application?

Yes	No
	X

If the answer above is yes, please explain why it should be considered by the Minister and why it was not made available to the environmental consultant or department during the application process.

Seven impacts on the marine environment and species and certain known and yet unknown causes and impacts are of great concern.

8. **DECLARATION:**

I declare that the contents of this submission are to the best of my knowledge the truth and I regard this declaration as binding on my conscience.

APPELLANT

DATE: 26/04/2023

environmental affairs
Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002

Email: Appealsdirectorate@environment.gov.za

APPEAL RESPONSE REPORT

PROJECT NAME/TITLE: TGS Geophysical Company (UK) Limited, Proposed Seismic Surveys

PROJECT LOCATION: Approximately 120 km offshore of St Helena Bay, extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay.

PROJECT REFERENCE NUMBER: Application Reference number: 12/1/040

29669

DATE PROJECT/ACTIVITY AUTHORISED:

DETAILS OF THE APPELLANT	DETAILS OF THE APPLICANT
Name of appellant: Angila Joubert	Name of applicant: TGS Geophysical Company (UK) Limited
Appellant's representative (if applicable):	Applicant's representative (if applicable): Liam Whitlow Environmental impact management Services P.O Box 2083, Pinegowrie, 2123
Postal address: Bergrivier Municipality P.O Box 29, Velddrif, 7365	Postal Address: TGS, Dukes Court Street, Working, GU21 5BH, United Kingdom
Email Address: joubertA@bergmun.org.za	Email Address: liam@eims.co.za
Telephone number: (022) 783 1112	Telephone number: (011) 789 7170
Fax Number:	Fax number:

GROUNDS OF APPEAL	RESPONDING STATEMENT	COMMENT BY THE DEPARTMENT / DMR
1. The impacts of the 2D and 3D seismic surveys and the sound impulses (high-level and low frequency) and multiple hydrophone streamers on the marine mammals and environment is significantly high and detrimental to their well-being, survival; and normal functioning. Noise from seismic surveys can result in physical injuries to the body of the marine species and even the death of the organism. The sound releases and impact will affect the marine mammals and species in their own ability to perceive and –move and orientate themselves within the ocean body. This includes fish species sea turtles, whales. Behavioural patterns will be altered and mortality rates may increase due to the impacts of the seismic surveys conducted in the natural habitat of the marine species. The effect of seismic surveys on zooplankton is not yet identified or determined (to note the importance of	The impacts of the 2D and 3D seismic surveys and the sound impulses (high-level and low frequency) and multiple hydrophone streamers on the marine mammals and environment is significantly high and detrimental to their well-being, survival; and normal functioning. Noise from seismic surveys can result in physical injuries to the body of the marine species and even the death of the organism. The sound releases and impact will affect the marine mammals and species in their own ability to perceive and –move and orientate themselves within the ocean body. This includes fish species sea turtles, whales. Behavioural patterns will be altered and mortality rates may increase due to the impacts of the seismic surveys conducted in the natural habitat of the marine	

29681

zooplankton as a food source for numerous species of marine fishes and mammals).	species. The effect of seismic surveys on zooplankton is not yet identified or determined (to note the importance of zooplankton as a food source for numerous species of marine fishes and mammals).	
2. Seismic surveying is known to have many types of effects on marine organisms. These can range in severity from short-term physical startle reactions to long-term behavioural changes such as abandonment of feeding habitat to mortality. Physiological stress responses to seismic sound on individuals can indirectly impact entire populations and exert cumulative pressures on already stressed species. The detailed impact of the affects is still unknown and more research is required in order to know the immediate as well as long term effect this will have on the Marine environment, mammals and organism. This could lead to irreversible damage. Identifying and exploiting oil and gas reserves involves increasing vessel traffic and seismic surveying, which add more sound to an already noisy marine acoustic environment. The marine organisms on which a healthy	Seismic surveying is known to have many types of effects on marine organisms. These can range in severity from short-term physical startle reactions to long-term behavioural changes such as abandonment of feeding habitat to mortality. Physiological stress responses to seismic sound on individuals can indirectly impact entire populations and exert cumulative pressures on already stressed species. The detailed impact of the affects is still unknown and more research is required in order to know the immediate as well as long term effect this will have on the Marine environment, mammals and organism. This could lead to irreversible damage. Identifying and exploiting oil and gas reserves involves increasing vessel traffic and seismic surveying, which	

ocean habitat depends are being impacted by these sounds in ways we are not certain of or have no detail of. This remains too risky for the survival of our sensitive marine environment and the fauna and flora it hosts and ultimately mankind being dependant on our environment and marine life and environment for a sustainable, environmental friendly co-existence and future.	add more sound to an already noisy marine acoustic environment. The marine organisms on which a healthy ocean habitat depends are being impacted by these sounds in ways we are not certain of or have no detail of. This remains too risky for the survival of our sensitive marine environment and the fauna and flora it hosts and ultimately mankind being dependant on our environment and marine life and environment for a sustainable, environmental friendly co-existence and future.	

29748

Nqobile Ndokweni

Subject: FW: TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT LOCATED OFFSHORE THE WEST COAST: URGENT
Attachments: Response to Angila Joubert.pdf

From: Sinazo Mnyaka <MnyakaS@petroleumagencysa.com>
Sent: Thursday, 29 February 2024 15:08
To: Joshua Makhaza <JMakhaza@dffe.gov.za>
Cc: Nosipho Nombewu <nnombewu@dffe.gov.za>; Heloise Van Schalkwyk <HVanSchalkwyk@dffe.gov.za>
Subject: RE: TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT LOCATED OFFSHORE THE WEST COAST: URGENT

Good afternoon Joshua

Please receive the attached responses. Kindly note that we struggle to work with the provided appeal document, hence we responded on a separate document.

Regards,
Sinazo

From: Joshua Makhaza <JMakhaza@dffe.gov.za>
Sent: Wednesday, February 28, 2024 12:56 PM
To: Sinazo Mnyaka <MnyakaS@petroleumagencysa.com>
Cc: Nosipho Nombewu <nnombewu@dffe.gov.za>; hvanschalkwyk <hvanschalkwyk@dffe.gov.za>
Subject: RE: TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT LOCATED OFFSHORE THE WEST COAST: URGENT

CAUTION: This email originated from outside of the Petroleum Agency SA organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sinazo

Please receive the attached appeal.

Kind regards

Joshua

From: Sinazo Mnyaka <MnyakaS@petroleumagencysa.com>
Sent: Wednesday, February 28, 2024 12:12 PM
To: Joshua Makhaza <JMakhaza@dffe.gov.za>
Cc: Nosipho Nombewu <nnombewu@dffe.gov.za>; Heloise Van Schalkwyk <HVanSchalkwyk@dffe.gov.za>
Subject: RE: TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT LOCATED OFFSHORE THE WEST COAST: URGENT

Good afternoon Joshua

We do not have the appeal in our records, can you please send it to me? I will respond and try to submit it by tomorrow morning. Please accept my apology for this oversight.

Regards,
Sinazo

From: Joshua Makhaza <JMakhaza@dffe.gov.za>
Sent: Tuesday, February 27, 2024 1:58 PM
To: Sinazo Mnyaka <MnyakaS@petroleumagencysa.com>
Cc: Nosipho Nombewu <nnombewu@dffe.gov.za>; hvanschalkwyk <hvanschalkwyk@dffe.gov.za>
Subject: RE: TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT LOCATED OFFSHORE THE WEST COAST: URGENT

CAUTION: This email originated from outside of the Petroleum Agency SA organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Sinazo

The above refers.

I am looking into my records, I can't find your comments regarding the other two appellants herein: Aukotowa Fisheries Cooperative (Pty) and Angila Joubert in relation to this appeal.

Please send to my email the ARR if you have previously commented on these appeals.

Your urgent response is appreciated.

Kind regards

Joshua Makhaza
Appeals and Lega4l Review
DFFE: Pretoria
Email:JMakhaza@dffe.gov.za

From: Sinazo Mnyaka <MnyakaS@petroleumagencysa.com>
Sent: Friday, November 10, 2023 3:29 PM
To: Joshua Makhaza <JMakhaza@dffe.gov.za>
Cc: Nosipho Nombewu <nnombewu@dffe.gov.za>; Heloise Van Schalkwyk <HVanSchalkwyk@dffe.gov.za>
Subject: RE: TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT LOCATED OFFSHORE THE WEST COAST: URGENT

Dear Joshua

Please receive attached as per your request.

Kind Regards
Sinazo Mnyaka |Environmental Compliance| Petroleum Agency SA
T: 021 938 3531| E: MnyakaS@petroleumagencysa.com

Petroleum Agency SA

South African Agency for Promotion of Petroleum Exploration and Exploitation SOC Ltd.
Registration No. 1999/015715/30

From: Joshua Makhaza <JMakhaza@dffe.gov.za>
Sent: Friday, November 10, 2023 1:33 PM
To: Sinazo Mnyaka <MnyakaS@petroleumagencysa.com>
Cc: Nosipho Nombewu <nnombewu@dffe.gov.za>; Heloise Van Schalkwyk <HVanSchalkwyk@dffe.gov.za>
Subject: TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT LOCATED OFFSHORE THE WEST COAST: URGENT

CAUTION: This email originated from outside of the Petroleum Agency SA organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sinazo

The above refers.

Please be advised that we are in a process of finalizing this appeal.

Please confirm if you have previously provided us with your comments with regard to this appeal, an if so, kindly provide us with the same comments. I cannot trace the information partly due to laptop crashing that resulted in some of the information missing.

Your assistance is appreciated.

Kind regards

Joshua Makhaza
Appeals and Legal Review
Department of Forestry, Fisheries and the Environment
JMakhaza@dffe.gov.za
Cell: 0763541590

Disclaimer

This email and its content are subject to the disclaimer as displayed on the **Petroleum Agency SA** website. To find out more Click Here.

Response to Angila Joubert`s appeal against the TGS Geophysical Company (UK) Limited 12-1-040

1. The potential impacts of the authorised activities were identified and assessed during the basic assessment undertaken. Physiological, behavioral, and masking impacts on marine mammals and turtles were found to be of medium significance before the implementation of mitigation measures and of low significance after mitigation. The recommended mitigation measures, which were found to be appropriate by the regulator, include passive acoustic and marine mammal monitoring. In addition, the application area is located within the main offshore shipping routes, therefore, the shipping noise is expected to be significant around the application area.

   Zooplanktons depend on the currents for movement and tend to be directly exposed to the sound source. The overall impacts on zooplanktons were found to be of medium significance before implementation of mitigation measures and be of very low significance after mitigation. The ring-fenced fishing and spawning area will be avoided to mitigate impacts on zooplanktons.

2. Kindly refer to response 1 above. In addition, the literature cited indicates research that has been done on the impacts of seismic surveys on marine fauna, these include work done by McCauley, 1994; McCauley *et al.*, 2000; Cetus Projects, 2007, etc.

Case Officer:

Sinazo Mnyaka

Date: 29 February 2024

Supervisor:

Phumla Ngesi

Date: 29 February 2024

forestry, fisheries
& the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002

Email: Appeals@environment.gov.za

APPEAL RESPONSE REPORT

PROJECT NAME/TITLE:

Environmental Authorisation in terms of Regulation 24 Of The National Environmental Management Act (Act 107 Of 1998), as amended, Environmental Impact Assessment Regulations (2014), for the Proposed TGS Orange Basin Reconnaissance Permit Project, located offshore off the West Coast, South Africa. (Exploration Right 12/1/040 Pertains)

PROJECT LOCATION:

3D seismic survey off the West Coast of South Africa, approximately 120 km offshore of St Helena Bay, extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay over a number of petroleum licence blocks.

PROJECT REFERENCE NUMBER: 1520 (Exploration Right 12/1/040)

DATE PROJECT/ACTIVITY AUTHORISED: 26 April 2023

DATE NOTIFIED OF DECISION: 17 April 2023

Initial/s:

JWS11

DETAILS OF THE APPELLANT	DETAILS OF THE APPLICANT
Name of appellant: Oceans Not Oil coalition	**Name of applicant:** TGS Geophysical Company (UK) Limited
Appellant's representative (if applicable): Janet Solomon	**Applicant's representative (if applicable):** Environmental Impact Management Services (Pty) Ltd (EIMS) - (EAP)
Postal address: 151 Umbilo Rd, Durban, 4001	**Postal Address:** P.O. Box 2083; Pinegowrie; 2123
Email Address: info@oceansnotoil.org	**Email Address:** searcher@eims.co.za
Telephone number: 0837891067	**Telephone number:** (011) 789 7170
Fax Number: N/A	**Fax number:** 086 571 9047

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
1. NEED AND DESIRABILITY OF THE PROJECT Climate change impacts of the proposed development were not fully and comprehensively assessed and/or considered prior to the issuance of the environmental authorisation by the DG and hence the decision should be set aside in terms of section 8 of the Promotion of Administrative Justice Act4 ("PAJA") . a) Sustaining the Wild Coast NPC & Others v Minister of Mineral Resources and Energy & Others, High Court of South Africa, Eastern Cape Division, Makhanda – Case No. 3491/2021, has not been drawn upon to produce a climate impact assessment that does not make the irrational, artificial distinction between oil exploration and production since both are		**Due to the nature and the duration of the authorised activity, the assessment of the climate change impacts was impossible. The GHG emissions from the activity will not differ from levels produced by vessels passing through the application area.**

Initial/s:

phases in a single process to find useable hydrocarbon reserves. Without such an assessment, there is a severely understated existential risk to present and future generations. Therefore all relevant considerations were not before the decision-maker, as contemplated under Section 6(2)(e)(iii) of the Promotion of Administrative Justice Act. b) There are strategic and economic reasons to re-evaluate identifying oil and gas resources with a view to further exploration and production (International Institute for Sustainable Development, 2022). These reasons include international gas phase-out pressure; reduced funding, increased cost of capital, carbon tax, trade taxes, etc. and that gas-functions in the electricity sector are already outcompeted, or expected,		

Initial/s:

based on trends (Halsey, Bridle. R, & Geddes 2022)		
2. SEISMIC SURVEYS <u>ARE</u> INVASIVE The BAR/EMPr defines seismic surveys as "non-invasive". a)Seismic surveys are listed activities demanding mitigation according to South African law because the noise and pressure waves generated by them spread quickly, occur every 10 /12 seconds, can be lethal or create injury, intrude on the activities of a significant amount of species for months at a time, effect the marine soundscape up to 4000kms away (Purdon 2018; Hildebrand 2005) from the source and can affect the internal organs, and so reproduction, of various species. There is no way to minimise the traumatising sound or pressure generated from the seismic		**Seismic surveys are part of the non-destructive exploration activities as listed in Table 8 of Harris et al., 2022 paper, presenting a list of sea use activities and their compatibility. However, the impacts of seismic surveys are known and will be managed according to industry best practices.** **The compatibility of seismic surveys on CBAs is conditional, hence the need to undertake the Impact Assessment to understand the impacts associated with the activity and the measures to mitigate such impacts. Based on the outcomes of the assessment, the potential impacts of the authorised activity and be managed successfully with the implementation of recommended mitigation measures.** **Heritage Impact Assessment undertaken by PGS Heritage (Pty) Ltd included in Appendix 3**

Initial/s:

survey and no way to remedy their effects. b) The idea that seismic surveys are non-invasive has been tested in South African courts and 2 judgements to date have applied a risk averse and precautionary approach, which takes into account the limits of current knowledge about the consequences of decisions and actions and have terminated the seismic surveys (Bloem 2021; Thulare 2022). c) The 3D survey area overlaps with areas mapped as Critical Biodiversity Area 1 (CBA 1): Natural and Critical Biodiversity Area 2: (CBA 2) Natural. Approximately 32.25 % of the proposed 3D survey area is covered by CBA 1 and CBA 2. The decision to allow TGS to conduct the survey in these CBAs stands counter to the		**of the Basic Assessment provide detailed assessment of intangible heritage. Section 8.8.4 of the basic assessment report provide a synopsis of the intangible heritage aspects considered and assessed in the heritage study.**

Initial/s:

purpose of the CBAs, therefore failing to conform to the National Environmental Management Act principles of sustainable development, and warrants review. d) The DG has not applied his mind to the dispossession which covers the loss of the incorporeal experienced by local communities. Concerns regarding impacts to intangible heritage were evident in both these recent cases, of which the DG will be aware: i. Sustaining the Wild Coast NPC & Others v Minister of Mineral Resources and Energy & Others, High Court of South Africa, Eastern Cape Division, Makhanda – Case No. 3491/2021 ii. Christian John Adams & Others v Minister of Mineral Resources and		

Initial/s:

Energy & Others. (2022, March 1) Case No. 1306/22 in the High Court of South Africa Western Cape Division, Cape Town. Accepting that seismic surveys are a non-invasive technology is both irrational and unreasonable. There was, therefore, material non-compliance with the mandatory preconditions of section 24O(1) of NEMA which requires the consideration of all relevant factors in reaching a decision on environmental authorisation.		

Initial/s:

3. REPEATED, PERSISTENT OR CUMULATIVE EXPOSURE IMPACTS There has been a failure to give effect to the general objectives of integrated environmental management in relation to sound pollution management a) The compounding effects of multiple abiotic and biotic stressors associated with multiple 3D surveys being undertaken concurrently is understated. TEEPSA DWOB; Searcher and GX Technology Corporation all have pending applications which overlap the TGS proposed survey area and may occur simultaneously. The risks associated with compounded behavioural disturbance and how chronically-present sound could constitute a threat to populations by changing behaviour and distribution, regularly, at critical times and in critical areas. Parsons et al. (2009) warn that		**Cumulative impacts and the possibility of multiple survey being undertaken simultaneously are considered and assessed in section 9.3.1.4 of the basic assessment report. Cumulative impact of the multiple survey was found to be of medium significance.**

Initial/s:

some of the more insidious and potentially devastating impacts arise through long- term, repeated, persistent or cumulative exposures. b) The judgement in Adams, C.J., Steenbergs Cove Small Scale Fishing Community, Aukatow Small Scale Fishiries Cooperative, W. Poggenpoel, R. Shosola, Coastal Links Langebaan, S. Smit, et al. 2022. C.J. Adams & others. v Minister of Mineral Resources and Energy & Others, (2022) Case (1306/22) 1–23 found that the apprehension of irreparable harm by the applicants was well founded, since the potential for cumulative impacts from multiple surveys was not taken into account.		
4. NO FORMAL ANALYSIS OF IMPACTS ON LIVELIHOODS There is a failure to consider the lack of empirical work done to establish the footprint of this expansive operation to		**It is the Agency`s view that impacts on livelihoods were assessed satisfactory. The assessment began by first understanding the dynamics of the affected communities to including other aspects that might have caused**

Initial/s:

substantiate claims of economic development, job creation, economic stimulus and details of how TGS's survey will uplift the socio-economic circumstances of most South Africans. a) The National Development Plan (Republic of South Africa 2017) proposes that Strategic Environmental Assessments (SEA) should be conducted in order to plan for sustainable use of the ocean environment, yet there has been neither a sector-wide, nor a project level, independent Strategic Environmental Assessment (SEA) conducted. A SEA is a critical way to anticipate, avoid and manage risks to people and the environment. It flows directly from the Constitutional right to an environment not harmful to health and wellbeing. Without a SEA project level environmental assessment remains uncomplemented by considerations fully		**a negative impact on livelihoods such as the COVID 19 pandemic and lastly considered impacts of the activity. This means that the assessment also considered current impacts on communities' livelihoods. The assessment is in section 9.3.3 of the basic assessment report and the impacts of the authorised activity on livelihoods was found to be on low significance with implementation of recommended mitigation measures.**

Initial/s:

adapted to policies, plans and programmes that minimize potential ecosystem harm measured against environmental baselines, or by having established indices for evaluating economic and social considerations, whilst taking into consideration the regional ocean systems. b) A cost benefit analysis not been undertaken for the TGS 1520 application. There is a failure to analyse the social welfare effects of a loss of harvest, accumulation of damage to ecosystems, or an oil spill, rising levels of dissatisfaction over imbalances in the distribution of impacts and the trade-offs of displacement on artisanal and small-scale operations in the fisheries/ aquaculture/ tourism sectors which play a crucial role in poverty reduction and the livelihood of poor communities in coastal areas. Nor is there reference made to		

Initial/s:

how these affected parties might be compensated.		
5. NO-GO NOT PROPERLY CONSIDERED The DG did not properly consider representations from I&APs that proceeding with fossil fuel exploration is a blatant violation of the Paris Agreement signed by the South African government and goes against what the best available climate science recommends, namely limiting hydrocarbon energy options to create a sustainable, resilient and equitable future for all; and did not consider alternatives, in particular the "no-go option", being the abandonment of the project entirely and developing renewable energy sources in the interests of effective mitigation of climate change. Three offshore oil and gas related court cases to date, have taken the ministers (		**The no-go alternative was considered but was not preferred based on the benefits that might be derived from the successful of the authorised project. The project did consider climate impacts, but these could not be assessed due to the nature and duration of the authorised activity. It should also be noted that the project will emit GHG emissions levels that will be below the threshold that, which requires reporting. This indicates that the project will not have significant negative contribution to climate change.**

Initial/s:

DMRE and DFFE) and developers to court to demand the minister engage the 'no-go' option to stop development before it starts. The applicants represent a large number of communities and organisation and they span South Africa's coastline (North East, East and West Coasts): *South Durban Community Environmental Alliance et al. V Minister of Environment, Forestry and Fisheries* & Others, (2021, June 14) Case No. 29433/21 in the High Court of South Africa Gauteng Division, Pretoria; https://drive.google.com/file/d/12IoY5RLGd0CGRoMrc2pn7kt4yohkCWxS/view Sustaining the Wild Coast NPC and Others vs. Minister of Mineral Resources and Energy and Others. (2021, December 28) Case No. 3491/2021 in the High Court of South Africa Eastern Cape Division, Makhanda/Grahamstown.		

Initial/s:

https://cer.org.za/wp-content/uploads/2021/12/SWC-v-Shell-Wild-Coast-Seismic-Blasting-Interdict-28.12.2021.pdf Christian John Adams & Others v Minister of Mineral Resources and Energy & Others. (2022, March1) Case No. 1306/22 in the High Court of South Africa Western Cape Division, Cape Town. https://cer.org.za/wp-content/uploads/2022/03/Adams-and-Others-v-Minister-of-Mineral-Resources-and-Energy-and-Others-ZAWCHC-24.pdf To continue expanding fossil fuel exploration, dismissing climate impacts and ignoring local communities in South Africa and around the world who are suffering the consequences of the climate emergency, makes the DG complicit in choices that exacerbate the climate crisis.		

Initial/s:

REFERENCES

Bloem, J. 2021. Judgment: Sustaining the Wild Coast & affected coastal communities & Natural Justice & Greenpeace Africa v the Ministers of Environment, Forestry's and Fisheries & Mineral Resources and Energy, Shell Exploration & Production South Africa BV, Impact Africa 1–43.

Halsey, R., Bridle. R, and A. Geddes. 2022. "Gas Pressure: Exploring the Case for Gas-Fired Power in South Africa."

Parsons, E. C.M., Sarah J. Dolman, Michael Jasny, Naomi A. Rose, Mark P. Simmonds, and Andrew J. Wright. 2009. "A Critique of the UK's JNCC Seismic Survey Guidelines for Minimising Acoustic Disturbance to Marine Mammals: Best Practise?" *Marine Pollution Bulletin* 58 (5): 643–51. https://doi.org/10.1016/j.marpolbul.2009.02.024.

Republic of South Africa. 2017. *National Development Plan 2030: Our Future-Make It Work. National Planning Commission*. Vol. 50. https://www.gov.za/sites/default/files/gcis_document/201409/ndp-2030-our-future-make-it-workr.pdf.

Thulare, J. 2022. C.J. Adams & others. v Minister of Mineral Resources and Energy & Others, (2022) Case (1306/22) 1–23.

ARR comments by Case Officer

Name & Surname: Sinazo Mnyaka

Date:26-06-2023

Signature:



.....

Approved by Supervior

Name & Surname: P Ngesi

Date: 26/06/2023



Signature:

.....

forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002

Email: Appeals@environment.gov.za

APPEAL RESPONSE REPORT

PROJECT NAME/TITLE:

Environmental Authorisation in terms of Regulation 24 Of The National Environmental Management Act (Act 107 Of 1998), as amended, Environmental Impact Assessment Regulations (2014), for the Proposed TGS Orange Basin Reconnaissance Permit Project, located offshore off the West Coast, South Africa. (Exploration Right 12/1/040 Pertains)

PROJECT LOCATION:

3D seismic survey off the West Coast of South Africa, approximately 120 km offshore of St Helena Bay, extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay over a number of petroleum licence blocks.

PROJECT REFERENCE NUMBER: 1520 (Exploration Right 12/1/040)

DATE PROJECT/ACTIVITY AUTHORISED: 26 April 2023

DATE NOTIFIED OF DECISION: 17 April 2023

Initial/s:

JWS12

DETAILS OF THE APPELLANT	DETAILS OF THE APPLICANT
Name of appellant: Elaine Mills	**Name of applicant:** TGS Geophysical Company (UK) Limited
Appellant's representative (if applicable):	**Applicant's representative (if applicable):** Environmental Impact Management Services (Pty) Ltd (EIMS) - (EAP)
Postal address: 307 Hillside Heights, Wessels Rd, Green Point, Cape Town, 8005	**Postal Address:** P.O. Box 2083; Pinegowrie; 2123
Email Address: elaine.mills@argusmedia.com	**Email Address:** searcher@eims.co.za
Telephone number: 066 485 9785	**Telephone number:** (011) 789 7170
Fax Number: N/A	**Fax number:** 086 571 9047

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DEPARTMENT
1. NEED AND DESIRABILITY OF THE PROJECT Climate change impacts of the proposed development were not fully and comprehensively assessed and/or considered prior to the issuance of the environmental authorisation by the DG and hence the decision should be set aside in terms of section 8 of the Promotion of Administrative Justice Act4 ("PAJA") . a) Sustaining the Wild Coast NPC & Others v Minister of Mineral Resources and Energy & Others, High Court of South Africa, Eastern Cape Division, Makhanda – Case No. 3491/2021, has not been drawn upon to produce a climate impact assessment that does not make the irrational, artificial distinction between oil exploration and production since both are		**Due to the nature and the duration of the authorised activity, the assessment of the climate change impacts was impossible. The GHG emissions from the activity will not differ from levels produced by vessels passing through the application area.**

Initial/s:

phases in a single process to find useable hydrocarbon reserves. Without such an assessment, there is a severely understated existential risk to present and future generations. Therefore all relevant considerations were not before the decision-maker, as contemplated under Section 6(2)(e)(iii) of the Promotion of Administrative Justice Act. b) There are strategic and economic reasons to re-evaluate identifying oil and gas resources with a view to further exploration and production (International Institute for Sustainable Development, 2022). These reasons include international gas phase-out pressure; reduced funding, increased cost of capital, carbon tax, trade taxes, etc. and that gas-functions in the electricity sector are already outcompeted, or expected,		

Initial/s:

based on trends (Halsey, Bridle. R, & Geddes 2022)		
2. SEISMIC SURVEYS ARE INVASIVE The BAR/EMPr defines seismic surveys as "non-invasive". a)Seismic surveys are listed activities demanding mitigation according to South African law because the noise and pressure waves generated by them spread quickly, occur every 10 /12 seconds, can be lethal or create injury, intrude on the activities of a significant amount of species for months at a time, effect the marine soundscape up to 4000kms away (Purdon 2018; Hildebrand 2005) from the source and can affect the internal organs, and so reproduction, of various species. There is no way to minimise the traumatising sound or pressure generated from the seismic		**Seismic surveys are part of the non-destructive exploration activities as listed in Table 8 of *Harris et al.,* 2022 paper, presenting a list of sea use activities and their compatibility. However, the impacts of seismic surveys are known and will be managed according to industry best practices.** **The compatibility of seismic surveys on CBAs is conditional, hence the need to undertake the Impact Assessment to understand the impacts associated with the activity and the measures to mitigate such impacts. Based on the outcomes of the assessment, the potential impacts of the authorised activity and be managed successfully with the implementation of recommended mitigation measures.** **Heritage Impact Assessment undertaken by PGS Heritage (Pty) Ltd included in Appendix 3**

Initial/s:

survey and no way to remedy their effects. b) The idea that seismic surveys are non-invasive has been tested in South African courts and 2 judgements to date have applied a risk averse and precautionary approach, which takes into account the limits of current knowledge about the consequences of decisions and actions and have terminated the seismic surveys (Bloem 2021; Thulare 2022). c) The 3D survey area overlaps with areas mapped as Critical Biodiversity Area 1 (CBA 1): Natural and Critical Biodiversity Area 2: (CBA 2) Natural. Approximately 32.25 % of the proposed 3D survey area is covered by CBA 1 and CBA 2. The decision to allow TGS to conduct the survey in these CBAs stands counter to the		**of the Basic Assessment provide detailed assessment of intangible heritage. Section 8.8.4 of the basic assessment report provide a synopsis of the intangible heritage aspects considered and assessed in the heritage study.**

Initial/s:

purpose of the CBAs, therefore failing to conform to the National Environmental Management Act principles of sustainable development, and warrants review. d) The DG has not applied his mind to the dispossession which covers the loss of the incorporeal experienced by local communities. Concerns regarding impacts to intangible heritage were evident in both these recent cases, of which the DG will be aware: i. Sustaining the Wild Coast NPC & Others v Minister of Mineral Resources and Energy & Others, High Court of South Africa, Eastern Cape Division, Makhanda – Case No. 3491/2021 ii. Christian John Adams & Others v Minister of Mineral Resources and		

Initial/s:

Energy & Others. (2022, March 1) Case No. 1306/22 in the High Court of South Africa Western Cape Division, Cape Town. Accepting that seismic surveys are a non-invasive technology is both irrational and unreasonable. There was, therefore, material non-compliance with the mandatory preconditions of section 24O(1) of NEMA which requires the consideration of all relevant factors in reaching a decision on environmental authorisation.		

Initial/s:

3. REPEATED, PERSISTENT OR CUMULATIVE EXPOSURE IMPACTS There has been a failure to give effect to the general objectives of integrated environmental management in relation to sound pollution management a) The compounding effects of multiple abiotic and biotic stressors associated with multiple 3D surveys being undertaken concurrently is understated. TEEPSA DWOB; Searcher and GX Technology Corporation all have pending applications which overlap the TGS proposed survey area and may occur simultaneously. The risks associated with compounded behavioural disturbance and how chronically-present sound could constitute a threat to populations by changing behaviour and distribution, regularly, at critical times and in critical areas. Parsons et al. (2009) warn that		**Cumulative impacts and the possibility of multiple survey being undertaken simultaneously are considered and assessed in section 9.3.1.4 of the basic assessment report. Cumulative impact of the multiple survey was found to be of medium significance.**

Initial/s:

some of the more insidious and potentially devastating impacts arise through long- term, repeated, persistent or cumulative exposures. b) The judgement in Adams, C.J., Steenbergs Cove Small Scale Fishing Community, Aukatow Small Scale Fishiries Cooperative, W. Poggenpoel, R. Shosola, Coastal Links Langebaan, S. Smit, et al. 2022. C.J. Adams & others. v Minister of Mineral Resources and Energy & Others, (2022) Case (1306/22) 1–23 found that the apprehension of irreparable harm by the applicants was well founded, since the potential for cumulative impacts from multiple surveys was not taken into account.		
4. NO FORMAL ANALYSIS OF IMPACTS ON LIVELIHOODS There is a failure to consider the lack of empirical work done to establish the footprint of this expansive operation to		**It is the Agency`s view that impacts on livelihoods were assessed satisfactory. The assessment began by first understanding the dynamics of the affected communities to including other aspects that might have caused**

Initial/s:

substantiate claims of economic development, job creation, economic stimulus and details of how TGS's survey will uplift the socio-economic circumstances of most South Africans. a) The National Development Plan (Republic of South Africa 2017) proposes that Strategic Environmental Assessments (SEA) should be conducted in order to plan for sustainable use of the ocean environment, yet there has been neither a sector-wide, nor a project level, independent Strategic Environmental Assessment (SEA) conducted. A SEA is a critical way to anticipate, avoid and manage risks to people and the environment. It flows directly from the Constitutional right to an environment not harmful to health and wellbeing. Without a SEA project level environmental assessment remains uncomplemented by considerations fully		**a negative impact on livelihoods such as the COVID 19 pandemic and lastly considered impacts of the activity. This means that the assessment also considered current impacts on communities' livelihoods. The assessment is in section 9.3.3 of the basic assessment report and the impacts of the authorised activity on livelihoods was found to be on low significance with implementation of recommended mitigation measures.**

Initial/s:

adapted to policies, plans and programmes that minimize potential ecosystem harm measured against environmental baselines, or by having established indices for evaluating economic and social considerations, whilst taking into consideration the regional ocean systems. b) A cost benefit analysis not been undertaken for the TGS 1520 application. There is a failure to analyse the social welfare effects of a loss of harvest, accumulation of damage to ecosystems, or an oil spill, rising levels of dissatisfaction over imbalances in the distribution of impacts and the trade-offs of displacement on artisanal and small-scale operations in the fisheries/ aquaculture/ tourism sectors which play a crucial role in poverty reduction and the livelihood of poor communities in coastal areas. Nor is there reference made to		

Initial/s:

how these affected parties might be compensated.		
5. NO-GO NOT PROPERLY CONSIDERED The DG did not properly consider representations from I&APs that proceeding with fossil fuel exploration is a blatant violation of the Paris Agreement signed by the South African government and goes against what the best available climate science recommends, namely limiting hydrocarbon energy options to create a sustainable, resilient and equitable future for all; and did not consider alternatives, in particular the "no-go option", being the abandonment of the project entirely and developing renewable energy sources in the interests of effective mitigation of climate change. Three offshore oil and gas related court cases to date, have taken the ministers (		**The no-go alternative was considered but was not preferred based on the benefits that might be derived from the successful of the authorised project. The project did consider climate impacts, but these could not be assessed due to the nature and duration of the authorised activity. It should also be noted that the project will emit GHG emissions levels that will be below the threshold that, which requires reporting. This indicates that the project will not have significant negative contribution to climate change.**

Initial/s:

DMRE and DFFE) and developers to court to demand the minister engage the 'no-go' option to stop development before it starts. The applicants represent a large number of communities and organisation and they span South Africa's coastline (North East, East and West Coasts): *South Durban Community Environmental Alliance et al. V Minister of Environment, Forestry and Fisheries* & Others, (2021, June 14) Case No. 29433/21 in the High Court of South Africa Gauteng Division, Pretoria; https://drive.google.com/file/d/12loY5RLGd0CGRoMrc2pn7kt4yohkCWxS/view Sustaining the Wild Coast NPC and Others vs. Minister of Mineral Resources and Energy and Others. (2021, December 28) Case No. 3491/2021 in the High Court of South Africa Eastern Cape Division, Makhanda/Grahamstown.		

Initial/s:

https://cer.org.za/wp-content/uploads/2021/12/SWC-v-Shell-Wild-Coast-Seismic-Blasting-Interdict-28.12.2021.pdf Christian John Adams & Others v Minister of Mineral Resources and Energy & Others. (2022, March1) Case No. 1306/22 in the High Court of South Africa Western Cape Division, Cape Town. https://cer.org.za/wp-content/uploads/2022/03/Adams-and-Others-v-Minister-of-Mineral-Resources-and-Energy-and-Others-ZAWCHC-24.pdf To continue expanding fossil fuel exploration, dismissing climate impacts and ignoring local communities in South Africa and around the world who are suffering the consequences of the climate emergency, makes the DG complicit in choices that exacerbate the climate crisis.		

Initial/s:

REFERENCES

Bloem, J. 2021. Judgment: Sustaining the Wild Coast & affected coastal communities & Natural Justice & Greenpeace Africa v the Ministers of Environment, Forestry's and Fisheries & Mineral Resources and Energy, Shell Exploration & Production South Africa BV, Impact Africa 1–43.

Halsey, R., Bridle. R, and A. Geddes. 2022. "Gas Pressure: Exploring the Case for Gas-Fired Power in South Africa."

Parsons, E. C.M., Sarah J. Dolman, Michael Jasny, Naomi A. Rose, Mark P. Simmonds, and Andrew J. Wright. 2009. "A Critique of the UK's JNCC Seismic Survey Guidelines for Minimising Acoustic Disturbance to Marine Mammals: Best Practise?" *Marine Pollution Bulletin* 58 (5): 643–51. https://doi.org/10.1016/j.marpolbul.2009.02.024.

Republic of South Africa. 2017. *National Development Plan 2030: Our Future-Make It Work. National Planning Commission*. Vol. 50. https://www.gov.za/sites/default/files/gcis_document/201409/ndp-2030-our-future-make-it-workr.pdf.

Thulare, J. 2022. C.J. Adams & others. v Minister of Mineral Resources and Energy & Others, (2022) Case (1306/22) 1–23.

Initial/s:

ARR comments by Case Officer

Name & Surname: Sinazo Mnya

Date:26-06-2023

Signature:



.....

Approved by Supervisor

Name & Surname: P Ngesi

Date: 26/06/2023



Signature:

.....

Initial/s:

forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002

Email: appeals@dffe.gov.za

APPEAL RESPONSE REPORT

PROJECT NAME/TITLE: PROPOSED TGS ORANGE BASIN RECONNASSAINCE PERMIT PROJECT LOCATED OFFSHORE THE WEST COAST, SOUTH AFRICA

PROJECT LOCATION: ORANGE BASIN LOCATED OFFSHORE THE WEST COAST, SOUTH AFRICA

PROJECT REFERENCE NUMBER: PASA REF: 12/1/040

DMRE REF: 1520

DATE PROJECT/ACTIVITY AUTHORISED: 17th of April 2023

DATE NOTIFIED OF DECISION: 26th April 2023

JWS13

3010

Initial/s:

DETAILS OF THE APPELLANT	DETAILS OF THE APPLICANT
Name of appellant: The Green Connection and Natural Justice	**Name of applicant:** TGS Geophysical Company (UK) LTD
Appellant's representative (if applicable): Green Connection: Liziwe McDaid Natural Justice: Melissa Groenink-Groves	**Applicant's representative (if applicable):** Mr Jevon Hilder
Postal address: 53 Hout Street, Cape Town	**Postal Address:** 8 Dalmeny Road, Pine Park, Randburg **PO Box 2083, Pinegowrie 2123, South Africa**
Email Address: liziwe@mweb.co.za / melissa@naturaljustice.org	**Email Address:** **EIMS Public Participation Team tgs@eims.co.za; jevon.hilder@tgs.com**
Telephone number: 082 731 5643	**Telephone number:** 011 789 7170
Fax Number: N/A	**Fax number:** **N/A**

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THEDMRE/PASA
INTRODUCTION 1. This is an appeal to the Honourable Minister of Forestry, Fisheries and the Environment ("**Appeal**" to the "**Minister**"), directed to the Director: Appeals and Legal Review of the Department of Forestry, Fisheries and the Environment ("**DFFE**"), to set aside the decision of the Director-General of the Department of Mineral Resources and Energy (as "**DG**" or **"DMRE"**) dated 17 April 2023 granting environmental authorisation to TGS Geophysical Company (UK) (as **"Third Respondent"**) allowing for a 3D seismic survey off the West Coast of South Africa. 2. The Minister should set aside the decision to grant authorization because the Environmental Basic Assessment Report (FBAR) did not comply with NEMA in several ways. The decision to grant authorization violates various provisions of NEMA, including the requirements for granting	For the reasons provided in the responses below it is the opinion of TGS Geophysical Company (UK) (TGS) that the Environmental Authorisation (EA) should remain valid, since the Basic Assessment Process was conducted in line with the requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. This included amongst others that: • The Need and Desirability of the Project was adequately addressed and assessed – Refer to Section 5 of the BasicAssessment Report (BAR)); • Marine and cumulative impacts were considered in detail in the BAR – refer to Section 9 of the BAR; • The EAP appointed for the project conducted an extensive Public Consultation Process, which resulted in meaningful consultation – Refer to Section 7 and Appendix 2 of the BAR;	The introduction, background and description of the project is noted. The responses will be given below from the first ground of appeal.

Initial/s:

environmental authorizations and the National Environmental Management Principles. The FBAR and the decision-maker failed to establish the need and desirability of the Project, failed to adequately consider marine impacts, and neglected to assess the cumulative impacts of the Project. The Second and Third Respondent also failed to engage in meaningful consultation, violating principles of fair administrative decision-making and the right of affected communities to be consulted. This failure to consult is inconsistent with NEMA's requirement to promote participation and take into account the interests of all parties. Moreover, the decision-maker disregarded NEMA Principles, including the precautionary principle and the principle of sustainable development, as well as the constitutional right to a non-harmful environment. The decision therefore to issue the authorization and the reasons provided are deemed irrational and unreasonable. 3. The Appellant submit this appeal on the following grounds:	• As stated in Section 11.3 of the BAR, The findings of the specialist studies conclude that there are no environmental fatal flaws that should prevent the proposed project from proceeding, provided that the recommended mitigation and management measures are implemented. Based on the nature and extent of the proposed project, the local level of disturbance predicted as a result of the reconnaissance activities, the findings of the specialist studies, and the understanding of the significance level of potential environmental impacts, it is the opinion of the EIA project team and the EAP that the significance levels of the majority of identified negative impacts can generally be reduced to an acceptable level by implementing the recommended mitigation measures and the project should be authorized.	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
3.1. Ground 1: A flawed and misguided need and desirability assessment 3.1.1. Climate Change Impacts. 3.1.2. The climate crisis. 3.1.3. South Africa's international climate change commitments. 3.1.4. Need for seismic data. 3.2. Ground 2: Failure to adequately consider marine impacts 3.2.1. Underwater sound from acoustic seismic surveys. 3.2.2. Harms to marine life. 3.2.3. Acoustic Modelling 3.2.4. Heightened Legislative Requirements are Not Considered for Critical Biodiversity Areas (CBAs), Ecologically or Biologically Significant Marine Areas (EBSAs), and Marine Protected Areas (MPAs). 3.2.5. CBAs 3.2.6. EBSAs and MPAs. 3.2.7. Cape Fur Seals	It is not clear from the evidence presented by Appellant, that they have sufficient mandate from the communities that they claim to represent.	

Initial/s:

3.2.8. Whale and Dolphins. 3.2.9. Fish. 3.2.10. Zooplankton. 3.2.11. The proposed mitigation measures are inadequate toprevent unacceptable harm to marine life. 3.2.12. Simultaneous Surveys. 3.2.13. Lack of baseline noise assessment. 3.2.14. Chronic Noise Impacts.		

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
3.3. Ground 3: Failure to adequately assess cumulative impacts 3.4. Ground 4: Failure to conduct meaningful consultation with communities and local people (and in particular small-scale fishers), within the public participation process, including the Social Impact Assessment process. 3.5. Ground 5: The FBAR does not contain a proper and objective assessment of the negative impacts of the project on people's human rights 3.6. Ground 6: Failure to consider relevant coastal management considerations or to comply with the National Environmental Management: Integrated Coastal Management Act 24 of 2008 3.7. Ground 7: Failure to provide adequate reasons for the decision 4. The Authorisation, with reference number 12/1/040, was granted in terms of regulation 24 of the National Environmental Management Act, 1998 ("**NEMA**") Environmental Impact Assessment Regulations, 2014 ("**EIA Regulations**").		

Initial/s:

5. The Appeal is lodged in terms of section 43(1A) of NEMA, which provides that: "*Any person may appeal to the Minister against a decision made in terms of this Act or any specific environmental management Act by the Minister responsible for mineral resources or any person acting under his or her delegated authority*", read with the NEMA National Appeal Regulations, 2014[1] ("**the Appeal Regulations**"), which provide for the submission of an appeal within 20 days from the date that the notification of the decision for an application for environmental authorisation was sent to the registered interested and affected parties (**I&APs**) by the Applicant (26 April 2023).[2]		

[1] GN R 993 GG 38303 of 8 December 2014.

[2] Regulation 4(1)(a) NEMA National Appeal Regulations, 2014.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
6. In accordance with the requirements of Regulation 4(2)(a) of the Appeal Regulations: 6.1. this Appeal is submitted in writing in the form obtained from the Appeal Administrator, and accompanied by this more detailed appeal document, being a statement setting out the grounds of appeal ("**the Grounds of Appeal**"). The Appellants are entitled to also submit these more detailed Grounds of Appeal as the Appeal submission. This submission must be taken into account by the Minister in making a decision on the Appeal; 6.2. to the extent possible, the Appeal is accompanied by relevant supporting documentation which is referred to in this Appeal submission - attached as Annexure B; and 6.3. we confirm, in compliance with Regulation 4(1) of the Appeal Regulations, that this Appeal is submitted within 20 days[3] from the date of notification to I&APs to the Appeal Administrator. A copy of the Appeal will		

Initial/s:

be provided to the Applicant and to those registered I&APs, and organs of state with an interest in the matter, insofar as possible and within time and cost constraints. The statement regarding compliance with Regulation 4(1) is contained in the cover letter to which these Grounds of Appeal are attached. In any event, we confirm compliance with Regulation 4(1). 7. The Appellants further submit that there are grounds for judicial review under the Promotion of Administrative Justice Act, 2000 ("**PAJA**") because the Authorisation comprises administrative action that *inter alia*:		

[3] The Appellants submit that the process provided for in the Appeal Regulations, in particular the requirement to submit an appeal in 20 days of the notification, severely prejudices the Appellants and infringes on their rights to a fair process. The Appellants continue to assert that the unreasonably short timeframes and onerous notification requirements of regulation 4(1), among others, render the Appeal Regulations a violation of the rights to just administrative action, and are thus unconstitutional.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
7.1. is unconstitutional or unlawful;[4] 7.2. was taken because of the failure to consider relevant considerations;[5] 7.3. is not rationally connected to the information before the decision-maker in making the Decision or to the reasons provided by the decision-maker for the Decision;[6] and 7.4. is so unreasonable that no reasonable person could have granted it.[7] **PARTIES** 8. The First Appellant is **Natural Justice**. 8.1. Natural Justice: Lawyers for Communities and the Environment is a non-profit organization specializing 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		

Initial/s:

for land and natural resources.. 9. The Second Appellant is **the Green Connection.** 9.1. 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		

[4] PAJA section 6(2)(d),(f)(i) and (i).

[5] PAJA section 6(e)(iii).

[6] PAJA section 6(f)(ii)(cc) and (dd).

[7] PAJA section 6(h).

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
the government and non-governmental/civil society sectors, which are an integral part of sustainable development. 10. The Appellants have legal standing to bring the Appeal not only in terms of section 43 of NEMA, but also to enforce environmental laws in terms of NEMA section 32, in that they *inter alia* act: "*(c) in the interest of or on behalf of a group or class of persons whose interests are affected; (d) in the public interest; and (e) in the interest of protecting the environment.*"[8] The Appellants act in the interest of, or on behalf of, persons who, for practical reasons, are unable to institute such proceedings, including members of coastal communities who do not have the capacity or resources to do so, in the interests of coastal communities who are affected by the proposed seismic activities, in the public interest, and in the interest of protecting the environment, to further the objectives of section 24 of the Constitution of the Republic of South Africa, 1996 ("the Constitution") and NEMA. 11. The Appellants are also Registered Interested and		

Initial/s:

Affected parties (I&AP) in respect of the application process for this authorisation. **BACKGROUND AND DESCRIPTION OF THE PROJECT** 12. The proposed project area is located between approximately 120 km offshore of St Helena Bay, extending north along the western coastline to approximately 230 km offshore of Hondeklip Bay over a number of petroleum licence blocks. The application area for the proposed 3D seismic survey is approximately 57 400 km^2 in extent. TGS proposes that a single survey vessel equipped with seismic sources and streamers be used. The proposed 3D survey would be supported by two escort vessels. It is estimated that the 3D survey will take 70 days (including downtime).[9] The area proposed for the		

[8] NEMA section 33(1)(c)-(d).

[9] BAR Executive Summary, pxvi.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
seismic survey is a large under-explored area with potential for both oil and gas. 13. On the 25th of November 2022, the Applicants submitted comments on the draft Basic Assessment Report prepared as part of the Environmental Impact Assessment (EIA) process. As mentioned above, the DG granted the Project an Environmental Authorisation on 17 April 2023, and the Appellants received notification of the decision on 26 April 2022. 14. The Reasons for the Decision are set out in Annexure 1 to the Authorisation. **GROUNDS OF APPEAL** 15. The decision to grant the Authorisation should be set aside by the Minister because the final Environmental Basic Assessment Report ("FBAR") failed to comply with NEMA in various respects; and the Director General''s decision to grant the Authorisation contravenes various provisions of NEMA,		

Initial/s:

including the requirements for granting environmental authorisations, the requirements of the National Environmental Management Act and the National Environmental Management Principles (section 2 of NEMA) ("NEMA Principles"), in that: 15.1. the need and desirability of the Project has not been established, as required by regulation 18 of the EIA Regulations read with regulation 23(3) and Appendix 3 to the EIA Regulations. 15.2. the FBAR and the DG failed to adequately consider the marine impacts and therefore have failed to meet the requirements of, inter alia, section 24O(1) NEMA to account for all relevant factors,[10] in particular those regarding the pollution,		

[10] NEMA, section 24O1(b).

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
environmental impacts or environmental degradation "*likely to be caused if the application is approved*",[11] as well as any guidelines, departmental policies, and environmental management instruments and any other information in the possession of the competent authority relevant to the Application.[12] This is also in contravention of the NEMA requirement to ensure that the activity's potential environmental impacts are properly assessed;[13] 15.3. The FBAR and DG have failed to adequately assess and consider the cumulative impacts of the Project, as required by the NEMA EIA Regulations, Appendix 3 section 3(j)(i). 15.4. TGS, and its appointed Environmental Assessment Practitioner ("EAP", has failed to engage in meaningful consultation in violation of the principles of		The impacts assessment methodology used is guided by the NEMA EIA Regulations, 2014 and it included assessment of cumulative impacts as indicated in Section 9.1 of the BAR.

Initial/s:

fair administrative decision-making and the right of interested and affected communities to be meaningfully consulted prior to a decision on authorisation being made, and in violation of section 2(4)(f) of NEMA, which stipulates that the participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured. It is also inconsistent with section 2(4)(g) of NEMA, which requires that decisions must take into account the interests, needs and values of all interested and affected parties, and this includes		

11 NEMA, section

Initial/s:

24O1(b)(i).

[12] NEMA, section 24O1(b)(viii).

[13] NEMA, section 24(4)(a)(iv).

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THEDMRE/PASA
recognising all forms of knowledge, including traditional andordinary knowledge. 15.5. the DG failed to consider and/or give effect to: the NEMA Principles, including the precautionary principle and the principle that requires development to be environmentally, socially and economically sustainable; and the Constitutional rights to an environment that is not harmful to health or wellbeing – as enshrined in section 24 of the Constitution of the Republic of South Africa, 1996 ("the Constitution"). The decision to issue the Authorisation and the reasons provided therefore are, furthermore irrational and unreasonable, and thus in contravention of PAJA. 15.6. The DG failed to consider relevant coastal management considerations or to comply with the National Environmental Management: Integrated Coastal Management Act 24 of 2008.		

Initial/s:

15.7. Ground 7: The DG failed to provide adequate reasons for the decision.		
Ground 1: A flawed and misguided need and desirability assessment 16. The NEMA EIA Regulations stipulate that a basic assessment report must include a motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred location.[14] 17. Section 5 of the FBAR includes a motivation of need and desirability for the proposed 3D seismic survey. Unsurprisingly, the FBAR	The EAP has conducted the impact assessment on the basis of the activities proposed by the applicant. Any subsequent authorisation would be restricted to these specifically assessed activities. Should the applicant or other applicants wish to undertake any additional exploration activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a consequent need to apply for the relevant permissions. These would include a formal application for an Exploration or Production Right as	The need and desirability of the authorised project was described and assessed according to the Guideline on Need and Desirability in terms of the EIA Regulations (Notice 819 of 2014). The need and desirability of the proposed activity in the context of the preferred location was included in the assessment. However, it is important to note that the success of the authorised project will not only contribute to the preferred project location, but to the entire country, hence the assessment extends to national level.

Initial/s:

[14] NEMA EIA Regulations, Appendix 1, section 2(c). With regard to need and desirability, a distinction is drawn between the 'general purpose and requirements' of the proposed activity and 'need and desirability'. The 2017 Guideline on Need and Desirability states as follows (at p10):

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THEDMRE/PASA
focusses on justifying the 'need and desirability' of the proposed project and fails to reflect views critical to 3D seismic surveys and offshore oil and gas exploration (and ultimately production). As a consequence, the 'need and desirability' assessment provided in the FBAR follows the pattern of previous seismic survey EIAs by (among other things) limiting the assessment of potential impacts to the proposed 3D seismic survey, with no assessment of the need and desirability of exploring for (and ultimately producing and using) new oil and gas reserves (including in the context of the climate change crisis and the right to food). The assessment also includes a section motivating the 'need' for seismic data.	well as a new EA. The impacts of such proposed activities would consequently require specific assessment and public consultation prior to approval. It is premature to assess the likely impacts of further invasive exploration activities or production activities as the extent, duration, location, and magnitude applicable to these activities are unknown at this stage. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, and production activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed on their merits as and when they are proposed.	The need and desirability assessment only focused on motivating for the proposed activity and required in terms of NEMA. Further exploration and production activity will be assessed when the applicant lodged application for such activities. The Agency is satisfied with the assessment undertaken for the proposed and authorised activity.
18. It is noted that the FBAR Needs and Desirability analysis indicates that the proposed project '*aims to identify oil and gas resources to be used in… energy production*	Please refer to Section 5 of the BA Report in regard to the need and desirability for the proposed activities. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's electricity planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the	Seismic surveys have various uses, and one is to explore for oil and gas resources, hence selected for the

Initial/s:

and/or processing or manufacturing of materials'.[15] The FBAR also claims in passing that "seismic surveying is not only used for petroleum and natural gas exploration and development, it can in certain instances also be used for	expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries	proposed project. It is therefore important to note that the sound emitted from the other uses undertaken in the ocean is like the one emitted during the oil and gas seismic surveys.

In order to properly interpret the EIA Regulations' requirement to consider "need and desirability", it is necessary to turn to the principles contained in NEMA, which serve as a guide for the interpretation, administration and implementation of NEMA and the EIA Regulations. **With regard to the issue of "need", it is important to note that this "need" is not the same as the "general purpose and requirements" of the activity. While the "general purpose and requirements" of the activity might to some extent relate to the specific requirements, intentions and reasons that the applicant has for proposing the specific activity, the "need" relates to the interests and needs of the broader public**.

...

The consideration of "need and desirability" in EIA decision-making therefore **requires the consideration of the strategic context of the development proposal along with the broader societal needs and the public interest**. The government decision-makers, together with the environmental assessment practitioners and planners, are therefore accountable to the public and must serve their social, economic and ecological needs equitably. Ultimately development must not exceed ecological limits in order to secure ecological integrity, **while the proposed actions of individuals must be measured against the short-term and long-term public**

Initial/s:

interest in order to promote justifiable social and economic development – i.e. ensuring the simultaneous achievement of the triple bottom-line. Considering the merits of a specific application in terms of the need and desirability considerations, it must be decided which alternatives represent the "**most practicable environmental option**", which in terms of the definition in NEMA and the purpose of the EIA Regulations are **that option that provides the most benefit and causes the least damage to the environment as a whole, at a cost acceptable to society, in the long-term as well as in the short-term**. (emphasis added)

The Guideline requires need and desirability assessments to **address the impact of planned activities on global and international responsibilities relating to the environment, including climate change** (at p11).

[15] FBAR, item 1.7.1, p24.

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
development of offshore wind, geothermal energy, and low-carbon solutions such as carbon capture and storage and also more generally for providing more insight and understanding into the regional geology of the area for scientific purposes." This statement about other uses is misguided and irrelevant. These other purposes of the projects surveying results are speculative at best, and have far less impacts on the ocean than oil and gas surveying.[16] It is also abundantly clear from the FBAR that the main purpose of this project is to survey for oil and gas deposits.	and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new	
19. The FBAR concludes that *'[a]s a result of the fact that this project entails only survey activities, it is anticipated that this project will not lead to a significant impact on the receiving environment'*.[17] In line with this, the FBAR does not consider or assess the potential climate and other negative impacts of subsequent oil and gas exploration, production and use. In other words, it fails to consider the lifecycle impacts associated	information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined. The 2021 NDC's are aligned with the IRP	The applicant or (EAP) is only required to assess impacts of the proposed activity, hence the focus in only on seismic survey. The nature and the duration of the authorised activity make it impossible to assess impacts of climate change meaningfully. Contributions to climate change will come from the vessels GHG emissions, which are like those emitted by

Initial/s:

with exploring for and exploiting oil and gas resources. Yet, at the same time, it does consider the positive impacts should oil and gas be eventually produced, such as the claim that it will provide energy security to South Africa. This self-serving analysis is not only deceiving, it is unlawful. ***Climate change impacts***	2019. The GHG emissions and associated climate change impacts associated with the seismic survey itself would be negligible. There are no significant GHG emissions directly related to the proposed activity nor significant climate change vulnerability risks. As such, the life-cycle of the project would be limited to the Reconnaissance activities only (i.e. **identification only** – and does not necessarily imply actual exploration or further production of oil and gas resources) and	other vessels operating at sea.

[16] For example, the offshore wind industry does not use airguns, and instead relies on High Resolution Geophysical (HRG) surveys to map the ocean bottom and its shallow geological features. That technology, such as echosounders, sidescan sonar, and sparkers, uses considerably

less power as compared to seismic airguns and also tends to operate at higher frequencies. Not only do higher frequency sounds dissipate more quickly in the ocean but they also tend to fall outside of the general hearing range of baleen whales, such as humpbacks and right whales. The use of seismic surveying to develop offshore wind is the equivalent of using a hammer when a feather could do the job. The area that is being surveyed is also 120 – 230 km offshore and includes deep to ultradeep depths between 1,500 – 4,000m. It would not be feasible to install a fixed nor floating turbines at those depths, as they are more suitable for depths of less than 50m and 50 to 1,000m, respectively Lastly, a World Bank analysis does not findthe area TGS is surveying to be ideal for offshore wind generation. ESMAP. 2019. Going Global: Expanding Offshore Wind to Emerging Markets at p. 20-21. Washington, DC: World Bank ("fixed foundation is considered technically viable in areas with water depth less than 50 m and average wind speeds over 7 m/s. Floating wind is considered technically viable with water depths from 50 m up to 1,000 m.").

[17] Ibid, item 1.8.3, p24.

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THEDMRE/PASA
20. The FBAR states that from a climate change perspective, it is '*not currently possible to accurately assess the risks associated with oil and gas activities, given that the specific details of these potential future activities are not known and therefore climate change impacts would need to be assessed in detail during any subsequent Scoping and EIA processes for any potential subsequent oil and gas productionprojects*'.[18] As a result. the FBAR does not conduct any climate change impact assessment, even in broad terms. 21. It is relevant to note that the issue of whether the decision-maker properly considered climate change impacts was referred to in the judgment of the full bench of the Makhanda High Court in the Shell Wild Coast seismic survey case.[19] The court stated in its judgement that the intervening parties' contention that the decision-maker gave no proper	this has been specified and defined in the Need and Desirability, and the associated impacts identified and assessed. The statement made by the Appellent that the Need and Desirability ismisleading and unlawful in that it considers "*positive impacts should oil and gas be eventually produced, such as the claim that it will provide energy security to South Africa*" is in itself misleading and inaccurate. Infact, the Need and Desirability clearly states that "*The proposed projectaims to identify oil and gas resources and* ***will not, at this stage, involve the use of the natural resources identified as part of the proposed survey project***" and furthermore makes no claims of any significant positive impacts and states on numerous occasions that *"The proposed activities are anticipated to have low negative ecological impacts. Refer to the impact assessment in Section 9 in this report."* Also noted is that TGS is a seismic data acquisition company and is in the business of data acquisition,	Kindly refer to the above response regarding impacts associated to climate change and further exploration and production activities.

Initial/s:

consideration to climate change impacts of the decision to grant the exploration right is an important factor to be considered in the process of granting an exploration right. The court referred to expert testimony relied upon to support this contention, which showed that '*most of the discovered reserves of oil and gas cannot be burnt if we are to stay on the pathway to keep global average temperature increases below 1.5 degrees Celsius. Authorising new oil and gas exploration, with its goal of finding exploitable oil and/or gas reserves and consequently leading to production, is not consistent with South Africa complying with its international climate change commitments*'.[20] 22. The court noted that according to the respondents in that case, climate change considerations are irrelevant when considering an	and are not an Oil & Gas Exploration or Production company. Data from TGS' seismic libraries are not only used for petroleum and natural gas exploration and development, data may also be used for development of offshore wind, geothermal energy, low-carbon solutions such as carbon capture and storage and also more generally for providing more insight and understanding into the regional geology of the area for scientific purposes.	

[18] FBAR, p33.

[19] *Sustaining the Wild Coast NPC & Others v Minister of Mineral Resources and Energy & Others*, High Court of South Africa, Eastern Cape

Initial/s:

Division, Makhanda – Case No. 3491/2021, at paras 120 to 125.

[20] Ibid, at para 121.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
application for an exploration right, and these considerations are premature because they fall to be considered at a much later stage. 23. The court pointed out that on the authority of the *Save the Vaal* case,[21] the '*processes are discrete stages in a single process that culminates in the production and combustion of oil and gas, and the emission of greenhouse gases that will exacerbate the climate crisis and impact communities' livelihoods and access to food'.*[22] The court went on to state that the respondent's thesis does not find support in *Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others* either, and referred approvingly to the following passage in Murphy J's judgement: The absence of express provision in the statute requiring a climate change impact assessment does not entail that there is no legal duty to consider climate change as a relevant consideration and does not answer the interpretative question of whether such a duty exists in administrative law. Allowing for the respondents' argument that no	The Earthlife Africa case referred to relates to the EA issued to construct and operate a new coal fired power station which bears no resemblance to seismic survey data acquisition. It is agreed that pending the outcome of an appraisal on the viability of extracting any oil or gas resource, which this seismic survey is likely to inform, due caution will need to be taken to avoid overcommitments and stranded assets. In terms of the "Need for Seismic Data", the main aim of the Needs and Desirability Section of the BA Report is to determine the need for the activity, and it is argued for that the survey is desirable given the current energy planning of the country, amongst other factors. It is agreed, considering the rapid technological advancements in the energy sector, that there is a need to continually reassess and revise where relevant the energy planning and policy for South Africa. Pending the outcome of an appraisal on the viability of extracting any oil or gas resource, which this seismic survey is likely to inform, due caution will need to be taken to avoid	

Initial/s:

empowering vision in NEMA or the regulations explicitly prescribes a mandatory procedure or condition to conduct a formal climate change assessment, the climate change impacts are undoubtedly a relevant consideration as contemplated by section 24O of NEMA for the reasons already discussed. A formal expert report on climate change impacts will be the best evidentiary means of establishing that this relevant factor in its multifaceted dimensions was indeed considered, while the absence of one will be symptomatic of the fact that it was not.[23] 24. The court in the Shell Wild Coast seismic survey case went on to statethe following:	overcommitments and stranded assets associated with the timing of South Africa's prevailing climate change commitments. The potential for methane leaks during resource extraction, processing, and utilisation will need to be assessed as and when such is proposed. It should further be noted that the acquisition of seismic survey data is considered important with respect to understanding the potential for future oil and gas production as part of the energy mix of the country	

[21] *Director: Mineral Development, Gauteng Region and Another v Save the Vaal Environment and Others* (133/98)[1999] ZASCA 9 (12 March 1999).

[22] Ibid, para 123.

[23] Ibid, para 124.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
It seems clear from the aforegoing, even taking into account the contentions raised by the respondents, that, had the decision-maker had the benefit of considering a comprehensive assessment of the need and desirability of exploring for new oil and gas reserves for climate change and the right to food perspective, the decision-maker may well have concluded that the exploration is neither needed nor desirable.[24] (emphasis added) 25. The Green Connection and Natural Justice submit that the FBAR is deficient, and the Needs and Desirability analysis incomplete, without at the very least a broad assessment of the climate change impacts should commercially exploitable oil and gas resources be identified through the proposed seismic survey (and should these resources be produced and utilised). It would be pointless to authorise this (and other) 3D seismic surveys should such an assessment conclude that the development of new oil and gas fields is incompatible with South Africa's climate change commitments.	going forward. The seismic data will provide information with which future decisions can be made. The South African legislation requires the payment of royalties and taxes to the South African government associated with the extraction of resources. There are further obligations on holders of mineral and petroleum rights to contribute to local economic development. The Draft Upstream Petroleum Resources Development Bill also provides for the state to receive a 20% carried interest in exploration and production rights. According to the specialist investigations undertaken, there is unlikely to be a significant impact on the marine environment and therefore there is not anticipated to be a consequent impact on the right to food. It should further be noted that, in the recent Presidential Climate Commission (PCC) recommendations on the electricity system which also specifically considered many local and international studies (including some of those cited by the appellant), the PCC expects a policy adjusted	

Initial/s:

The 'climate crisis' 26. The need and desirability (from a climate change perspective) of conducting a 3D seismic survey (which – as mentioned above – the FBAR aims to identify oil and gas resources to be used in energy production and/or processing or manufacturing of materials) is particularly important given that climate change has been acknowledged as a 'crisis' with human-induced climate change impacts being experienced in every region. It is also recognised that the climate change 'crisis' requires immediate, rapid and large-scale reductions in greenhouse gas (GHG) emissions to limit global warming to 1.5°C (including accelerated action in this decade to reduce global carbon dioxide emissions by 45 per cent by 2030 relative to the 2010 level and to net-zero around mid-century). In	IRP to promote approximately 50 to 60 GW of variable renewable energy by 2030, supported by co-located storage, and between 3 and 5 GW of peaking support (for example gas, running at low utilisations). Therefore, although the PCC doesn't advocate for large scale new coal or gas the PCC does recommend the inclusion of up to 5GW of peaking support (typically to be provided in part by gas). In summary, the re-evaluation of South Africa's energy planning and policy falls beyond the scope of this assessment. The current policy provides for a portion of the electricity mix to be provided by gas, and that such has been accounted for and included in the countries climate change commitments (NDC's). The source of the gas to meet this need would either be imported of produced locally. The feasibility of the later can only be defined once the extent if the resources have been defined.	

[24] Ibid, para 125.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
support of these submissions, some of the recent developments relating to the climate crisis are discussed briefly below. 27. In August 2021, the Intergovernmental Panel on Climate Change (IPCC) (an international body for assessing the science related to climate change) released its 6th Assessment Report (AR6).[25] In its summary for policymakers, the IPCC indicates (among other things) that: 27.1. It is unequivocal that human influence has warmed the atmosphere, ocean and land, and that widespread and rapid changes in the atmosphere, ocean, cryosphere and biosphere have occurred;[26] 27.2. The scale of recent changes across the climate system as a whole – and the present state of many aspects of the climate system – are unprecedented over many centuries to many thousands of years;[27] 27.3. Human-induced climate change is already affecting many weather and climate extremes in every region	Thereafter a decision can be taken as to whether the resource should be extracted or produced. This EA was issued for seismic survey only and does not result in any stranded assets, but aims to provide information on potential resources. Assessment and analysis of the data acquired by this survey will help inform the Government's decisions on the viability and impact of producing any located assets compared to importing equivalent energy resources.	

Initial/s:

across the globe. Evidence of observed changes in extremes such as heatwaves, heavy precipitation, droughts, and tropical cyclones, and, in particular, their attribution to human influence, has strengthened since AR5;[28] 27.4. Global surface temperature will continue to increase until at least mid-century under all emissions scenarios considered, and that global warming of 1.5°C and 2°C will be exceeded during		

[25] Climate Change 2021: The Physical Science Basis, available online at: https://www.ipcc.ch/report/sixth-assessment-report-working-group-i/

[26] Para A.1

[27] Para A.2

[28] Para A.3

3028

Initial/s:

3046

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
the 21st century unless deep reductions in CO2 and other GHG emissions occur in the coming decades;[29] 27.5. Many changes in the climate system become larger in direct relation to increasing global warming. They include increases in the frequency and intensity of hot extremes, marine heatwaves, heavy precipitation, and, in some regions, agricultural and ecological droughts; an increase in the proportion of intense tropical cyclones; and reductions in Arctic sea ice, snow cover and permafrost;[30] 27.6. Continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation and the severity of wet and dry events;[31] 27.7. Many changes due to past and future GHG emissions are irreversible for centuries to millennia, especially changes in the ocean, ice sheets and global sea level;[32] 27.8. From a physical science perspective, limiting human-		

Initial/s:

induced global warming to a specific level requires limiting cumulative CO2 emissions, reaching at least net zero CO2 emissions, alongwith strong reductions in other GHG emissions. Strong, rapid and sustained reductions in CH4 emissions would also limit the warming effect resulting from declining aerosol pollution and would improve air quality.[33] 28. On 9 August 2021, the IPCC issued a press release relating to its AR6 report. It states that the report provides new estimates of the		

[29] Para B.1

[30] Para B.2

[31] Para B.3

[32] Para B.5

[33] Para D.1

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
chances of crossing the global warming level of 1.5°C in the next decades, and finds that unless there are immediate, rapid and large- scale reductions in GHG emissions, limiting warming to close to 1.5°C or even 2°C will be beyond reach.[34] 29. Also on 9 August 2021, UN Secretary-General António Guterres described the AR6 report as nothing less than "*a code red for humanity. The alarm bells are deafening, and the evidence is irrefutable*". (emphasis added) 30. Guterres is reported as noting that the internationally agreed threshold of 1.5 degrees above pre-industrial levels of global heating was perilously close, and that we are at imminent risk of hitting this threshold in the near term. Guterres is indicated as advising that the only way to prevent exceeding this threshold, is by urgently stepping up our efforts, and pursuing the most ambitious path. Guterres is reported as stating that solutions are clear: "*Inclusive and green economies, prosperity, cleaner air and better health are possible for all, if we respond to this*		

Initial/s:

crisis with solidarity and courage". Ahead of the COP26 climate conference in Glasgow in November 2021, Guterres stated that all nations needed to join the net zero emissions coalition, and reinforce their promises on slowing down and reversing global heating "*with credible, concrete, and enhanced Nationally Determined Contributions (NDCs)*" that lay out detailed steps. 31. In April 2022, Guterres tweeted that *'[c]limate activists are sometimes depicted as dangerous radicals. But the truly dangerous radicals are the countries that are increasing the production of fossil fuels. Investing in new fossil fuels infrastructure is moral and economic madness'*.[35] Addressing graduate students in May 2022, Guterres expressed the view that investing in fossil fuels is now "*a*		

[34] https://www.ipcc.ch/2021/08/09/ar6-wg1-20210809-pr/

[35] https://twitter.com/antonioguterres/status/1511294073474367488?lang=en

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
dead end - economically and environmentally. No amount of greenwashing or spin can change that. So, we must put them on notice: Accountability is coming for those who liquidate our future."[36] 32. The 26th Conference of the Parties of the UNFCCC (COP26) was held in Glasgow in the last quarter of 2021. Recognition of the climate 'crisis', as well as the urgent need to increase effort and to accelerate action to address climate change (including by developing nations), are reflected in the outcome of COP26 and recorded in the Glasgow Climate Pact. The Glasgow Climate Pact (among other things): 32.1. Expresses alarm and utmost concern that human activities have caused around 1.1°C of global warming to date and that impacts are already being felt in every region; 32.2. Reaffirms the long-term global goal to hold the increase in the global average temperature to well below 2°C above pre- industrial levels and to pursue		

Initial/s:

efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change; 32.3. Recognizes that the impacts of climate change will be much lower at the temperature increase of 1.5°C compared with 2°C and resolves to pursue efforts to limit the temperature increase to 1.5°C; 32.4. Recognizes that limiting global warming to 1.5°C requires rapid, deep and sustained reductions in global GHG emissions, including reducing global carbon dioxide emissions by 45 per cent by 2030 relative to the 2010 level and to net zero around mid-century as well as deep reductions in other GHGs;		

[36] https://news.un.org/en/story/2022/05/1118932

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
32.5. Also recognizes that this requires accelerated action in this critical decade, on the basis of the best available scientific knowledge and equity, reflecting common but differentiated responsibilities and respective capabilities and in the context of sustainable development and efforts to eradicate poverty; 32.6. Invites Parties to consider further actions to reduce by 2030 non-carbon dioxide GHG emissions, including methane which has been identified as a driver of climate change and the main polluting emission from natural gas; 32.7. Calls upon Parties to accelerate the development, deployment and dissemination of technologies, and the adoption of policies, to transition towards low-emission energy systems, including by rapidly scaling up the deployment of clean power generation and energy efficiency measures, including accelerating efforts towards the phasedown of unabated coal power and phase-out of inefficient fossil fuel subsidies, while providing targeted support to the poorest and		

Initial/s:

most vulnerable in line with national circumstances and recognizing the need for support towards a just transition; 32.8. Emphasizes the importance of protecting, conserving and restoring nature and ecosystems, including forests and other terrestrial and marine ecosystems, to achieve the long-term global goal of the Convention by acting as sinks and reservoirs of GHGs and protecting biodiversity, while ensuring social and environmental safeguards. 33. The climate 'crisis' is also recognised by the International Energy Agency (IEA), of which South Africa is an IEA associated country. During or about July 2021, the IEA published its *Net Zero by 2050 – A Roadmap for the Global Energy Sector* report. In the foreword to this report, the Executive Director of the IEA states (among other things) as follows:		

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
We are approaching a decisive moment for international efforts to tackle the climate crisis – a great challenge of our times. The number of countries that have pledged to reach net-zero emissions by mid-century or soon after continues to grow, but so do global greenhouse gas emissions. This gap between rhetoric and action needs to close if we are to have a fighting chance of reaching net zero by 2050 and limiting the rise in global temperatures to 1.5 °C. Doing so requires nothing short of a total transformation of the energy systems that underpin our economies... Despite the current gap between rhetoric and reality on emissions, our Roadmap shows that there are still pathways to reach net zero by 2050. The one on which we focus is – in our analysis – the most technically feasible, cost-effective and socially acceptable. Even so, that pathway remains narrow and extremely challenging, requiring all stakeholders – governments, businesses, investors and citizens – to take action this year and every year after so that the goal does not slip out of reach.		

Initial/s:

This report sets out clear milestones – more than 400 in total, spanning all sectors and technologies – for what needs to happen, and when, to transform the global economy from one dominated by fossil fuels into one powered predominantly by renewable energy like solar and wind. Our pathway requires vast amounts of investment, innovation, skilful policy design and implementation, technology deployment, infrastructure building, international co-operation and efforts across many other areas. Since the IEA's founding in 1974, one of its core missions has been to promote secure and affordable energy supplies to foster economic growth. This has remained a key concern of our Roadmap, drawing on special analysis carried out with the International Monetary Fund and the International Institute for Applied Systems Analysis. It shows that the enormous challenge of transforming our energy systems is also a huge opportunity for our economies, with the potential to create millions of new jobs and boost economic growth.		

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
Another guiding principle of the Roadmap is that clean energy transitions must be fair and inclusive, leaving nobody behind. We have to ensure that developing economies receive the financing and technological know-how they need to continue building their energy systems to meet the needs of their expanding populations and economies in a sustainable way. It is a moral imperative to bring electricity to the hundreds of millions of peoplewho currently re deprived of access to it, the majority in of them in Africa... 34. On fossil fuels used in energy production, the report states that: ***There is no need for investment in new fossil fuel supply in our net zeropathway.*** Beyond projects already committed as of 2021, there areno new oil and gas fields approved for development in our pathway, and no new coal mines or mine extensions are required. 35. When natural gas is burned for energy, it releases carbon dioxide into the atmosphere. More importantly, the extraction, processing, transport and use of natural gas		

Initial/s:

cause significant amounts of methane to be released into the atmosphere too. *According to the United Nations,* ***methane is a 84-86 times more potent greenhouse gas than carbon dioxide over a 20-year period, and 28-34 times more potent over 100-year period.***[37] More research is also showing that methane often leaks during the production, transport and use ofnatural gas. Therefore, its contribution to climate change is significantly unaccounted for.[38] Drones, laser absorption spectroscopy, and satellites, among other new methane monitoring technologies, have improved the identification and quantification of emissions across the gas lifecycle, leading researchers to conclude		

[37] International Energy Agency, Global Methane Tracker 2022- Overview, https://www.iea.org/reports/global-methane-tracker-2022/overview. See also International Energy Agency, Global Energy Review: CO2 Emissions in 2021,(2022), https://iea.blob.core.windows.net/assets/c3086240-732b-4f6a-89d7 db01be018f5e/GlobalEnergyReviewCO2Emissionsin2021.pdf.

[38] South Africa is likely among those that are underreporting because the Technical Guidelines for GHG reporting uses outdated emission factors from the 2006Intergovernmental Panel on Climate Change (IPCC) Guidelines

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
that national governments have almost universally underestimated these emissions.[39] 36. If 3,000 megawatts of new gas-to-power plants were built to meet South Africa's 2019 Integrated Resource Plan for Electricity, and the plants were fuelled by imported LNG, the annual emissions from this fuel use would be more than 2.5 million tonnes of CO2e (carbon dioxide equivalent) if the plants ran at 75% capacity. This is the equivalent of driving over half a million gasoline-powered vehicles for a year.[40] For gas or any other fossil fuel, a life-cycle analysis is therefore necessary to quantify the total amounts of GHG emissions (predominantly carbon dioxide and methane) that result from every step in the energy production process: from extracting the fossil fuel at the well or mine to burning it at a power plant or other facility. This is therefore important because all these processes are linked and should not be viewed in isolation. ***South Africa's international climate change commitments*** 37. South Africa is a Party to the United Nations Framework		

Initial/s:

Conventionon Climate Change (UNFCCC), which enjoins State Parties to take precautionary measures to anticipate, prevent or minimize the causes of climate change (Article 3.3). 38. South Africa, as a Party to the UNFCCC that ratified the Kyoto Protocol and adopted the Paris Agreement, has committed to *'working with others to ensure temperature increases are kept well below 2°C above pre-industrial levels, which could include a further revision of the temperature goal to below 1.5°C in light of emerging*		

[39] Jonathan Mingle, Methane Detectives: Can a Wave of New Technology Slash Natural Gas Leaks?, YALE E360, (2019), https://e360.yale.edu/features/methanedetectives-can-a-wave-of-new-technology-slash-natural-gas-leaks.

[40] EPA, EPA equivalency calculator, https://www.epa.gov/energy/greenhouse-gasequivalencies-calculator#results

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
science' by reducing GHG emissions. South Africa has also committed (among other things) to: 38.1. Preparing, communicating and maintaining Nationally Determined Contributions (NDCs) that it intends to achieve reach global peaking of GHG emissions as soon as possible, and to undertake rapid reductions thereafter;[41] and 38.2. Striving to formulate and communicate long-term GHG emission development strategies.[42] 39. There have been various Conferences of the Parties and meetings since, with decisions related to Nationally Determined Contributions (NDCs) contained in decisions 4/CMA.1 and 18/CMA.1 and their annexes. 40. South Africa submitted its first Intended Nationally Determined Contribution under the Paris Agreement on 25 September 2015, which became the country's first NDC on 1 November 2016. Subsequently, South Africa revised its first NDC in 2021:[43]\		

Initial/s:

Table 2 : South Africa's updated NDC mitigation targets

Year	Target	Corresponding period of implementation
2025	South Africa's annual GHG emissions will be in a range from 398-510 Mt CO_2-eq	2021-2025
2030	South Africa's annual GHG emissions will be in a range from 350-420 Mt CO_2-eq	2026-2030

[41] Paris Agreement, Article 4.1 – 4.3.

[42] Paris Agreement, Article 4.19

[43] Available online at: https://www.dffe.gov.za/sites/default/files/reports/draftnationalydeterminedcontributions_2021updated.pdf#:~:text=South%20Africa%E2%80%99s%20intended%20nationally%20determined%20contribution%20%28INDC%29%28RSA%2C%20n.d.%29,Agreement.%20The%20INDC%20and%20first%20NDC%20are%20identical. This revised NDC is indicated as an enhancement and update of South Africa's NDC under the Paris Agreement, 'meeting its obligation under Article 4.9 to communicate NDC's every 5 years, and responding to requests in paragraphs 23 to 25 of decision 1/CP.21'. South Africa's second (next) NDC is intended to be communicated in 2025.

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
41. South Africa's energy sector is estimated at contributing about 84% percent to the country's overall GHG emissions (including Carbon Dioxide and Methane).[44] 42. In February 2020, South Africa submitted to the UNFCCC its first long-term low GHG emission development strategy titled *South Africa's Low Emission Development Strategy 2050.* It is indicated in the executive summary of this strategy that South Africa, as one of the top 20 global GHG emitters and with a high dependency on fossil fuels, will need to make substantial emission cuts to contribute its fair share to global GHG emission reductions.[45] 43. The FBAR does not provide any indication (or estimation) of how future GHG emissions (resulting from future exploitation of oil and gas that may be discovered through the exploration drilling project) would impact on South Africa's ability to achieve its GHG emissions targets (as set out in South Africa's NDC) or its updated GHG emissions targets (as set out in South Africa's revised NDC). This is particularly relevant given that the emissions targets for the 2026- 2030 period are lower than the		

Initial/s:

targets for the 2021-2025 period, while offshore oil and gas developments could take at least a decade to reach the production stage. This could result in offshore oil and gas investments (as well as associated gas infrastructure developments) in the future becoming unneeded 'stranded assets' and a burden on future generations. There is also a risk that in the future tariffs will be levied on various goods exported by fossil-fuel dependent countries – the European Union is reported to be		

[44] https://www.climatelinks.org/resources/greenhouse-gas-emissions-factsheet-south-africa

[45] South Africa's Low Emission Development Strategy 2050, pviii.

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THEDMRE/PASA
gradually phasing in its Border Adjustment Mechanism as part of the EU's Green Deal.[46] ***Need for seismic data*** 44. Under the sub-heading 'Need for seismic data', the FBAR states that a discussion of the needs and desirability of the project '*would not be complete without understanding the need for acquisition of the seismic data and possible oil and gas exploration and production that could potentially take place in the future as a result of the survey*'.[47] 45. Ironically, the FBAR then quickly goes on to state that *'[i]t cannot be said with absolute certainty that exploration drilling, let alone production activities, will be undertaken in the future. As such, it is not currently possible to accurately assess the risks associated with these activities, given that the specific details of these potential future activities are not known. While it is acknowledged that the*		The results of the seismic survey are not yet known, hence there is a need to undertake the survey to determine the existence of oil and gas resources. Only after the analysis of the acquired data, the applicant or any other person who purchased the data will be able to determine the possibility of further exploration and production over the area. Currently it is not known if there will be further exploration or production over the area, or even the required infrastructure to undertake further activities. Hence, it in not possible to assess impacts.

Initial/s:

risks mentioned would need assessment, such assessment falls outside of the scope of the current application and would need to be assessed in detail during subsequent Scoping and EIA processes, should exploration drilling or production be proposed. The environmental consequences applicable to the planned survey activities have been identified and assessed in this BA Report'.[48] The views of the Makhanda High Court in this regard (in the context of future production, climate change and the right to food) have been traversed earlier in the Green Connection and Natural Justice's comments (see paragraphs 27 to 30 above) and are not repeated here. The Green Connection and Natural Justice stands by their view that at the very least a broad assessment of the impacts and risks		

[46] See for example *Just Energy Transitions and Natural Gas in Africa: Balancing Climate Action and Structural Transformation,* The African Climate Foundation, August 2022, at p14. Available online at: https://africanclimatefoundation.org/wp-content/uploads/2022/10/ACF-GAS-REPORT-V7.indd-final-1.pdf

[47] FBAR, p33-34.

[48] Ibid.

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
associated with future invasive exploration activities, production activities and use of any discovered oil reserves should be included in the BAR. 46. The FBAR report then proceeds with a glowing (and one-sided) endorsement of the use of natural gas: The fastest growing sector for the use of natural gas is for the generation of electric power. Natural gas power plants usually generate electricity in gas turbines, directly using the hot exhaust gases from the combustion of the gas… Of the three fossil fuels used for electric power generation (coal, oil and natural gas), natural gas emits the least carbon dioxide per unit of energy produced. Natural gas emits 30% and 45% less carbon dioxide than burning oil and coal, respectively. Burning natural gas also releases lower amounts of nitrogen oxides, sulphur dioxide, particulates and mercury when compared to coal and oil. The increased use of natural gas can, in the short		

Initial/s:

term, serve as a transition fuel on the path to the carbon-neutral goal of the Paris Agreement. In addition to gas as a key transitional fuel reducing reliance on coal, the benefits of oil and gas could include significant amount of job creation, especially if local beneficiation takes place. An increase in domestic natural gas reserves would enable South Africa to take steps to secure the countries' energy supply (through diversification), assist in reducing the emissions of greenhouse gases (by reducing the country's reliance on coal for electricity generation) and reduce the need for the importation of gas. As such, exploration for additional domestic hydrocarbon reserves is considered important and supported by national policy, and any discoveries would be well received by the local market and are consistent with the objectives stated in the 2019 IRP. Natural gas emits 30% and 45% less carbon dioxide than burning oil and coal, respectively, and 65% less carbon dioxide than coal when the increased efficiency of Combined Cycle Gas Turbines versus coal fired power stations is considered. Eskom produces over 200MtCO2/yr, over 40% of South Africa's total. South Africa also has SASOL's Secunda coal to liquids		

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
plant, the biggest single source of CO2 in the world at 57MtCO2/yr (~12.5% of South Africa's total) to produce 160k barrels of products per day. Supplying these products from conventional oil production and refining would generate approximately 10% of those emissions, 5 to 6MtCO2/yr. According to the 2019 IRP the availability of gas in the short to medium term is a risk as South Africa does not currently have gas resources. There is also a supply and foreign exchange risk associated with likely increase in gas volumes depending on the energy mix adopted post 2030 when a large number of coal fired power stations are decommissioned. South Africa's economic growth is dependent on the availability of energy, ensuring a sustainable and reliable supply of electricity with sufficient capacity is a key aspect to growing the economy of South Africa in the future. The electricity shortages experienced in South Africa over the past decade are a contributing factor to the significant slowdown in economic growth rate. To enable economic growth within the target rate of between 6% and 8% to be achieved, it will be necessary for Government to continue increasing electricity generating capacity in the country. The use of natural gas for		The applications for oil and gas activities are required to consider relevant policies and legislation when undertaking the impact assessment. The motivation for the proposed activity is based on various applicable South African Policies. Kindly refer to the responses above regarding the impact assessment and consideration of future activities.

Initial/s:

electricity generation is identified in national policy, together with renewable energy technologies, as an alternative in diversifying the domestic energy supply away from its current reliance on coal. Gas is identified in the draft Integrated Resources Plan as significant contributor to South Africa's energy mix in the period up to 2030. Availability of gas also provides an opportunity to convert to Combined Cycle Gas Turbine and run open-cycle gas turbine plants at Ankerlig (Saldanha Bay), Gourikwa (Mossel Bay), Avon (Outside Durban) and Dedisa (Coega IDZ) on gas (IRP 2019).[49] 47. Perhaps concerned that it is making the case that seismic surveys are indeed the 'thin edge of the wedge' that will lead to increased fossil fuel extraction, production and use (with associated climate change		

[49] Ibid.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
impacts), the BAR steps back from its natural gas endorsement to repeat the point that *'[f]rom a climate change perspective, it is not currently possible to accurately assess the risks associated with oil and gas activities, given that the specific details of these potential future activities are not known and therefore climate change impacts would need to be assessed in detail during any subsequent Scoping and EIA processes for any potential subsequent oil and gas production projects'*.[50] 48. The FBAR then proceeds to argue that: The feasibility of using natural gas for domestic power generation is considered to be dependent on the extent of available domestic reserves of natural gas, as well as the financial cost of importing natural gas should those reserves be insufficient. The acquisition of seismic survey data is therefore considered		

Initial/s:

important with respect to understanding the potential for future oil and gas production as part of the energy mix of the country going forward and the need and desirability of the project is therefore supported from an energy security perspective.[51] 49. We note here that despite reliance on the IRP to motivate for the project, the FBAR fails to assess whether the amount of gas called for in the IRP would in any event require the exploitation of the resources sought by TGS. 50. Two recent independent studies (among others) challenge the view that fossil gas is necessary for electricity generation and as a transition fuel. 51. The International Institute for Sustainable Development's (IISD) *Gas Pressure: Exploring the case for gas-fired power in South Africa* (March 2022) report points out that while there used to be a rational view that fossil gas would be necessary either during a transition to		

[50] Ibid.

[51] Ibid.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
low-carbon energy or as part of the long-term energy mix for electricity production: ....revolutions first in renewable energy costs and then in battery storage costs have upended this view. Analysis of the South African electricity system shows that gas supply is not technically necessary until at least 2035, if ever. In the last few years, either the risks associated with gas have increased, or the understanding of existing risks has increased. Consequently, South Africa may see significant negative outcomes from developing a large gas-to-power system now... the trend toward decarbonization, coupled with cost reductions for renewable energy and storage, creates risks for gas investment. Investment in gas can reasonably be expected to lead to higher costs for consumers, just transition challenges for workers, and losses for investors.[52] 52. The ISSD report highlights some of the risks associated with gas-to- power investment in South Africa. These risks include significant contributions to climate change (as a consequence of CO2 and methane emissions when gas is burned), increasing international pressure to move away		

Initial/s:

from gas due to climate impacts, financial risks linked with gas-to-power, the risk of reduced security of affordable gas supply, the risk of stranded assets, and the risk of creating an additional just transition burden (future gas workers and communities face a repeat of the transition hardships currently faced by the coal sector).[53] 53. Meridian Economics' *'Hot Air about Gas – An Economic Analysis of the Scope and Role for Gas-Fired Power Generation in South Africa'* (June 2022) report points out that while South Africa's large-scale use of gas appears to be central to current energy policy direction in South Africa, *'this rests on a 2012 vision which pre-dates dramatic*		

[52] IISD report, piv. Available online at: https://www.iisd.org/publications/report/south-africa-no-need-for-gas

[53] IISD report, pages 8 – 12.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
reductions in renewable energy costs and carbon emissions space'.[54] The report goes on to state that independent analysis of the power sector across multiple recent studies shows that South Africa's power needs can be met both now and in the future with very little use of gas, and that there is '*no evidence to support the large-scale gas envisaged in the GMP; this is uneconomical even before carbon emissions are considered'*.[55] Meridian point out that *'the assumption that gas-fired power generation would replace coal ignores the fact that other technology combinations are now better at replacing coal-fired power than gas, and it is against these technologies that gas-fired generation should actually be compared'*.[56] Meridian demonstrate that existing modelling provides no economic rationale for "big gas" in the power sector, and that *'the impact of using large volumes of gas to generate power will be borne by electricity consumers and will essentially be a subsidy provided by power consumers to otherwise unviable gas use in other sectors'*.[57]		

Initial/s:

54. The Vital Ambition Report[58] by Meridian Economics in collaboration with the Council for Scientific and Industrial Research ("CSIR") Energy Centre ("Vital Ambition Report") states that gas to power is only justified in the South African energy mix in so far as it is required for low-utilisation flexible capacity (peaker plants) for balancing the system during peak power demand. The report confirms that no investments in gas infrastructure for energy production and generation is needed now or in the near future.[59] Furthermore the		

[54] Meridian report, page ii. Available online at: https://meridianeconomics.co.za/wp-content/uploads/2022/06/Hot-Air-About-Gas.pdf

[55] Ibid.

[56] Ibid, p1.

[57] Ibid, p37.

[58] Meridian Economics, 2020. A Vital Ambition: Determining the Cost of Additional CO2 Emission Mitigation in the South African Electricity System. See at https://meridianeconomics.co.za/wp-content/uploads/2020/07/Ambition.pdf

[59] Gas and peaking resources contribute just 1.1% of total electricity generation in 2025, and 2.4% by 2035 according to the same Meridian report.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
2019 IRP will likely need to be updated in the foreseeable future to align with South Africa's 2021 Nationally Determined Contribution under the Paris Agreement and to keep pace with quickly evolving science and significant reductions in price for solar and wind energy. However, even the 2019 IRP, which is rooted in an outdated and scientifically and economically unsound understanding of the necessity for any gas in the energy mix[60], only projects the collective contribution of gas and diesel to the 2030 energy mix to be 1.3% combined.[61] 55. According to a recent report prepared by Robert W. Howarth titled "Methane emissions and climate warming risk from hydraulic fracturing and shale gas development: implications for policy"[62] the climate impacts of gas are greater than those of coal per unit of energy produced when evaluated over a 20-year timeframe, the period most relevant for climate change if humans are to avoid catastrophic run-away warming. Though gas emits less carbon dioxide per unit energy than coal, its upstream GHG emissions are more		

problematic for the climate, as it leaks and vents potent methane throughout its lifecycle; researchers have been able to better detect emissions across the lifecycle of gas ever more accurately thanks to new methodologies and technologies (particularly "top-down" measurements using satellite and aerial assessments). 56. The use of fossil fuels must be phased out quickly due to the urgent need to address global warming. A recent study published in *Nature*,		

[60] Meridian Economics, Hot Air About Gas: An Economic Analysis of the Scope and Role for Gas-Fired Power Generation in South Africa (2022), pages 2-3, https://meridianeconomics.co.za/wp-content/uploads/2022/06/Hot-Air-About-Gas.pdf

[61] 2019 Integrated Resource Plan, page 42.

[62] Robert W Howarth. 2015. Methane emissions and climate warming risk from hydraulic fracturing and shale gas development: implications for policy" Energy and Emissions Control Technologies at pages 47-50. See https://www.research.howarthlab.org/publications/f_EECT-61539-perspectives-on-air-emissions-of-methane-and-climatic-warmin_100815_27470.pdf

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
the world's leading multidisciplinary science journal, discovered that "by 2050, we find that nearly 60% of oil and fossil methane gas, and 90% of coal, must remain unextracted to stay within a 1.5 °C carbon budget." According to the study, "most regions must reach peak production now or within the next decade, making many operational and planned fossil fuel projects unviable."[63] It is common practice that proposed exploration activities such as reconnaissance, only commence months and sometimes years after the need and desirability assessment is undertaken, with extraction and production only commencing years later.[64] According to one study, the world's largest oil and gas fields took an average of 5.5 years from discovery to first production and 17 years to reach peak output.[65] Chevron Corporation's (CVX) Gorgon natural gas development project off the coast of Australia took 30 years to complete, and another six years to begin producing liquefied natural gas.[66] Therefore exploration projects whose objectives are to locate gas deposits for energy companies to exploit through the construction and production of fossil fuels, run the risk of creating risks for		

Initial/s:

such infrastructure to become stranded assets which invariably impacts on the development potential of South Africa in achieving its climate goals. With no economic justification for large-scale gas use in power, such a strategy would result in assets that are stranded before their first kWh of power is generated. Given this, the proposed reconnaissance		

[63] Welsby, D., Price, J., Pye, S. et al. Unextractable fossil fuels in a 1.5 °C world. Nature 597, 230–234 (2021). https://doi.org/10.1038/s41586- 021-03821-8.

[64] While new wells in developed reservoirs can be drilled and brought online in a matter of months, production from new fields can take years due to complex permitting requirements and the construction of infrastructure such as pipelines and storage facilities

[65] Henrik Wachtmeister, Mikael Höök, "Investment and production dynamics of conventional oil and unconventional tight oil: Implications for oil markets and climate
strategies" Energy and Climate Change,

Initial/s:

Volume 1, 2020, 100010, ISSN 2666-2787, https://doi.org/10.1016/j.egycc.2020.100010. (https://www.sciencedirect.com/science/article/pii/S2666278720300106

[66] https://australia.chevron.com/-/media/australia/our-businesses/documents/Gorgon-Project-Milestones-Fact-Sheet.pdf

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
project in no way provides a remedy nor will address in the immediate future South Africa's current energy insecurity issues. 57. Importantly, seismic surveys to explore for oil and gas will not have any immediate impact on South Africa's energy security, as any oil and gas extracted would not belong to South Africa, but would invariably belong to the companies that extract for profit.[67] Energy companies compete for access to mineral rights granted by governments by either entering a concession agreement, meaning any discovered oil and gas are the property of the producers, or form part of a production-sharing agreement which favours the interest of the producers and ultimately diminishing the general interests of the broader South African Republic. 58. The oil and gas that will be eventually extracted by oil and gas companies is ultimately exploited for profit. It is not used to generate a benefit that results		The planned project is just for seismic survey and the main objective is to acquire seismic data, which will be sold to interested parties. Should a certain company decide to buy the data and explore or produce from the area, the contractual agreements will be dealt with by the relevant departments. The EIA process does not deal with such aspects.

Initial/s:

in broad based security for energy production nor does it lead to the production of energy for South Africa and its citizens. If oil and gas found following a successful reconnaissance, and that are ultimately exploited, are not used to produce energy for South Africa, this invariably undermines the sole stated goal underpinning the need and desirability of this proposed reconnaissance project—its supposed contribution to energy security for South Africa—and provides no tangible benefit for South Africans. 59. While the increased use of gas as a 'transitional fuel' is promoted by government and vested interest groups, the Green Connection and Natural Justice submit that the increased use of fossil gas (especially in electricity generation) will lead to increased emissions of climate warming GHGs, and methane (CH4) in particular. While natural gas combustion is less carbon-intensive than that of coal, fugitive emissions arising from the production, transport, storage and use of natural gas have a much greater climate impact than CO2. In		

[67] Stewart Glickman and Shang Yang Chuah, Oil, Gas & Consumable Fuels Industry Surveys (New York: CFRA, 2019)

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THEDMRE/PASA
particular, over a 20-year period (which is particularly relevant since the next 20 years are a critical window for addressing the climate crisis) methane emissions, which make up approximately 70-90% of natural gas emissions, are projected to be 82.5 times as impactful as those of CO2.[68] The desirability of using gas as a 'transitional' fuel is also questionable having regard to volatile international gas prices, aswell as the potential risk of Carbon Border Taxes being introduced in the future.[69] This risk will impose restrictions on the export of products with a high carbon footprint, putting South Africa's economy at greater risk of developing gas to power rather than clean renewable alternatives. This invariably diminishes the need and desirability for promoting new gas development projects, as the negative climate impacts and financial risks undermine the potential for gas to represent a viable solution for South Africa's ambitions to address development whilst respecting universal and regional climatechange obligations. 60. The fundamental outcome of the need and desirability assessment should not be centred on the determination of		The need and desirability do not only focus on determining if gas technology will ensure security for electricity but focuses on motivating the need for oil and seismic

Initial/s:

whether gas technology will ensure security of supply for electricity. Instead, due to the climate crisis, this assessment should be centred on whether South Africa needs, or should rely on, gas to provide security of supply of electricity and whether alternative technologies could meetthe same supply objectives with less harm and risk. Renewable energy and/or storage can replace gas to provide reliable and cost- effective generating capacity while greatly reducing the environmental and health risks associated with gas.[70]		surveys in South Africa. This is because this technology will provide data that is needed to determine availability of oil and gas resources that could be used to contribute to energy mix.

[68] See the IPCC's 6th Assessment Report (AR6), Working Group 1, Chapter 6 *The Earth's Energy Budget, Climate Feedbacks and Climate Sensitivity*, Table 7.15 at p1017. Available online at: https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Chapter07.pdf

[69] https://cer.org.za/wp-content/uploads/2022/10/Natural-Gas-factsheet.pdf

[70] See, e.g., Union of Concerned Scientists, Turning Down the Gas in California (13 July 2018), https://www.ucsusa.org/resources/turningdown-gas-california?_ga=2.79265367.2135392956.1587590973-34786515.1587590973#ucs-report-downloads

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
61. The call for gas as part of the energy mix set forth in the 2019 IRP does not excuse the decision-maker from taking climate change impacts into account, including as part of the need and desirability assessment. The case for need and desirability must address climate impacts and cannot simply rest on the 2019 IRP as evidence of need or desirability as relied upon by the EAP in the BAR. In the judgment of the High Court in *Earthlife Africa*[71], the court expressed that with respect to a decision maker's reliance on the IRP when rendering a decision on an application for environmental authorisation, the following is important to acknowledge: (a) "Policy instruments developed by the Department of Energy cannot alter the requirements of environmental legislation for relevant climate change factors to be considered".[72] (b) Establishing the need and desirability of a proposed project, is a key objective of each stage of scoping and impact assessment and must account for South Africa's 2021 NDC under the Paris Agreement. The EAP must therefore provide		It is important to note that the climate change instruments and agreements have not resulted in changes in South African legislation related or governing oil and gas activities. However, consideration of climate change impacts is required in undertaking such projects.

Initial/s:

a broad and robust analysis of multiple alternative literature on renewable energy resources and make a justifiable and reasonable case for a project's need and desirability having considered the available literature, without relying solely on the 2019 IRP and other policy documents. This invariably assists the decision maker to prioritise the granting of the best decision which will prioritize the integrity of the environment, and the social welfare, health and safety aspects of the socio-economic environment for present and future generations.		
Ground 2: Failure to adequately consider marine impacts. ***Underwater sound from seismic surveys***	The importance of sound is clearly acknowledged in the BAR and consequently a dedicated acoustic modelling assessment was prepared as part of the BAR. EIMS appointed	

	experienced and qualified scientists	

[71] Earthlife Johannesburg and Another v. Minister of Energy and Others 2017 2 All SA 519 (GP)

[72] See above at para 97.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
62. The ocean is an acoustic world. This is because water is a dense medium, and sound travels faster and farther underwater. Marine species, from larvae to whales, utilise this efficiency and have evolved to depend on sound for essential biological functions, including feeding, breeding, communicating, navigating, and socializing.[73] 63. Sound is also a fundamental component of marine habitats. Different ocean environments have distinct acoustic signatures that comprise their acoustic habitat. These acoustic habitats are created from a combination of biological sounds (e.g., fish choruses, snapping shrimp, urchin movement, whale calls) and environmental sounds (e.g.	to assess the likely impacts from seismic noise. The associated noise impacts were a key focus of the BAR and this clearly indicated in Section 9 of the BAR. It should be noted that a qualified and experienced marine ecology specialist was appointed to conduct an assessment of the likely impacts as identified and described in Section 9.3.1 of the BAR. The significance rating for each impact is determined through consideration of the nature, extent, duration, magnitude and probability of each impact. Please refer to section 9.1 of the BAR for an explanation of the assessment methodology utilised. The significance of all identified impacts in the marine ecology report, which included the impacts associated with the underwater sound from the proposed seismic survey, were considered to be of low significance once mitigation has been applied. The significance of environmental impacts varies depending amongst others on the specific location, prevailing sensitivities, receptors, timing, and extent of the proposed activities. The EAP and the specialists identified and assessed potential environmental	The Sound Transmission Loss Modelling included in appendix 3.5 of the BAR modelled sound propagations and zones of sound impact for various marine species. The underwater noise impact assessment criteria included the theoretical zones of noise influence (namely, auditability, masking, response, hearing loss and physical injury) as described by Richardson *et al.,* 2013. The assessment considered extensive scientific literature on the subject of noise impacts on marine species and specifically on species of concern (namely, marine mammals, fish and turtles). Therefore, newly recommended scientific noise exposure criteria on marine species were adopted in the modelling exercise. Short- and long-range modelling scenarios were undertaken to determine noise impacts in proximity and far from the air gun source. Various environmental factors were included

Initial/s:

waves crashing, rain, earthquakes). The addition of anthropogenic noise to these soundscapes disrupts the abilities of marine species to use naturally occurring acoustic cues and has detrimental effects on individual organisms, populations, and communities. [74] 64. Seismic airgun blast are the loudest human-created noises introduced into the ocean environment and they travel long distances through seawater. Studies have shown that seismic blasts are at least detectable at distances greater than 500-700 km, even up	impacts (supported by inputs from the public consultation process) and has	in the modelling. Cumulative SEL modelling, which accounts for all acoustic energy received from all seismic impulses within the specific period of exposure, was undertaken. The modelling also accounted for all oceanic conditions experienced in the area of interest including the water depth. The results indicated that the impacts are more proponent in proximity to the air gun sources and decreases with distance. The results were found to be similar in short, long range and cumulative impact scenarios. The modelling report recommended management actions, which were included as conditions of the Environmental Authorisation and will be implemented during operations. Modelling is accepted globally as a scientific method used in scientific research. The mitigation measures proposed consider the unknowns and a precautionary approach is adopted to ensure that unknown impacts are mitigated. The literature indicated the gap in

Initial/s:

		practical marine study experiments due to the complexity of the marine environment. However, the literature also recommends undertaking of such experiments during the oil and gas operations such as surveys. The operators are willing to allow for such to happen during their operations. Discussions and plans for such have been initiated and hopefully soon the experiments will be undertaken in one of the seismic survey operations. There is no Marine Protection Area that falls within the application area. While the CBAs that are within the application area will be managed in terms of their compatibility status. Cumulative impacts of simultaneous seismic survey operations are considered and assessed in the BAR and in the Sound Transmission Loss Modelling. Mitigation measures to be implemented during operations are recommended the BAR. It should also be noted that the zones of

Initial/s:

		immediate impact range to a maximum of 3800m, while the zones of cumulative impact range to a maximum of 5 050m for all marine species including fish eggs and fish larvae. It can therefore be said that the recommended mitigation measures including 40 km between survey operations are satisfactory and will mitigate impacts.

[73] Supporting Affidavit of Dr. Aaron N. Rice at paras. 8, *Sustaining the Wild Coast NPC & Others v Minister of Mineral Resources and Energy & Others*, High Court of South Africa, Eastern Cape Division, Makhanda – Case No. 3491/2021, attached marked **Annex B1**; Supporting Affidavit of Dr. Douglas P. Nowacek at paras. 9 & 13, *Sustaining the Wild Coast NPC & Others v Minister of Mineral Resources and Energy & Others*, High Court of South Africa, Eastern Cape Division, Makhanda – Case No. 3491/2021, attached marked Annex B2.

This appeal incorporates the expert opinions of Dr. Rice and Dr. Nowacek who submitted affidavits in the matter of *Sustaining the Wild Coast NPC & Others v Minister of Mineral Resources and Energy & Others*, High Court of South Africa, Eastern Cape Division, Makhanda – Case No. 3491/2021. Both of the affidavits provide expert insight on underwater acoustics, how marine species utilize acoustic cues for biological processes, and how seismic surveys may impact different taxa. The declarations will be used to assist the court to understand general principles and

Initial/s:

processes and will not be used to support specific impacts that were associated with that case on the east coast of South Africa.

[74] Rice Supporting Affidavit at para. 12.

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
to 4,000 km.[75] Other studies have detected seismic surveys at levels sufficient to mask, or obscure, baleen whale calls at distances of thousands of kilometres away from the source.[76] Airgun noise influences and degrades the acoustic habitat of marine species over a far greater area than the metres and kilometres that the FBAR considers and in fact, according to the science, can easily reach coastal areas 120 – 230 km from the survey area. 65. In addition, the noise produced by airgun arrays becomes virtually continuous at greater distances from the source creating chronic noise impacts. This is because the sounds emanating from a seismic airgun array do not behave as individual and finite sound source *in situ* but reflect off the ocean surface and seafloor as they travel, leading to a continuous increase in the sound level through reverberation. The effect has repeatedly been documented.[77] Studies have found seismic surveys causing elevated ambient noise levels by more than 25 dB (approximately a 4-fold increase in noise levels) across distances of 40 km and these sound levels remain elevated	proposed management and mitigation measures. The impacts are, by virtue of the fact that the impact assessment is a predictive assessment, regarded as 'potential'. All impacts identified in the process can be reduced to a low or medium significance with the implementation of the management and mitigation measures. All impacts associated with a proposed project are considered potential impacts until the impact actually occurs. The studies undertaken internationally over the past ~70 years on the impacts of noise on marine fauna (of which some 400 peer-reviewed publications have been summarised and cited in the marine faunal specialist study) have concluded that the effects of underwater sounds vary substantially and depend on a wide variety of physical and biological factors. When writing articles on the effects of seismic acquisition on marine fauna it is therefore not difficult to bias the literature cited to either demonstrate detrimental and irreversible impacts or only very limited impacts, depending on the personal view of the author(s) and/or the targeted readership. The marine faunal	

Initial/s:

during the periods between airgun blasts.[78] Open ocean condition observations have found that the noise produced and were sustainedfor months at a time.[79] 66. Because of several flaws in its approach, the BAR does not fully identify and assess the risk posed to marine species and ecosystemsand does not effectively mitigate the risks from the proposed the proposed surveying.	assessment has made efforts to present published results objectively, and nowhere claims that acousticsurveys do not result in impacts. Injury is likely at very short range, with behavioural disturbance occurring over greater distances. The final significance ratings are determined using information from the peer- reviewed literature together with the noise modelling results (which put the threshold distances from the source array to mortality and	

[75] Rice Supporting Affidavit at para. 18; Nowacek Supporting Affidavit at paras. 9-10.

[76] Rice Supporting Affidavit at para. 18; Nowacek Supporting Affidavit at paras. 13.

[77] Rice Supporting Affidavit at para. 19-20; Nowacek Supporting Affidavit at para. 10. [78] Rice Supporting Affidavit at para. 19-20; Nowacek Supporting Affidavit at para. 10.[79] Rice Supporting Affidavit at para. 19-20; Nowacek Supporting Affidavit at para. 10.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
Harms to marine life 67. It is well established that marine seismic surveys cause serious and irreparable harms to marine life. The Biodiversity and Ecosystem Services Assessment Report[80] ("Pisces Report") prepared for the Project acknowledges the a wide range of impacts on numerous species: • Physiological injury and/or mortality; • Behavioural avoidance; • Reduced reproductive success/spawning; • Masking of environmental sounds and communication; • Collision of turtles/marine mammals with the survey and support vessels or entanglement in towed acoustic apparatus; and • Indirect impacts on piscivorous predators due to seismic effects on prey species.	potential mortal injury into perspective), adopting the precautionary principle as is required when undertaking such impact assessments, and taking into account the sensitivity of receptors present in southern African waters. Given all of the evidence, the conclusion reached for the various assessments is that impacts are either of low or very low significance. The Noise impact on plankton is assessed in Section 9.3.1.1.7 of the BA report. The reconnaissance permit area is located far offshore (120 km at its closest point) and therefore beyond the influence of coastal upwelling, which will influence both plankton abundance and the abundance of fish species that depend on plankton as a food source. From Figures 17, 18 and 19 in the marine ecology specialist assessment it is evident that the project area lies well beyond major fish spawning and recruitment area (and therefore zooplankton and ichthyoplankton abundance). An EIA is a risk-assessment based study and is a process of evaluating the likely environmental impacts of a proposed project or development. It is not possible to provide	

Initial/s:

68. According to the Pisces Report, the following species are present in the Project area and face the highest risk of harm from the proposed survey: • humpback whales, which migrate through the area between June and November (inclusive); • sperm whales, beaked whales and other odontocetes that frequent offshore waters; • large migratory pelagic fish and shark species that show seasonal association with Child's Bank and Tripp Seamount;	conclusive evidence of the fact that impacts will be negligible. However, it can be stated with regards to the uncertainties and gaps in knowledge that these have specifically been taken into consideration during the assessment of the particular impacts. The confidence level of the rating has been stated and the level and type of mitigation proposed has followed the clear mitigation hierarchy presented in the Specialist reports and also the EIA Report. Accordingly, the mitigation measures proposed are deemed to be sufficient to account for the eventuality that unforeseen events or organism responses are encountered during the actual survey operations, and will ensure that there is independent oversight and feedback to ensure compliance with the EMPr.	

[80] PISCES Environmental Svcs (Pty) Ltd (for TGS Geophysical Company), *Biodiversity and Ecosystem Services Assessment Report* ("Pisces Report") (Sept. 2022).

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
• leatherback turtles which frequent offshore waters in low numbers and aggregate around seamounts to feed on jellyfish; and • various pelagic Albatross, Petrel, Storm Petrel and Shearwater species (the Pisces report indicates that pelagic seabirds are likely to be relatively frequently encountered in the offshore waters of the Reconnaissance Permit area).[81] 69. A 2022 review of peer-reviewed literature on the physiological, behavioural and ecological impacts of the 3D seismic survey activities on marine wildlife[82] ("Harris Report", attached marked **Annex B3**) found that the type of sound emitted during seismic surveys has been directly linked to physical damage to marine animals, including soft tissue trauma damage, embolisms, damage to organs used in balance and orientation, concussions, haemorrhaging, decompression sickness and both temporary and permanent threshold shifts to hearing ability. The Harris Report also found that some species	The extent of the TGS survey area is substantively different from that applied for by Searcher in 2021 and which was the focus of the Harris (2002) review. The TGS Application Area is located further from shore and avoids many of the identified sensitive areas and sensitive times of the year. A team of similarly qualified specialists considered the proposed activity, identified and assessed potential impacts, and where applicable made recommendations to manage and mitigate the impacts. All impacts assessed can be reduced to a medium or low significance with the implementation of management and mitigation measures described in the BA report and accompanying EMPr. Please refer to Section 9.3.1 of the BA Report for the assessment of the potential impact on marine fauna (including impact on humpback whales, southern right whales, leatherback turtles, African penguin, and cape fur seal) in the context of the proposed activity. The Appellant's submission that the Acoustic Modelling, is largely a desktop assessment is correct. However, it cannot	

Initial/s:

display physiological stress responses and behavioural changes to seismic activities, such as moving away rapidly, diving or remaining still. These responses are likely to increase their energy consumption and energy costs, reduce their time to forage, and/or affect their vulnerability to predation, thus having negative impacts on the survival of individuals (especially young or compromised animals) as well as the overall population growth and survival of a species (especially for threatened species that are already at risk of extinction). **Acoustic Modelling**	be stated that the model failed to provide meaningful information as is claimed by the Appellant. The technical noise report relies on predictive modelling to predict thenoise impacts associated with the seismic survey. In order to refine and confirm this information, the underwater noise modelling study recommends that "Baseline noise measurements can provide useful information (prior to operations) when interpreting underwater noise predictions for the introduction of a new noise source. As such, it is recommended that underwater noise measurements be implemented	

[81] Pisces Report at 45.

[82] Harris, Olbers & Wright, *Report on Scientific Basis for concerns of significant harm inflicted to marine wildlife by 2D and 3D seismic surveys on the South and West Coasts of South Africa* (14 January 2022).

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
70. The Appellants submit that the underwater noise modelling was largely a desktop study rather than a meaningful examination of the acoustic harms that seismic surveying will have. 71. The acoustic modelling failed to provide meaningful information in several ways: 71.1. The model should have included in situ testing to 'ground truth' the modelling and accurately determine the potential noise impacts associated with various aspects of the proposed 3D seismic survey (sound in the ocean is affected by pressure, salinity, temperature and temperature gradients, and can travel many kilometres from the source). 71.2. The model should have assessed the impacts of noise on all species (different species have different sensitivities to noise) during the environmental impact assessment process (not ex post factor). 71.3. The assessment should include (but not be limited to) potential impacts on the migration of snoek (a species that is important to the livelihoods of small-scale	that would include the deployment of underwater sound monitoring equipment to establish an actual baseline prior to the commencement of the survey and then operational levels of noise during the survey." The migration of snoek has been described in Section 8.5.3.10 of the BA Report. Additionally, the impact of the proposed activity on juvenile turtles is described detail in Section 4.3.3 (Impacts of Seismic Noise on Turtles) of the Marine Ecological Assessment. It is also already recommended in Section 9.3.4.2 of the BA Report as well as the EMPr that TGS should contribute to assisting with collaboration on independent research on how fish species on the West Coast such as snoek respond to seismic surveying. The NEM:BA, NEM:PAA and NEM:ICMA are all identified as key pieces of legislation applicable to the proposed project in Section 4 of the BAR. Furthermore, the BAR goes on to discuss CBAs and ESAs in Section 6.2 – CBA 1 indicates irreplaceable or near-irreplaceable sites that are required to meet biodiversity targets with limited, if	

Initial/s:

fishers) and juvenile turtles (which are significant from a biodiversity perspective given their endangered status) that are in turn dependent on other species. **Heightened Legislative Requirements are Not Considered for Critical Biodiversity Areas (CBAs), Ecologically or Biologically Significant Marine Areas (EBSAs), and Marine Protected Areas (MPAs)** 72. The National Environmental Management: Biodiversity Act, 2004 ("NEMBA") provides for ecosystems that warrant special conservation attention. These include ecosystems identified as Critical Biodiversity Areas ("CBAs") or Ecological Support Areas ("ESAs") in a bioregional plan, biodiversity sector plan or provincial spatial biodiversity plan.	any, option to meet targets elsewhere, whereas CBA 2 are "best design sites" and there are often alternative areas where feature targets can be met; however, these will be of higher cost to other sectors and / or will be larger areas. Activities within these management zones are classified into those that are "compatible", those that are "not compatible", and those that have "restricted compatibility". Non-invasive (e.g. seismic surveys) and invasive (e.g. exploration wells) exploration activities are classified as having "restricted compatibility". Activities with restricted compatibility require a detailed assessment to determine whether the recommendation is that they should be permitted (general), permitted subject to additional regulations (consent), or prohibited, depending on a variety of factors. Petroleum production is, however, classified as "not	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
73. The Appellants contend that the Minister ignored the critical importance of NEM:BA, NEM:PAA and relevant provisions of NEM:ICMA in terms of protecting and conserving the identified CBAs within the survey area, as well as the EBSAs and MPAs. At the very least, the value of these areas and the extent of potential negative impacts of exploratory activities on these areas should have been considered. The BAR failed to provide any assessments for the CBAs contained within the Application Area or the EBSAs and MPAs that are adjacent to the area. <u>CBAs</u> 74. The FBAR failed to meet even minimal standards of providing a "detailed assessment" and relevant mitigation in order to protect irreplaceable and near-irreplaceable CBAs from the intense and chronic blasts of the seismic survey. In fact, the Sound Transmission Loss Modelling report makes no reference to critical biodiversity areas. 75. FBAR acknowledges that there are several CBAs within the Application Area itself: *The Application Area overlaps with areas mapped as Critical*	compatible" in CBAs, but may be compatible, subject to certain conditions, in ESAs. Seismic surveying is not only used for petroleum and natural gas exploration and development. It is also used for development of offshore wind, geothermal energy, and low-carbon solutions such as carbon capture and storage and also more generally for providing more insight and understanding into the regional geology of the area for scientific purposes. Therefore the CBA areas are not considered no-go areas for the purposes of seismic survey activities. In addition, the National Coastal and Marine Spatial Biodiversity Plan for the coast and ocean around the South African mainland states that petroleum production may be possible in CBAs using lateral drilling or other techniques that do not result in biodiversity impacts. According to the plan if significant petroleum resources are identified in these areas the selection of the site as a CBA could be re-evaluated, although this would require alternative CBAs to be identified to meet biodiversity targets.	

Initial/s:

Biodiversity Area 1 (CBA 1): Natural and Critical Biodiversity Area 2: (CBA 2) Natural. Approximately 32.25 % of the proposed 3D acquisition area is covered by CBA 1 and CBA 2 Natural, 0.22% by CBA 1 and CBA 2 Restore, and 1.75% by ESA (see Figure 91).[83] 76. CBA 1 are irreplaceable or near-irreplaceable sites that are "required to meet biodiversity targets with limited, if any options to meet targets elsewhere."[84] CBA 2 are best design sites where there may be alternative areas where biodiversity targets can be met at a higher	The potential impact on MPAs, CBA's and EBSA's is specifically noted in the BAR. A buffer of at least 5 km is recommended around MPAs, as stated in the EMPr. No buffer requirements are proposed by the marine fauna specialist for CBAs or ESBAs as the impact on these areas is expected to be low – negligible. Section 8.6 of the BAR presents the proximity of the planned activities in relation to ecologically or biologically significant areas. There is one Ecologically or Biologically Significant Marine Area (EBSA) overlapping the application area, and this was considered through the selection of the L1 point in order to gauge the effects on the Tripp Seamount to the	

[83] BAR at 162.

[84] BAR at 162.

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
cost or requiring the allocation of additional area to achieve the targets.[85] 77. The FBAR recognizes that the exploration activities, including seismic surveys, are classified as having restricted compatibility with CBAs, which require a "detailed assessment to determine whether the recommendation is that they should be permitted (general – as is the case for this assessment), permitted subject to additional regulations (consent), or prohibited, depending on a variety of factors."[86] The BAR fails to even identify the unique and irreplaceable features of the CBAs in order to be able to assess whether this activity should be permitted. 78. CBA areas have been identified and set aside, and resources have been invested, in order to protect these biologically critical habitats and the marine species that depend on them. Seismic surveys will run directly over these critical biodiversity areas designated as irreplaceable and near-irreplaceable, causing severe and potentially irreversible impacts.	north. A number of Marine Protected Areas (MPAs) are located adjacent to the proposed survey areas. Section 9.3.1.1.2 of the BAR identifies and assesses the potential impact on Cape Fur Seals. Figure 37 in the marine ecology specialist assessment illustrates the foraging ranges of seals on the West Coast from tracking data. From this it is evident that the survey area lies offshore of these foraging ranges. Additionally, suitable mitigation measures have been proposed to monitor for and protect the seals should they be encountered during the survey in Section 9.3.1.1.2 of the BAR. Section 9.3.1.1.1 and Appendix 3-5 of the BAR identifies and assesses the potential impact on beaked and other whales. This includes a description of the potential impact on: • Physiological injury and mortality; • Behavioural avoidance; • Masking of Sounds and Communication; and • Indirect impacts due to effects on predators or prey.	

Initial/s:

79. The FBAR has failed to look in detail at the CBAs, understanding why they were identified as critical biodiversity areas, and then propose specific mitigation measures in order to make an informed assessment as to the "restricted capability." EBSAs and MPAs 80. The underwater Sound Transmission Loss Modelling report conducted for the BAR indicates in its introduction that the proposed survey areas are adjacent to a few Ecologically or Biologically Significant Marine Areas (EBSAs), and Marine Protected Areas (MPAs) including Childs Bank and Shelf Edge, and Cape Canyon and	Section 9.3.1.1.1 of the BAR then goes on to state that *"The potential impacts cannot be eliminated due to the nature of the seismic sound source required during surveying. The proposed mitigation measures, which are essentially designed to keep animals out of the immediate area of impact and thereby reduce the risk of deliberate injury to marinemammals would reduce the intensity of most impacts to medium, and the residual impacts will reduce to low consequence and LOW significance, except for the effects on prey which remains of VERY LOWsignificance."*	

[85] BAR at 162.

[86] BAR at 162.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
Associated Islands, Bays and Lagoon.[87] The BAR expands that list adding important areas such as the Benguela Muds MPA, Robben Island MPA, Southeast Atlantic Seamounts MPA and additional MPAs "that fall within the broader project area."[88] The Bar also identifies and describes eight EBSAs, including transboundary relevant to the seismic survey area.[89] 81. Although these protected areas do not fall within the seismic survey area itself, the nature of seismic survey will cause impacts on the habitats and the marine species that these areas are meant to protect. These include endangered and protected species, breeding areas, sensitive and vulnerable habitat, resident whales, and many other features which make the spaces fragile and sometimes slow to recover, which has warranted their protection. 82. The FBAR makes no effort to identify impacts to these sensitive areas and to mitigate the potentially irreversible harms that the seismic survey will cause. As noted above, the sound from seismic surveys can travel hundreds of	Section 9.3.1.1.5 of the BAR identifies and assesses the potential impact on pelagic fish. It was concluded that the location of the Application Area well to the west of the 'ring-fenced' area and proposed mitigation measures, which are essentially designed to keep animals out of the immediate area of impact and thereby reduce the risk of deliberate injury to fish, reduces the intensity of the impacts relating to physiological injury / mortality to medium, the residual impact will reduce to low consequence and be of LOW significance. All other impacts on fish remain of LOW significance. Avoidance effects or behavioural alterations from seismic surveys involving many fish species do not automatically imply risk factors and thus do not necessarily cause a disturbance to the fishery (McCauley et al., 2000). A recent large-scale experiment conducted by Meekan et al. (2021) in Australia showed no short-term or long-term effects on the abundance or behaviour of demersal fish assemblages in response to a commercial seismic source. This suggests that seismic surveys have little impact on demersal fishes.	

Initial/s:

kilometres and will penetrate into the MPAs and EBSAs. Further, the seismic surveys will increase the ambient noise beyond the survery area. The chronic blasting every 6-20 seconds for months (70 days) will cause behavioural disturbances and possibly more damage to these sensitive areas, which the BAR did not take into account. **Cape fur seals** 83. In South Africa, since October 2021, thousands of dead and/or dying Cape fur seals, have washed ashore along the south and west coasts. The cause of these die-offs remains unknown but avian flu has been ruled out and malnourishment appears to be the most widely	Other studies that found no evidence of significant changes in catch rates or fish abundance include Hassel et al. 2004, Picket et al. 1994, Miler and Cripps 2013 and Thomson et al. 2014. Noise modelling was undertaken for the proposed survey and the transmission of sound at various threshold levels was taken into account. In terms of the Russell Report, inputs from the fisheries specialist points to the fact that tuna catches globally were under stress mainly from fishing effort and also due to climate variability. In fact, the data, if interrogated further, shows that the variability in catches in Namibia	

[87] TGS: South Africa Orange Basin 3D Seismic Survey, Sound Transmission Loss Modelling at at 1-2

[88] BAR at 157-59.

[89] BAR at 159-61.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
accepted reason. Activities associated with the Project could further pressure this species by physically harming individual seals, and by disrupting the seals' food supply. 84. The Pisces Report states that Cape fur seals are unlikely to be found in the project area, citing map that shows generalized foraging areas that extend nearly exactly to the edge of the reconnaissance area.[90] However, the report also states, "[s]eals are highly mobile animals with a general foraging area covering the continental shelf up to 120 nautical miles (~220 km) offshore,"[91] meaning a large part of the reconnaissance area is well within the foraging range of Cape fur seals. Moreover, the Based on the questionable assumption that Cape fur seals are unlikely to occur within the reconnaissance area, the Pisces Report authors deemed their sensitivity to the proposed seismic operations to be "LOW," in spite of the finding that "The potential impact of physiological injury to seals as a result of seismic noise is deemed to be of HIGH intensity."[92] **Whales and dolphins**	were more associated with operational dynamics of the Namibian fleets and their licensing conditions that had reduced their effort (as South African vessels were not permitted to fish in Namibian waters). Cumulative impacts are assessed in Section 9 of the BA report. For both technical and commercial reasons, it is unlikely that concurrent seismic surveys will be undertaken in the same area during the same survey window. However, the cumulative impacts associated with multiple surveys was assessed and detailed in Section 9.3.5 of the BAR. Section 9.3.5 of the BA Report states that "three seismic surveys of regional extent, undertaken simultaneously, could be expected to result in an impact of medium negative significance on the large pelagic longline sector, both with and without the application of mitigation measures. This relates to the large pelagic long-line sector only, and only in the event that all three surveys are undertaken simultaneously. It should be noted that the seismic industry typically avoids simultaneous surveys occurring in close proximity to each other as this has the potential to degrade	

Initial/s:

3110

85. There is genuine conservation concern for beaked whales that are particularly sensitive to anthropogenic noise, including seismic surveys. It has been demonstrated that even minor, non-lethal disturbances, resulting in changes in behaviour such as displacement from preferred habitats, could impact a population.[93] 86. The phenomenon of energy-cost (from stress and avoidance behaviour) is of particular concern for some of the species expected to be encountered in the survey area in question, particularly the humpback whales and southern right whales who are at risk of the	the quality of the recorded survey data. Other cumulative impacts are all expected to be low after mitigation is applied – therefore overall cumulative impacts are considered low post-mitigation. It should also be noted that of the three potential surveys cited by the Appellants, the GX Technologies survey should be disregarded as the company went into liquidation in 2022. The appellants' contention that up to 30% of the revenue generated by the impacted fisheries would be lost during the 70 day period is unsubstantiated and vague for the following reasons:	

[90] Pisces Report at 69 (Fig. 37).

[91] *Id.* at 111.

[92] *Id.*

[93] Harris Report

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
airgun noise affecting their behaviour or interfering with the communication between mother and calf. Any impact on their energy reserves could impact on their condition (weight-loss and physiological condition) and affect survival of the animals during a vulnerable time (especially for lactating mothers and their calves) on their long migration to feeding grounds in Antarctica.[94] **Fish** 87. The BAR downplays the impacts of seismic surveys on fish and the fisheries they support, particularly in the case of the large pelagic longline fishery and the tuna pole-line fishery. While the BAR assesses the exclusion of fishing vessels due to temporary safety zones during seismic surveys, it fails to adequately assess the actual impacts of seismic activities on the target fish species themselves, both in the short and long-term. During the seismic survey, fishing vessels would be required to maintain a safe operational distance from the survey vessel and streamer array, which may extend up to 6 nautical miles. The FBAR assessed the impact of potential exclusion for each	• The four-month window is proposed to coincide with the period of lowest activities for the fisheries that operate in the potentially affected sectors; • It should further be noted that the survey will not be undertaken over the entire tuna fisheries area or the whole application area at the same time and will thus not lead to a complete shutdown of the fishing activities in the pelagic longline sector during the 70 day period of the survey; and • The mitigation measures included in Section 9.3.2 of the BAR provide for avoidance of the peak fishing periods and, furthermore, for the establishment of clear communication channels to be established with the other users of the survey area and to ensure that the disturbance within this sector is reduced to the absolute minimum. The impact on the affected fishing sectors was assessed to be of low significance and short duration and it could thus not be stated that "The FBAR fails to consider the long-term behavioural or migration impacts that seismic activity could	

Initial/s:

commercial sector based on the affected area of fishing ground and the amount of catch reported within the Reconnaissance Permit area. Given the location of the Reconnaissance Permit application area, two high-value fisheries are directly impacted: the large pelagic longline fishery (targeting tuna, swordfish and shark) and the tuna pole-line fishery. 88. The FBAR concluded that the Project's activities will result in exclusion to fishing grounds for at least the large pelagic longline fishery. The FBAR states that "[t]here is a high probability that the large pelagic longline sector (targeting tuna, swordfish and shark) will experience loss of access to fishing ground over the duration of the	have on the pelagic longline fishery, which include several species of tuna." Impacts of cumulative sound exposure on marine mammals are evaluated using disturbance and injury threshold, defined as temporary threshold shifts (TTS) and permanent threshold shifts (PTS) (Southall et al. 2019). The audibility of a noise pertains only to the perception or detection of a sound above background levels of ambient noise. The thresholds established by Southall et al. (2019) are internationally regarded as standard references for environmental impact assessment of underwater noise. Although the modelling report doesn't specifically reference the CBA areas, the purpose of the modelling was to model the likely sound transmission and contours. The outputs of the model were then	

[94] Harris Report

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
proposed 70-day survey," and that [t]he impact of exclusion is assessed to be of high magnitude."[95] 89. In terms of noise impacts to the target fish of the large pelagic longline fishery and the tuna pole-line fishery, the Pisces Report acknowledges that "[s]eismic activities have been predicted to possibly affect the migration patterns of tuna leading to substantially reduced catches of albacore and southern bluefin tuna in southern Namibia and the Great Australian Bight, respectively,"[96] yet ultimately the Report concludes that "[a]s there is currently a dearth of information on the impacts of seismic noise on truly pelagic species such as swordfish and tuna (Evans et al. 2018; Webster et al. 2018), links between changes in migration patterns and subsequent catches thus remains speculative."[97] The FBAR thus maintains that potential impact on individual fish behaviour is of MEDIUM consequence and that "the residual impact due to seismic noise is considered to be of LOW NEGATIVE significance for the large pelagic longline and tuna pole-line sectors."[98]	considered and assessed by the marine ecology specialist who specifically considered the CBA areas. The Appellants' submission that mitigation measures proposed only focus on marine mammals, is not substantiated by the large number of mitigation measures as detailed in Section 9 and 11.4 of the BAR. The use of infra-red cameras was discussed during the various public meetings held during the BAR review phase and included in the Public Participation Report in Appendix 2. It should further be noted that the Appellants' commented on the lack of inclusion of infra-red cameras during the BAR review phase, and subsequently the EAP included this as a specific mitigation measure in the final BAR. It is therefore strange that the Appellant now disputes the use of this technology and lists this as a supporting factor in this grounds of appeal. The Noise impact on plankton is assessed in Section 9.3.1.1.7 of the BA report. The study by McCauley et al. (2017) generated significant public attention, but the paper	

Initial/s:

90. Overall, the FBAR concludes that with mitigation (timing of the surveys to avoid peak fishing periods), the following overall impactsignificance: Based on the combination of extent, duration and magnitude of the impact, and considering the high probability that the impact would occur, the overall significance of the impact is considered to be MEDIUM	has not been widely accepted by the scientific expert community as the findings are considered severely flawed. Details on the independent reviews of the paper are provided in the EnerGeo response to a publication by the Scientific Advisory Group on Emergencies (SAGE). Follow-up studies by Richardson et al (2017) failedto conclusively demonstrate discernible effects on zooplankton biomass on a regional scale and Fields et al. (2019) detected no significant behavioural differences in the copepod species *Calanus*	

[95] BAR, pg. 212.

[96] Pisces Report, pg. 132.

[97] Pisces Report, pg. 132.

[98] BAR, pg. 244.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
NEGATIVE. Due to the low probability of the operations of the tuna pole- line sector within the Reconnaissance Permit area, the overall significance of the impact on the sector is considered to be LOW NEGATIVE. 91. The FBAR fails to adequately assess the vulnerability of the targeted fish species (including tuna and sharks) to noise impacts, and any decision-based on it would be unreasonable. This is a major flaw because many of the large pelagic fish and shark species likely to occur in the offshore regions of the Orange Basin are considered globally 'Vulnerable' (e.g., bigeye tuna, blue marlin, Oceanic Whitetip shark, dusky shark, great white shark, longfin mako), 'Endangered' (e.g., shortfin mako, whale shark) and 'Critically Endangered' (Southern bluefin tuna). 92. The impact on fish assemblages is difficult to interpret, due to multiple factors at play including but not limited to the ability of a species to move from an area as well as the receiving habitat. A global review of the effect of seismic activities on fish and invertebrates acknowledged the limits of the current research due to experimental designs used	*finmarchius* based on distance to the source or control vs. exposed groups. The reconnaissance permit area is located far offshore (120 km at its closest point) and therefore beyond the influence of coastal upwelling, which will influence both plankton abundance and the abundance of fish species that depend on plankton as a food source. From Figures 17, 18 and 19 in the marine ecology specialist assessment it is evident that the project area lies well beyond major fish spawning and recruitment area (and therefore zooplankton and ichthyoplankton abundance); Figure 27 shows the area in relation to Cape Gannet and African Penguin distribution; Figure 37 shows the area in relation to seal foraging areas and Figure 47 shows the area in relation to virtual turtle hatchling trajectories. The survey area in relation to various marine mammal distributions is also provided and in all cases it is evident that interaction with marine fauna in those offshore waters should be minimal. The impact assessment shows that these impacts are of a medium-low significance even before any mitigation measures are applied.	

Initial/s:

or due to the focus on single species during investigations. A key concern is a lack of research focused on confounding effects and multiple stressors, therefore potential impacts of seismic surveys that have been previously identified may be reflective of underestimation or overestimation and would depend on the type of interaction (synergistic, additive, or antagonistic).[99] 93. Sounds pollution from seismic surveys may have a wide range of effects on fish species. Exposure to intense sounds can result in mortal injury, but over longer distances issues are associated with sounds that are detectable by fish and which may affect their behaviour, causing them to move away from their migration routes, flee important habitats in which they feed or breed, interfere with	Regarding the supplementation with respect to the operating hours ofthe PAM monitoring: This would require the survey to likely run over two (or more) seasons. This is not only not cost effective for the seismicoperator, but would extend the duration of the acoustic impacts (and others) associated with surveying. Considering that the survey area is located within the major shipping lanes and that ambient sound levels (dominated by the noise of vessels) will be persistent throughout the day and night, it seems more appropriate to undertake the survey in as	

[99] Harris Report

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
their communications, affect reproductive behaviour (where sound is used to attract mates and facilitate spawning), or prevent or mask the detection of other biologically important sounds. Because of these many-pronged effects, seismic surveys can have compounding negative impacts on marine fish. 94. In his expert affidavit filed in a recent seismic survey case,[100] Dr Alexander Claus Winkler provided testimony regarding evidence of direct, lasting behavioural effects of seismic surveys on the rhythmic behavioural foraging patterns of cod in the North Sea. Winkler points out that both hake and snoek perform rhythmic diel foraging migrations off the seafloor at night and onto the seabed during the day. Given that seismic surveys are conducted both during the day and night, it is likely that these benthic fish species will migrate higher up the water column at night, bringing them within distances that may expose them to direct injury and mortality impacts from seismic surveys. It is noted that the Pisces report indicates that species most likely to be found in the area of interest include large	short a time as possible, in which case night-time operations are necessary. The studies undertaken internationally over the past ~70 years on the impacts of noise on marine fauna (of which some 400 peer-reviewed publications have been summarised and cited in the marine faunal specialist study) have concluded that the effects of underwater sounds vary substantially and depend on a wide variety of physical and biological factors. When writing articles on the effects of seismic acquisition on marine fauna it is therefore not difficult to bias the literature cited to either demonstrate detrimental and irreversible impacts or only very limited impacts, depending on the personal view of the author(s) and/or the targeted readership. The marine faunal assessment has made efforts to present published results objectively, and nowhere claims that acoustic surveys do not result in impacts. Injury is likely at very short range, with behavioural disturbance occurring over greater distances. The final significance ratings are determined using information from the peer-reviewed literature together with	

Initial/s:

migratory fish (such as tuna, billfish and sharks), many of which are considered threatened by the IUCN due to overfishing.[101] 95. In addition, contrary to the FBAR's conclusions that there is only LOWNEGATIVE significance for the large pelagic longline and tuna pole- line sectors,[102] a 2018 desktop survey of South Africa fisheries impacts from seismic surveying by Namibian fisheries expert David Russell ("Russell Report") concluded the following: [W]here there are cumulative impacts from repetitive surveys in the same area, as has occurred off Southern Namibia tuna fishing grounds, where	the noise modelling results (which put the threshold distances from the source array to mortality and potential mortal injury into perspective), adopting the precautionary principle as is required when undertaking such impact assessments, and taking into account the sensitivity of receptors present in southern African waters. Given all of the evidence, the conclusion reached for the various assessments is that impacts are either of low or very low significance. It is not disputed that MMO sightings are not 100% efficient. Various approaches have been adopted over the years to improve observer	

[100] Available online at: https://drive.google.com/drive/folders/1m-h8MoRfdflJfKHLiB_ulD1KX-dBktua (21. Alexander Winkler).

[101] Pisces Report at 40.

[102] Capricorn Report, pg. xxx.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
catches have severely declined since 2011, and in 2017 dropped off to non-commercial catch rates, there is the ominous possibility that the tunas change their migration path. Environmental factors such as El Nino appear to also have contributed significantly, but combined with regular seismic surveys, the environmental signals are potentially devastating.[103] 96. There is a possibility that up to three seismic surveys (Searcher, TGS, and GX Technologies) would take place simultaneously in the area, which would further increase geographic exclusion of the fishery. If multiple 3D seismic surveys were not undertaken simultaneously, then sequential surveys in the same area would prolong the loss of access to the pelagic longline sector and duration of seismic impacts to fisheries. Yet the FBAR does not directly assess the impacts of simultaneous surveys on the fisheries. 97. The FBAR concludes, without citing any evidence, that after months of up to three simultaneous seismic surveys in the pelagic longline sector, "[o]nce completed there is	efficiency, particularly at night, with infra-red binoculars and mast- mounted infra-red (IR) cameras being tested. These have, however, not proven as effective as initially anticipated, due to lack of detectable temperature differences, resulting in the implementation of the 24/7 PAM surveillance. From a seismic operator's perspective, it is not feasible or cost-effective to cease airgun operations at night as this would prolong the duration of the survey possibly requiring multiple seasons to complete the acquisition. This would also add substantially to the overall survey duration and cumulative impacts.	

Initial/s:

not expected to be any residual impact."[104] As noted above, the Russell report identified potential long-term impacts of repeat seismic activity on Southern Namibian tuna fisheries, with implications that tuna may change their migration patterns to avoid noise pollution.[105] The BAR fails to adequately consider or mitigate impacts to the pelagic longline sectorthat are both short-term (potentially closing the fishery for 70 days or longer given multiple surveys in a single year) and long-term (inflicting behavioural and migration shifts).		

[103] Assessing the Impact of Seismic Surveys on South African Fisheries, 2018. David Russell Fisheries Consultancy for the Responsible Fisheries Alliance ("Russell Report"), pg. 6.

[104] BAR, pg. 236.

[105] Russell Report.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
98. The sector had an estimated wholesale value of R124 Million in 2018, or 1.2% of the total value of all fisheries combined. For tuna pole- line, the fishery runs predominantly from November through June, while the large pelagic longline fishery runs highest from May to November.[106] The FBAR lists a proposed window of January – May forits 70-day 3D seismic survey, meaning a large fraction (up to 30% with an approximate wholesale value of R40 Million) of the fishery year stands to be excluded. Because its assessment did not adequately consider the longer-term residual impacts on the fisheries from seismic activity, this monetary loss stands to be much greater than that estimated from fishery exclusion alone. 99. The FBAR fails to consider the long-term behavioural or migration impacts that seismic activity could have on the pelagic longline fishery, which include several species of tuna. Such changes in thefishery could have severe and lasting implications for communities dependent on this important fishery for many years to come and should have been included in the impact assessment.		

Initial/s:

100. The FBAR states that "[t]he zones of TTS [temporary threshold shift] effect for fish species with and without swim bladders are predicted to be within 3.5 km from the survey lines for the 3D survey 24-hour operation scenarios considered."[107] This predicted zone of TTS for fish both with and without swim bladders is a gross underestimation and based on minimal and non-regional specific data, including data from riverine 2D seismic activity on freshwater species (e.g, Popper et al., 2005). As the Capricorn Report admits, "[t]o date there have		

[106] BAR App. 3.2 PROPOSED 3D MULTI-CLIENT SEISMIC SURVEY IN THE ORANGE BASIN, OFFSHORE SOUTH AFRICA Fisheries Specialist Study, September 2022 ("Capricorn Report"), pg. 66.

[107] BAR, pg. 235.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
been no studies focused directly on the [fish] species found locally."[108] 101. Most of the mitigation measures proposed in the BAR are designed to minimise impacts to marine mammals. As admitted in the Pisces Report, vastly less is known about how such mitigation measures alleviate sound impacts experienced by marine fish species.[109] Large pelagic fish (e.g. tuna, sunfish, or sharks) would not be detected by PAM (which would be tuned for marine mammal vocalisations) and would not likely be detected visually at night by observers or using an infrared thermal imaging camera (since cold-blooded fish, as opposed to warm-blooded mammals, do not have high enough temperature differences from the water). 102. The FBAR further fails to provide evidence that infrared thermal imaging is effective as a mitigation measure. 103. TGS takes no preventative mitigation measures to minimise impacts to marine fish species during 3D surveying and has a single and insignificant mitigation		

Initial/s:

measure (7.1) to shut down seismic shooting in the case the following is observed: "mass mortalities of squid and fish (specifically large shoals of tuna or surface shoaling small pelagic species such as sardine, anchovy and mackerel) when estimated by the MMO [marine mammal observer] to be as a direct result of the survey."[110] 104. Although it has been suggested that the sound energy from air guns may harm fish species with swim bladders and those without, there are very few studies directly examining the potential effects on fish physiology or behaviour, and even fewer focusing on pelagic fish species. Unknown impacts are not the same as no impacts, and the		

[108] Capricorn Report, pg. 10.

[109] PISCES Report, pg. 192.

[110] PISCES Report, pg. 197.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
precautionary principle should be invoked. There are significant knowledge gaps regarding the impact of 3D seismic surveys on marine fish species, particularly those that would be impacted by the Project. Specifically, there is currently not enough information about the fish species in the area or their response to sound to be able to make any meaningful assessment of the impacts. Therefore, the precautionary approach set out in NEMA suggests that this lack of knowledge should weigh against the proposed 3D seismic surveying in a vital and valuable offshore fishery. **Zooplankton** 105. The FBAR disregards the precautionary approach at every step in the analysis of impacts on plankton, which it concludes does not warrant mitigation measures and will have a medium pre-mitigation impact, yet a very low residual impact.[111] Yet, as demonstrated below, there is a significant concern that the BAR underestimates the impacts of seismic surveys on plankton, which form the base of the ocean food chain.		

106. The FBAR does not provide actual data to demonstrate that there is not significant or even medium plankton abundance in the survey area. The BAR "expects" that plankton abundance to be low with seasonal peaks may occur associate with MPAs.[112] Yet, the surveying is meant to have temporal overlap with speak spawning products of commercially important species.[113] 107. Studies by McCauley et al. (2017) referenced in the Pisces Report indicates that seismic blasts may kill various species of zooplankton in Australia at distances of up to 1200 m from an airgun[114], and more		

[111] Marine Ecology Impact Assessment at 144. [112] Marine Ecology Impact Assessment at 141. [113] Marine Ecology Impact Assessment at 144.

[114] Robert D. McCauley *et al.*, *Widely used marine seismic survey air gun operations negatively impact zooplankton*, 1, Nat. Ecol. Evol., 1–8 (2017).

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
recent research shows lethal and behavioral impacts to zooplankton from airgun discharges.[115] Still, other studies (Fields et al., 2019), report no measured mortality or sublethal effect on copepods at distances >10 m from a seismic blast in Norwegian waters.[116] And other studies (Richardson 2017) found "substantial impact of seismic activity on zooplankton populations on a local scale within or close to the survey area."[117] While noting that zooplankton mortality can be difficult to assess in the field (in situ) and that realistic conditions are very difficult to reproduce in a laboratory setting, nevertheless these highly contradictory results suggest that effects may be variable and highly dependent on zooplankton species and/or marine geographical area. Research should be undertaken to survey the current literature on zooplankton types in the Benguela Upwelling Zone and better link this knowledge to the airgun impacts literature available. The BAR fails to take these steps, making it impossible to assess the impacts of seismic surveys to the zooplankton communities underpinning the food webs that support fish,		

Initial/s:

marine mammals, and fisheries. 108. As noted, zooplankton forms the base of many important food webs in the marine environment. Depletion of zooplankton could thus have an impact on food for their predators (such as fish) as well as impact fish eggs and larvae (Ichthyoplankton) with potential local impacts on species important in fisheries. This damage to zooplankton as found by studies over 1km away (McCauley 2017) and within 15km (Richardson 2017) from the survey array raises concern		

[115] Emilie Hernes Vereide *et al.*, *Effects of airgun discharges used in seismic surveys on development and mortality in nauplii of the copepod Acartia tonsa*, 327, Environ. Pollut., 121469 (2023).

[116] *Id.*

[117] Rice Supporting Expert Affidavit at para. 29 (restating the conclusion from the study's authors: "We found there was substantial impact of seismic activity on zooplankton populations on a local scale within or close to the survey area, with a maximum decline of 22% in zooplankton populations in the survey area, 14% within 15km of the survey area.").

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
that a 500m buffer for other animals that are unable to move away from the sound, is far too small to ensure that damage is not inflicted (even if they were able to evade it).[118] **The proposed mitigation measures are inadequate to prevent unacceptable harm to marine life** Simultaneous Surveys 109. The FBAR proposes the use of a 40 km buffer between vessels during concurrent simultaneous surveys (p. 211) as a mitigation measure, relying on "advice from the US Department of Interior (2014)." The purpose of the buffer is to mitigate "the cumulative impacts of three potential surveys occurring concurrently."[119] The 40 km buffer mitigation measure, first proposed in the United States, originally purported to avoid harassment of marine mammals during simultaneous surveys. This was expected to be achieved through a distance between vessels that would provide a corridor where "airgun noise is below [harassment] thresholds and approaching ambient levels such that animals may pass		

Initial/s:

through rather than go larger distances to go around the survey vessels."[120] However, the mitigation measure neither provides a corridor below harassing levels of acoustic noise for marine mammals between vessels seismic surveying, nor does it mitigate cumulative impacts as portrayed in the FBAR. In fact, the mitigation measure is not even used in the US, making the FBAR reliance upon this measure deeply flawed. 110. First, the 40 km buffer is based upon a threshold of 160 dB for harassment, a standard that the U.S. government has since abandoned as appropriate to provide adequate protections. For		

[118] Harris Report

[119] BAR at 211.

[120] US Department of Interior, Atlantic OCS Proposed Geological and Geophysical Activities, Mid-Atlantic and South Atlantic Planning Areas, Final Programmatic Environmental Impact Statement at 2-37 (2014).

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
example, the US government found in 2018 in reviewing harms to marine mammals during oil and gas geophysical surveys that, "[s]tudies of marine mammals in the wild and in experimental settings do not support" use of a single 160-decibel threshold and that "that an approach reflecting a more complex probabilistic function is better reflective of available scientific information," because it "takes the fundamental step of acknowledging the potential for . . . harassment at exposures to received levels below 160 [decibels]."[121] 111. Second, as noted above, scientists recognize that this 160 decibel threshold is not supported by science. In addition, in his expert declaration Dr. Nowacek noted that "seismic surveys can disrupt important behaviors in baleen whales at exposure levels far below the 160 dB threshold".[122] 112. Third, the application of a 40 km buffer as a wholesale solution for simultaneous surveys is incompatible with even the 2014 Department of Interior document that the		

Initial/s:

BAR is relying upon. In fact, the US Government prohibits the use of a 40 km buffer as a general mitigation measure. It instead found that new science demonstrated that "airgun noise can be detected at great distances from the sound source, such as across ocean basins," and that therefore, the mitigation measure must be considered in the site- specific context and include any new information at the time as well as "any potential aggregate effects from existing permitted		

[121] See Taking and Importing Marine Mammals; Taking Marine Mammals Incidental to Geophysical Surveys Related to Oil and Gas Activities in the Gulf of Mexico, 83 Fed. Reg. 29,212, 29,247-48 (June 22, 2018).

[122] See Nowacek Supporting Affidavit at para. 18.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
surveys."[123] The BAR does none of this analysis and in fact proposes potentially reducing the buffer zone.[124] 113. This mitigation measure has been proven to be scientifically unsound and ineffective and uses an approach inapposite with the base documents upon which the BAR relies, inconsistent with the current practice of the US Government, and inconsistent with the science. Therefore, there is no basis for the BAR to conclude that a 40 km buffer will mitigate cumulative impacts of concurrent seismic surveys. <u>Inefficacy of Proposed Mitigation Measures</u> 114. Several of the proposed mitigation measures are ineffective to mitigate the harms related to the impacts of the seismic surveys. Consequently, the significance of the post mitigation impacts are understated, exposing marine species, in particular marine mammals and to more injury and harm than indicated in the conclusions of the BAR. 115. Soft Starts and Ramp Ups: Harris *et al.* found that the soft starts are "are likely to reduce the impact for highly mobile		

Initial/s:

large animals, this is unlikely to be adequate for the many species that are prevalent in the area over the austral summer months and are unable to avoid the array or leave the area due to their lower mobility, such as smaller turtles, penguins, invertebrates, some fish species and zooplankton."[125] Moreso, Dr. Nowacek found that soft starts or ramp ups do not protect highly mobile cetaceans, finding them "inadequate to protect cetaceans present year-round or deep-diving		

[123] US Department of Interior, Atlantic OCS Proposed Geological and Geophysical Activities, Mid-Atlantic and South Atlantic Planning Areas, Final Programmatic Environmental Impact Statement at 2-38 (2014).

[124] BAR at 211.

[125] Harris Report at Summary of Findings.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
beaked whales."[126] Dr. Nowacek further expounded "there has been no experimental confirmation that this procedure is broadly effective at reducing overall exposure."[127] In considering a situation where soft starts or ramp ups worked perfectly, Dr. Nowacek found that "this mitigation measure would reduce only the number of injuries incurred in the vicinity of the seismic vessel and does not address at all the larger body of effects."[128] 116. Observers: Harris *et al.* explain that visual observers, although important to mitigation, have deficiencies, which brings into question the BAR's conclusions regarding the level of impacts post-mitigation: *"The finding of observer efficiency (from a scientific monitoring study conducted during the 2018/19 and 2019/2020 seasons on the humpback whales on the east coast) suggests that even with trained observers up to 44% of humpback whales in an area went undetected. This casts doubt on the effectiveness and success of Marine Mammal Observer (MMO) sightings of the largest species (humpbacks) as a mitigation measure, indicating that it is most likely that whales go undetected.*		

127

Initial/s:

Furthermore, the detection rate for smaller species, such as dolphins, seals, turtles and flightless birds (penguins), would be expected to be much lower, obviating the effectiveness of visual observations to prevent harm to these species."[129] 117. Dr. Nowacek reiterates that the mitigation measure of visual observers is "inadequate to protect cetaceans present year-round or deep-diving beaked whales."[130] Dr. Nowacek further explains that the use of visual observers to detect whales "is imperfect at best"		

[126] Nowacek Supporting Affidavit at para. 13.4.

[127] Nowacek Supporting Affidavit at para. 13.4 (incorporating para. 47 of expert declaration by reference). [128] Nowacek Supporting Affidavit at para. 13.4 (incorporating para. 47 of expert declaration by reference). [129] Harris Report at Summary of Findings.

[130] Nowacek Supporting Affidavit at para. 13.4.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
because low light and other poor visibility conditions (such as fog or high-sea states) impair the ability to spot whales and, as Dr. Nowacekgoes into further detail, even in ideal conditions it is very difficult to spot whales.[131] This is echoed by Harris et al. stating the "efficacy of aMMO is likely to be low due to the nature of the offshore marine environment in the survey area (frequent high swells and winds affecting surface visibility), putting species who are missed by MMOs and PAM operators at extreme risk, particularly at night or during adverse weather conditions."[132] 118. Passive Acoustic Monitoring (PAM): Harris *et al*. discuss how "the reliance on observers to do visual sightings to supplement the PAM monitoring during the day, as a mandated mitigation measure, necessitates questioning the acceptability of continuing with survey activities at night. If the visual observations are useful (perhaps sighting large animals around 65% of the time) in addition to PAM, then relying on PAM alone at night cannot be an effective mitigation measure. The authors express the		

Initial/s:

opinion that surveys should not occur between sunset and sunrise each day if a real attempt of maximum avoidance of cetaceans is the objective of this mitigation measure."[133] 119. Dr. Nowacek discusses as well the limited benefit of PAM. With PAM, "whales will not be detected even when present if they are quiet or not vocalizing or if background noise is too high." Dr. Nowacek also noted that "studies show that baleen whales cease vocalizing in the presence of even low levels of seismic survey noise."[134]		

[131] Nowacek Supporting Affidavit at para. 13.4 (incorporating para. 45 of expert declaration by reference).

[132] Harris Report at Summary of Findings.

[133] Harris Report at Summary of Findings.

[134] Nowacek Supporting Affidavit at para. 13.4 (incorporating para. 46 of expert declaration by reference).

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
120. The FBAR's attempts to address this shortcoming in mitigation by equipping MMOs "with infra-red cameras in order to observe mammals at night."[135] However, this is an undeveloped technology for spotting cetaceans. It is not reliable, so much so that it is not typically used by scientists as part of their surveys. Further, there are questions with the scope of view, range/distance, as well as the impact of conditions on the ability to use the technology. In short, it is encouraging to bring new technologies to the table, however it requires more testing and improvement before it could be considered suitably reliable and certainly before it could be factored into the the mitigation of harms to cetaceans. **Lack of baseline noise assessment** 121. The FBAR fails to establish an acoustic baseline assessment of the area, and furthermore fails to present a plan to conduct an adequate baseline noise assessment. As part of its recommendations to minimise impacts to marine fauna, the BAR lists:		

Initial/s:

Baseline noise measurements can provide useful information (prior to operations) when interpreting underwater noise predictions for the introduction of a new noise source. As such, it is recommended that underwater noise measurements be implemented that would include the deployment of underwater sound monitoring equipment to establish an actual baseline prior to the commencement of the survey and then operational levels of noise during the survey.[136] 122. The FBAR provides no guidance for the recommended baseline noise measurement, including the duration of monitoring period, or a		

[135] BAR at 251.

[136] Final BAR, pg. 241.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
range or frequency for detection. This lack of detail means it remains impossible to assess if this mitigation step would meet best practice standards such as those put forward by the Marine Mammal Observers Association. 123. The current lack of a baseline assessment means that the ambient background noise considered in the noise modelling falls short of best practices. Best practice acoustical modelling entails collecting site-specific data to calibrate acoustic models that can then be applied to characterize acoustic exposure of marine fauna in a given study area.[137] **Chronic Noise Impacts** 124. The seismic survey's airguns consist of 24 active airguns that will blast sound loud enough to penetrate the seabed floor every 6-20 seconds, 24 hours a day, for 70 days. Each acute blast will create direct harms to marine species. In addition, besides the direct harm that the pulse will create, the repetitive blasting will increase ambient noise, even at a distance of 100 kilometres.[138] These two factors expose marine		

Initial/s:

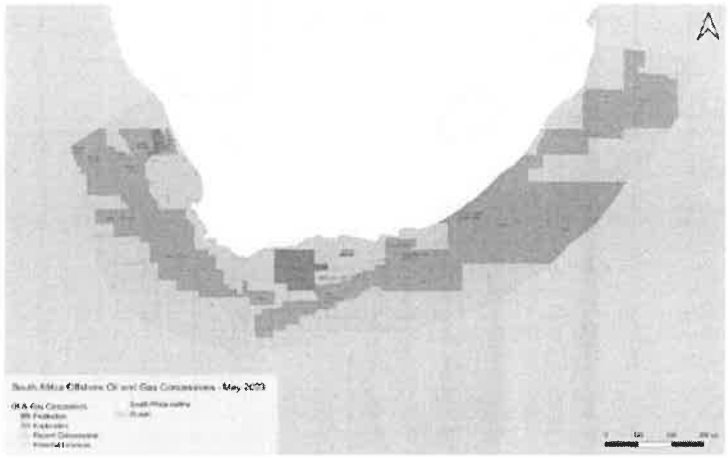
species to chronic noise impacts over a large distance, as the sound travels hundreds and even thousands of kilometres.[139] The FBAR fails to take into account the increased stress and behavioural impacts that this chronic noise will cause on marine species in the area of seismic surveying and beyond		

[137] Alexander N. Rutenko *et al.*, *Acoustic monitoring and analyses of air gun, pile driving, vessel, and ambient sounds during the 2015 seismic surveys on the Sakhalin shelf*, 194, Environ. Monit. Assess., 744 (2022).

[138] Nowacek Supporting Affidavit at para. 13.

[139] Rice Supporting Affidavit at paras. 16, 24 & 36; Nowacek Supporting Affidavit at paras. 9-10, 13.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
Ground 3: Failure to adequately assess cumulative impacts 125. Below is a map detailing the updated categories of Oil and Gas concessions along the entire coastline of South Africa:  Information received from Petroleum Agency SA, in line with a PAIA Request submitted by the Legal Resources Centre on 12	It is understood that ION GXT has been declared bankrupt and have ceased operations - as such, the ION GXT Reconnaissance Permit is considered to be defunct. Section 9.3.5 of the BA Report states that "three seismic surveys of regional extent, undertaken simultaneously, could be expected to result in an impact of medium negative significance on the large pelagic longline sector, both with and without the application of mitigation measures. This relates to the large pelagic long-line sector only, and only in the event that all three surveys are undertaken simultaneously. It should be noted that the seismic industry typically avoids simultaneous surveys occurring in close proximity to each other as this has the potential to degrade the quality of the recorded survey data. Other cumulative impacts are all expected to be low after mitigation is applied – therefore overall cumulative impacts are considered low post-mitigation. The marine faunal assessment has made efforts to present published results objectively, and nowhere claims that acoustic surveys do not result in impacts. The inference is	

Initial/s:

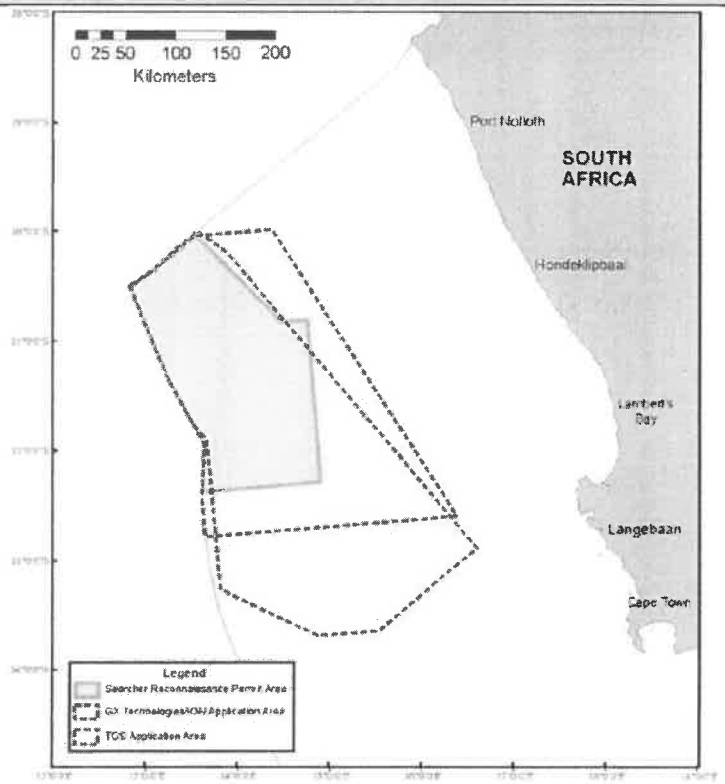
October 2022 126. In addition to the abovementioned map, it is noted that the BAR acknowledges that should other seismic survey campaigns be undertaken concurrently with TGS's proposed survey programme, cumulative impacts may be likely and there would be a need for alignment in planning of such concurrent operations to reduce	that, for these whale populations, there is no direct evidence to link the long-term negative change to population size directly to seismic survey activities. The statement is only one regarding the "lack of evidence" with respect to certain whale populations and seismic surveys. The marine fauna report recommends planning seismic surveys to avoid sensitive areas and periods for some marine fauna: Movement of migratory cetaceans (particularly baleen whales) from their southern feeding grounds into low latitude waters (June/July and late October/November), and their aggregation on the summer feeding grounds between St Helena Bay and Dassen Island from late October to late December and ensure that migration paths are not blocked by seismic operations. If possible, the survey should be undertaken from	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
cumulative noise impacts to an acceptable significance.[140] The draft BAR notes that there are two current pending applications with PASA (Searcher Geodata and GX Technology Corporation) which both overlap the proposed TGS 3D seismic survey area, as depicted in the diagram below:	North to South to avoid these feeding aggregations. A discussion of the migration of various cetaceans is provided in Section 8.4.3.6 of the BA Report. It is unlikely that concurrent seismic surveys will be undertaken in the same area during the same survey window however the cumulative impacts associated with multiple surveys needs to be, and was, assessed. The decision-making authority did elaborate on the decision regarding whether concurrent surveys can take place. The proposed seismic activity will not automatically lead to further exploration, production, and utilisation of petroleum resources. The information to be obtained through the seismic survey will provide information as to whether they may be exploitable resources. The climate change impacts of any potential future exploration or production activities would have to be assessed as part of the associated and required Environmental Authorisation applications submitted for those projects, with due consideration of the other climate affecting activities proposed or in place at the time.	

Initial/s:

[140] Final BAR 1520, para 9.3.5, p234.

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
 Source: TGS draft BAR, p235. 127. The BAR states that despite the difficulty in undertaking a reliable assessment of the potential cumulative		

Initial/s:

environmental impacts of future seismic acquisition in the Deep Water Orange Basin (due to likely variation in the scope, extent and duration of proposed surveys), the cumulative impacts of three potential surveys occurring		

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
concurrently needs to be considered. The FBAR thus includes a cumulative assessment which assumes that the three surveys (Searcher, TGS and GX Technologies) occur simultaneously during the summer survey window in 2022/23. In this event, the draft BAR indicates that: 128. Associated impacts to marine fauna would be of **high intensity** and extend regionally, over the short-term (assuming they take place over the same summer survey window). The impact consequence for cumulative surveys is therefore considered medium. 129. Concurrent activities could also add to the cumulative impact on fisheries. Simultaneous survey operations would result in an increase in the extent and magnitude of the impact on the large pelagic longline sector. The impact duration would remain unchanged. Three seismic surveys of regional extent, undertaken simultaneously, could be		

Initial/s:

expected to result in an impact of **medium negative significance** on the large pelagic longline sector, both with and without the application of mitigation measures. 130. Curiously, the BAR impact table[141] combines cumulative impacts on marine fauna and fisheries and rates the pre-mitigation environmental significance as 'medium' and the post-mitigation impact as 'low'. This does not reconcile with the preceding paragraphs which indicate with regard to cumulative impacts of three concurrent seismic surveys, an impact of medium negative		

[141] At p236.

142

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
significance on the large pelagic sector could be expected 'both with and without the application of mitigation measures. 131. The Final BAR states regarding confounding and cumulative effects that the assessments of impacts of seismic sounds provided in the scientific literature usually consider short-term responses at the level of individual animals only, as the understanding of how such short- term effects relate to adverse residual effects at the population level is limited. The report goes on to state that data on behavioural reactions to seismic noise acquired over the short-term could, however, easily be misinterpreted as being less significant than the cumulative effects over the long-term (i.e. what is initially interpreted as an impact not having a detrimental effect and thus being of low significance, may turn out to result in a long-term decline in the population, particularly when combined with other stressors such as temperature, competition for food, and shipping noise). The report notes that confounding effects are, however, difficult to separate from those due to seismic surveys.[142]		

132. The report also states that the potential cumulative impacts on individuals and populations as a result of other seismic surveys undertaken either previously, concurrently or subsequently are difficult to assess. The report indicates that a significant adverse residual environmental effect is considered one that affects marine biota by causing a decline in abundance or change in distribution of a population(s) over more than one generation within an area. The report makes reference to numerous 2D and 3D seismic surveys having been undertaken off the West Coast over the past 17 years, and relies on reported increases in the southern right whale and humpback whale populations over a time when seismic surveying frequency has increased as *'suggesting that, for these populations at*		

[142] Final BAR 1520, para 9.3.1.4 at p209-210.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
least, there is no evidence of long-term negative change to population size as a direct result of seismic survey activities'.[143] The assumption made that an increase in whale populations suggests that there is no evidence of long-term negative change to population sizes as a direct result of seismic activities, is questionable. This is an assumption that cannot be inferred from the facts (the increase could be as a result ofany number of other external factors). 133. It cannot simply be assumed that the lack of evidence of long-term negative population changes as a direct result of seismic survey activities means that there are no negative impacts (including potentially significant impacts). In their report relating to the TOSACOEIA appeal, Harris *et al* point out that although the humpback whale population is increasing, there is evidence to suggest that cetaceans in South African waters are being affected by changes in their ecosystem and it is not well understood yet what is driving		

Initial/s:

these changes and what the long terms effects could potentially be to populations.[144] Concerns noted in the report include an observed decrease in southern right whale calving success of the South African population and a strong link between foraging success and reproduction.[145] They suggest an investigation into possible decreases and/or spatial or temporal shifts in their prey availability at higher latitudes due to environmental variability. They also highlight a concern of the continued low numbers of unaccompanied adults		

[143] Final BAR 1520, para 9.3.1.4 at p210.

[144] Wilkinson, C. (2021) *Estimating population changes in humpback whales (Megaptera novaeangliae) migrating past Cape Vidal, South Africa,* MSc thesis, Cape Peninsula University of Technology, p108. Cited in Harris JM, Olbers JM, Wright K (6 April 2022) *Comments on Tosaco Energy Block 1 Exploration Right issued to Tosaco Energy (Pty) Ltd (PASA Reference: 12/3/362).*

[145] Vermeulen, E., Wilkinson, C., & G. van den Berg (2020) *Report of the 2019 South African southern right whale aerial survey*, Report to IWC 10.13140/RG.2.2.29556.37766. Cited in Harris JM, Olbers JM, Wright K (6 April 2022) *Comments on Tosaco Energy Block 1 Exploration Right issued to Tosaco Energy (Pty) Ltd (PASA Reference: 12/3/362).*

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
along the South African coast which could potentially have serious consequences for cow-calf pairs in relation to the country's whale-watching industry in the future. 134. The BAR states that in the 'unlikely' event that multiple surveys would take place at the same time within the same survey area, 'the risk of cumulative noise impact must be considered and is suggested to be managed'. The BAR suggests that mitigation should include maintaining a distance of at least 40 km between survey vessels 'until sufficient objective evidence is obtained that a reduced buffer distance is acceptable'. Where this 40 km buffer distance cannot be maintained, the FBAR suggests that each of the additional activities to those described in the technical noise report should be modelled or otherwise considered in terms of the cumulative noise level and with reference to the criteria described in the report.[146]		

Initial/s:

135. However, as referred above at paragraphs 109-1113, the US Government prohibits the use of a 40 km buffer as a general mitigation measure and therefore, the mitigation measure must beconsidered in the site-specific context and include any new information at the time as well as "any potential aggregate effects from existing permitted surveys. This mitigation measure has been proven to be scientifically unsound and ineffective and uses an approach inapposite with the base documents upon which the BARrelies. Therefore, there is no basis for the BAR to conclude that a 40 km buffer will mitigate cumulative impacts of concurrent seismic surveys.		

[146] Final BAR, p236.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
136. Given the lack of certainty regarding cumulative impacts of concurrent 3D seismic survey areas, a risk averse and cautious approach should be applied by not authorising concurrent surveys and suggests that should the decision-maker ought to have refused granting the environmental authorisation. 137. In addition, the FBAR does not consider the cumulative impacts of other proposed offshore oil and gas seismic surveys, exploration and production in other Blocks within South Africa's exclusive economic zone. Having regard to the global Climate Emergency[147] and South Africa's international commitment[148] to *'working with others to ensure temperature increases are kept well below 2°C above pre- industrial levels, which could include a further revision of the temperature goal to below 1.5°C in light of emerging science[149]'* by reducing greenhouse gas (GHG) emissions, TGS's proposed 3D		

seismic survey would, if additional commercially viable resources are identified and developed through to production phase, inevitably add to South Africa's overall GHG emissions (South Africa's energy sector currently contributes an estimated 84% percent to the country's overall GHG emissions).[150] As a reasonably foreseeable future impact that may become more significant, especially in combination with impacts arising from similar offshore oil and gas exploration and		

[147] https://www.unenvironment.org/explore-topics/climate-change/facts-about-climate-emergency

[148] As a party to the United Nations Framework Convention on Climate Change (UNFCC) that ratified the Kyoto Protocol and adopted the Paris Agreement.

[149] See for example South Africa's *Intended Nationally Determined Contribution (INDC)*, available online at: https://www4.unfccc.int/sites/ndcstaging/PublishedDocuments/South%20Africa%20First/South%20Africa.pdf

[150] https://www.climatelinks.org/resources/greenhouse-gas-emissions-factsheet-south-africa

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THEDMRE/PASA
production activities, it is submitted that the cumulative impacts[151] of such GHG emissions need to be identified and assessed.		
Ground 4: Failure to conduct meaningful consultation with communitiesand local people (and in particular small-scale fishers), within the public participation process, including the Social Impact Assessment process 138.It is one of the foundational principles of NEMA that the participation of all interested and affected parties must be promoted and the participation of disadvantaged people must be ensured.[152] Section 24(4)(a)(v) of NEMA provides that interested and affected parties must be given a reasonable opportunity to participate in the environmental impact assessment process. Regulation 41(6) provides that the public participation process must be facilitated in a manner that provides all potential interest and affected parties a reasonable opportunity to comment on the proposed project.	It is our opinion that the Public Participation Process was conducted in line with and exceeded the requirements of the Environmental Impact Assessment (EIA) Regulations (2014), as amended, and that the processfollowed was reasonable. With reference to Section 7 and Appendix 2 ofthe BA Report, EIMS has undertaken the public participation and consultation processes in accordance with the requirements of the NEMA EIA Regulations. This process included notification and communication in three different languages, via Radio and Newspaper advertisements, site notices, posters, and direct notification; as well as public and focus group meetings within the potentially affected communities. Opportunity was provided to review and	The Public Participation Process undertaken was in line with the requirements of NEMA. The public was provided with at least 30 days to review and submit comments. The process started with the identification of interested and affected parties (I&APs) from historic projects and through a call to register as I&APs. All registered and pre-identified were notified of the planned project via post, fax, email. Site notices were placed at various locations along the are of interest. Newspaper advertisements were published in various languages (namely, English, IsiXhosa, and Afrikaans) between 19 and 26 August 2022. Radio advertisements were published in various radio stations in isiXhosa, English and Afrikaans from 26 August to 3 September 2022. Initial public meetings were held in five (5) locations around

151

Initial/s:

Regulation 41(2) of the EIA Regulations requires that the public participation process take into account the relevant guidelines. The 2017 Public Participation Guidelines provide that: 137.1. The level of public participation must be informed by the characteristics of the potentially affected parties.[153] 137.2. The method of communication must be an effective method thatwill easily reach the intended audiences.[154]	comment on the BA Report and associated documentation to be submitted to the decision maker. It should further be noted that detailed consultations with community members and leadership were conducted by the Social and Heritage Specialists to obtain the views of project affected communities and the potential social and heritage impacts of the proposed project. The applicant is not aware of any additional requests received from I&APs for further avenues or opportunities for	the area of interest between 29 August and 3 September 2022. Draft BAR public meetings were held in seven (7) locations around the area of interest from 31 October to 05 November 2022. A virtual meeting was held on 10 November 2022. All comments received during the public participation process were responded to and included in appendix 12 of the BAR. There was no request received by the Agency requesting extension for submission of the final BAR due to request received from the public for more time to review and submit comments. The Agency was satisfied with the PPP undertaken, hence the decision to grant authorisation was taken. EIMS published the BAR on their website and included a data free version. Carmelita Mostert was registered and an I&AP and was aware of the options to download and the report and never requested a hardcopy to be sent to her, if she was not able to access the available options.

s

[151] 'Cumulative impact' is defined in the NEMA EIA Regulations as follows: 'in relation to an activity, means the past, current and reasonably foreseeable future impact ofan activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may become significant when added tothe existing and reasonably foreseeable impacts eventuating from similar or diverse

[152]

Initial/s:

activities.

[152] NEMA, section 2(4)(f).

[153] At p. 8.

[154] At p. 9.

153

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
137.3. The language used must provide all potential interested and affected parties a reasonable opportunity to comment without unnecessary difficulty.[155] 139. The court in *Sustaining the Wild Coast NPC*[156] has upheld this and stated: "Meaningful consultation entails providing communities with the necessary information on the proposed activities and affording them an opportunity to make informed representations"[157] 140. Coastal communities and the general public have been overwhelmed with the number of offshore oil and gas related applications running in parallel processes, particularly those which may impact the south-west and west coast of South Africa. In the month of May, I&APs have been called upon to respond to no less than four offshore oil and gas EIA processes, without taking into	participation. The public participation requirements and obligations of the NEMA EIA Regulations has been complied with. With Reference to the table presented in point 141 above, it should be noted that EIMS was the EAP and it is unclear whether this comment relates to this application. However, it should be stated that it is clear that the TGS process did not conflict with other concurrent processes and it is anticipated that I&APs had sufficient time to attend the extensive public consultations undertaken during the initial call to register phase, as well as the BAR Review period. Please refer to the Public Participation Report in Appendix 2 of the BAR for further details on the public consultations undertaken. It should be noted that the Ms Mostert was specifically identified as a key Interested and Affected Party (I&AP) and included in the Public Participation throughout the Basic Assessment Process. Ms Mostert's comments were captured in the minutes of the meetings included in Appendix 2-6 and 2-9 of the BAR. As requested during the	

Initial/s:

account legislative public participation processes for the Upstream Petroleum Resources Development Bill and the draft Marine Spatial Plans during a similar period. The EAP in the current application, SLR, has been appointed to conduct three of these parallel EIAs. 141. The table below sets out the various EIA processes, in which it is clear that multiple public meetings and submission dates are running during similar time periods:	public meetings, the final BAR was also made available on the EIMS website (and the datafree version thereof) post submission of the final report to the Competent Authority for adjudication and was available throughout the appeal notification period. The EAP therefore, utilized the reasonable and requested methods of communication and transparency and did not receive requests for alternative methods. It is also important to consider that the findings of the BAR were that there is unlikely to be significant adverse impacts. With reference to Section 7 and Appendix 2 of the BA Report, EIMS has undertaken the public participation and consultation processes in	

[155] At p. 9.

[156] Sustaining the Wild Coast NPV and Others v Minister of Mineral Resources and Energy and Others (3491/2021) [2021] ZAECGHC 118

[157] Sustaining the Wild Coast NPC, para 26.

Initial/s:

GROUNDS OF APPEAL				RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
Project	**EAP**	**Public Participation Meeting Dates**	**Comment/Appeal Due Dates**	accordance with the requirements of the NEMA EIA Regulations. This process included notification and communication in three different languages, via Radio and Newspaper advertisements, site notices, posters, and direct notification; as well as public and focus group meetings within the potentially affected communities. Opportunity was provided to review and comment on the BA Report and associated documentation to be submitted to the decision maker. It should further be noted that detailed consultations with community members and leadership were conducted by the Social and Heritage Specialists to obtain the views of project affected communities and the potential social and heritage impacts of the proposed project. The public participation requirements and obligations of the NEMA EIA Regulations has been complied with. The recommendation of the SIA is that, should the project be approved a representative from TGS must consult with leadership of the community to determine how the communities should be consulted with in future – that is, what is the way the community members prefer to be consulted with for provision of commencement notification	
TEEPSA Block 5/6/7: exploration drilling	SLR Consulting (Pty) Ltd	June – July 2022	7 December 2022 12 May 2023		
TEEPSA DWOB: exploration drilling	SLR Consulting (Pty) Ltd	November 2022 May 2023	14 December 2022 12 May – 12 June 2023		
TEEPSA 11B/12B: productio	WSP Group Africa (Pty) Ltd	January 2023	14 February 2023		

15t

Initial/s:

ndrilling				and/or daily updates to advise on survey schedules, communication in respect of the proposed research outcomes, etc. The recommendation to include further consultation as part of the conditions of authorisation intends to ensure that the consultation process goes further than just the EIA process, but is continued throughout the entire process, regardless of the outcome. This will assist communities and people on the ground to make informed decisions about technical matters. The intention of the recommendation is not for this condition to be suspensive or determinant on the ultimate decision but rather to function as an additional management/ mitigation measure to be implemented post approval to reduce the significance of the identified impacts and further enhance the community engagements	
TGS: reconnaissance	EIMS (Pty) Ltd	August / September 2022	25 November 2022 18 May 2023		
Searcher Geodata: reconnaissance	EIMS (Pty) Ltd	July 2022	13 October 2022 9 February 2023		
CGG Services SAS: reconnaissance	SLR Consulting (Pty) Ltd	April 2023	11 April – 31 May 2023		

Initial/s:

GROUNDS OF APPEAL				RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
Karpowership Saldanha: power generation from gas	Triplo4 Sustainable Solutions	October / November2022	13 December 2022	during implementation, should the project be implemented. The SIA specialist has made a reasoned opinion that the project can be approved on the basis of the outcomes of the consultations already undertaken. Communities are diverse and there are community members who are supportive of	

Initial/s:

142. Many members of the public will be confused by the various applications, with different processes, slightly different due dates, slightly different applicants all being branded the same with the same EAPs conducting similar EIA processes. It is inconceivable that affected coastal communities are able to respond to each of these processes in a meaningful way. This means that fishers must fish for a living, requiring them to be out at sea daily or for extended periods of time. Even if they wish to do so, they do not have the time or resources to attend multiple public meetings, engage with voluminous technical information, provide comments, ascertain whether their comments have been addressed in comments and response reports, and thereafter proceed to draft appeals. The result, even if unintended, is that those who have less resources, who are required to be out at sea to make their livelihoods, and/or who are unable to fully understand the different proposals and processes, are not able participate and engage meaningfully. The chilling effect is that they are significantly prejudiced by the onslaught of applications	this type of development, as much as there are community members against the development. Communities were asked to suggest mitigation measures that the specialists should consider, and this influenced some of the recommendations made in the SIA. All perspectives were considered during the EIA process and the social impact analysis. The SIA report makes detailed recommendations about further engagement with the communities, and other mitigation and management measures. The mitigation and management measures should be considered in its entirety within the context of the report. Efficient engagement with a community involves more than merely setting up a meeting and inviting people. In many communities there is an expectation that outsiders should enter the community via the leadership before a community meeting can take place. TGS needs to determine what the most appropriate way would be to interact, and this may differ between communities, in order to engage with the individuals and communities in a decolonised way. Once this is done, TGS can proceed with engaging with the communities as a whole in an appropriate way. Education is suggested as a mitigation measure to empower community members to make informed decisions where they are in a position to weigh up the pros and cons for themselves, as was
143. There are many people, particularly those such as small-scale fishing communities and co-operatives who will be	

Initials:

impacted by the project, who do not have access to the resources and expertise required to access, consider and comment on the records relating to the project, which are voluminous and technical in nature. The current estimate is	requested by community members during the public meetings. The updated conditions (omissions) referred to were included for clarity. The Appellants assertion that the voices of the communities have not been heard by virtue of the inclusion of conditions requiring that ongoing engagements, education and collaboration is unfounded. The purpose of these measures was to ensure that there were ongoing	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
that around 136 unitary entities could be defined as 'communities' under the proposed community based rights allocation system. In theWestern Cape and Northern Cape in particular, these settlements canseldom be described as 'communities' in the sense of small, spatially defined geographic units with a homogenous social structure and shared norms.[158] This is not recognised nor considered in the BAR or SIA in that the reports appear to limit their analysis by failing to consider the intricate social structures and norms within these "communities" thereby considering these communities as homogenous and disregarding their unique characteristics. 144.We attach hereto a letter from Carmelita Mostert, marked **Annex B5**, which was also separately sent to the Appeals Authority, which clearly sets out opposition to the seismic surveys	interaction, communication and feedback regarding the operational aspects. The EAP has conducted the impact assessment on the basis of the activities proposed by the applicant. Any subsequent authorisation would be restricted to these specifically assessed activities. Should the applicant or other applicants wish to undertake any additional exploration activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a consequent need to apply for the relevant permissions. These would include a formal application for an Exploration or Production Right as well as a new EA. The impacts of such proposed activities would consequently require specific assessment and public consultation priorto approval. It is premature to assess the likely impacts of further invasive exploration activities or production activities as the extent, duration, location, and	

Initial/s:

based on the impact on fisheries, and points out their difficulties associated with having to find hardcopy reports and with having to consider how her community's comments have been considered by the EAP.	magnitude applicable to these activities are unknown at this stage. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, and production activities in that these are listed as distinct and separate listed activities.	
145. To ensure access to a reasonable, adequate and fair public participation process, TGS and their appointed EAP should have used reasonably distinctive and appropriate alternative methods to inform and educate affected communities and small-scale fishers of the significant adverse impacts that this project could have on them. Running a public participation process during time period could not achieve meaningful and effective consultation.	There is provision in law for these activities to be assessed on their merits as and when they are proposed.	

[158] Moenieba Isaacs and Mafaniso Hara. 2015. "Backing small-scale fishers: Opportunities and challenges in transforming the fish sector. Institute for Poverty, Land and Agrarian Studies Rural Status Report 2. University of Western Cape, at page 13. Access link here https://cer.org.za/wp-content/uploads/2016/08/Backing-Small-scale- Fishers_PLAAS.pdf

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
146. The BAR included a Social Impact Assessment (SIA) that noted[159] that communities feel that there were significant gaps in the available data, and that from a social perspective the non-technical or social risks can potentially cause significant impacts. The report highlighted that potential social impacts identified included: • Uncertainty; • Further marginalisation of vulnerable groups; • Concerns about cumulative impacts; • Impact on livelihoods; • Impacts on sense and spirit of place; • Impacts on social license to operate; • Stakeholder fatigue and disillusionment; • Community expectations; and		The Social Impact Assessment undertaken for the proposed activity provided recommendations, which formed conditions of the EA and will be implemented as recommended in the report. Recommendations provided during Searcher EIA process were specifically for Searcher and cannot be enforced on TGS (project in question). Kindly refer to response above for any public participation grounds of appeal.

Initial/s:

• Social unrest. 147. These impacts are rated in the final BAR as being of high or medium significance prior to mitigation, and as being medium significance post-mitigation.[160] 148. The report further pointed out that seismic reconnaissance projects are controversial in South Africa, and that while for many stakeholders it is an emotional matter, for others the potential of		

[159] Appendix 3.4 to the TGS final BAR, Social Impact Assessment, Equispectives Research and Consulting Services (Sept 2022), at p 101.

160

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
impacting on their livelihoods is the biggest fear. The report indicates that some stakeholders feel that the exploration for fossil fuels is not in line with sustainable development and the fight against climate change, while other stakeholders feel that it is imperative for the growth and development of the South African economy to engage in these investigations. The expert describes this as a 'complex and wicked problem'.[161] 149. The report went on to state that from a social perspective, it is clear that the communities and the majority of local people are opposed to the project, and that because the project does not happen in a social vacuum, the social environment is much wider than the footprint of the project. The report states further that: *If the social risks and potential damage to cultural and indigenous rights are considered the impact on the social*		

Initial/s:

fabric of already vulnerable communities may be significant. At this stage communities feel that they cannot make informed decisions.[162] *(emphasis added)* 150. Curiously, while this TGS SIA is almost identical to the SIA submitted in the Searcher draft BAR (ref. 1518), the TGS version omits the following sentence from the above paragraph:		

[161] Ibid, pii. In a footnote to the TGS final BAR, a 'wicked problem' is indicated as *'a problem that is difficult or impossible to solve because of incomplete, and changing requirements that are often difficult to recognise'.*

[162] Ibid, piii.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
*From [a] social perspective the project can only be recommended **after** meaningful consultation, local research, education, and awareness raising has been done in the project affected communities.*[163] *(emphasis added)* 151.An extract from the Searcher SIA is attached marked Annex B4. 152.Instead, the TGS SIA report makes the following recommendation: *From a social perspective it is recommended **that the project proceed subject to the mitigation measures** (i.e. meaningful consultation, local research, education, and awareness raising in the project-affected communities) **forming part of the conditions for authorisation and being implemented prior to the commencement of the actual survey**.*[164] 153.This recommendation is strikingly different to the		

Initial/s:

recommendation made in the Searcher SIA, which stated as follows: *The recommendation is therefore that the project **can only proceed once** the social mitigation measures have been implemented and the community are sufficiently informed and educated to [be] able to engage in a meaningful manner.*[165] *(emphasis added)*		

[163] Searcher 1518 draft BAR SIA, piii.

[164] TGS BAR, piii.

[165] Searcher 1518 draft BAR SIA, piii.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
154. The Appellants submitted in their comments on the draft BAR that recommending that the project proceed subject to meaningful consultation being undertaken – and included as a mitigation measure in the environmental authorisation and implemented prior to the commencement of the 'actual survey' – is highly irregular within the context of an environmental impact assessment.[166] There is no legal basis for meaningful consultation to be undertaken after an environmental authorisation is granted, and including such a recommendation as a condition of authorisation undermines the regulatory scheme for prior impact assessment that is subjected to public consultation.		
155. Notwithstanding the above mentioned submissions, the environmental authorisation ("EA") approves the BAR and EMPr, and indicates that it is mandatory for the holder to implement all the recommendations and management		

Initial/s:

measures stipulated in the EMPrthroughout all phases of the proposed activities.[167] The EA also stipulates as a specific condition that a community engagement protocol that is based on the San Code of Research Ethics be developed, in consultation with the affected communities and must include a community strategy and grievance mechanism.[168] The EMPr in turn includes as mitigation measures various recommendations under the heading 'Socio-Economic Considerations', all of which are indicated as to be implemented 'Prior to Operation and ongoing'.		

[166] Para 120 at page 60 of Green Connection and Natural Justice DBAR comment submission.

[167] EA, section 5.4.1.

[168] EA, section 5.5.15.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
156. The Appellants submit that notwithstanding the public participation processes conducted during the BAR and the SIA processes (which the appellants submitted in paragraphs 115- 121 above, were not adequate or meaningful), it is clear from the SIA that communities and the majority of local people are opposed to the project and that seismic survey companies do not have a 'social license to operate'. The SIA indicates that *'[i]f TGS…wants to proceed with the project, they will need to engage in meaningful conversation with the communities and try to restore relationships. From a community and social risk perspective this is not negotiable*'.[169] The inclusion of mitigation measures in the EMPr (and by reference the EA) fails to adequately take into account the needs and values of the communities (and small scale fishers) who are opposed to the seismicsurvey.[170] Their voices in opposition to the seismic survey remain unheard in the final BAR and EA. Furthermore, it is submitted that the mitigation measure that TGS should (prior to the operation and on an ongoing basis) *'consult with the traditional leadership of the affected communities to establish what their understanding*		

Initial/s:

of meaningful consultation is and how communities should be consulted in the future'[171] cannot be a substitute for meaningful consultation with communities and local people during the EIA process. It is submitted further that such an approach violates the principles of fair administrative decision-making and the right of interested and affected communities to be meaningfully consulted prior to a decision on authorisation being made, and is inconsistent with section 2(4)(f) of NEMA, which stipulates that the participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the		

[169] TGS SIA, p107.

[170] Section 2(4)(g) of NEMA requires that decisions must take into account the interests, needs and values of all interested and affected parties, and this includes recognising all forms of knowledge, including traditional and ordinary knowledge.

[171] EMPr, section 13.7 item D.

172

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured. 157. The Appellants also note that the SIA states further that the seismic survey industry should reassess their position and social license to operate as an industry in the South African context and should conduct a strategic environmental assessment of the impact of the industry.[172] Notwithstanding this, the report makes a one-sided assumption that the discovery of commercially exploitable fossil oil or gas resources would be beneficial to the economic development of South Africa: '*Potential future benefits and the economic development of the country should the surveys find any significant resources are not disputed*'.[173] The Green Connection and Natural Justice submit that the SIA should have reflected the many negative socio-economic impacts that could or are likely to manifest should commercially exploitable reserves be		

173

Initial/s:

found and developed through to production and use (including but not limited to the socio- economic costs of climate change[174]). 158. In light of the above, the Appellants submit that the public participation process, including the SIA conducted, did not constitute meaningful consultation with communities and local people (and in particular small-scale fishers), and that the mitigation measures requiring further consultation after the EIA has been conducted and a		

[172] Ibid p109.

[173] Ibid, p109.

[174] In 2021 an international team of scientists published their findings that economic damage from climate change could be six times higher by the end of this century than previously estimated. See: https://www.ucl.ac.uk/news/2021/sep/economic-cost-climate-change-could-be-six-times-higher-previously-thought

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
decision on authorisation made (but prior to the operation and ongoing thereafter) does not cure this flaw in the EIA process. As a consequence, it is submitted that the EA should be overturned on appeal.		
Ground 5. The FBAR does not contain a proper and objective assessment of the negative impacts of the project on people's human rights 159. Small-scale or subsistence fishers in coastal communities heavily rely on local fish populations for their livelihood and cultural practices. If seismic surveys lead to a reduction in fish stocks, it can have negative consequences for these fishers. They may experience reduced catch rates, economic losses, and disruptions to their traditional fishing practices. Furthermore, the cultural and heritage aspects tied to fishing may be undermined if fish populations decline significantly, as it can	Section 9.3.3.1 of the BAR in dealing with the cultural heritage impacts, details the following: "The cultural heritage and living heritage related to the communities linked to fisheries and ocean subsistence and further identifying as indigenous communities can potentially be impacted by the proposed project. This impact is indirect and is in the community perceived to be primarily linked to their economic existence as a result in the loss of fishing yield." The Marine Ecological Assessment and the fisheries impact Assessment did not find that there would be a significant impact fishing activities as a result of the	Impacts on fisheries were assessed, including impacts on fish catch rates. The impact on catch rate was found to be of immediate duration and reversible without additional time or cost. Based on the distance of fishing grounds from the area of interest, only the large pelagic longline and tuna pole-line sectors are considered susceptible to the effects of elevated sound. However, with the implementation of the recommended mitigation measures, the impacts will be on low negative significance. The proposed seismic survey area is further offshore from many fishing grounds and areas where community members undertake their cultural practices. Therefore, the proposed activity will not have an impact such activities. The Heritage Impact

Initial/s

impact the intergenerational transmission of traditional knowledge and practices. 160. To better understand the correlation and potential impacts, comprehensive scientific studies and assessments are necessary. These studies would need to evaluate the specific local conditions, fish populations, and cultural contexts of the coastal communities in question. 161. Mitigation measures that are proposed within the EMPr, the specialist acoustic studies, socio-economic impact studies and	proposed seismic survey. As a result, the assumption by the Appellant that there would necessarily be an impact on the cultural practices, is questioned. It should further be noted that the specific local conditions, fish populations, and cultural contexts of the coastal communities in question were considered as part of the BAR as detailed in the Section 8 and 9 and Appendix 3 of the BAR. It is not disputed that the "small-scale or subsistence fishers in coastal communities often have deep cultural and heritage associations with fish and the marine environment. Their practices, traditions, and identity are intertwined with these resources." The impacts identified and the mitigation measures proposed in the Cultural Heritage Assessment and Social Impact Assessment, made it clear that the direct impact on fish populations was considered in detail and highlighted the cultural and heritage significance of	Assessment included in appendix 3.3 covered all potential cultural impacts, while social and socio-economic impacts were assessed in Social Impact Assessment included in appendix 3.4.

Initial/s

	fishing. Based on the findings of these studies and as detailed in the BAR, it was the	

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
heritage impact studies such as adjusting survey timing and locations, implementing exclusion zones, and using sound mitigation technologies, can help reduce the potential negative impacts of seismic surveys on marine life. However, when it comes to the cultural and heritage associations of fish and the broader marine environment, proposing the above mentioned mitigation measures which solely focus on reducing direct impacts on fish populations, may fail to address the complex nuances and broader concerns.[175] 162. Small-scale or subsistence fishers in coastal communities often have deep cultural and heritage associations with fish and the marine environment. Their practices, traditions, and identity are intertwined with these resources. Simply mitigating the direct impact on fish populations may not adequately address the cultural and heritage significance of fishing. Preserving cultural practices, traditional knowledge, and the social fabric of coastal communities requires a more holistic approach	opinion of the specialists and the EAP, that the there are no environmental fatal flaws that should prevent the proposed project from proceeding, provided that the recommended mitigation and management measures are implemented. Based on the nature and extent of the proposed project, the local level of disturbance predicted as a result of the reconnaissance activities, the findings of the specialist studies, and the understanding of the significance level of potential environmental impacts, it is the opinion of the EIA project team and the EAP that the significance levels of the majority of identified negative impacts can generally be reduced to an acceptable level by implementing the recommended mitigation measures and the project should be authorized. Consequently, and with due consideration of the mitigation measures recommended by the Cultural Heritage and Social Impact Assessments, it was the opinion of the Applicant and the EAP that the proposed survey will not detrimentally affect cultural practices, traditional knowledge, and the social fabric of coastal communities. Specific mitigation measures that point to the robust consideration	

Initial/s:

that recognizes and respects their unique relationships with the marine environment. 163. Small-scale or subsistence fishers in coastal communities understand through their indigenous knowledge of fishing, that the marine ecosystem is capable of sensitivity to outside interferences. As fishers, they have observed that even the slightest interference with the sensitive marine ecosystem will have an impact on every fish in the ocean, and as a result their livelihoods. Plankton, for example, are the most sensitive to any interferences which indirectly have implications for the larger fish species that feed on plankton. Scientific experts have confirmed in their expert assessments that it is likely that the sound blasting in the ocean caused by seismic	of the human rights aspects identified in the BAR include the following: • TGS should develop a community engagement protocol that is based on the San Code of Research Ethics. This should be done in consultation with the affected communities. This should include a communication strategy and grievance mechanism. • TGS should contribute to assisting with collaboration on independent research on how fish species on the West Coast such as snoek respond to seismic surveying. • Consult with communities on potential ways in which to make a positive contribution to the communities.	

[175] Page 217-218 of the FBAR

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
surveys will impact on the behaviour of plankton decreasing the number of plankton in the water.[176] Furthermore experts are of the opinion that seismic testing will have a significant adverse impact on numerous species of marine fauna, including endangered and vulnerable species located in the exploration area, and zooplankton.[177] 164. Mitigation measures that solely focus on addressing direct impacts on fish populations may not be appropriate for effectively addressing the indirect and cumulative effects on the broader ecosystem/ecocentric based cultural and heritage rights associated with fishing. Eco-centric based cultural and heritage rights are rights that can be defined as rights that acknowledge that ecosystems, species, and natural elements have their own rights and should be respected and preserved for their inherent worth, beyond their instrumental value to humans. Within this framework, cultural and heritage rights are understood in relation to	• A representative from TGS should consult with the traditional leadership of the affected communities to establish what their understanding of meaningful consultation is and how communities should be consulted in future. This will assist with adjusting the relationship between TGS and the traditional communities. Given the socio-political environment, opposition to the project and associated non-technical risks, further meaningful engagement with the leadership and communities are critical from a social perspective. The above mitigation measures demonstrate that there is an onus on the applicant to further engage and develop a deeper understanding of the cultural and social aspects and practices within these communities. The nuances associated with potential disruption of fish behaviour, altered migration patterns, and changes to the ecological dynamics that are crucial to the cultural and heritage aspects tied to fishing, was assessed in detail in the Marine Ecological Assessment and included in Section	

Initial/s:

the natural environment. Ensuring the protection of eco-centric based cultural and heritage rights involves recognizing and safeguarding the cultural practices, knowledge systems, traditions, and spiritual beliefs of indigenous and local small-scale or traditional fishing communities and other groups that have a close relationship with their surrounding ecosystems. These rights encompass the right to maintain and protect cultural landscapes, sacred sites, traditional	9 of the BAR for each of the organism groups. The impacts associated with each of these groups were found to be of LOW significance and fully reversable. It should further be noted that in terms of the fishing, the fisheries assessment was duly cognisant of the relationship between the small scale fishers and the application area, as well as the TEK, which some of the community member referred to during the public meetings, and was duly considered by the specialists. This is evidenced by the following extract from Section 8.5.3.10 of the BAR: *"Small-scale fishermen along the Northern Cape and Western Cape coastlines are*	

[176] McCauley et al, *Widely used marine seismic survey air gun operations negatively impact zooplankton* (2017), https://www.nature.com/articles/s41559-017-0195

[177] Fewtrell, J.L. and McCauley R.D., 2012. Impact of air gun noise on the behaviour of marine fish and squid. Marine Pollution Bulletin 64 (2012) 984–993; Harris

JM, Olbers JM, and Wright K. 2022. "Report on Scientific basis for concerns of significant harm inflicted to marine wildlife by 2D and 3D Seismic

Initial/s:

Surveys on the South and
West Coasts of South Africa."

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
ecological knowledge, and sustainable resource management practices.[178] 165. The examples of proposed mitigation measures formulated by the EMPr inadequately acknowledge the substantial impact on ecosystem/ecocentric based cultural and heritage rights resulting from the broader indirect and cumulative consequences on fishing populations. 165.1. Implementing exclusion zones to minimize direct impacts on fish populations and sensitive habitats does not sufficiently address the broader ecosystem/ecosystem based cultural and heritage associations of fishing. While exclusion zones can help protect specific areas from immediate harm, they may not	*unlikely to range beyond 20 km from the coastline; thus, inshore of the Reconnaissance Permit area (refer to Figure 83). This assessment is however cognisant of the ongoing issues related to the perceived areas fished and species targeted by SSF off the West Coast of South Africa e.g. that cultural practice of SSF may occur to 55 km offshore. While SSF regulations clearly specify that fishing is required to take place "nearshore" the actual differentiation between SSF and other fishing operations that might include SSF, such as the commercial "traditional linefish" and "pole and line" and the extent to which these commercial fisheries might include SSF, remains unclear. As such the offshore extent to which SSF may operate requires a precautionary approach in this assessment and consideration that the possibility exists (albeit a remote possibility that cannot be verified through the information made available on these fisheries), that SSF may have occurred historically and potentially in the future further offshore than suggested by the information made available for this assessment i.e. there is a remote possibility that*	

Initial/s:

consider the holistic connections between fish populations, migration routes, and the cultural practices of coastal communities that extend beyond specific locations. 165.2. Using sound mitigation technologies, such as acoustic deterrent devices, can help reduce thedirect impacts of seismic surveys on marine life. However, these measures may not fully address the indirect and cumulative effects on cultural and heritage rights. They primarily focus on	*some SSF may have targeted certain species (of which tuna and snoek are the main candidate species) further offshore than 20 km. The distance fished offshore by SSF and the associated risks determined in this assessment further necessarily considers practical aspects, notably that bottom fishing is impractical in waters deeper than 100 m and as such any bottom fishing, whether SSF or commercial, is highly unlikely beyond a precautionary depth being the 100 m depth contour. Further, in regard to migratory species, such as longfin tuna and snoek, economic and regulatory aspects relating to distances fishedoffshore is pertinent [i.e. such as the requirements of the South African Maritime Safety Authority (SAMSA)] in particular that most SSF are notlikely to be "B" class certified (i.e. can operate up to 40 nm offshore and*	

[178] Akwasi-Achemfuour (2021) Balancing the interests of wildlife and humans resulting in sustainable ecotourism: the case of Boabeng-Fiema Monkeys' sanctuary, Ghana. In: McIntyre-Mills JJ, Corcoran Nantes Y (eds) From polarization to multispecies relationships: re-generation of the commons in the era of mass extinctions. Springer, NewYork, pp 519–536; McIntyre-Mills, J.J., Makaulule, M., Lethole, P. et al. Ecocentric Living: A Way Forward Towards Zero Carbon: A Conversation about Indigenous Law andLeadership Based on Custodianship and Praxis. Syst Pract Action Res 36, 275–319 (2023). https://doi.org/10.1007/s11213-022-09604-0

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
reducing noise levels and immediate physical harm, but do not consider the potential disruption of fish behavior, altered migration patterns, or changes to the ecological dynamics that are crucial to the cultural and heritage aspects tied to fishing. 165.3. Temporal restrictions, such as conducting seismic surveys during specific seasons or avoiding critical reproductive periods, may help reduce direct impacts on fish populations. However, these restrictions may not fully address the indirect and cumulative effects on the cultural and heritage rights associated with fishing. Cultural practices and traditional knowledge often extend beyond specific seasons and reproductive periods, and the long-term sustainability of fishing traditions and associated rights may depend on the availability of fish	*are longer than 9 m) are likely limited to "C" class being mainly vessels* *of <9 m21 permitted to only operate < 15 nm offshore."* It should be noted that the ecosystem level impact and interrelationships are described in section 4.3.8 of the Marine Ecological Assessment. The recommendation of the SIA is that, should the project be approved a representative from TGS must consult with leadership of the community to determine how the communities should be consulted with in future – that is, what is the way the community members prefer to be consulted with for provision of commencement notification and/or daily updates to advise on survey schedules, communication in respect of the proposed research outcomes, etc. The recommendation to include further consultation as part of the conditions of authorisation intends to ensure that the consultation process goes further than just the EIA process, but is continued throughout the entire process, regardless of the outcome. This will assist communities and people on the ground to make informed decisions about technical matters. The intention of the	

Initials:

populations throughout the year. 165.4. Implementing measures specifically focused on protecting certain fish species or habitats may not comprehensively address the broader cultural and heritage rights tied to fishing. While protecting specific species or habitats is important for biodiversity conservation, cultural and heritage associations with fishing often encompass a diverse range of species, ecosystems, and traditional practices that go beyond the conservation of individual components.	recommendation is not for this condition to be suspensive or determinant on the ultimate decision but rather to function as an additional management/ mitigation measure to be implemented post approval to reduce the significance of the identified impacts and further enhance the community engagements during implementation, should the project be implemented. The SIA specialist has made a reasoned opinion that the project can be approved on the basis of the outcomes of the consultations already undertaken. Communities are diverse and there are community members who are supportive of this type of development, as much as there are community members against the development. Communities were asked to suggest mitigation measures that the specialists should consider, and this influenced some of the recommendations made in	

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
166. To effectively address the indirect and cumulative effects on ecosystem/ecocentric based cultural and heritage rights associated with fishing, mitigation measures should take a more holistic and inclusive approach that consider and incorporate the following aspects: 166.1. Incorporating the perspectives and insights of coastal communities into decision-making processes, ensuring their meaningful participation in the development and implementation of mitigation measures. 166.2. Recognizing and preserving cultural and heritage practices by considering the broader socio-cultural contexts, intergenerational knowledge transfer, and the long-term sustainability of traditional fishing practices. 166.3. Integrating traditional ecological knowledge with scientific research to inform mitigation strategies and ensure	the SIA. All perspectives were considered during the EIA process andthe social impact analysis.	

Initial/s:

that they address the interconnectedness of fish populations, ecosystems, and cultural and heritage rights. 167. While the mitigation measures may focus on reducing direct impacts, there can be indirect and cumulative effects that are not fully addressed. Seismic surveys, even with mitigation, can still cause disturbances, alter fish behavior, or disrupt migration patterns, which may have cascading effects on the broader ecosystem. 168. Given the ecosystem impacts, seismic testing will likely result in a trophic cascade affecting all levels of the food chain and therefore indirectly impacting on small-scale fishing communities. The Fisheries Specialist failed to assess the potential impact of the seismic surveys on zooplankton in and around the survey area, as well as the knock- on effects that zooplankton die-off would have on the fish species on		

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
which small-scale and subsistence fishers rely for their sustenance and livelihood.[179] These indirect knock on and cascading effects on the dynamic and interconnected ecosystem could potentially affect not only food security for local small-scale fishing communities, but could also impact on the ecosystem/ecocentric based cultural and heritage rights associated with fishing. Counter to the requirements of NEMA and the NEM:ICMA, the BAR and the competent authority's decision does not consider impacts from an ecosystem perspective, and as a consequence, the "downstream" impacts have not been adequately assessed and presented to the DG. 169. Additionally, the cumulative impacts of multiple surveys or other anthropogenic activities in the area need to be weighed together. These indirect and cumulative impacts can have implications for cultural and heritage associations, as they may disrupt traditional practices and the functioning balance of the marine ecosystem.		

Initials

170. Given the absence of a socio-economic impact assessment which adopts an ecocentric and ecosystem approach to the assessment ofimpacts, and which should have evaluated the cascading impacts onfood webs, and how this will impact on the right to access of sufficient food as well as the associated connections of heritage and cultural rights to the practices of fishing, relevant information was not placed before the decision-maker. In the absence of that information, a precautionary approach should have been adopted. This omission is material – the right to food and culture and heritage are constitutionally enshrined – and consequently the authorisation should not have been granted.		

[179] Page 77 -82 of Fisheries Specialist Study

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA

[180] Page 30 of the EMPr

171. Small-scale fishers often possess traditional ecological knowledge ("TEK"), which includes their understanding of fish behavior, spawning grounds, and the dynamics of the marine environment. This knowledge is often based on observations passed down through generations and is deeply connected to their cultural heritage. Proposing mitigation measures without considering and incorporating TEK may overlook valuable insights and alternative approaches that could better protect both the fish populations and the ecosystem/ecocentric based cultural and heritage rights of coastal fishing communities.		
172. Given the above, it is submitted that the proposed and authorised mitigation measures are inadequate. The mitigation measures set out in the EMPr are designed to re-assess impacts post-project.[180] This is flawed for a number of reasons, including:		
172.1. The proposed measures are aimed at providing "resources and support for		

[180] Page 30 of the EMPr

Initial/s:

communities to develop and undertake safeguarding measures or plans to enhance the mitigation capacity of their intangible cultural heritage by fostering dialogue, mutual understanding and reconciliation between and within communities" which in noway holds TGS accountable for any impacts caused by the 3D seismic surveys activities. 172.2. The proposed mitigation measures fail to comprehend and mitigate any of the economic or		

[180] Page 30 of the EMPr

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
other harms to livelihoods, and cultural and heritage practices and identity. 173. The pre-mitigation significance given to the socio economic and cultural and heritage impacts are rated as Medium, and then Low post mitigation. If mitigation does not actually change the impacts, then it is implausible that the rating can change significantly as well. There is no rational connection between the results of the arbitrary, and somewhat absurd, mitigation measures and any change in significance with regards to the impacts caused by the reconnaissance activities on coastal communities. 174. The Social Impact Assessment (SIA) and Heritage Impact Assessment urges the need for dialogue and engagement with communities prior to the commencement of these		

Initials:

activities as the Expert confirms that the oil and gas companies do not have a social license to continue currently.[181] However, there is evidence of any further dialogue with these communities with regards to addressing issues specifically relating to the indirect and cumulative effects on cultural and heritage rights associated with fishing. 175. Therefore, engaging and involving coastal communities in the decision-making process is crucial. Meaningful consultation and participation allow communities to express their concerns, share their knowledge, and contribute to the development of effective mitigation measures. Failure to include the perspectives and needs of these communities can result in measures that do not adequately		

[181] Page 109-110 of the SIA, and page 56, 58 of HIA.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THEDMRE/PASA
address their cultural and heritage associations and may lead tofurther marginalization. 176. Despite the apparent expert knowledge and the level of understanding expressed in the report recommendations regarding the potential effects of the seismic survey proceeding on the communities' identity, sense of place, and spiritual, cultural, and indigenous rights, and that decisions must consider the interests, needs, and values (our emphasis) of all interested and affected parties, including acknowledging all forms of knowledge, including traditional and ordinary knowledge,[182] it is clear that necessary deep conversations with coastal communities were not conducted. Consequently, insufficient information was placed before the decision-maker, and he/she neglected to afford sufficient weight to the indigenous and cultural rights of coastal communities.		

Initial/s:

Ground 6: *Failure to consider relevant coastal management considerations or to comply with the National Environmental Management: Integrated Coastal Management Act 24 of 2008*	Section 4 of the BAR does list the Integrated Coastal Management Act (ICMA) and the Marine Living Resources Act. The decision-making authority was required to consider the principles and obligations of the ICMA in the decision making process.	The authorised project is a coastal activity as it is located within coastal waters. As such, the likelihood of this project causing pollution or any other impact to the coastal environment is considered and assessed during the EIA process. Furthermore, various other applicable instruments responsible for the protection of coastal waters such as MARPOL requirements will be adhered to during operations. Various plans will be developed and implemented during operation to manage all potential negative impacts to the coastal environment.
177. Section 63(1) of NEM:ICMA requires a competent authority to take account of specific factors when deciding whether or not to grant an environmental authorisation under NEMA for "coastal activities". By virtue of this section, the decision maker ought to have appreciated that in deciding whether to grant an environmental authorisation or not, he or she was required to consider additional	The marine fauna study assesses the potential impacts of the survey on the marine environment. The proposed survey activities to be undertaken by TGS are expected to result in impacts on marine invertebrate fauna in the Orange Basin, ranging from negligible to very low significance. Only in the case of potential impacts to turtles and marine mammals are impacts of low significance expected. If all	

[182] Section 2(4)(g) of NEMA.

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
factors specified in section 63 of NEM:ICMA[183] and whether or not the proposed project "would be contrary to the interests of the whole community". This required an eco-centric consideration of the impacts of the proposed project in an area that must be afforded a particularly high standard of protection given the natural functioning of the dynamic coastal processes. 178. Section 12 and 21 set out the State's obligation in relation to the management of the coastal zone, which must be taken into account in taking a decision in respect of this zone. 179. The Director-General's decision makes no mention of section 63 of NEM:ICMA, and the ESIA contains no evidence that the factors set out in section 63 was	environmental guidelines, and appropriate mitigation measures recommended in this report are implemented, there is no reason why the proposed seismic survey programme should not proceed. With respect to the management and conservation of protected areas noted in the ICMA and MLRA, this is discussed in Section 8.6 of the BA Report. In terms of protected areas, Child's Bank and Tripp Seamount lie outside of the proposed 3D survey area, and any demersal species associated with these important fishing banks would receive the seismic noise within the far field range, and outside of distances at which physiological injury or avoidance would be expected. Despite the current lack of knowledge of the community structure and endemicity of South African macroinfauna off the edge of the continental shelf, the marine component of the 2018 National Biodiversity Assessment, rated the South Atlantic bathyal and abyssal unconsolidated habitat types that characterise depths beyond 500 m, as being of 'Least concern', with only those communities occurring along the	

Initial/s:

considered or assessed. Whilst the BARidentifies that section 63 of NEM:ICMA is applicable, it does notassess each of the factors set out in section 63. 180. Read together, this means that there was no factual investigation as required by section 63 of the NEM:ICMA, including a determination of whether the coastal public property and the coastal protection zone would be impacted, and if so, to what extent the proposed activity is consistent with the goal of establishing or protecting those areas.[184]The management plans that are relevant in these areas, like the Coastal Management Programme for the	shelf edge (-500 m) being considered 'Vulnerable'. This primarily reflects the great extent of these habitats in the EEZ. Numerous sanctuaries, marine protected area (MPA) exist offshore and along the coastline of the Western Cape, although none of them overlap with the Reconnaissance Permit Area. Seismic surveying is not only used for petroleum and natural gas exploration and development. In addition, the National Coastal and Marine Spatial Biodiversity Plan for the coast and ocean around the South African mainland states thatpetroleum production may be possible in CBAs using lateral drilling or other techniques that do not result in biodiversity impacts. According	

[183] S 63(1)(c), s 63(1)(h)(i), s 63(1)(h)(iv) and s 63(1)(i) of NEM:ICMA.

[184] Section 63(1)(c) of NEM:ICMA.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
Western Cape Province,[185] have also not been taken into consideration. 181. The BAR does not, at any point, consider the interests of the affected human and non-human communities in any collective way. Consequently, the interests of the whole community[186] have not been presented to the decision-maker in the BAR, and without evidence of specific consideration of these interests in the Reasons for the Decision, the decision-maker has not evaluated these interests in their decision to grant environmental authorisation. 182. As set out elsewhere in this appeal, the impacts associated with seismic surveys could have significant impacts on marine life and coastal communities. Oceans play a critical role in regulating the climate and mitigating global warming by absorbing carbon dioxide.	to the plan if significant petroleum resources are identified in these areas the selection of the site as a CBA could be re-evaluated, although this would require alternative CBAs to be identified to meet biodiversity targets. No MPAs are located within the proposed survey area. Zero no-go areas within the proposed survey area have been identified in any of the specialist studies conducted. It should further be noted that the interests of the whole community (from and intra- and inter-generational perspective, as well as having regard to potential impacts on living organisms in South Africa's coastal waters) was indeed assessed in the assessing of the marine ecology, the impact on the fishing industry, the detailed social and cultural heritage assessments, and the public consultation undertaken. With regards to the requirements of Section 63 of the NEM:ICMA, the Competent Authority thus had sufficient information at their disposal in order to reach an informed decision regarding the proposed activity.	

Initial/s:

Seismic surveys pose a significant threat to functioning marine ecosystems, to living organisms in South Africa's coastal waters,and		

[185] Western Cape Coastal Management Programme: 2016 available at https://cer.org.za/wp-content/uploads/2009/12/Western-Cape.pdf Draft Western Cape Coastal management Programme 2022 – 2027 available at https://www.westerncape.gov.za/eadp/files/atoms/files/DRAFT%20Western%20Cape%20Provincial%20Coastal%20Management%20Programme%202022- 2027.pdf.

[186] In terms of the National Environmental Management: Integrated Coastal Management Act 24 of 2008 (NEM:ICMA), the '**interests of the whole community**' is defined
as meaning the collective interests of the community determined by:

(a) prioritising the collective interests in coastal public property of all persons living in the Republic over the interests of a particular group or sector of society;

Initial/s:

(b) adopting a long-term perspective that takes into account the interests of future generations in inheriting coastal public property and a coastal environment characterised by healthy and productive ecosystems and economic activities that are ecologically and socially sustainable; and

taking into account the interests of other living organisms that are dependent on the coastal environment.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
to communities that depend upon the oceans for their livelihoods. Small-scale fishers and fishing-dependent communities are particularly vulnerable to the negative impacts on fish stocks upon which they depend for their livelihoods. 183. The Appellants submit that it is not in the interests of the whole community (from and intra- and inter-generational perspective, as well as having regard to potential impacts on living organisms in South Africa's coastal waters) to expose our oceans and coasts to the increased risks associated with seismic surveys, or associated with further intended exploratory drilling and/or production activities.		

Initial/s:

Ground 7 *Failure to provide adequate reasons for the decision* 184. The reasons for the DG's decision, as described in Appendix 1 of the Environmental Authorisation ("the EA"), sets out that the following were 'key findings' that resulted in the decision to approve TGS's application for environmental authorisation: 185. The decision concludes as follows: *In view of the above, and having taken into consideration environmental management principles as set out in section 2 of NEMA, this Department is satisfied that the proposed activity will not be in conflict with the objectives of Integrated Environmental Management set out in Chapter 5*	It is the opinion of the Applicant that the Competent Authority thus had sufficient information at their disposal in order to reach an informed decision regarding the proposed activity.	The reasons from the decision on the Environmental Authorisation (EA) are based on the National Environmental Management Act, Environmental Impact Assessment Regulations (EIA Regulations) of 2014, as amended. So the reasons will reflect whether or not the requirements of the regulations were met. This also includes consideration of applicable guidelines, policies and strategies. These are also legislated guiding instruments used to assess the environmental impact assessment undertaken by applicants. Hence, the reasons for decision will be the same in various EAs.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THEDMRE/PASA
of [NEMA] and will not result to any detrimental risks to the environment and public. The environmental authorisation is accordingly granted. 186. These reasons, and the conclusion arising from these reasons are generic and unsubstantiated. The reasons are almost verbatim the same reasons provided by the DG in other oil and gas related applications, such as those contained in the Environmental Authorisations for Searcher Geodata UK Limited and TotalEnergies EP South Africa Block 567 (Pty) Ltd . The EA itself further fails to deal substantively with any of the main issues raised by the Appellants and other I&APs. 187. On the reasons provided, it is impossible to conclude that the DG took all relevant considerations into account, including the submissions made by the Appellants and other interested and affected parties.		

Initial/s:

To the contrary, it appears that the DG failed to consider all relevantinformation, for the reasons set out elsewhere in this appeal		
Ground 8. Decision to grant authorisation contravenes NEMA Principles, the Constitution and PAJA 190. Section 33 of the Constitution recognises that everyone has the right to administrative action that is lawful, reasonable and procedurally fair. PAJA seeks to give effect to this right.	It is the opinion of the Applicant that the Competent Authority thus had sufficient information at their disposal in order to reach an informed decision regarding the proposed activity.	The Agency received all required information and was satisfied with the EIA process undertaken, as it was in line with NEMA requirements. The decision to grant the EA was therefore recommended.

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
191. From what is set out above, it is clear that the decision to grant authorisation to TGS runs contrary to at least the following NEMA principles: 191.1. Decision-makers must apply the precautionary principle when there is uncertainty or lack of scientific consensus regarding potential environmental harm. This principle requires taking preventive action to avoid serious or irreversible environmental damage, even in the absence of full scientific certainty. 191.2. Decision-making should promote equity and fairness in the distribution of environmental benefits and burdens. This principle recognizes the rights of all individuals, particularly disadvantaged and vulnerable groups, to a healthy environment and seeks to avoid disproportionately negative impacts on these groups.		

Initial/s:

191.3. Decision-makers must protect and conserve ecosystems, biodiversity, and ecological processes. This principle recognizes the intrinsic value of ecosystems and the critical role they play in supporting life and maintaining ecological balance. 192. It is further submitted that 192.1. irrelevant considerations were taken into account orrelevant considerations were not considered;		

Initial/s:

GROUNDS OF APPEAL	RESPONDING STATEMENT BY THE APPLICANT	COMMENTS BY THE DMRE/PASA
192.2. the action itself contravenes a law or is not authorised by an empowering provision; 192.3. the action itself is not rationally connected to the information before the administrator; and 192.4. the exercise of the power or the performance of the function authorised by the empowering provision, in pursuance of which administrative action was purportedly taken, is so unreasonable that no reasonable person could have so exercised the power or performed the function. 193. The decision is consequently reviewable under section 6(2) of PAJA. CONCLUSION 194. The Appellants have sent out in this appeal a number		

Initial/s:

of grounds on which the decision to grant environmental authorisation to TGS was fatally flawed. The decision to authorise the project is consequently unlawful, in that it failed to comply with, inter alia, the Constitution and NEMA.		

ARR comments by Case Officer

Approved by Supervior

Initial/s:

Name & Surname:

Date:

Signature:

.....

Name & Surname:

Date:

Signature:

.....

Initial/s:

https://www.linkedin.com/search/results/all/?keywords=Sinazo%20Mnyaka%20EAp&origin=GLOBAL_SEARCH_HEADER&sid=E7s

accessed on 14 March 2025

Sinazo Mnyaka Reg. EAP (EAPASA), (Pr.Sc.Nat)
· 2nd
Environmental Compliance Coordinator at Petroleum Agency SA
City of Cape Town, Western Cape, South Africa · Contact info
200 connections
Ian Hammond, Helena Atkinson, and 9 other mutual connections

Petroleum Agency SA
University of the Western Cape

Connect | Message | More

https://www.linkedin.com/search/results/all/?keywords=Natasha%20Thomas%20petrosa&origin=GLOBAL_SEARCH_HEADER&sid=!sy

accessed on 14 March 2025

Natasha Thomas · 2nd
Corporate Environmental Leader (acting) at PetroSA-onshore and offshore
George, Western Cape, South Africa · Contact info
123 connections
Dhiren Naidoo (Pr.Sci.Nat., MIAQM) and Renay Pillay are mutual connections

PetroSA
Rhodes University

Connect | Message | More

PASA Website

https://geoportal.petroleumagencysa.com/PortalPASA/CustomHtml.aspx?PageID=1bd9677e-bf68-4a0c-be7e-207913e9264b

accessed on 12 March 2025

Contact Details

Petroleum Agency SA

Tel : + 27 21 938 3500
Fax : + 27 21 938 3520
Email us

Physical Address:

Tygerpoort Building
7 Mispel Street
Bellville 7530,
Cape Town
South Africa

Postal Address:

P.O Box 5111
Tygervalley 7536,
South Africa

For queries related to the portal please contact any of the following:

David Aphane: aphaned@petroleumagencysa.com : Tel : 021 938 3551

Phumla Ngesi : ngesip@petroleumagencysa.com : Tel 021 938 3570

Michael Thovhakale : ThovhakaleA@petroleumagencysa.com : Tel 021 938 3579

Thembani Munengwane : munengwanet@petroleumagencysa.com: Tel 021 938 3557

Michelle Mtshemla : mtshemlam@petroleumagencysa.com : Tel : 021 938 3581

Sithembiso Ngubane : ngubanes@petroleumagencysa.com : Tel : 021 938 3511

JWS

3220 2268
JWS16

ROUTE FORM FOR AN APPEAL TO THE MINISTER

COMPONENT: CHIEF DIRECTORATE APPEALS AND STRATEGIC ENVIRONMENTAL INSTRUMENTS

EDMS NO: LSA 231067

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA

DIRECTOR	CHIEF DIRECTOR
Name: Ms. H Van Schalkwyk Extension: 8835 Office No. First Floor Block B	Name: Adv F Patel Extension: 9330 Office No. First Floor Block B

Rank	Date	Signature	Office
D: A&LR	13 May 2024		Block B
CD	13 May 2024	Patel	Block B

BRIEFING NOTE:

These appeals were lodged against the decision taken by the Department of Mineral Resources and Energy to granting an Environmental Authorisation to TGS Geophysical Company (UK) Limited, on 17 April 2023, for certain 3D seismic survey activities in the orange basin, located offshore off the West Coast of South Africa, approximately 120km offshore of St Helena Bay, extending north along the West Coastline to approximately 230km offshore of Hondeklip Bay.

The due date for the finalisation of these appeals is **20 May 2024.**

MINISTER

INSTRUCTIONS/REMARKS

JWS17

forestry, fisheries
& the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

References: LSA 231067
Enquiries: Joshua Makhaza
Telephone: (012) 399 8287

MINISTER

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA

1. PURPOSE

1.1 To inform the Minister about these appeals were lodged against the decision taken by the Department of Mineral Resources and Energy to granting an Environmental Authorisation to TGS Geophysical Company (UK) Limited, on 17 April 2023, for certain 3D seismic survey activities in the orange basin, located offshore off the West Coast of South Africa, approximately 120km offshore of St Helena Bay, extending north along the West Coastline to approximately 230km offshore of Hondeklip Bay, and

1.2 To request that Minister consider and sign the attached decision addressed to the appellants, which states that the applicant's environmental authorisation is confirmed with the same conditions of authorisation as appeared in section 5 of the competent authority's

Reasons for Decision dated 17 April 2023 and has however included a special direction, namely a community / fisheries liaison officer be appointed, and this is to be included in the EA

2. BACKGROUND AND DISCUSSION

2.1 On 22 September 2022, TGS Geophysical Company (UK) Limited (the Applicant) applied to the Department of Mineral Resources and Energy (DMRE) for an Environmental Authorisation (EA) to conduct specified 3D seismic survey activities in the Orange Basin, located offshore off the West Coast of South Africa, approximately 120km offshore of St Helena Bay, extending north along the West Coastline to approximately 230km offshore of Hondeklip Bay.

2.2 This application was submitted in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) as amended, read with the Environmental Impact Assessment Regulations, 2014 (2014 EIA Regulations) to the DMRE, being the Competent Authority (CA) in respect of this application.

2.3 As required by regulation 12 of the 2014 EIA Regulations, the Applicant commissioned Environmental Impact Management Services (Pty) Ltd (EIMS) as an independent environmental assessment practitioner (EAP), to prepare and submit the application for EA.

2.4 In support of this application for an EA, and as required by Regulation 19 of the 2014 EIA Regulations, the EAP submitted the Basic Assessment Report (BAR) dated 6 December 2022 for consideration and decision making.

2.5 In terms of the BAR:

2.5.1 The proposed project area is located between approximately 120km offshore of St Helena Bay, extending north along the western coastline to approximately 230km offshore of Hondeklip Bay over a number of petroleum licence blocks. The Application Area for the proposed 3D seismic survey is approximately 57 400 km^2 in extent (the Area);

2.5.2 It is proposed that a single survey vessel equipped with seismic sources and streamers be used. The proposed 3D survey would be supported by up to two escort vessels. The 3D survey will take in the order of 70 days including downtime;

2.5.3 The application is, in accordance with the NEMA-Listed activity/ies for Listed Activity 21(b) (GNR 983) as follows:

"Any activity including operation of that activity which requires a reconnaissance permit in terms of section 74 of the Mineral and Petroleum Resource Development Act, as well as any other applicable activity as contained in the Listing Notice or in Listing Notice 3 of 2014, required to exercise the reconnaissance permit, excluding- (a) any desktop study; and (b) any aerial survey."

2.6 On 17 April 2023, the DMRE granted the EA to the applicant under DMRE reference number PSA Ref: 12/1040.

2.7 The registered and affected parties (I&APs) were informed of the decision to grant the EA on 26 April 2023.

2.8 The Directorate: Appeals and Legal Review (Appeals Directorate) within the Department of Forestry and Fisheries and the Environment (the Department) received the following appeals against the decision that was taken to grant the Applicant an EA:

2.8.1 First Appellant – Western Cape Department of Environmental Affairs and Development Planning on 15 May 2023

2.8.2 Second Appellant - Aukotowa Fisheries Primary Cooperative Ltd on 15 May 2023;

2.8.3 Third Appellant - Angela Joubert on 12 May 2023;

2.8.4 Fourth Appellant - Oceans not Oil Coalition on 12 May 2023;

2.8.5 Fifth Appellant - Elaine Mills on 12 May 2023; and

2.8.6 Sixth Appellant - Natural Justice/Green Connection on 12 May 2023.

2.9 These appeals were lodged in terms of section 43(1) of NEMA, read together with Regulation 4 of the National Appeal Regulations, 2014 (2014 Appeal Regulations).

2.10 On or between 2-12 June 2023, the Applicant submitted its responding statements to the appeals in terms of Regulation 5 of the 2014 EIA Regulations.

2.11 The DMRE submitted comments in respect of the First, Second, Fourth and Fifth Appellants' grounds of appeal on 26 June 2023.

2.12 The appeals are premised on the grounds summarised below:

2.12.1 First Appellant's grounds of appeal

- Cumulative impacts not assessed and lack of scientific knowledge to gauge the impact of seismic acoustic blasts and their effect on the marine environment;
- Activities approved in the absence of a Strategic Environmental Assessment.

2.12.2 Second Appellant's grounds of appeal

- Concerns about the consultation process;
- Concerns that the process was not open and a transparent participatory in accordance with NEMA;
- Questioning the submissions from the Applicant regarding the "perceived impact" of proposed activities as opposed to the "actual impact";
- Concerns that granting the EA does not meet South Africa's climate change goals, e.g., Paris Agreement and Kyoto Protocol, and effort to achieve net zero.

2.12.3 Third Appellant's grounds of appeal:

- lack of in-depth studies on impact of acoustics instruments on the ocean and marine life.

2.12.4 Fourth Appellant's grounds of appeal:

- Need and desirability of the project;
- invasive nature of seismic surveys;
- Repeated, persistent or cumulative exposure impacts;
- No formal analysis of impact on livelihoods;
- No-go not properly considered.

2.12.5 Fifth Appellant's grounds of appeal:

- Need and desirability of the project;
- invasive nature of seismic surveys;

- Repeated, persistent or cumulative exposure impacts;
- No formal analysis of impact on livelihoods;
- No-go not properly considered.

2.12.6 Sixth Appellants' grounds of appeal:

- Need and desirability of the project;
- Invasive nature of seismic surveys;
- Repeated, persistent or cumulative exposure impacts;
- No formal analysis of impact on livelihoods;
- No-go not properly considered.

2.13 This is an appeal in a "wide" sense. I have therefore approached the appeal by reassessing and re-determining the merits of the EA application.

2.14 Before I deal with each of the grounds of appeal, I wish to stress that I was guided in this appeal by the principles set out in section 2 of NEMA. These principles apply alongside all of the other appropriate and relevant considerations, including Government's responsibility to respect, protect, promote and fulfil the social and economic rights in Chapter 2 of the Constitution and in particular the basic needs of persons disadvantaged by unfair discrimination. My decision has therefore been guided after a careful consideration of all of the principles set out in section 2 of NEMA, including section 2(2) which provides that "environmental management must place people and their needs at the forefront of its concern and serve their physical, psychological, developmental, cultural and social interests equitably"; also section 2(3) which provides that "*development must be socially, environmentally and economically sustainable*". Moreover, when I considered the issue of sustainable development, I did so with section 2(3) in mind and I considered the proper application of the factors articulated in section 2(4)(a) to (r).

2.15 I am also guided by the judgement in *Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others*[1] where at para 80 of this judgment, the Honourable Murphy J explained that:

[1] [2017] 2 All SA 519 (GP)

"NEMA, like all legislation, must be interpreted purposively and in a manner that is consistent with the Constitution, paying due regard to the text and context of the legislation. Section 2 of NEMA sets out binding directive principles that must inform all decisions taken under the Act, including decisions on environmental authorisations. The directive principles serve as guidelines (by reference) to which any organ of state must exercise any function when taking any decision in terms of NEMA or any statutory provision concerning the protection of the environment. They guide the interpretation, administration and implementation of NEMA, and any other law concerned with the protection or management of the environment. Competent authorities must take into account the directive principles when considering applications for environmental authorisation. The directive principles promote sustainable development and the mitigating principle that environmental damage must be avoided, minimised and remedied. The environmental impact assessment process is a key means of promoting sustainable development, by ensuring that the need for development is sufficiently balanced with full consideration of the environmental impacts of a project with potential environmental impacts. The directive principles caution decision-makers to adopt a risk-averse and a careful approach, especially in the face of incomplete information."

2.16 With this in mind, I now deal with the grounds of appeal submitted by each of the appellants and where I deem it appropriate, I shall address those grounds of appeal that are overlapping in nature or duplicated under a single ground of appeal.

3 OTHER BRANCHES / CHIEF DIRECTORATES CONSULTED

The DMRE, was consulted.

4 IMPLICATIONS

There may be legal implications in that the decision of the Minister may be challenged in court.

5. RECOMMENDATIONS

It is recommended that the Minister:

5.1. Take note of the late filing of the appeal against the decision of the DMRE to taken by the Department of Mineral Resources and Energy to granting an Environmental Authorisation to TGS Geophysical Company (UK) Limited at the abovementioned properties; and

5.2. Consider and sign the attached decision addressed to the appellant, which states that the applicant's environmental authorisation is confirmed with the same conditions of authorisation as appeared in section 5 of the competent authority's Reasons for Decision dated 17 April 2023 and has however included a special direction, namely a community / fisheries liaison officer be appointed, and this is to be included in the EA

DIRECTOR: APPEALS AND LEGAL REVIEW
DATE: 13 May 2024

RECOMMENDATIONS SUPPORTED

Patel

CHIEF DIRECTOR: APPEALS AND STRATEGIC ENVIRONMENTAL AUTHORISATIONS
DATE: 13 May 2024

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA

RECOMMENDATIONS

It is recommended that the Minister:

5.1. Take note of the late filing of the appeal against the decision of the DMRE to taken by the Department of Mineral Resources and Energy to granting an Environmental Authorisation to TGS Geophysical Company (UK) Limited at the abovementioned properties; and

NOTED / NOTED WITH COMMENTS

5.2. Consider and sign the attached decision addressed to the appellant, which states that the applicant's environmental authorisation is confirmed with the same conditions of authorisation as appeared in section 5 of the Competent Authority's Reasons for Decision dated 17 April 2023 and has however included a special direction, namely a community / fisheries liaison officer be appointed, and this is to be included in the EA.

DRAFT APPEAL DECISION SIGNED / AMENDED AND SIGNED / NOT APPROVED

MS B D CREECY
MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT
DATE: 22/3/2024

JWS17

forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

References: LSA 231067
Enquiries: Joshua Makhaza
Telephone: (012) 399 8287

MINISTER

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA

1. PURPOSE

1.1 To inform the Minister about these appeals were lodged against the decision taken by the Department of Mineral Resources and Energy to granting an Environmental Authorisation to TGS Geophysical Company (UK) Limited, on 17 April 2023, for certain 3D seismic survey activities in the orange basin, located offshore off the West Coast of South Africa, approximately 120km offshore of St Helena Bay, extending north along the West Coastline to approximately 230km offshore of Hondeklip Bay, and

1.2 To request that Minister consider and sign the attached decision addressed to the appellants, which states that the applicant's environmental authorisation is confirmed with the same conditions of authorisation as appeared in section 5 of the competent authority's

Reasons for Decision dated 17 April 2023 and has however included a special direction, namely a community / fisheries liaison officer be appointed, and this is to be included in the EA

2. BACKGROUND AND DISCUSSION

2.1 On 22 September 2022, TGS Geophysical Company (UK) Limited (the Applicant) applied to the Department of Mineral Resources and Energy (DMRE) for an Environmental Authorisation (EA) to conduct specified 3D seismic survey activities in the Orange Basin, located offshore off the West Coast of South Africa, approximately 120km offshore of St Helena Bay, extending north along the West Coastline to approximately 230km offshore of Hondeklip Bay.

2.2 This application was submitted in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) as amended, read with the Environmental Impact Assessment Regulations, 2014 (2014 EIA Regulations) to the DMRE, being the Competent Authority (CA) in respect of this application.

2.3 As required by regulation 12 of the 2014 EIA Regulations, the Applicant commissioned Environmental Impact Management Services (Pty) Ltd (EIMS) as an independent environmental assessment practitioner (EAP), to prepare and submit the application for EA.

2.4 In support of this application for an EA, and as required by Regulation 19 of the 2014 EIA Regulations, the EAP submitted the Basic Assessment Report (BAR) dated 6 December 2022 for consideration and decision making.

2.5 In terms of the BAR:

2.5.1 The proposed project area is located between approximately 120km offshore of St Helena Bay, extending north along the western coastline to approximately 230km offshore of Hondeklip Bay over a number of petroleum licence blocks. The Application Area for the proposed 3D seismic survey is approximately 57 400 km^2 in extent (the Area);

2.5.2 It is proposed that a single survey vessel equipped with seismic sources and streamers be used. The proposed 3D survey would be supported by up to two escort vessels. The 3D survey will take in the order of 70 days including downtime;

2.5.3 The application is, in accordance with the NEMA-Listed activity/ies for Listed Activity 21(b) (GNR 983) as follows:

"Any activity including operation of that activity which requires a reconnaissance permit in terms of section 74 of the Mineral and Petroleum Resource Development Act, as well as any other applicable activity as contained in the Listing Notice or in Listing Notice 3 of 2014, required to exercise the reconnaissance permit, excluding- (a) any desktop study; and (b) any aerial survey."

2.6 On 17 April 2023, the DMRE granted the EA to the applicant under DMRE reference number PSA Ref: 12/1040.

2.7 The registered and affected parties (I&APs) were informed of the decision to grant the EA on 26 April 2023.

2.8 The Directorate: Appeals and Legal Review (Appeals Directorate) within the Department of Forestry and Fisheries and the Environment (the Department) received the following appeals against the decision that was taken to grant the Applicant an EA:

2.8.1 First Appellant – Western Cape Department of Environmental Affairs and Development Planning on 15 May 2023

2.8.2 Second Appellant - Aukotowa Fisheries Primary Cooperative Ltd on 15 May 2023;

2.8.3 Third Appellant - Angela Joubert on 12 May 2023;

2.8.4 Fourth Appellant - Oceans not Oil Coalition on 12 May 2023;

2.8.5 Fifth Appellant - Elaine Mills on 12 May 2023; and

2.8.6 Sixth Appellant - Natural Justice/Green Connection on 12 May 2023.

2.9 These appeals were lodged in terms of section 43(1) of NEMA, read together with Regulation 4 of the National Appeal Regulations, 2014 (2014 Appeal Regulations).

2.10 On or between 2-12 June 2023, the Applicant submitted its responding statements to the appeals in terms of Regulation 5 of the 2014 EIA Regulations.

2.11 The DMRE submitted comments in respect of the First, Second, Fourth and Fifth Appellants' grounds of appeal on 26 June 2023.

2.12 The appeals are premised on the grounds summarised below:

2.12.1 First Appellant's grounds of appeal

- Cumulative impacts not assessed and lack of scientific knowledge to gauge the impact of seismic acoustic blasts and their effect on the marine environment;
- Activities approved in the absence of a Strategic Environmental Assessment.

2.12.2 Second Appellant's grounds of appeal

- Concerns about the consultation process;
- Concerns that the process was not open and a transparent participatory in accordance with NEMA;
- Questioning the submissions from the Applicant regarding the "perceived impact" of proposed activities as opposed to the "actual impact";
- Concerns that granting the EA does not meet South Africa's climate change goals, e.g., Paris Agreement and Kyoto Protocol, and effort to achieve net zero.

2.12.3 Third Appellant's grounds of appeal:

- lack of in-depth studies on impact of acoustics instruments on the ocean and marine life.

2.12.4 Fourth Appellant's grounds of appeal:

- Need and desirability of the project;
- invasive nature of seismic surveys;
- Repeated, persistent or cumulative exposure impacts;
- No formal analysis of impact on livelihoods;
- No-go not properly considered.

2.12.5 Fifth Appellant's grounds of appeal:

- Need and desirability of the project;
- invasive nature of seismic surveys;

- Repeated, persistent or cumulative exposure impacts;
- No formal analysis of impact on livelihoods;
- No-go not properly considered.

2.12.6 Sixth Appellants' grounds of appeal:

- Need and desirability of the project;
- Invasive nature of seismic surveys;
- Repeated, persistent or cumulative exposure impacts;
- No formal analysis of impact on livelihoods;
- No-go not properly considered.

2.13 This is an appeal in a "wide" sense. I have therefore approached the appeal by reassessing and re-determining the merits of the EA application.

2.14 Before I deal with each of the grounds of appeal, I wish to stress that I was guided in this appeal by the principles set out in section 2 of NEMA. These principles apply alongside all of the other appropriate and relevant considerations, including Government's responsibility to respect, protect, promote and fulfil the social and economic rights in Chapter 2 of the Constitution and in particular the basic needs of persons disadvantaged by unfair discrimination. My decision has therefore been guided after a careful consideration of all of the principles set out in section 2 of NEMA, including section 2(2) which provides that "environmental management must place people and their needs at the forefront of its concern and serve their physical, psychological, developmental, cultural and social interests equitably"; also section 2(3) which provides that "*development must be socially, environmentally and economically sustainable*". Moreover, when I considered the issue of sustainable development, I did so with section 2(3) in mind and I considered the proper application of the factors articulated in section 2(4)(a) to (r).

2.15 I am also guided by the judgement in *Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others*[1] where at para 80 of this judgment, the Honourable Murphy J explained that:

[1] [2017] 2 All SA 519 (GP)

"NEMA, like all legislation, must be interpreted purposively and in a manner that is consistent with the Constitution, paying due regard to the text and context of the legislation. Section 2 of NEMA sets out binding directive principles that must inform all decisions taken under the Act, including decisions on environmental authorisations. The directive principles serve as guidelines (by reference) to which any organ of state must exercise any function when taking any decision in terms of NEMA or any statutory provision concerning the protection of the environment. They guide the interpretation, administration and implementation of NEMA, and any other law concerned with the protection or management of the environment. Competent authorities must take into account the directive principles when considering applications for environmental authorisation. The directive principles promote sustainable development and the mitigating principle that environmental damage must be avoided, minimised and remedied. The environmental impact assessment process is a key means of promoting sustainable development, by ensuring that the need for development is sufficiently balanced with full consideration of the environmental impacts of a project with potential environmental impacts. The directive principles caution decision-makers to adopt a risk-averse and a careful approach, especially in the face of incomplete information."

2.16 With this in mind, I now deal with the grounds of appeal submitted by each of the appellants and where I deem it appropriate, I shall address those grounds of appeal that are overlapping in nature or duplicated under a single ground of appeal.

3 OTHER BRANCHES / CHIEF DIRECTORATES CONSULTED

The DMRE, was consulted.

4 IMPLICATIONS

There may be legal implications in that the decision of the Minister may be challenged in court.

5. RECOMMENDATIONS

It is recommended that the Minister:

5.1. Take note of the late filing of the appeal against the decision of the DMRE to taken by the Department of Mineral Resources and Energy to granting an Environmental Authorisation to TGS Geophysical Company (UK) Limited at the abovementioned properties; and

5.2. Consider and sign the attached decision addressed to the appellant, which states that the applicant's environmental authorisation is confirmed with the same conditions of authorisation as appeared in section 5 of the competent authority's Reasons for Decision dated 17 April 2023 and has however included a special direction, namely a community / fisheries liaison officer be appointed, and this is to be included in the EA

DIRECTOR: APPEALS AND LEGAL REVIEW
DATE: 13 May 2024

RECOMMENDATIONS SUPPORTED

CHIEF DIRECTOR: APPEALS AND STRATEGIC ENVIRONMENTAL AUTHORISATIONS
DATE: 13 May 2024

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA

RECOMMENDATIONS

It is recommended that the Minister:

5.1. Take note of the late filing of the appeal against the decision of the DMRE to taken by the Department of Mineral Resources and Energy to granting an Environmental Authorisation to TGS Geophysical Company (UK) Limited at the abovementioned properties; and

NOTED / NOTED WITH COMMENTS

5.2. Consider and sign the attached decision addressed to the appellant, which states that the applicant's environmental authorisation is confirmed with the same conditions of authorisation as appeared in section 5 of the Competent Authority's Reasons for Decision dated 17 April 2023 and has however included a special direction, namely a community / fisheries liaison officer be appointed, and this is to be included in the EA.

DRAFT APPEAL DECISION SIGNED / AMENDED AND SIGNED / NOT APPROVED

MS B D CREECY
MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT
DATE: 22/5/2024

JWS18

MINISTER

FORESTRY, FISHERIES AND THE ENVIRONMENT

REPUBLIC OF SOUTH AFRICA

Reference: LSA 231067

APPEAL DECISION

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA

Western Cape Department of Environmental Affairs and Development Planning	First Appellant
Aukotowa Fisheries Primary Cooperative Ltd	Second Appellant
Angela Joubert	Third Appellant
Oceans not Oil Coalition	Fourth Appellant
Elaine Mills	Fifth Appellant
Natural Justice/Green Connection	Sixth Appellant
TGS Geophysical Company (UK) Limited	Applicant
Department of Mineral Resources and Energy	Competent Authority

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, DATED 17 APRIL 2023 TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA.

Appeal: These appeals were lodged against the decision taken by the Department of Mineral Resources and Energy to granting an Environmental Authorisation to TGS Geophysical Company (UK) Limited, on 17 April 2023, for certain 3D seismic survey activities in the orange basin, located offshore off the West Coast of South Africa, approximately 120km offshore of St Helena Bay, extending north along the West Coastline to approximately 230km offshore of Hondeklip Bay.

1. BACKGROUND

1.1 On 22 September 2022, TGS Geophysical Company (UK) Limited (the Applicant) applied to the Department of Mineral Resources and Energy (DMRE) for an Environmental Authorisation (EA) to conduct specified 3D seismic survey activities in the Orange Basin, located offshore off the West Coast of South Africa, approximately 120km offshore of St Helena Bay, extending north along the West Coastline to approximately 230km offshore of Hondeklip Bay.

1.2 This application was submitted in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) as amended, read with the Environmental Impact Assessment Regulations, 2014 (2014 EIA Regulations) to the DMRE, being the Competent Authority (CA) in respect of this application.

1.3 As required by regulation 12 of the 2014 EIA Regulations, the Applicant commissioned Environmental Impact Management Services (Pty) Ltd (EIMS) as an independent environmental assessment practitioner (EAP), to prepare and submit the application for EA.

1.4 In support of this application for an EA, and as required by Regulation 19 of the 2014 EIA Regulations, the EAP submitted the Basic Assessment Report (BAR) dated 6 December 2022 for consideration and decision making.

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, DATED 17 APRIL 2023 TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA.

1.5 In terms of the BAR:

1.5.1 The proposed project area is located between approximately 120km offshore of St Helena Bay, extending north along the western coastline to approximately 230km offshore of Hondeklip Bay over a number of petroleum licence blocks. The Application Area for the proposed 3D seismic survey is approximately 57 400 km^2 in extent (the Area);

1.5.2 It is proposed that a single survey vessel equipped with seismic sources and streamers be used. The proposed 3D survey would be supported by up to two escort vessels. The 3D survey will take in the order of 70 days including downtime;

1.5.3 The application is, in accordance with the NEMA-Listed activity/ies for Listed Activity 21(b) (GNR 983) as follows:
"Any activity including operation of that activity which requires a reconnaissance permit in terms of section 74 of the Mineral and Petroleum Resource Development Act, as well as any other applicable activity as contained in the Listing Notice or in Listing Notice 3 of 2014, required to exercise the reconnaissance permit, excluding- (a) any desktop study; and (b) any aerial survey."

1.6 On 17 April 2023, the DMRE granted the EA to the applicant under DMRE reference number PSA Ref: 12/1040.

1.7 The registered and affected parties (I&APs) were informed of the decision to grant the EA on 26 April 2023.

1.8 The Directorate: Appeals and Legal Review (Appeals Directorate) within the Department of Forestry and Fisheries and the Environment (the Department) received the following appeals against the decision that was taken to grant the Applicant an EA:

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, DATED 17 APRIL 2023 TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA.

1.8.1 First Appellant – Western Cape Department of Environmental Affairs and Development Planning on 15 May 2023

1.8.2 Second Appellant - Aukotowa Fisheries Primary Cooperative Ltd on 15 May 2023;

1.8.3 Third Appellant - Angela Joubert on 12 May 2023;

1.8.4 Fourth Appellant - Oceans not Oil Coalition on 12 May 2023;

1.8.5 Fifth Appellant - Elaine Mills on 12 May 2023; and

1.8.6 Sixth Appellant - Natural Justice/Green Connection on 12 May 2023.

1.19. These appeals were lodged in terms of section 43(1) of NEMA, read together with Regulation 4 of the National Appeal Regulations, 2014 (2014 Appeal Regulations).

1.20. On or between 2-12 June 2023, the Applicant submitted its responding statements to the appeals in terms of Regulation 5 of the 2014 EIA Regulations.

1.21. The DMRE submitted comments in respect of the First, Second, Fourth and Fifth Appellants' grounds of appeal on 26 June 2023.

1.22. The appeals are premised on the grounds summarised below:

1.22.1. First Appellant's grounds of appeal

- Cumulative impacts not assessed and lack of scientific knowledge to gauge the impact of seismic acoustic blasts and their effect on the marine environment;
- Activities approved in the absence of a Strategic Environmental Assessment.

1.22.2. Second Appellant's grounds of appeal

- Concerns about the consultation process;
- Concerns that the process was not open and a transparent participatory in accordance with NEMA;

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, DATED 17 APRIL 2023 TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA.

- Questioning the submissions from the Applicant regarding the "perceived impact" of proposed activities as opposed to the "actual impact";
- Concerns that granting the EA does not meet South Africa's climate change goals, e.g., Paris Agreement and Kyoto Protocol, and effort to achieve net zero.

1.22.3. Third Appellant's grounds of appeal:

- lack of in-depth studies on impact of acoustics instruments on the ocean and marine life.

1.22.4. Fourth Appellant's grounds of appeal:

- Need and desirability of the project;
- invasive nature of seismic surveys;
- Repeated, persistent or cumulative exposure impacts;
- No formal analysis of impact on livelihoods;
- No-go not properly considered.

1.22.5. Fifth Appellant's grounds of appeal:

- Need and desirability of the project;
- invasive nature of seismic surveys;
- Repeated, persistent or cumulative exposure impacts;
- No formal analysis of impact on livelihoods;
- No-go not properly considered.

1.22.6. Sixth Appellants' grounds of appeal:

- Need and desirability of the project;
- Invasive nature of seismic surveys;
- Repeated, persistent or cumulative exposure impacts;
- No formal analysis of impact on livelihoods;
- No-go not properly considered

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, DATED 17 APRIL 2023 TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA.

1.23. This is an appeal in a "wide" sense. I have therefore approached the appeal by reassessing and re-determining the merits of the EA application.

1.24. Before I deal with each of the grounds of appeal, I wish to stress that I was guided in this appeal by the principles set out in section 2 of NEMA. These principles apply alongside all of the other appropriate and relevant considerations, including Government's responsibility to respect, protect, promote and fulfil the social and economic rights in Chapter 2 of the Constitution and in particular the basic needs of persons disadvantaged by unfair discrimination. My decision has therefore been guided after a careful consideration of all of the principles set out in section 2 of NEMA, including section 2(2) which provides that "environmental management must place people and their needs at the forefront of its concern and serve their physical, psychological, developmental, cultural and social interests equitably"; also section 2(3) which provides that "*development must be socially, environmentally and economically sustainable*". Moreover, when I considered the issue of sustainable development, I did so with section 2(3) in mind and I considered the proper application of the factors articulated in section 2(4)(a) to (r).

1.25. I am also guided by the judgement in *Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others*[1] where at para 80 of this judgment, the Honourable Murphy J explained that:

> "*NEMA, like all legislation, must be interpreted purposively and in a manner that is consistent with the Constitution, paying due regard to the text and context of the legislation. Section 2 of NEMA sets out binding directive principles that must inform all decisions taken under the Act, including decisions on environmental authorisations. The directive principles serve as guidelines (by reference) to which any organ of state must exercise any function when taking any decision in terms of NEMA or any statutory provision concerning the protection of the environment. They guide the interpretation,*

[1] [2017] 2 All SA 519 (GP)

administration and implementation of NEMA, and any other law concerned with the protection or management of the environment. Competent authorities must take into account the directive principles when considering applications for environmental authorisation. The directive principles promote sustainable development and the mitigating principle that environmental damage must be avoided, minimised and remedied. The environmental impact assessment process is a key means of promoting sustainable development, by ensuring that the need for development is sufficiently balanced with full consideration of the environmental impacts of a project with potential environmental impacts. The directive principles caution decision-makers to adopt a risk-averse and a careful approach, especially in the face of incomplete information."

1.26. With this in mind, I now deal with the grounds of appeal submitted by each of the appellants and where I deem it appropriate, I shall address those grounds of appeal that are overlapping in nature or duplicated under a single ground of appeal.

2. GROUNDS OF APPEAL, RESPONSES AND COMMENTS

First Appellant's Grounds of Appeal

2.1. The First Appellant raised the following grounds of appeal:

2.1.1. Cumulative Impacts was not assessed in that there is insufficient scientific knowledge to gauge the impact of seismic acoustic blasts and their effect on the marine environment; and

2.1.2. Activities were approved in the absence of a Strategic Environmental Assessment (**SEA**).

First Appellant's Submissions

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, DATED 17 APRIL 2023 TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA.

2.2. The First Appellant made the following submissions in support of its grounds of appeal:

2.2.1. The impact of seismic acoustic blasts is not conclusive and therefore presents an environmental risk to the marine environment if undertaken. It was submitted that in terms of section 2 of NEMA the "precautionary principle" applies in South Africa and that unlike other counties, South Africa's policy and legal framework requires more conclusive evidence to support an activity with a potential significant impact over a large area;

2.2.2. The cumulative impacts of reconnaissance, exploration and mining and drilling activities have not been assessed and evaluated in the context of the impact on other marine and coastal-based economic activities;

2.2.3. It (the First Appellant) commented on the BAR and noted the inconclusiveness of scientific knowledge on the impact of seismic surveys incorporating acoustic blasts on the marine environment;

2.2.4. Reference was made to the decision of the Western Cape High Court judgement in the case of *Christian John Adams & Others v Minister of Mineral Resources and Energy & Others (case number: 1306/22)* where the applicants in that matter presented the argument that cumulative impacts of seismic surveys have not been studied in South Africa and that the impact on fish assemblages was difficult to interpret; and

2.2.5. The activities have been approved in the absence of SEA, which would serve to coherently plan/co-ordinate the activities to manage the cumulative impacts. The decisions taken are "piece-meal" and do not ensure the development of the nation's mineral and petroleum resources in a proper,orderly and ecologically sustainable manner while promoting justifiable social and economicdevelopment as per the objectives set out in section 2(h) of the Mineral and Petroleum Resource Development Act 28 of 2002 (MPRDA).

Applicant's response:

2.3. The Applicant responded to the First Appellant's grounds of appeal as follows:

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, DATED 17 APRIL 2023 TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA.

2.3.1. The assumptions and limitations, including knowledge gaps, were included in the BAR. Having regard to these information gaps, the assessment of the impact of the proposed activities adopted a strongly precautionary approach. It is acknowledged that information on deep-water habitats and their associated biota is lacking however, this is primarily due to the difficulties and high costs associated with sampling beyond the inner continental shelf;

2.3.2. Virtually all of the limited information available has been obtained during hydrocarbon exploration projects, which in themselves provided a good opportunity for collecting baseline data at depths beyond which commercial fisheries operate. Information from such ecological baseline surveys is, however, not always made publicly available as it is often considered proprietary information;

2.3.3. Even with the information gaps, the level of certainty (confidence rating) of the impact predictions in the marine fauna report is considered high;

2.3.4. Furthermore, the Project may be able to contribute to conducting independent research on how fish species on the West Coast (such as snoek) respond to seismic surveying. As the location of this particular survey is far offshore, the impact on the biophysical environment is expected to be relatively low. The Project is seen as a good opportunity to obtain local data and to conduct local research that could be useful for similar projects and applications that may take place in the future. The Applicant undertook to liaise with relevant scientific research institutions to investigate the potential of collaborating in independent on-water research during the survey, as recommended in the BAR;

2.3.5. The the decision referred to by the First Appellant in *Christian John Adams & Others v Minister of Mineral Resources and Energy* is not directly comparable to the application for EA, primarily because the extent of the proposed application area is significantly smaller and is located approximately 200km offshore. Thus, the extent of sensitive environments within the Project area is substantially smaller and will affect a substantially smaller number of users;

2.3.6. For both technical and commercial reasons, it is unlikely that concurrent seismic surveys will be undertaken in the same area during the same survey window. However, the cumulative impacts associated with multiple surveys were assessed and detailed in Section 9.3.5 of the BAR. Furthermore, the cumulative impacts were considered as part of each of the impacts identified for the entire project as detailed and described where relevant in Section 9.3 of the BAR.

2.3.7. In addition, the offshore activities are proposed and authorised within a framework of existing legislation, policies and management plans, such as those described in detail in Sections 4 and 8.6 of the BAR. In addition, the law currently does not require that a SEA be undertaken as a precursor to a project receiving an EA.

2.3.8. Furthermore, it was the submission of the First Appellant that undertaking a SEA would be purely speculative in the context that the Project relates to the reconnaissance for a resource and directly to the development of the resource that may potentially be located offshore. Thus, while a SEA would provide an additional framework within which the potential future development of the resources should be considered, such a SEA would rely on the outcome of the exploration to define the nature and extent of the potential resource. Accordingly, without this information a SEA for development of the resource would be purely speculative.

2.3.9. Finally, as stated in section 8.3.10 of the Social Impact Assessment Report (Mitigation and Management), assessing all cumulative impacts of the seismic survey industry on the livelihoods of communities and addressing perceptions and alleviating fear from a strategic perspective is not the Applicant's responsibility and falls outside the scope of the environmental impact assessment. It is the responsibility of the relevant authorities and the industry. However, the seismic survey industry as a whole has and should continue to assess on an ongoing basis its position and social license to operate as an industry in a South African context and work with stakeholders to conduct a SEA of the impact of the industry and further embark on an awareness raising and education campaign. A participatory process, beyond only having meetings is needed including workshops where communities can engage in experiential learning. If the seismic survey industry fails to

address the community's need for education and cooperation, it will result in significant delays and increase the risk for social unrest. The Applicant has already commenced working with the energy industry alliance, EnerGeo, and with PASA to initiate discussion within the industry. EnerGeo has also been engaged in the consultation process on PASA's new community consultation guidelines.

Competent Authority's Response:

2.4. The Competent Authority responded as follows:

2.4.1. The precautionary principle was considered and followed throughout the EIA process. This process assessed potential and cumulative impacts of the proposed activity and recommended mitigation measures. The recommendations and implementation of the mitigation measures for potential impacts is a precautionary measure.

2.4.2. Whilst gaps in knowledge and limitations in experiments on marine species are acknowledged, precautionary measures have been put in place to manage potential impacts. It should be noted that the limitations in experiments are because the experiments were conducted in controlled environments and therefore, the impacts were noted early and were exaggerated. The literature indicates that the behavior of the tested species would differ in their natural environment. Seismic surveys are undertaken globally with standard and specific mitigation measures without any evidence of injuries and behavioral changes of species that were related to the operations. It can therefore be concluded that the implementation of recommended globally used mitigation measures minimizes the impact on marine species.

2.4.3. The Competent Authority is not responsible for conducting a SEA. Furthermore, the authorised activity followed and met the minimum requirements of the current relevant legislation. Hence, it was approved.

2.4.4. It is therefore satisfied with the assessment conducted by the EAP on behalf of the Applicant.

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, DATED 17 APRIL 2023 TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA.

2.5. **Evaluation (Reasons for Decision)**

2.5.1. The crux of this ground of appeal relates to the cumulative impact of reconnaissance, exploration and mining on the ocean and sea life in general.

2.5.2. In this regard, I take note that the seismic survey right was granted to the applicant under section 24 of the 2014 EIA Regulations and in respect of specific and limited areas being the areas specific to 120km offshore of St Helena Bay, extending north along the Western Coastline to approximately 230km offshore of the Hondeklip Bay, off the West Coast of South Africa.

2.5.3. The EA also sets out detailed conditions that must be met by the Applicant, in conducting the intended seismic surveys and I refer to each of the conditions set out in 5.5 of the EA, as if specifically incorporated herein. These conditions incorporate the mitigation measures set out in the BAR which are specifically designed to limit any interference to marine and sea life in the vicinity of the intended survey, and to ensure adequate and proper monitoring of the intended activities on such marine life.

2.5.4. In relation to cumulative impacts, I note that the cumulative impacts have been evaluated and set out in the BAR.

Cumulative noise impacts:

2.5.5. In light of the limited studies on cumulative impacts and on seismic activities, I note that EAP has recommended a number of measures specifically aimed and curbing any cumulative noise impacts associated with multiple studies, albeit that it is unlikely that such activities will be undertaken during the same survey window due to impacts on operation and data acquisition. Thus, whilst there are currently two EA applications for seismic

surveys pending before the DMRE, which overlap the areas of the Project, it is unlikely that they will proceed at the same time as the Project.

2.5.6. Even if these activities are undertaken during the same window, in considering the associated impacts to marine fauna as a result of the three potential surveys, the EAP concludes that such impacts would be of high intensity and extend regionally over a short term and concludes therefore that the consequence for cumulative survey is medium[2]. In particular EAP notes that three seismic surveys of regional extent, undertaken simultaneously, would be expected to result in an impact of medium negative significance on the large pelagic longline sector, both with and without the application of mitigation measures, but without any residual impact once the activities are completed. The impacts are thus limited to the planning and operational phases, and it is not anticipated that there will be any need for closure or rehabilitation once the 3D surveys have been concluded. Closure will be limited to waste generation and disposal and water contamination and pollution measures which aligns with the pre-development.

2.5.7. I further note that the following mitigation measures in relation to noise have been recommended and included in the EMPr :

- A distance of at least 40 km is maintained between survey vessels until sufficient objective evidence is obtained so that a reduced buffer distance is acceptable;
- Each of the additional activities to those described in the technical noise report would be considered required only in the case where a 40 km buffer distance between active survey ships cannot be maintained;
- Should surveys run simultaneously, it would be required to amend the EMPr, which would be subject to further assessment and consultation.

2.5.8. Having considered that it is firstly unlikely that three survey activities will be conducted during the same window and over the same area and taking into account the mitigation

[2] BAR, para 9.35

measures proposed by the EMPr, which are part of the specific conditions of the EA, I find that any cumulative impacts on the marine fauna and species is adequately catered for in a precautionary manner.

Noise acoustics

2.5.9. At page 240 of the BAR, it is noted that the impact from immediate exposure to individual airgun array pulses, the maximum zones of PTS effect for sea turtles, are predicted to be within 19 metres from the source location. The behavioural disturbance for sea turtles caused by the immediate exposure to individual pulses are predicted to be within 1.3 km of the source array. In terms of the impact from cumulative exposure to multiple airgun array pulses, the noise impacts related to recoverable injury and TTS on sea turtles are expected to be high at the near field from the source location.

2.5.10. As a result, the following mitigation, measures to minimise the seismic impact on assessed marine fauna species has been recommended, and included as part of the EMPr :

- Recommended safety zones- based on the maximum threshold distances modelled for PTS (marine mammals and sea turtles) and potential mortal injury (fish) due to immediate exposure from single pulses and cumulative exposure from multiple pulses;
- Implementing a soft-start procedure if testing multiple seismic sources. Delaying soft-starts if shoaling large pelagic fish, turtles, seals, or cetaceans are observed within the zone of impact;
- Baseline noise measurements can provide useful information (prior to operations) when interpreting underwater noise predictions for the introduction of a new noise source. As such, it is recommended that underwater noise measurements be implemented that would include the deployment of underwater sound monitoring equipment to establish an actual baseline prior to the commencement of the survey and then operational levels of noise during the survey;

203

- Lower source levels could be achieved through better system optimization, i.e. a better pairing of source and receiver characteristics, and better system gain(s). For example, new receiver technologies, such as fibre optic receivers, may allow the use of lower amplitude sources through a higher receiver density and/or a lower system noise floor. Some evidence exists which indicates that re-engineered seismic sources with "mufflers" can be used to attenuate unwanted high frequency energy without affecting frequencies of interest. In addition, kerosene free hydro-streamers should be used. It is also important to ensure that 'turtle-friendly' tail buoys are used or that existing tail buoys are fitted with either exclusion or deflector 'turtle guards'.

2.5.11. In light of the mitigation measures provided, the proposed survey activities to be undertaken by the Applicant are expected to result in impacts on marine invertebrate fauna in the Orange Basin, ranging from negligible to very low significance.

2.5.12. The EAP also considers that some migratory species are now present year-round off the West Coast, e.g. baleen and toothed whales. The BAR recommends that data collected by independent onboard observers should form part of a survey close–out report to be forwarded to the necessary authorities, and any incidence data and seismic source output data arising from surveys should be made available for analysis of survey impacts in Southern African waters. This recommendation has been incorporated into the EA and also sees to the stoppage of any activities in the event of spotting such marine species.

2.5.13. I further note on page 227 of the BAR that the Applicant specifically addresses the concerns in relation to cumulative impact and notes examples where communities can successfully co-exist.

2.5.14. Moreover, I note that the EAP, in the *Impact Prioritisation*, included that each potentially significant impact has been assessed in terms of cumulative impacts as found on page 194 of the BAR.

2.5.15. I am nevertheless aware of the fact that there are certain limitations and gaps in knowledge as confirmed by the Applicant in their response. In this regard, I note that the location of this survey is faroffshore and that the impacts on the biophysical environment are expected to be relatively low. Furthermore, due to the limited local data there is a need for these types of surveys to be conducted to enable the authorities to obtain the much-needed data and conduct local research that will be useful to inform future applications of this manner.

2.5.16. I note the submission that a SEA should have been conducted, however I do not believe that the absence of a SEA is an impediment to the granting of an EA, because neither NEMA nor the EIA Regulations prohibit the undertaking of reconnaissance activities where there is no SEA or Marine Spatial Plan (MSP).

2.5.17. In the circumstances, these grounds of appeal are without merit and are accordingly dismissed.

Second Appellant's Grounds of Appeal

2.6. The Second Appellant raised the following grounds of appeal:

2.6.1. Concerns about the consultation process.

2.6.2. The process was not an open and a transparent participatory process in accordance with NEMA.

2.6.3. The submissions from the Applicant regarding the "perceived impact" of proposed activities as opposed to the "actual impact".

2.6.4. Concerns that granting the EA does not meet South Africa's climate change goals, e.g., Paris Agreement and Kyoto Protocol.

Second Appellant's Submissions

2.7. The Second Appellant made the following submissions in support of its grounds of appeal:

2.7.1. That the consultation process was not properly conducted, and the information presented during the consultation process was not accurate. As community and small-scale fisher organisation, it does not share Government's position of promoting oil and gas exploration especially as there are various concerns related to such activities. Furthermore, this position of Government is particularly concerning when regard is had to the state of the environment in other countries that have adopted a similar approach. It (the Second Appellant) is concerned about safeguarding South Africa's environmental resources for future generations.

2.7.2. The consultation process was not open and transparent as required by NEMA. There was a failure to consult meaningfully with communities on ways to make a positive impact on communities and that this issue should form part of the consultation process. Instead, communities were presented with limited options that do not have regard to the specific needs of communities. Accordingly, the consultation process is not meaningful.

2.7.3. That the reference "perceived impact" as opposed to the "actual impact" is of concern because there are studies that show the actual impact of the proposed activities on marine life. The Second Appellant cites the incident of the 2010 Gulf of Mexico, Deepwater Horizon blowout as an example.

Applicant's Response

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, DATED 17 APRIL 2023 TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA.

2.8. The Applicant submits that:

2.8.1. The Public Partnership Process (PPP) was conducted in line with the 2014 EIA Regulations and the Second Appellant was specifically identified as a key Interested and Affected Party (I&AP) and thus included in the PPP throughout the basic assessment process. It (the Applicant) scheduled public meetings with the Second Appellant, both at the pre-application and at the BAR review phases; however the Second Appellant refused to engage meaningfully during such meetings.

2.8.2. The purpose of the pre-application meeting was to capture the initial concerns of the members and key I&AP's including the Second Appellant. Community members attended this meeting but only for the purposes of publicly protesting and they left before any presentations could be made. During the BAR review phase meeting, members of the Second Appellant did attend and were given an opportunity to present their views and interact with the EAP.

2.8.3. The information in the BAR report regarding the impact of the proposed project is based on the latest research and that the proposed project will not significantly add to the marine traffic in South African waters as it will only involve two vessels. Whilst the Applicant acknowledges that there may have been projects in other countries that have negatively impacted the environment, lessons have been learnt from these projects and protective and mitigatory measures implemented contributing to internationally accepted best practice as reflected in the BAR. These mitigation measures are set out in the EMPr which has been approved.

2.8.4. Significant measures are taken to ensure that there are no unplanned spills and notes further that the vast majority of exploration industry related pollution events have been down to drilling and extraction activities rather than surveying and further, that the findings

of the specialist studies concluded that there are no fatal flaws that should prevent the proposed project from proceeding. Furthermore, the significant levels of identified negative impacts can generally be reduced to acceptable levels through the recommended mitigation measures that form part of the EA.

2.8.5. The consultation process was carried out in compliance with NEMA, read together with the 2014 EIA Regulations. The Applicant noted that the purpose of consultation was not consent seeking but rather an opportunity for affected parties to raise concerns and for these concerns to be considered and brought to the attention of the decision makers, which in this case is the DMRE. In this regard, there was compliance and that the consultations were therefore meaningful.

2.8.6. It (the Applicant) noted that the use of the offshore environment is not restricted to fishing activities and insofar as the small scale fishing industry is concerned, in terms of the impact assessments undertaken and with the implementation of the approved mitigation measures, the significance of the impact of the proposed project can be reduced to acceptable levels and thus would not lead to significant impacts on users of the same environment in terms of biological and socio-economic environment. Accordingly, the proposed project would not lead to the destruction of the livelihood of small-scale fishing industries.

Competent Authority's Response

2.9. The Competent Authority responded as follows:

2.9.1 It found that that the PPP was undertaken in accordance with the PPP Guideline and thus the minimum requirements of NEMA were met. The Second Appellant had an opportunity to and was involved in the PPP process from the onset and was identified as an I&AP and received all relevant information and notifications.

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, DATED 17 APRIL 2023 TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA.

2.9.2. All information provided during the PPP was related to the proposed activity and general information was provided relevant to oil and gas in South African and globally. The information referred to by the Second Appellant is unclear and it is therefore not possible to provide a clear response thereto. Oil and gas projects are undertaken in a sustainable manner as regulated by NEMA. Furthermore, the EIA process is designed to ensure that the proposed project is undertaken in a sustainable manner.

2.9.3. The PPP is undertaken in relation to the proposed project activities. In this instance, the proposed project concerned the activity of a seismic survey. The Second Appellant's participation in the PPP is related to raising their concerns, views, objections, and any other related matter that might help in minimizing the impacts of the proposed project activity. As such, the Applicant cannot undertake development activities proposed by communities. It is also important to note that the proposed project has the potential to produce long-term benefits to South Africa, even though immediate benefits are limited. According to the results of the EIA process, the proposed project activity will not result in detrimental impact to the receiving environment.

2.9.4. The impacts on fishing sector were assessed, including impacts on catch rates and it was found that any such negative impacts will be low. The BAR sets out various mitigation measures, such as avoidance of the peak fishing season for the affected sector, and these mitigation measures formed part of the conditions of the EA. Furthermore, blowouts are not expected during the proposed activity.

2.9.5. Past incidences, such as the Deepwater Horizon incident, has led to great improvements in terms of safety during the undertaking on oil and gas activities globally. However, it is to be noted that the proposed project activity differs from the activities undertaken during this incident. Therefore, the potential impacts will also differ. The scientific reports and

information referred to by the Appellant is unclear and therefore it is not possible to respond clearly thereto.

2.9.6. However, there are various resources engaged to monitor and secure the environment and in particular in relation to the fishing activities of the Second Applicant. An Environmental Officer will be appointed to ensure implementation of the approved EMPr. The Marine Mammal Observer and Passive Operator are responsible for monitoring movements of marine species and advising the crew on actions to take. The Fisheries Liaison Officer is responsible for monitoring impacts on marine fauna and communications with maritime vessels.

2.9.7. The authorised activities will not result in detrimental impacts on the receiving environments and therefore, the need for compensation is not expected. The affected area is an open space and thus the focus action would be to clean up the area and make it safe for the activities to continue, should there be a need.

2.9.8. The protocols referred to recognise that there is a need for an energy mix in South Africa and reference various policies that provide for minimization of climate change impacts. The nature and the duration of the planned activities make it impossible to assess the impacts on climate change. According to the results of the EIA, the proposed activity will not result in detrimental impacts on the receiving environment. Whilst there are no immediate benefits anticipated from the proposed activity, however, dependent on the success of the proposed project, there might be future benefits.

2.10. **Evaluation (Reasons for Decision)**

2.10.1. I have addressed aspects regarding the veracity of the application process and compliance with NEMA, above.

2.10.2. Regarding whether the Applicant conducted the PPP in accordance with the 2014 EIA Regulations, I am mindful that one of the purposes of the public participation provisions in NEMA and the 2014 EIA Regulations is to afford I&APs the opportunity to express their views on matters affecting them. This principle was reiterated by the Constitutional Court in *Fuel Retailers Association of Southern Africa v Director General Environmental Management Department of Agriculture and Conservation and Environment Mpumalanga Province*[3] (the Fuel Retailers case).

2.10.3. The 2014 EIA Regulations prescribes the specific requirements for the public participation process (PPP).

2.10.4. Regulations 41(2)(b) & (c) and 41(3) of the 2014 EIA Regulations requires the person conducting the PPP to "*give notice to all potential interested and affected parties of an application or proposed application which is subjected to public participation*" by giving written notice, in any of the manners provided for in section 47D of the Act, and by placing an advertisement in a local newspaper, which "*give details of the application or proposed application which is subjected to public participation.*

2.10.5. Regulations 3(8), 19, 40(1) and 43(1) of the 2014 EIA Regulations require that potential or registered I&APs be given a period of at least 30 days to submit their comments on the BAR and EMPr, amongst other reports, prior to submitting the BAR to the competent authority for decision-making purposes.

2.10.6. Regulation 41(6) of the 2014 EIA Regulations requires the person conducting the PPP to ensure that information containing all relevant facts in respect of the application is made available to potential I&APs and that participation by potential or registered I&APs is

---

3 *Fuel Retailers Association of Southern Africa v Director General Environmental Management Department of Agriculture and Conservation and Environment Mpumalanga Province* 2007 (6) SA 4 (CC) at para 76.

facilitated in such a manner that they are provided with a reasonable opportunity to comment on the application or proposed application.

2.10.7. Regulation 44(1) requires the applicant to ensure that the comments of I&APs are recorded in the report and that such written comments, including responses to such comments, are attached to the reports that are submitted to the competent authority.

2.10.8. These provisions are written in peremptory terms.

2.10.9. In evaluating the Second Appellants' contentions that they were not adequately consulted in respect of the EA application for the proposed project, I considered page 37 of the BAR, which sets out the process followed in terms of PPP, and which cites the following:

2.10.9.1. The Applicant identified organs of state and Key Stakeholders on page 37 of the BAR who was consulted, and the Second Appellant's name is reflected on page 37;

2.10.9.2. The PPP commenced on 14 August 2022 with an initial notification and call to register as I&APs for a period of 30 days;

2.10.9.3. Notification letters were distributed in English's, isiXhosa and Afrikaans to all I&APs;

2.10.9.4. Newspaper advertisements describing the proposed project and EIA process was placed in the Cape Times (English and isiXhosa), Sentinel News (English and Afrikaans), Westlander (English and Afrikaans), Ons Kontrei (English and Afrikaans) and Die Plattelander (English and Afrikaans) as well as in the National Gazette;

2.10.9.5. Site notices were placed in English Afrikaans and isiXhosa at 100 onshore locations adjacent to the application area during the week of 16 to 20 August 2022;

2.10.9.6. Radio adverts were aired on KFM Radia NFM Radio Namakwaland and Radio West Coast;

2.10.9.7. The BAR was placed for public review to all registered I&APs for a period of 30 days from 21 October -32 November 2022 and hard copies were made available at various venues as set out on page 41 of the BAR;

2.10.9.8. Public meetings were held from 29 August -3 September 2022 at various venues as set out in page 41 of the BAR.

2.10.10. Accordingly, the information before me confirms that the Applicant conducted the PPP in accordance with Chapter 6 of the 2014 EIA Regulations.

2.10.11. Insofar as the Second Appellant has expressed concerns about the perceived impact of the proposed project activities on small scale fishers, I note that with the implementation of the project controls and mitigation measures, that the residual impact of the proposed survey is considered to be of low negative significance.

2.10.12. I further take note that the impact on catch rates due to sound elevation levels was also assessed. The noise effects assessed included physiological effects (physical injury/permanent threshold shift (PTS) and temporary threshold shift (TTS)) and behavioural disturbance due to either immediate impact from single airgun pulses or cumulative effects of exposure to multiple airgun pulses over a period of 24 hours. Sound levels for the seismic survey could notionally be expected to attenuate to below levels for behavioural disturbance at a distance of 4 km from the source. The spatial extent of the impact of sound (produced by the airgun array) on catch rates is expected to be regional, although localised at any one time. In this regard I note that the impact is considered to be of intermediate duration and reversible without additional time or cost. Based on the distance of fishing grounds from the Reconnaissance Permit area, only the large pelagic longline and tuna pole-line sectors are considered to be susceptible to effects of elevated sound. The EAP notes that with the implementation of the project controls and mitigation

measures, the residual impact due to seismic noise is considered to be of low negative significance. There is no impact expected on the demersal trawl, midwater trawl, demersal longline, small pelagic purse-seine, linefish, west coast rock lobster, netfish and small-scale fishing sectors.

2.10.13. The BAR also confirms that the application Area does not overlap with the key spawning or nursery areas therefore the risk of noise disturbance to spawning behaviour and fishery recruitment is considered unlikely.

2.10.14. I also note that the following mitigation measures imposed to limit any impact on the fisheries concerned:

2.10.14.1. In order to mitigate the impacts on the large pelagic longline sector, the survey should avoid taking place during June and July;

2.10.14.2. Prior to the commencement of survey activities, affected parties should be informed of the navigational co-ordinates of the proposed survey acquisition area, timing and duration of proposed activities and any implications relating to the safety zone that would be requested, as well as the movements of support vessels related to the project (FishSA, SA Tuna Association, SA Tuna Longline Association and Fresh Tuna Exporters Association);

2.10.14.3. Other key stakeholders should be notified prior to commencement and on completion of the survey (DFFE, the South African Navy Hydrographic Office (SANHO), South African Maritime Safety Association (SAMSA) and Ports Authorities);

2.10.14.4. For the duration of the survey, a navigational warning should be broadcast to all vessels via Navigational Telex (Navtext) and Cape Town radio;

2.10.14.5. Updates of the scheduled weekly survey plan should be circulated to the operators of affected fishing vessels on a daily basis;

2.10.14.6.A Fisheries Liaison Officer (FLO) should be present on board the seismic vessel or escort vessel for the duration of the survey in order to facilitate communications between the seismic and fishing vessels in the project area.

2.10.15.Considering the mitigation measures from the specialist studies, I find that the measures to limit the survey to avoid sensitive areas and periods for some marine fauna; movement of migratory cetaceans (particularly baleen whales) from their southern feeding grounds into low latitude waters (June/July and late October/November) and their aggregation on the summer feeding grounds between St Helena Bay and Dassen Island from late October to late December; ensure that migration paths are not blocked by seismic operations; and to avoid periods of peak fishing activity during June and July in order to reduce the probability of disruption to the large pelagic longline fishing sector and tuna pole line fishing sector; are reasonable and sufficient to mitigate against any impact to such fisheries.

2.10.16.I have also considered the Heritage and Social Assessment impact studies report and note that the identified impact on fishing stock is confirmed to be low for all species. By inference, a potential impact on fishing yield could be expected and thus potential economic impact on communities due to reduced caught fish volumes. Pre-mitigation negative impact on a regional scale over the long term with a moderate intensity is predicted due to the potential indirect impact on the communities and, ultimately, their heritage, with a high probability of this impact occurring. The pre-mitigation impact on heritage resources is rated as medium. The potential residual impact on heritage resources, with mitigation measures from the scientific studies, is projected as low with a medium confidence factor.

2.10.17.Although the marine fauna and fisheries specialists have indicated that the impacts on the marine fauna would be negligible, the concern of communities remains that there are significant gaps in the available data. Fishing communities, with generations of experience in the ocean, fear that the behaviour of the fish will change and that this would affect their

catch rates and consequently their livelihoods. The concern of cumulative impacts that will push the ocean beyond recovery from such activities is raised. I do however note that the EAP indicated that the Applicant, as well as other companies that want to do surveys or exploration in the area, currently do not have social license to operate. A large part of this is due to a lack of meaningful consultation by previous applicants from a community perspective. If the Applicant or any other seismic survey company wants to proceed with the project, they will need to engage in meaningful conversation with the communities and try to restore relationships. From a community and social risk perspective this is not negotiable. I further note that the EAP suggested that the project proceed subject to the mitigation measure of meaningful consultation, local research, education, and awareness raising in the project-affected communities. These conditions were incorporated into the EA, which are requirements prior to the commencement of the survey.

2.10.18. I am accordingly satisfied that the impact on the fishing industry has been properly mitigated.

2.10.19. In the circumstances, there is no merit to these grounds of appeal, and they are dismissed.

Third Appellant's Grounds of Appeal

2.11. The Third Appellant raised the following grounds of appeal:

2.11.1. The impact of the 2D and 3D seismic surveys and the sound impulses and multiple hydrophone streamers on the marine mammals and environment is significantly high and detrimental to their well-being, survival and normal functioning, including marine life and the marine eco-system, both short-term and long-term, in various respects including:

- causing physical injuries as well as mobility and orientation within the ocean body, including sea turtles and whales;
- behavioural patterns will be altered;

- Mortality rates may increase;
- Negative impact on entire populations and exerting cumulative pressures on already stressed species;
- Impacting on marine fish and mammal food sources like zooplankton.

2.11.2. Detailed impacts of seismic surveying are still unknown, and more research is required;

2.11.3. There is a risk of irreversible damage;

2.11.4. The resultant increase in noise levels is a high risk that will directly and negatively impact marine fish, mammals, fauna and flora and thus the environment.

Applicant's Response

2.12. There was no response from the Applicant.

Competent Authority's Response

2.13. There was no response from the Competent Authority.

2.14. **Evaluation (Reasons for Decision)**

The Third Appellant's appeal is concerned with the impact of the seismic pulses on marine mammals. This aspect has been addressed in detail in the preceding appeals and I refer to my comments in relation thereto.

2.14.1. Accordingly, there is no merit to this ground of appeal, and it is dismissed.

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, DATED 17 APRIL 2023 TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA.

Fourth, Fifth and Sixth Appellants' Submissions

2.15. The Fourth, Fifth and Sixth Appellants raise the substantially similar grounds of appeal, albeit that some submissions are more detailed than others. The Sixth Appellant made detailed submission in respect of these grounds of appeal and these submissions encapsulate the appeal grounds submitted by the Fourth and Fifth Appellants. As set out above, I address grounds of appeal that are overlapping in nature or duplicated under a single ground of appeal. It is to be noted that these grounds of appeal are extensive extending into over 100 pages. It is therefore not practical to restate the appeal submissions and instead, the grounds of appeal and responses are summarised herein. Regard can be had to the Appeal Response Reports for greater detail.

2.16. The following grounds of appeal were raised:

2.16.1. The desirability assessment is flawed for the following reasons:

- Climate Change Impacts
- The climate crisis
- South Africa's international climate change commitments
- Need for seismic data;

2.16.2. Failure to adequately consider the impact on Marine life;

- Underwater sound from acoustic seismic surveys.
- Harms to marine life
- Acoustic Modelling
- Heightened Legislative Requirements are Not Considered for Critical Biodiversity Areas (CBAs), Ecologically or Biologically Significant Marine Areas (EBSAs), and Marine Protected Areas (MPAs).
- CBAs
- EBSAs and MPAs.

- Cape Fur Seals
- Whale and Dolphins.
- Fish.
- Zooplankton
- The proposed mitigation measures are inadequate to prevent unacceptable harm to marine life.
- Simultaneous Surveys
- Lack of baseline noise assessment
- Chronic Noise Impacts

2.16.3. Failure to adequately assess cumulative impacts;

2.16.4. Failure to conduct meaningful consultation with communities and local people (and in particular small-scale fishers), within the PPP, including the Social Impact Assessment process;

2.16.5. The BAR does not contain a proper and objective assessment of the negative impacts of the project on people's human rights;

2.16.6. Failure to consider relevant coastal management considerations or to comply with the National Environmental Management: Integrated Coastal Management, 2008(Act No. 24 of 2008);

2.16.7. Failure to provide adequate reasons for the decision.

- The Appeal was timeously submitted in accordance with the requirements of NEMA, the 2014 EIA Regulations and the Appeal Regulations, 2014, in writing and accompanied by a detailed appeal document, being a statement setting out the detailed grounds of appeal and accompanied by relevant supporting documentation;

- There are grounds for judicial review under PAJA because the EA comprises administrative action that *inter alia* it:
  - is unconstitutional and unlawful;
  - was taken because of the failure to consider relevant considerations;
  - is not rationally connected to the information before the decision-maker in making the Decision or to the reasons provided by the decision-maker for the Decision; and
  - is so unreasonable that no reasonable person could have granted it.

Response by the Applicant

2.17. The Applicant also provided a comprehensive response to the grounds of appeal raised by the Sixth Appellant. A summary of the response is set out below and more detail can be obtained from the Appeal Response Reports. I note that the Applicant did not respond to the Fourth and Fifth Appellants; however, as indicated above, the grounds of appeal relied upon by these Appellants are encapsulated in the detailed grounds of appeal raised by the Sixth Appellant and accordingly so are the Applicant's responses.

2.18. The Applicants responds that thee Basic Assessment process was conducted in line with the requirements of the 2014 EIA Regulations. This included amongst others that:

2.18.1. The Need and Desirability of the Project was adequately addressed and assessed (Section 5 of the BAR); Marine and cumulative impacts were considered in detail (Section 9 of the BAR);

2.18.2. The EAP appointed for the project conducted an extensive Public Consultation Process, which resulted in meaningful consultation (Section 7 and Appendix 2 of the BA);

2.18.3. As stated in Section 11.3 of the BAR, the findings of the specialist studies conclude that there are no environmental fatal flaws that should prevent the proposed project from proceeding, provided that the recommended mitigation and management measures are

implemented. Based on the nature and extent of the proposed project, the local level of disturbance predicted as a result of the reconnaissance activities, the findings of the specialist studies, and the understanding of the significance level of potential environmental impacts, it is the opinion of the EIA project team and the EAP that the significance levels of the majority of identified negative impacts can generally be reduced to an acceptable level by implementing the recommended mitigation measures and the project should be authorized;

2.18.4. It is not clear from the evidence presented by Appellant, that they have a sufficient mandate from the communities that they claim to represent.

Competent Authority's Response

2.19. The Competent Authority provided a response to the Fourth and Fifth Appellants' grounds of appeal but not to the Sixth Appellant's grounds of appeal. As indicated above, the grounds of appeal relied upon by these Appellant's are the same and therefore, the Competent Authority's response applies to all these appeals.

2.20. The following response was submitted by the Competent Authority:

2.20.1. Due to the nature and the duration of the authorised activity, the assessment of the climate change impacts was impossible.

2.20.2. The GHG emissions from the activity will not differ from levels produced by vessels passing through the application area.

2.20.3. Seismic surveys are part of the non-destructive exploration activities as listed in Table 8 of Harris et al., 2022 paper, presenting a list of sea use activities and their compatibility. However, the impacts of seismic surveys are known and will be managed according to industry best practices.

2.20.4. The compatibility of seismic surveys on CBAs is conditional, hence the need to undertake the Impact Assessment to understand the impacts associated with the activity and the

measures to mitigate such impacts. Based on the outcomes of the assessment, the potential impacts of the authorised activity can be managed successfully with the implementation of recommended mitigation measures.

2.20.5. Heritage Impact Assessment undertaken by PGS Heritage (Pty) Ltd included in Appendix 3 of the Basic Assessment provide detailed assessment of intangible heritage. Section 8.8.4 of the BAR provides a synopsis of the intangible heritage aspects considered and assessed in the heritage study.

2.20.6. Cumulative impacts and the possibility of multiple surveys being undertaken simultaneously are considered and assessed in section 9.3.1.4 of the BAR. Cumulative impact of the multiple surveys was found to be of medium significance.

2.20.7. The impacts on livelihoods were assessed satisfactorily. The assessment began by first understanding the dynamics of the affected communities including other aspects that might have caused a negative impact on livelihoods such as the COVID 19 pandemic and lastly considered impacts of the activity. This means that the assessment also considered current impacts on communities' livelihoods. The assessment is in section 9.3.3 of the BAR and the impacts of the authorised activity on livelihoods was found to be on low significance with implementation of recommended mitigation measures.

2.20.8. The "no-go alternative" was considered but was not preferred based on the benefits that might be derived from the success of the authorised project. The project did consider climate impacts, but these could not be assessed due to the nature and duration of the authorised activity. Furthermore, the project will emit GHG emissions levels that will be below the threshold that requires reporting. This indicates that the project will not have significant negative contribution to climate change.

2.21. **Evaluation (Reasons for Decision)**

2.21.1. The Fourth, Fifth and Sixth Respondent's raise certain issues which have already been addressed in relation to the other appeals lodged and I accordingly refer to my assessment of these issues as set out above including:

2.21.1.1. The cumulative impact of reconnaissance, exploration and mining on the ocean and sea life in general;

2.21.1.2. The PPP; and

2.21.1.3. The impact of the proposed project activities on small scale fishers.

2.21.2. I note that some of the concerns raised by the Appellants extend beyond the proposed project activity in respect of which the EA was granted. I confirm that any activity beyond the EA will be subject to a separate application and a separate assessment process. Accordingly, it is not relevant and therefore not necessary to consider submissions in respect of activities that fall outside the EA for the purposes of this appeal.

2.21.3. I have considered the needs and desirability of the Project. The BAR on page 21-33 thereof addresses the needs and desirability of the Project and further covers the context of the oil and gas industry, applicable policies and planning frameworks (local, national, and international) and broadly societal needs and public interest. I note that the Project is in alignment with government policies and plans such as the Integrated Resources Plan 2019 (IRP) which recognises the need for South Africa to employ a diversified energy mix to meet the country's electricity requirements. I have furthermore considered the Guideline on Need and Desirability as well as the No- Go alternative which is also addressed on page 36 of the final BAR.

2.21.4. I am therefore satisfied that the criteria for the need and desirability for the Project has been demonstrated by the Applicant, in particular that the Project accords with legislative requirements and government policies and plans, including the IRP, the National Development Plan (NDP) and the draft Marine Spatial Planning Sector Plans which includes a Marine Offshore Oil and Gas Sector Plan (the Draft MS Plan). The IRP and the Integrated Energy Plan (IEP) recognise natural gas as a required source to produce electricity and direct thermal energy. Its role to contribute to maintaining base-load

electricity and peak-load electricity is acknowledged, and it is also recognised as a way to transition South Africa towards a lower carbon economy providing the flexibility required to complement renewable energy sources and as a lower carbon option compared to coal.

2.21.5. Having considered the grounds of appeal and the response thereto by the Applicant and the Competent Authority, I am of the view that the potential impacts and mitigation measures in respect of the Project and environmental receptors have been adequately identified, considered and addressed.

2.21.6. I am satisfied that the socio-economic impacts and mitigation measure on *inter alia*, marine fauna, small scale and commercial fishing have been considered and addressed. Any spill is unlikely, and it is therefore unlikely that there will be a need for compensation.

2.21.7. Many of the comments made by the appellants were made on the assumption that the impacts associated with production had to be considered, not just those associated with exploration. This approach is incorrect. The EA and accordingly, this appeal is limited to considerations of the impacts of exploration which are far less significant and far less invasive than they will be if extraction and production takes place. As such, it is not necessary nor appropriate to consider the possible impacts of a project that is not yet planned and that falls outside the scope of the EA.

2.21.8. That being said, I am concerned about the plight of small-scale fishers and the communities that they belong to. I appreciate this Project presents a cause of concern and anxiety for small scale fishers and communities for whom the well-being of the sea, fish stocks and the environment is crucial to their own physical and emotional wellbeing.

2.21.9. Whilst I am satisfied that communities were consulted and that their concerns were taken into account, I nevertheless take the view that the Applicant needs to do more, on an ongoing basis, to allay their fears and anxiety. This can be done if the communities have

an open channel of communication with the Applicant. Thus, if they have concerns that arise from, for example, things that they may see or hear about that worry them or cause them anxiety, they should be able to raise these with the Applicant and the Applicant should spend time investigating the source of the fears and anxiety to allay them or otherwise address them.

2.21.10. For that reason, I am including a new condition in the EA, requiring the Applicant to appoint a community / fisheries liaison officer, who must be available to the affected communities. The communities must have access to the liaison officer who, in turn, must keep them informed of the activities at regular intervals and be available to answer any questions that they may have. This will go a long way to allying fears and anxiety. This is separate from the grievance procedure.

2.21.11. I note the grounds of appeal related to aspects of human rights and constitutionality. As discussed above, I am guided in this appeal by the principles set out in section 2 of NEMA which apply alongside all of the other relevant considerations including constitutional considerations. I am satisfied that the principles in NEMA are constitutionally sound and that the requirements of the Constitution were met during the EAI process. To the extent that parties are dissatisfied with the constitutional compliance of the process I am advised that the principle of subsidiarity applies and that the appropriate course of action would be for the Constitutionality of NEMA to be challenged.

2.21.12. I note that it is submitted that there was a failure to consider relevant coastal management considerations or to comply with the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (ICMA). I have considered the BAR and am satisfied that that the provisions of the ICMA and section 63 were considered.

2.21.13. I am accordingly satisfied that all relevant factors have been considered that the decision is lawful and constitutionally sound and administratively fair.

APPEALS AGAINST THE DECISION TAKEN BY THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY, DATED 17 APRIL 2023 TO GRANT AN ENVIRONMENTAL AUTHORISATION TO TGS GEOPHYSICAL COMPANY (UK) LIMITED FOR THE PURPOSE OF THE PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT, LOCATED OFFSHORE OFF THE WEST COAST, SOUTH AFRICA.

2.21.14. Therefore, save for including the new condition of creating a liaison officer, I find that the grounds of appeal have no merit and are accordingly dismissed.

3. DECISION

3.1. In reaching my decision on these appeals, I have taken the following information into consideration:

3.1.1. The EA dated 17 April 2023;
3.1.2. Responding statements submitted by the Applicant on 2, 6, 7 and 12 June 2023;
3.1.3. Comments submitted by the CA on 26 June 2023 ; and
3.1.4. The information contained in the project file PASA ref: 12/1/040;
3.1.5. The final BAR report, together with relevant specialist studies annexed thereto.

3.2. In terms of section 43(6) of NEMA, I have the authority, after considering the appeal, to confirm, set aside or vary the decision, provision, condition or directive or to make any other appropriate decision.

3.3. Having carefully considered the appeals and responses to them, together with all other relevant information, I have decided as follows:

3.3.1. The applicant's environmental authorisation is confirmed with the same conditions of authorisation as appeared in section 5 of the competent authority's Reasons for Decision dated 17 April 2023. I have however included a special direction, namely a community / fisheries liaison officer be appointed, and this is to be included in the EA.

3.4. In arriving at my decision, it should be noted that I have not responded to each, and every statement set out in the appeals and/or responses thereto. I have, however, considered all of them. Where a particular statement is not directly addressed, the absence of any

response thereto should not be interpreted to mean that I agree with or abide by the statement made.

3.5. Should any party be dissatisfied with my decision, it may apply to a competent court to have my decision judicially reviewed. Judicial review proceedings must be instituted within 180 days of notification hereof in accordance with the provisions of sections 6 and 7 of the Promotion of Administrative Justice Act No.3 of 2000.

MS B D CREECY, MP

MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT

DATE: 22/5/2024 .

JWS19

forestry, fisheries
& the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

Attention: Office of the State Attorney, Johannesburg

Email: RNemakonde@justice.gov.za

Dear Mr Nemakonde

RE: PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT (PROJECT REFERENCE-(12/1/040) – APPEAL IN TERMS OF SECTION 43 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT 107 OF 1998 NEMA, 1998 (NEMA)

APPEAL NAME: ORANGE BASIN RECONNAISSANCE PERMIT
LSA NUMBER: 231002

1. Please proceed to send a brief cover to Advocate Shahnaaz Bismilla, in her capacity as a member of the Minister's Appeals Advisory Team (AAT), to advise the Minister on appeals lodged in terms section 43 of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA)
2. For your ease of convenience, we will send the documents that form part of the brief directly to Counsel, whilst you attend to address the brief cover to reach Counsel.
3. Please note the appeal is in terms of NEMA and therefore urgent, and as such your urgent assistance in this regard is thus appreciated.
4. The agreed fee of the above counsel is R850 per hour, capped to maximum budget of R15 000.

RE: PROPOSED TGS ORANGE BASIN RECONNAISSANCE PERMIT PROJECT (PROJECT REFERENCE-(12/1/040) – APPEAL IN TERMS OF SECTION 43 OF THE NATIONAL ENVIRONMENTA MANAGEMENT ACT 107 OF 1998 NEMA, 1998 (NEMA)

5. Kindly be advised that Mr Joshua Makhaza (Jmakhaza@dffe.gov.za / 0763541590) is responsible for administering this matter and all future correspondence may be directed to him.

Kind regards,

Ms Heloise Van Schalkwyk
Acting-Director: Appeals and Legal Review
Department of Forestry, Fisheries and the Environment
Date: 5 March 2024

IN THE HIGH COURT OF SOUTH AFRICA

(WESTERN CAPE DIVISION, CAPE TOWN)

CASE NO.: 24492/2024

In the matter between:

AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED	First Applicant
THE GREEN CONNECTION NPC	Second Applicant
NATURAL JUSTICE	Third Applicant

and

DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES	First Respondent
MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT	Second Respondent
TGS GEOPHYSICAL COMPANY (UK) LIMITED	Third Respondent
MINISTER OF MINERAL AND PETROLEUM RESOURCES	Fourth Respondent

---

CONFIRMATORY AFFIDAVIT: SHAHIL SINGH

I, the undersigned,

SHAHIL SINGH

do hereby make oath and state as follows:

1. I am the Legal Advisor of The Green Connection NPC ("Green Connection").

2. The Green Connection NPC's registered office is situated at Unit B1, Clareview Business Park, 236 Imam Haron Road, Claremont, Cape Town.

3. I am duly authorised to depose to this affidavit on behalf of The Green Connection NPC, who is the second applicant.

4. The facts contained in this affidavit are within my personal knowledge, unless the context indicates otherwise, and are, to the best of my knowledge and belief, both true and correct.

5. I have read the founding affidavit deposed to by Johannes Walter Steenkamp. I confirm all of the allegations in the founding affidavit insofar as they pertain to me and to The Green Connection NPC.

SHAHIL SINGH

I hereby certify that the deponent knows and understands the contents of this affidavit and that it is to the best of the deponent's knowledge both true and correct. This affidavit was signed and sworn to before me at Rondebosch on this the 8 day of May 2025, and that the Regulations contained in Government Notice R.1258 of 21 July 1972, as amended by R1648 of 19 August 1977, and as further amended by R1428 of 11 July 1989, having been complied with.

COMMISSIONER OF OATHS
Full names:
Address:
Capacity:

KAREN CROUSE
COMMISSIONER OF OATHS
PRACTISING ATTORNEY - R.S.A
2ND FLOOR TANNERY PARK
21 BELMONT ROAD
RONDEBOSCH

IN THE HIGH COURT OF SOUTH AFRICA

(WESTERN CAPE DIVISION, CAPE TOWN)

CASE NO.: 24492/2024

In the matter between:

AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED	First Applicant
THE GREEN CONNECTION NPC	Second Applicant
NATURAL JUSTICE	Third Applicant

and

DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES	First Respondent
MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT	Second Respondent
TGS GEOPHYSICAL COMPANY (UK) LIMITED	Third Respondent
MINISTER OF MINERAL AND PETROLEUM RESOURCES	Fourth Respondent

---

CONFIRMATORY AFFIDAVIT: LUCIEN LIMACHER

I, the undersigned,

LUCIEN LIMACHER

do hereby make oath and state as follows:

1. I am the Head of Defending Rights and Litigation of Natural Justice.

L.J.D.

2. Natural Justice's principal place of business is situated at Mercantile Building, 63 Hout Street, Cape Town, 8000, South Africa.

3. I am duly authorised to depose to this affidavit on behalf of Natural Justice, who is the third applicant.

4. The facts contained in this affidavit are within my personal knowledge, unless the context indicates otherwise, and are, to the best of my knowledge and belief, both true and correct.

5. I have read the supplementary founding affidavit deposed to by Johannes Walter Steenkamp. I confirm all of the allegations in the founding affidavit insofar as they pertain to me and to Natural Justice.

LUCIEN LIMACHER

I hereby certify that the deponent knows and understands the contents of this affidavit and that it is to the best of the deponent's knowledge both true and correct. This affidavit was signed and sworn to before me at Johannesburg on this the 8th day of May 2025, and that the Regulations contained in Government Notice R.1258 of 21 July 1972, as amended by R1648 of 19 August 1977, and as further amended by R1428 of 11 July 1989, having been complied with.

COMMISSIONER OF OATHS

Full names: NATALIE FERREIRA LIMACHER
Address: Commissioner Of Oaths Ex Officio
Capacity: Non-Practising Attorney (RSA)
112 7th Avenue, Fairland
Johannesburg 2170

IN THE HIGH COURT OF SOUTH AFRICA

(WESTERN CAPE DIVISION, CAPE TOWN)

CASE NO.: 24492/2024

In the matter between:

AUKOTOWA FISHERIES PRIMARY CO-OPERATIVE LIMITED	First Applicant
THE GREEN CONNECTION NPC	Second Applicant
NATURAL JUSTICE	Third Applicant

and

DIRECTOR-GENERAL: DEPARTMENT OF MINERAL AND PETROLEUM RESOURCES	First Respondent
MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT	Second Respondent
TGS GEOPHYSICAL COMPANY (UK) LIMITED	Third Respondent
MINISTER OF MINERAL AND PETROLEUM RESOURCES	Fourth Respondent

---

CONFIRMATORY AFFIDAVIT: FIONA BESTER

I, the undersigned

FIONA BESTER

do hereby make oath and say that:

1. I am an adult female attorney and I am a partner of Chennells Albertyn

Attorneys of 44 Alexander Street, Stellenbosch, Western Cape, the Applicants' Attorney of Record.

2. The facts deposed to herein are within my personal knowledge, unless the context indicates to the contrary, and are true and correct.

3. I have read the founding affidavit deposed to by Johannes Walter Steenkamp. I confirm all of the allegations in the founding affidavit insofar as they pertain to me and to Chennells Albertyn Attorneys.

FIONA BESTER

I hereby certify that the deponent knows and understands the contents of this affidavit and that it is to the best of the deponent's knowledge both true and correct. This affidavit was signed and sworn to before me at Stellenbosch on this the 08th day of May 2025, and that the Regulations contained in Government Notice R.1258 of 21 July 1972, as amended by R1648 of 19 August 1977, and as further amended by R1428 of 11 July 1989, having been complied with.

COMMISSIONER OF OATHS
Full names: Onke Manggwambi
Address: Stellenbosch, Alexander Street
Capacity: Administration Clerk

CLERK : CIVIL
Private Bag X5009, Stellenbosch, 7600
2025 -05- 08
STELLENBOSCH
MAGISTRATE'S COURT