

Reinett Mogotshi

From: Lindsey Bungartz
Sent: 01 March 2018 10:31 PM
To: Reinett Mogotshi
Subject: FW: Exploration Drilling off Richardsbay- in re Scoping Report

Please add to the CRR if not there already

From: Mark Beyl [mailto:mark@mblaw.co.za]
Sent: Thursday, February 08, 2018 11:00 AM
To: Lindsey Bungartz <Lindsey.Bungartz@erm.com>
Cc: 'Phillip Marx' <phillip@zwn.co.za>; 'Gerrie Delport' <Gerrie.Delport@expresspros.co.za>; 'First Call Maintenance' <firstcall@mweb.co.za>; Bruce Mann <bruce@ori.org.za>; dickpratt@ivanhoe.co.za
Subject: RE: Exploration Drilling off Richardsbay- in re Scoping Report



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mbeyl@mblaw.co.za

P O Box 2469
Johannesburg 2000
Docex 322 JHB
Tel: 011 333 7790
Fax: 086 623 1471

Hi Lindsay,

I refer to my previous letter on 8 November 2017.

Kindly inform me what is the status of the exploration drilling of the above project is, and in particular when the interested and affected parties meeting will take place?

Look forward to hear from you soon.

Kind Regards,

From: Mark Beyl

Sent: 08 November 2017 12:27 PM

To: lindsey.bungartz@erm.com

Cc: 'Phillip Marx' <phillip@zwn.co.za>; 'Gerrie Delport' <Gerrie.Delport@expresspros.co.za>; 'First Call Maintenance' <firstcall@mweb.co.za>; Bruce Mann <bruce@ori.org.za>; dickpratt@ivanhoe.co.za

Subject: Exploration Drilling off Richardsbay- in re Scoping Report



1. We refer to the above matter, and more specifically to our telephonic conversation earlier today.
2. We wish respond to the invitation to comment and attend to the public participation meetings on 13 November 2017, which has now been postponed to early next year.

BRIEF BACKGROUND OF SADSAA & RBSBC

3. Our organization, the SOUTH AFRICAN DEEP ANGLING SEA ORGANISATION (“SADSAA”) is the national governing body of all recreational deep sea anglers in South Africa, is made up of all the geographical provinces, and in the provinces in turn is made up of various clubs, which has approximately 8000 members countrywide. Amongst our members are highly regarded marine scientists and biologists, which assist us with credible scientific data. Writer is the national environmental officer of SADSAA, and a member of the RBSBC.
4. SADSAA’s objectives relevant to the above issue is *inter alia* to liaise and co-operate with all levels of government, private enterprise and other concerned and/or interested bodies for the protection and/or conservation of marine fish, their habitats and food fish and/or sport fishing grounds.
5. SADSAA is affiliated to various international organization’s such as IGFA, the Billfish Foundation and International Light Tackle Association, and is also recognized by SASCOC.

RBSBC

6. This letter is also addressed to you on behalf of one of our constituent clubs, the Richards Bay Ski Boat Club (“RBSBC”), which is affiliated to Zululand, and the latter is one of SADSAA’s constituent provinces.
7. RBSBC has a direct interest in the above intended exploration drilling as the area of interest is approximately 60 km from the Richards Bay Port, which will probably be used as a basis for the drilling vessels.

INTERESTED AND AFFECTED PARTIES

8. The RBSBC and SADSAA request to be awarded the status as interested and affected party in terms of the National Environmental Management Act (NEMA), and we shall be pleased to receive confirmation as such.

COMMENTS

9. Naturally both SADSAA & the RBSBC will forward more detailed comments after the public participation meetings early next year, but in the main our current concerns are briefly set out hereinafter.
10. SADSAA & the RBSBC is hosting an international Game & Bill Fish Tournament in February 2019, and your client’s intended drilling is scheduled for late 2018 and early 2019.
11. The area of interest is close to a renowned marlin and tuna fishing area and it is within the Agulhas current that flows southward following the shelf edge, that is believed to be the path of migratory bill and gamefish. To an extent these environmental concerns have been identified by yourselves, although not specifically bill and gamefish.
12. Common sense dictates if it affects various fish species and mammals , it will affect Marlin, Tuna and game fishing. We are concerned the intended drilling causes the migratory fish to avoid

the area of interest, which could result in little or no fish being caught, and notwithstanding a well-run tournament hosted by SADSAA and the RSBC, any international participant will be loath to return to this venue.

13. We look forward to your reply, as well as the new dates for the meeting once they are determined.

Yours Faithfully,

Mark Beyl

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 22 February 2018 04:35 PM
To: 'development@dargleconservancy.org.za'
Cc: Lindsey Bungartz
Subject: RE: Environmental Impact Assessment for Exploration Drilling within Block ER236, off the East Coast of South Africa.

Hi Brenda

Thank you for the email. Dargle Conservancy has been registered as an Interested and Affected Party (I&AP) and will be kept informed throughout the EIA process.

Kind Regards
Reinett Mogotshi (on behalf of Lindsey Bungartz)

From: Brenda Grant [<mailto:development@dargleconservancy.org.za>]
Sent: Friday, February 09, 2018 6:21 AM
To: Lindsey Bungartz <Lindsey.Bungartz@erm.com>
Subject: Environmental Impact Assessment for Exploration Drilling within Block ER236, off the East Coast of South Africa.

Please register the Dargle Conservancy as an interested and affected party in the above matter.

Regards
Brenda 0828537815



Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Briege Williams
Tel: 021 462 4502
Email: bwilliams@sahra.org.za
CaseID: 11842

Date: Monday February 12, 2018
Page No: 1

Interim Comment

In terms of Section 38 of the National Heritage Resources Act (Act 25 of 1999)

Attention: Ms Alessandro Gelmetti
Eni South Africa BV
1st Floor, Icon Building c/o Cube WS Cnr Lower Long St. & Hans Strijdom Rd. Foreshore, 8001,
Cape Town, South Africa

Eni South Africa BV (Eni), and Sasol Africa Limited (Sasol) hold an Exploration Right 12/3/236 (ER 236) off the East Coast of South Africa. Eni and Sasol are considering the possibility of conducting an exploration drilling programme in Block ER 236 to assess the commercial viability of the hydrocarbon reservoir for future development.

The South African Heritage Resources Agency would like to thank you for submitting the "Draft Scoping Report for Exploration Drilling within Offshore Block ER236, KZN, South Africa".

With regard to the Draft Scoping Report it is noted that it contains no mention of maritime and underwater cultural heritage such as shipwrecks. In terms of the National Heritage Resources Act, No 25 of 1999 (NHRA), heritage resources, including any wreck being a vessel or aircraft or any part thereof older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority.

The East coast of South Africa has historically been a very busy shipping channel and whilst there has been no shipwrecks positively identified directly in the exploration area there are three reports of ships being lost in the study area. Two of the reported wrecks are those of the Nova Scotia (1942) and the Aelybryn (1943) which were both lost during the 2nd World War. Both vessels were torpedoed by German U-Boats with a great loss of life, especially the Nova Scotia who was transporting Italian internees when she was hit, resulting in the loss of 858 people. The Nova Scotia is known to have gone down in the northern part of the exploration area whilst the Aelybryn may lie to the east of the area, both would be considered war graves. Another well known vessel thought to have been wrecked in the area is that of the Waratah which went missing in July 1909, en route from Durban to Cape Town, she disappeared with 211 passengers and crew aboard and no trace of her has ever been found.

As the proposed exploration drilling is undergoing an Environmental Authorisation (EA) Application process and National Environmental Management Act, No 107 of 1998 (NEMA), it is incumbent on the developer to ensure that a Heritage Impact Assessment (HIA) is done as per section 38(3) and 38(8) of the National

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Enquiries: Briege Williams
Tel: 021 462 4502
Email: bwilliams@sahra.org.za
CaseID: 11842

Date: Monday February 12, 2018
Page No: 2

Heritage Resources Act, Act 25 of 1999 (NHRA). This must include a maritime archaeology component and any other applicable heritage components. The HIA must be conducted as part of the EA Application in terms of NEMA and the 2017 NEMA EIA Regulations.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Briege Williams
Heritage Officer
South African Heritage Resources Agency

Lesa la Grange
Acting Manager: Maritime and Underwater Cultural Heritage
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/409359>
(, Ref:)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for

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Date: Monday February 12, 2018
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proposed work.

2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 22 February 2018 04:39 PM
To: 'PTeddy Govender'
Subject: RE: Greenpeace Durban Local Group Updates | 14 February 2018

Good Day

Thank you for your email. We have noted the comments from Green Peace, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: PTeddy Govender [mailto:483svet@gmail.com]
Sent: Friday, February 16, 2018 12:43 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Fwd: Greenpeace Durban Local Group Updates | 14 February 2018

Please note the comments of the Greenpeace.

----- Forwarded message -----

From: "Durban Volunteers Africa" <volunteers.durban.africa@greenpeace.org>
Date: Feb 14, 2018 16:08
Subject: Greenpeace Durban Local Group Updates | 14 February 2018
To:
Cc:

Dear All,

Herein are the **Durban Local Group** updates which include: Report back: Exploration Drilling public meeting, Latest: South Durban logistics park and Hillcrest landfill, Report back: Strategic Planning Meeting, and Durban Knots Club 1st Meetup - Southern Rock - Sat.

***Report back: Exploration Drilling public meeting**

Unfortunately I didn't make the [public meeting](#) with regards to the **EIA** for **Exploration Drilling** off our Coast (Offshore Block ER236) as I was knocked down by the nasty tummy bug that's been going around, but am now fighting fit! From what I gather the meeting was well attended with 3x full taxi loads of concerned folk from **Umlazi** and **Kwamkutha**, and 2x taxi loads of **KZN fisherfolk** attending at the Tropicana Hotel on Durban's Golden Mile. Below this email is the report back via **Desmond D'sa** of **SDCEA** and a message from **Alice Thomson** via the **Earthlife Durban** mailing list.

***Latest: South Durban logistics park and Hillcrest landfill**

Way below this email you can find the latest update with regards to the respective **Durban eco justice** court case battles, that being the **South Durban logistics park** and the **Hillcrest landfill**.

***Report back: Strategic Planning Meeting**

On Sunday, 11 Feb we had a successful Strategic Planning Meeting (highlights directly below) held at the **Bayhead Natural Heritage Site**. I selected the **Bayhead Natural Heritage Site** strategically as part of the planning meeting with an eye on the major eco battles one would be faced with - thanks to the carbon-addicted "[Phakisa Oceans Economy](#)". BTW for the **South African and Global Democratic Eco-Socialist Alternatives** do have a look at the new [Climate Crisis book](#) (edited by **Vishwas Satgar**) with **Blue Economy** blahblah on trial. No doubt the **Bayhead Natural Heritage Site** is a strategic location and vital eco-gem which has been somewhat neglected - numerous alien vegetation can be identify, boardwalk rickety, collapsing in places, litter a ton! Notes from the meeting will be sent out soon too.



***Durban Knots Club 1st Meetup - SouthernRock - Sat**

So as you know, we the **Greenpeace local group: Durban** have started a **Knots Club!** The primary objective of the **Durban Knots Club** is to help us (Durb's climbers) stay active, but also to introduce potential climbers to the climbing world. And so we have earmarked this coming, Saturday 17 Feb for the 1st meetup at the [Southern Rock Climbing Centre](#) - which is an indoor climbing gym. These climbing gyms are rock climbing gyms which is different to the industrial climbing techniques we use in **Greenpeace** - But even though it is different it does help you in other ways; keeping fit, exercising and growing your core muscles, getting used to working at heights, growing your safety and connectivity thinking, and it will definitely improve your confidence in climbing. There is usually a bouldering section at these climbing gyms where you can free climb (you do not need a rope or a climbing buddy), and this is great for growing your confidence and physical strength when starting out at rock climbing. ***Please note** that the day pass for the gym is R110 and also one would need to fill in a waiver (one can print and complete the waiver before you arrive in order to speed up the admission process). We plan to meetup at 10am - If you are keen to join, do let me know ASAP! Ta!

Best,
Delwyn - on behalf of the facilitators
Greenpeace Durban Local Group

----- Forwarded message -----

From: **Alice Thomson** <alicetho@ispace.co.za>

Date: Fri, Feb 9, 2018 at 6:01 PM

Subject: Fw: Public Meeting Reminder: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

To: Earthlife Africa google group <earthlife-durban@googlegroups.com>

Dear Earthlifers

Below is a report-back of the public meeting, which formed part of the EIA for offshore exploration drilling off our coast. If you would like to get involved in the campaign against offshore drilling, please let me know.

Yours for justice

Alice

On 08 Feb 2018, at 4:14 PM, Alice Thomson <alicetho@ispace.co.za> wrote:

We certainly did rattle them!

I spoke about climate change – the situation in the Western Cape should be a massive wake-up call to all of us that we need to avert climate catastrophe. I pointed out that of all the fossil fuel reserves that already exist, we can only afford to use 20%. 80% of all our coal, oil and gas must stay under the ground if we are to avert catastrophic climate change. Thus Eni could find themselves in the position that many of their existing wells will become “stranded assets”. In other words their investments will be useless. This will happen if governments around the world take the Paris Climate Agreement seriously and keep temperatures below 2 degrees above pre-industrial levels. It really is stupid to explore for more oil and gas when we know we cannot afford to use what has already been discovered.

The Managing Director at Eni responded by saying that he is concerned about climate change, but that we will still need some oil and gas as we transition away from fossil fuels. I would have liked to respond. This transition should lead to a reduction in Eni’s operations and yet they want to expand operations and therefore expand supply. It is clear that they have no idea about the carbon bubble and they are betting that our governments will not take climate change seriously enough to cut emissions to what is required by science.

Eni together with Shell are involved in the biggest oil corruption scandal ever – they paid a minister in Nigeria \$1.3 billion in a dirty deal for a license to explore for oil in a valuable oil block. The case will go to court in Milan in March. Read more here <https://unearthed.greenpeace.org/2017/02/10/shell-and-eni-hit-with-corruption-charges-over-nigerian-oil-deal/>
<https://www.globalwitness.org/en-gb/press-releases/nigeria-files-billion-dollar-claim-against-jp-morgan-over-shell-and-eni-2011-oil-deal/>
<https://www.globalwitness.org/en/campaigns/oil-gas-and-mining/shell-knew/>
<https://www.nytimes.com/2017/12/20/business/energy-environment/shell-eni-italy-nigeria.html>

Eni has a shocking track record in Nigeria with an average of 4 spills per week in 2015 <https://unearthed.greenpeace.org/2016/02/22/arctic-oil-eni-nigeria-spills/> Environmental Rights Action says that oil spills result in loss of livelihoods, loss of health and reduction in lifespan. Amnesty International says that Eni have poor reporting systems and the number of spills is likely to be far higher than what they report. Spills lead to the destruction of fishing grounds, deaths and sickness. In spite of the 50 year oil boom in Nigeria and the fact that it is a very wealthy country, 80% of the citizens live on less than \$2 per day. The poor do not realise the benefits of the oil industry.

This is perhaps why the room disrupted when the Eni spokesman blamed poor communities on the oil spills, saying that most of them were due to sabotage and theft from oil pipelines. However, if the oil revenues were used to give every Nigerian decent health, education, sanitation, water and electricity, people wouldn't see the need to "steel" from the pipelines.

ERM admitted that very few local jobs will be created as there will be mostly highly specialised work which will be brought in from other countries.

On 08 Feb 2018, at 7:45 AM, Desmond <desmond@sdceango.co.za> wrote:

Hi Everyone

Last night's meeting was a shocker for the consultants as they never expected to be taken on by a well-informed youth from UMLAZI and KWAMKUTHA , I was proud these guys rocked up with 3x full taxis loads and 2x taxis loads of KZN fisherfolk at the Tropicana Hotel on Durban's Golden Mile. The company must have thought they could get away with just a tick box exercise instead they must return and provide a series of answers that they and their consultants had to answer and this went on till late in fact the meeting closed after 21.30pm as clearly the consultants EMR [David Shandler]and ENI were exhausted and could not take the fiery probing questions launched at them .

These are the questions that must be passed onto the guys attending the Port Shepstone meeting today details below. Please encourage people you know to attend.

The major points

- Sasol their strategic partner was not available?
- They did not advertise for this meeting as they decided that they will work only with people who registered. Not in ISIZULU or even the English media .

- There are key areas all along the coast that they did not engage that will be affected and will have to decide where this is public participation ? [See below the areas where the meetings are held]
- The presentation by ENI was flawed and gave a one sided view of the oil and gas exploration in at least 9 African countries , Nigeria, Kenya, Ivory Coast , Ghana ,Mozambique ,South Africa Etc .They presented the benefit of the oil& gas exploration and some jobs they create ,answer to climate change nothing to do with the atrocities and destruction their facilities have contributed throughout the continent .
- They have a renewable energy programme no facts or investment when they intend carrying this out but will be done after the oil& gas is explored .
- The time frame is limited and they want to present the scoping report before the regulator within 30days. They conceded to print all documents and the scoping report in ISIZULU
- They are looking to drill and recover 3.4 billion litres of oil and gas.[Green gases is the terminology they use]
- Safety a message issue which they failed to respond
- They refused to respond to certain question regarding the millions of jobs , small business and doing a social enhancement study that shows that these jobs could be lost .
- They have already determined that certain aspects of their development will not be investigated .
- EMR will do inhouse research and we raised this as conflict of interest .
- No research on the impacts of the coastline.
- We demanded them explain and show the benefits and clearly there are none .
- They conceded that their language and information must be brought to the level of ordinary people and in their language
- They have conceded to a peer review and this appointment must be done in full collaboration of the communities
- They put across the notion that the long term benefit will be cheaper fuel.
- Nothing on the loss of livelihoods
- Scoping documents will be done and put into libraries which we disagreed and requested everyone gets either hard copies or electronic
- On the pathetic history in Africa they blamed sabotage and theft
- On the corruption scandal they did not respond but merely to say they had a proud history .

Clean air vs industrial development: Durban court case explained

South Durban environmental alliance brings case to court

The High Court in Durban is to rule on an application to prevent a new industrial development in South Durban. Photo: Nomfundo Xolo

By [Mluleki Marongo](#)

8 February 2018

What is the right balance between economic development and environmental protection? This is the issue raised in a court battle over a new industrial development in south Durban.

On 11 December 2017, the High Court in Durban heard a case brought by the South Durban Community Environmental Alliance, a civic organisation which aims to protect air, water, and soil quality. The alliance challenged the decision of the KwaZulu-Natal MEC for Economic Development, Tourism and Environmental Affairs to grant environmental authorisation for the construction of a logistics and distribution park.

The site of the park is in the South Durban Industrial Basin, very close to the suburbs of Clairwood, Moberi and Jacobs, which are already part of an industrial hub. The plan approved by the MEC includes warehouses, buildings, parking places and a yard to service heavy lorries.

The alliance believes that the development will cause a danger to the health, air quality and wellbeing of the surrounding communities. They are also concerned about the noise from the trucks and that children, most of whom walk to school, will be in danger from the trucks.

The alliance, which has a long history of fighting for clean air in the area, says under apartheid people were deliberately housed in the area to facilitate easy access to cheap labour for industry. As a result, residents live near toxic dumps, sewage treatment plants, and polluting industries and bear the public health costs associated with the petrochemical industry. These health costs include high levels of asthma, severe chest complaints, and cancer, says the alliance.

The land on which the park would be built is owned by Capital Property Fund, which made an application to the MEC's department in order to develop the land and comply with the requirements of the National Environmental Management Act (NEMA).

Before the Department could grant approval it had to consult interested and affected parties. An environmental assessment practitioner was appointed to investigate the potential damage to the environment. An environmental impact report was compiled and issued. On 29 May 2015, the department granted the environmental authorisation. The alliance appealed, unsuccessfully, to the MEC and then approached the High Court seeking an order to compel the MEC to reconsider their appeal.

The alliance presented four major arguments to support their requests. They said:

- the MEC had failed to consider two major health studies in coming to his conclusion showing the damage caused by polluting industries and vehicle trucking emissions. The studies also showed that such industries are major causes of ill health such as cancer, asthma and other respiratory diseases;
- the report on which the MEC had based his decision contained no assessment of the health of the community, such as the number of children who are asthmatic and suffer from respiratory diseases;
- the MEC relied on a particular report which did not use appropriate methodology and was written by a person whose qualifications were omitted from the report; and
- the MEC failed to consider the principle of environmental justice. This principle would require him to take into account environmental damage and ensure that they this did not unfairly discriminate against people.

The MEC opposed the challenge, arguing that the authorisation was done in terms of the law, that the environmental impact report had met all legal requirements. He said the report had considered the air quality issue and concluded that the increased emissions would only have a minor impact on the air quality. He also said he had considered the two health studies and available evidence suggested no need to investigate the matter further.

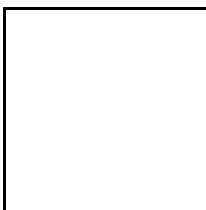
Capital Property Fund also opposed the alliance's challenge. Its reasons closely mirror the MEC's. The Fund argued that there would be no significant danger to the health of local communities from the development and the use of heavy haulage vehicles during the construction and operation of the park; that the air quality issue had been assessed and addressed; and that the alliance had not proved that the park would generate disproportionate vehicular emissions.

The key question raised by this case is the balance between economic development on the one hand and environmental impact on the other. Section 24 of the Constitution gives everyone the right "to an environment that is not harmful to their health or well-being" and requires that laws are passed to "secure ecologically sustainable development". South Africa has many laws that aim to strike a sound balance between the two, and the Community Alliance's case shows that the interpretation of these laws and their implementation remains an issue of concern for communities seeking to protect their constitutional right to a healthy environment.

The Court reserved judgement.

Legal fight over R4.5bn logistics park in Durban

15/09/2017



Tania Broughton, News24 correspondent

Error! Filename not specified.

Durban - Residents of Clairwood are expected to turn out in their numbers at the KwaZulu-Natal High Court in Durban on Friday when their lawyers challenge the provincial government's approval of a massive R4.5bn logistics park at the old Clairwood Racecourse - once the only green lung in the area.

The South Durban Environmental Alliance - through the Legal Resource Centre - want a judge to overrule the decision which, they say will only worsen the pollution-related illnesses the community suffers.

These are claimed to include cancer, asthma and other respiratory diseases.

The 76.4ha site is to be developed by Capital Property Fund which has approval for warehouses, buildings, parking and a distribution yard to service heavy haulage vehicles transporting containers to and from the logistics park.

In heads of argument, it is argued that the approved development abuts the residential suburb and the community - comprising 22 000 households and 200 000 residents - is already surrounded by heavy industry.

It is in close proximity to several major hazard installations, including two petrochemical refineries, a large paper mill, motor manufacturer and a major tank storage area where hazardous chemicals are stored and pipelines carrying inflammable substances in large volumes.

"The location of Clairwood in the South Durban Industrial Basin (SDIB) is a legacy of apartheid era town planning which deliberately located industry and working class communities in close proximity to each other.

"The objective was to ensure control of the disenfranchised in resource challenged townships while simultaneously ensuring the provision of labour for the burgeoning exclusively white industry."

'Not our duty'

The alliance alleges that in approving the development - and turning down its subsequent appeal - the then MEC for economic development Mike Mabuyakhulu had not taken into account the findings of two major health studies probing the effect of air pollution.

He also had not taken into account "the prevailing air quality conditions" and the impact the development could have on the well-being of the residents.

The present MEC, Sihle Zikalala, in his affidavit, claims these were taken into consideration.

But he adds that if the alliance "felt strongly about this aspect", it should have put up a more recent air impact assessment into the effects the development would have in the South Durban basin.

The alliance says that is not its job.

"It is plainly not our duty to provide the competent authority with the information necessary to reach a decision on an application for environmental authorisation."

'No genuine dispute'

Capital Property Fund, in its heads of argument, says the environmental impact of the park was assessed.

"There is no significant danger to the health of local communities as a result of the development and the consequent use of heavy haulage vehicles during the construction and operation of the logistics and distribution park. The effect on air quality will be negligible.

"Air quality was not overlooked or ignored during the Environmental Impact Assessment process. An appropriately qualified air quality risk assessor investigated air quality impact. His substantive findings have not been challenged in a meaningful way.

"The applicant [the alliance] may disagree with those findings, but it has not raised a genuine dispute. Simple disagreement with the outcome is not a valid basis for judicial review," it argues.

The matter is expected to be heard by Judge Rashid Vahed and judgment is expected to be reserved.

- 9 Feb 2018
- The Mercury
- Bernadette Wolhuter

EnviroServ fight continues

THE Upper Highway Air (UHA) group is not giving up its fight against EnviroServ and has returned to court, this time to challenge the Minister of Environmental Affairs' December decision to relax the terms of a suspension notice issued to the waste disposal giant.

The EnviroServ Shongweni landfill site's operating licence was suspended last April after a barrage of complaints from locals who alleged "toxic" emissions from the hazardous waste site were making them sick.

But then in December, Environmental Affairs Minister Edna Molewa relaxed the terms of the suspension and granted EnviroServ permission to accept, treat and dispose of solid waste at the site.

Now, the UHA wants a judge to set aside Molewa's decision and lodged its application in the Durban High Court on Tuesday.

In her founding affidavit, UHA director Lauren Johnson said the minister's December decision constituted "procedurally and substantively unfair administrative action".

Johnson said the suspension could only be lifted when the department was satisfied there was "no longer a threat to human health or environment arising from operations".

And it was not "a scenario where (EnviroServ) could be rewarded from lessening the threat its operations pose and the harm caused," she went on.

Johnson claimed that EnviroServ was being rewarded for "alleged reductions in emissions", while the impacts on the communities remained.

And she labelled the analysis EnviroServ submitted to the minister in November and December 2017, "which allegedly demonstrated the existence of another mystery polluter in the area", as "palpably flawed" and of "selected portions of monitoring data, culled from the totality of monitoring data available".

EnviroServ spokesperson Thabiso Taaka said yesterday afternoon that the company was aware of the court action.

"EnviroServ has noted the application by the Upper Highway Air, for a review of the minister's decision and is consulting its legal team on the matter," Taaka said.

"We are confident that the minister has considered all the facts presented to her pertaining to our remedial programme, scientific reports and continuous monitoring."

The UHA group also filed its replying affidavit this week in the ongoing civil proceedings to have the site shut down permanently.

And the criminal case – in which EnviroServ chief executive Dean Thompson, coastal operations manager Clive Kidd, group technical director Esmé Gombault and treatment and disposal specialist Dr Johan Schoonraad stand accused of contravening the National Air Quality Act – was also in court this week.

<http://witspress.co.za/catalogue/the-climate-crisis/>

The Climate Crisis

South African and Global Democratic Eco-Socialist Alternatives



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Editor(s): [Vishwas Satgar](#)

- **Publication Date:** February 2018
- **Dimensions and Pages:** 336pp; 229 x 152mm

‘This volume reminds us that fossil fuel corporations, petro states and ruling elites are the key forces deepening the climate crisis. Hurricanes like Harvey and Irma have once again demonstrated the ways that extreme weather events disproportionately impact working people, the poor and Black lives. The wealthy, meanwhile, take cover in their wine cellars on private islands. Only systemic change, led from below, holds out the hope for a safe and sturdy future. This volume features some of the best thinking we have from the climate justice forces who are already mapping the way to that next world.’

— **Naomi Klein, author of *No Is Not Enough*, *This Changes Everything*, *The Shock Doctrine* and *No Logo***

Capitalism’s addiction to fossil fuels is heating our planet at a pace and scale never before experienced. Extreme weather patterns, rising sea levels and accelerating feedback loops are a commonplace feature of our lives. The number of environmental refugees is increasing and several island states and low-lying countries are becoming vulnerable. Corporate-induced climate change has set us on an ecocidal path of species extinction. Governments and their international platforms such as the Paris Climate Agreement deliver too little, too late. Most states, including South Africa, continue on their carbon-intensive energy paths, with devastating results. Political leaders across the world are failing to provide systemic solutions to the climate crisis. This is the context in which we must ask ourselves: how can people and class agency change this destructive course of history?

Volume three in the Democratic Marxism series, *The Climate Crisis* investigates ecosocialist alternatives that are emerging. It presents the thinking of leading climate justice activists, campaigners and social movements advancing systemic alternatives and developing bottom-up, just transitions to sustain life. Through a combination of theoretical and empirical work, the authors collectively examine the challenges and opportunities inherent in the current moment. This volume builds on the class-struggle focus of Volume 2 by placing ecological issues at the center of democratic Marxism. Most importantly, it explores ways to renew historical socialism with democratic, ecosocialist alternatives to meet current challenges in South Africa and the world.

1 The Climate Crisis and Systemic Alternatives **Vishwas Satgar**

PART ONE :THE CLIMATE CRISIS AS CAPITALIST CRISIS

2 The Limits of Capitalist Solutions to the Climate Crisis **Dorothy Grace Guerrero**

3 The Anthropocene and Imperial Ecocide: Prospects for Just Transitions **Vishwas Satgar**

PART TWO: DEMOCRATIC ECO-SOCIALIST ALTERNATIVES IN THE WORLD

4 The Employment Crisis, Just Transition and the Universal Basic Income Grant **Hein Marais**

5 The Rights of Mother Earth **Pablo Sólon**

6 Buen Vivir: An Alternative Perspective from the Peoples of the Global South **Alberto Acosta and Mateo Martínez Abarca**

7 Challenging the Growth Paradigm: Marx, Buddha and the Pursuit of 'Happiness' **Devan Pillay**

8 Ubuntu and the Struggle for an African Eco-socialist Alternative **Christelle Terreblanche**

9 The Climate Crisis and the Struggle for African Food Sovereignty **Nnimmo Bassey**

PART THREE: DEMOCRATIC ECO-SOCIALIST ALTERNATIVES IN SOUTH AFRICA

10 The Climate Crisis and a 'Just Transition' in South Africa: An Eco-Feminist-Socialist Perspective **Jacklyn Cock**

11 Energy, Labour, and Democracy in South Africa **Michelle Williams**

12 Capital, Climate and the Politics of Nuclear Procurement in South Africa **David Fig**

13 Climate Jobs at Two Minutes to Midnight **Brian Ashley**

14 Deepening the Just Transition Through Food Sovereignty and the Solidarity

Economy **Andrew Bennie and Athish Satgoor**

15 Eco-Capitalist Crises in the 'Blue Economy': Operation Phakisa's Small, Slow Failures **Desné Masie and Patrick Bond**

CONCLUSION: **Vishwas Satgar**

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 22 February 2018 04:47 PM
To: K Langa (21110737); ERM South Africa Project ENI Offshore Exploration
Subject: RE: EIA FOR EXPLORATION DRILLING WITHIN BLOCK ER236 OFFSHORE OF THE EAST COAST, SOUTH AFRICA

Dear Sir/Madam

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: K Langa (21110737) [mailto:21110737@dut4life.ac.za]
Sent: Wednesday, February 14, 2018 2:51 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: EIA FOR EXPLORATION DRILLING WITHIN BLOCK ER236 OFFSHORE OF THE EAST COAST, SOUTH AFRICA

ATT: Charlene Jefferies

Greetings.

I hereby wish to submit a form for registration as interested and affected party for the EIA for exploration drilling as above mentioned.

Herewith attached is a form with comments.

Thank you

Kwanele Langa

Registration and Comment Sheet

EIA FOR EXPLORATION DRILLING WITHIN BLOCK ER236, OFFSHORE OF THE EAST COAST, SOUTH AFRICA

Should you have any queries, comments or suggestions regarding the proposed Project, please note them below.

Return this comment sheet to:

Charlene Jefferies of ERM Southern Africa

Email: eni.offshore.eia@erm.com


Tel: 021 681 5400;

Postnet Suite 90, Private Bag X12, Tokai, 7966

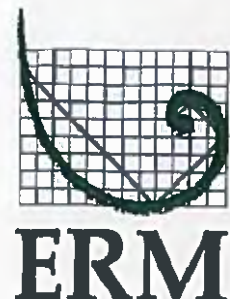
Project Website: www.erm.com/eni-exploration-eia

I want to formally register as an Interested and Affected Party (I&AP) and be provided with further information and notifications during the EIA process		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
I would like to receive my notifications by:	Email <input checked="" type="checkbox"/>	Post <input type="checkbox"/>	Fax <input type="checkbox"/>

Comments

Lodge oil spill contingency plan in Environmental Management Programme.			
Ensure reasonably practicable compliance for ecological sustainability.			
Transparency Policy (Community benefit) listed activities and careers.			
Title and Name:	MR KWANELE LANGA		
Organisation:	PRIVATE		
Telephone:	N/A	Fax:	N/A
Cell:	082 830 6386	Email:	21110737@clut4life.co.za
Postal Address:	P.O. BOX 20, EMPANGENI, 3880		
Kwanele		13-02-2018	
Name KW	Signature	Date	

Thank you for your participation!



Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 08:04 AM
To: Steven Craig; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Block ER236

Good Morning Steven

Thank you for your interest in this project. The documents submitted shall be forwarded to Eni for consideration.

Kind Regards
Reinett Mogotshi

From: Steven Craig [mailto:Steven.Craig@craig-group.com]
Sent: Wednesday, February 14, 2018 9:52 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: RE: Block ER236

Good morning
Just a follow up email
Your feedback appreciated

Thanks
Steven

Steven Craig
General Manager
Craig International South Africa (Pty) Ltd

Tel: +27 (21) 552 9445
Mob: +27 (82) 530 5826
Out of Hours: +27 82 324 9580
Email: Steven.Craig@craig-group.com
Web: www.craig-international.com



Craig International South Africa (Pty) Ltd
Unit 1 Corner of 1st & 4th Street, Montague Gardens
7441, Cape Town, South Africa

Our latest addition to EnergySurplus - NOV Rapid Rig (efficient singles land rig)

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ebuy Our Online Procurement Catalogue https://clicktime.symantec.com/a/1/3buorFNe_yTuRO-qBQbh9p8gKgEN-FW_-r4QvsbK0pQezgAK9moDUGR456u_9psUnJABcjBXWR0ry6sYHjoqzKaDtd3pYk-SVtGH0vziYlKpjic2KDJMuy4QoaULIUjWXthGSZwywS0-7pQRJp3y7yifKmRo3AQzIY3i9gZzq5McX5mJiMOXogrTz60wytPiBm-YeS5kRQm6_Y0uik_LFV69tKVOS_8GdrnIQD_INucADqmD8i_lccHu8ruG9kOhIS9GYFu5QFPKegCABMiewlYjy6Sk2hFnyz2MLQiP6N5bDGbevyOSPwvyj1TcaEPGJvRpEoxKpJS7QAu1qwfUP8wyHIO0ZnPOHP7I6omk7caxrs6FbPZmLIH5mzhREkzqvnkXyvbLLTiKNmu2hQcMojqlZksC1XAZ-e2wO0%3D&u=http%3A%2F%2Fwww.craig-group.com%2F

B-BBEE Level 4 Contributor

Global Sourcing, Worldwide Supply

Aberdeen Calgary Cape Town Doha Dubai Hamburg Houston

From: Steven Craig

Sent: 22 January 2018 01:40 PM

To: 'eni.offshore.eia@erm.com' <eni.offshore.eia@erm.com>

Subject: Block ER236

Good day

Further to above proposed project I would appreciate information as regards registering our South African entity. We currently support Saipem, Petromar and Boscongo from this office and fully set up with 30day credit facilities. We are currently BBEEE Level 4 moving to Level 2 in the coming months.

A quick company intro as follows:

Operating in South Africa since 2001 and part of The Craig Group, we have offices in Aberdeen (head office since 1933), Calgary, Doha, Dubai, Houston, Hamburg and Warsaw enabling access to all major manufacturers and suppliers worldwide with easy access to reseller discounts and savings. We are regularly supplying to Bumiarmada, RK, EMAS, Greatship, Fugro, Swire, TERAS and Tidewater within Southern Africa, while we also support many of the local shipping agents. We ship to Angola, Congo, Namibia, Gabon, Ghana, Cameroon, Ivory Coast and Nigeria on a weekly basis where our main clients include Chevron, BP, ENI and many of the drilling contractors & oil and mining service players. Recent projects include Maersk Deliverer, Venturer, Belford Dolphin, EMAS Constellation, Endeavour, Transocean Marianas, Thalassa, Proteus, Pontus & Conqueror rigs, Front Puffin FPSO, FDS, FDS2, Tungsten Explorer, Titanium Explorer, Ensco, Macdermid North Ocean 105 /101 and Cartagena Trader. We also recently facilitated full scope of supplies on the SBM Installer in Cape Town dry dock. We deliver to De Beers daily.

Advantages of using Craig International as follows:

- worldwide network of suppliers enabling significant reseller discounts thanks to our aggregated spending power in our global offices
- rapid response to RFQs with same day quotations at competitive pricing
- 30 day credit facility
- monthly rebate
- DDP deliveries throughout Africa to include free delivery to Cape Town harbour
- online purchasing suite 'EBUY' ebuy.craig-international.com which can be tailored to ENI with fixed pricing on repeat purchase items
- spend analysis reports on a monthly basis
- consolidated deliveries and invoicing taking cost out of the supply chain
- ISO 9001:2008, 14001:2004, OHSAS 18001:2007 accredited
- BBBEE Level 4 becoming Level 2 in coming months

Attaching a copy of our e-brochure for your perusal and look forward to supporting any procurement requirements, no matter how large or small.

Thanks
Steven

Reinett Mogotshi

From: Elise Tempelhoff <eliset@24.com>
Sent: 15 February 2018 10:47 AM
To: ERM South Africa Project ENI Offshore Exploration
Subject: RE: Public Meeting Reminder: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Thank you, Charlene.

To which website do I go?

When will the scoping report be completed?

Groete/Kind regards
Elise Tempelhoff
Omgewingsspesialis joernalis/Environmental specialist journalist
Epos: eliset@24.com
Sel: 083 309 1192
Twitter: @elisetempelhoff
Webtuiste: www.Netwerk24.com

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[Word 'n intekenaar](#)

From: ERM South Africa Project ENI Offshore Exploration [mailto:eni.exploration.eia@erm.com]
Sent: Wednesday, 07 February 2018 11:10
To: Elise Tempelhoff <eliset@24.com>; ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Cc: Lindsey Bungartz <Lindsey.Bungartz@erm.com>
Subject: RE: Public Meeting Reminder: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Dear Elise

Thank you for your interest in the Project. During the Scoping Phase of the EIA process, public participation activities have been focused around Durban and Richards Bay as this is where the potential impacts may be felt, and where many of our stakeholders are based. While Block ER236 extends along a large portion of the KZN coastline, the onshore logistics base will be located in either Richards Bay or Durban. Should it be determined that the public participation programme needs to be expanded, based on the outcomes of the impact assessment, this will be considered by the EIA team.

The presentation from the public meetings will be made available on the Project website. All comments and questions raised at the meetings, along with a response, will be included in the final Scoping Report which will be made available to the public.

You have been registered as an Interested and Affected Party (I&AP) and will be kept informed throughout the EIA process.

Yours sincerely,

Charlene Jefferies (*on behalf of Lindsey Bungartz*)

ERM

2nd Floor | Great Westerford | 240 Main Road | Rondebosch | 7700 | Cape Town | South Africa

T +27 21 681 5400 | **F** +27 21 686 0736 | **M** +27 82 532 7231

E charlene.jefferies@erm.com | **W** www.erm.com



The business of sustainability

From: Elise Tempelhoff [<mailto:eliset@24.com>]

Sent: Monday, February 05, 2018 1:00 PM

To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>

Subject: RE: Public Meeting Reminder: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Dear Lindsey

Will there be no public meetings regarding this very important issue in Johannesburg?

Many interested and affected parties stay in Johannesburg and Pretoria.

Groete/Kind regards

Elise Tempelhoff

Omgewingsspesialis joernalis/Environmental specialist journalist

Epos: eliset@24.com

Sel: 083 309 1192

Twitter: @elisetempelhoff

Webtuiste: www.Netwerk24.com

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[Word 'n intekenaar](#)

From: ERM South Africa Project ENI Offshore Exploration [<mailto:eni.exploration.eia@erm.com>]

Sent: Monday, 05 February 2018 12:54

To: Lindsey Bungartz <Lindsey.Bungartz@erm.com>

Subject: Public Meeting Reminder: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Dear Stakeholder,

RE: Environmental Impact Assessment for Exploration Drilling within Block ER236, off the East Coast of South Africa

You are reminded that the Scoping Phase public meetings for the EIA for Exploration Drilling within Block ER236 take place this week. ERM will present more information about the project and the EIA. Details of the public meetings are as follows:

Date: 6 February 2018

Venue: Premier Hotel The Richards, 3 Hibberd Dr, Meer En See, Richards Bay

Time: 17:30, the project team will be available at the venue from 16:00

Date: 7 February 2018

Venue: Gooderson Tropicana Hotel, 85 OR Tambo Parade, South Beach, Durban

Time: 17:30, the project team will be available at the venue from 16:00

Date: 8 February 2018

Venue: Port Shepstone Country Club, Port Shepstone

Time: 17:30, the project team will be available at the venue from 16:00

We look forward to your participation.

Yours Sincerely

Lindsey

Lindsey Bungartz

Senior Consultant

ERM Southern Africa (Pty) Ltd

2nd Floor | Great Westerford | 240 Main Road | Rondebosch | 7700 | Cape Town | South Africa

T +27 21 681 5400 | **F** +27 21 686 0736 |

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Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 22 February 2018 04:26 PM
To: 'I.Nanni@sanbi.org.za'
Cc: Lindsey Bungartz
Subject: RE: interested party

Good Day Ingrid

Thank you for the email. You have been registered as an Interested and Affected Party (I&AP) and will be kept informed throughout the EIA process.

Kind Regards

Reinett Mogotshi (on behalf of Lindsey Bungartz)

From: Lindsey Bungartz
Sent: Thursday, February 15, 2018 10:10 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: FW: interested party

From: Ingrid Nanni [<mailto:I.Nanni@sanbi.org.za>]
Sent: Wednesday, February 14, 2018 10:19 AM
To: Lindsey Bungartz <Lindsey.Bungartz@erm.com>
Subject: interested party

Good day

Please register me as an interested party in the

Environmental Impact Assessment for Exploration Drilling within Block ER236, off the East Coast of South Africa

Thank you

Ingrid Nanni

Cell: 082 8300165

i.nanni@sanbi.org.za

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Reinett Mogotshi

From: PTeddy Govender <483svet@gmail.com>
Sent: 16 February 2018 12:43 PM
To: ERM South Africa Project ENI Offshore Exploration
Subject: Fwd: Greenpeace Durban Local Group Updates | 14 February 2018

Follow Up Flag: Follow up
Flag Status: Flagged

Please note the comments of the Greenpeace.

----- Forwarded message -----

From: "Durban Volunteers Africa" <volunteers.durban.africa@greenpeace.org>
Date: Feb 14, 2018 16:08
Subject: Greenpeace Durban Local Group Updates | 14 February 2018
To:
Cc:

Dear All,

Herein are the **Durban Local Group** updates which include: Report back: Exploration Drilling public meeting, Latest: South Durban logistics park and Hillcrest landfill, Report back: Strategic Planning Meeting, and Durban Knots Club 1st Meetup - Southern Rock - Sat.

***Report back: Exploration Drilling public meeting**

Unfortunately I didn't make the [public meeting](#) with regards to the **EIA** for **Exploration Drilling** off our Coast (Offshore Block ER236) as I was knocked down by the nasty tummy bug that's been going around, but am now fighting fit! From what I gather the meeting was well attended with 3x full taxi loads of concerned folk from **Umlazi** and **Kwamkutha**, and 2x taxi loads of **KZN fisherfolk** attending at the Tropicana Hotel on Durban's Golden Mile. Below this email is the report back via **Desmond D'sa** of **SDCEA** and a message from **Alice Thomson** via the **Earthlife Durban** mailing list.

***Latest: South Durban logistics park and Hillcrest landfill**

Way below this email you can find the latest update with regards to the respective **Durban eco justice** court case battles, that being the **South Durban logistics park** and the **Hillcrest landfill**.

***Report back: Strategic Planning Meeting**

On Sunday, 11 Feb we had a successful Strategic Planning Meeting (highlights directly below) held at the **Bayhead Natural Heritage Site**. I selected the **Bayhead Natural Heritage Site** strategically as part of the planning meeting with an eye on the major eco battles one would be faced with - thanks to the carbon-addicted "[Phakisa Oceans Economy](#)". BTW for the **South African and Global Democratic Eco-Socialist Alternatives** do have a look at the new [Climate Crisis book](#) (edited by **Vishwas Satgar**) with **Blue Economy** blahblah on trial. No doubt the **Bayhead Natural Heritage Site** is a strategic location and vital eco-gem which has been somewhat neglected - numerous alien vegetation can be identify, boardwalk rickety, collapsing in places, litter a ton! Notes from the meeting will be sent out soon too.



***Durban Knots Club 1st Meetup - SouthernRock - Sat**

So as you know, we the **Greenpeace local group: Durban** have started a **Knots Club**! The primary objective of the **Durban Knots Club** is to help us (Durb's climbers) stay active, but also to introduce potential climbers to the climbing world. And so we have earmarked this coming, Saturday 17 Feb for the 1st meetup at the [Southern Rock Climbing Centre](#) - which is an indoor climbing gym. These climbing gyms are rock climbing gyms which is different to the industrial climbing techniques we use in **Greenpeace** - But even though it is different it does help you in other ways; keeping fit, exercising and growing your core muscles, getting used to working at heights, growing your safety and connectivity thinking, and it will definitely improve your confidence in climbing. There is usually a bouldering section at these climbing gyms where you can free climb (you do not need a rope or a climbing buddy), and this is great for growing

your confidence and physical strength when starting out at rock climbing. ***Please note** that the day pass for the gym is R110 and also one would need to fill in a waiver (one can print and complete the waiver before you arrive in order to speed up the admission process). We plan to meetup at 10am - If you are keen to join, do let me know ASAP! Ta!

Best,
Delwyn - on behalf of the facilitators
Greenpeace Durban Local Group

----- Forwarded message -----

From: **Alice Thomson** <alicetho@ispace.co.za>

Date: Fri, Feb 9, 2018 at 6:01 PM

Subject: Fw: Public Meeting Reminder: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

To: Earthlife Africa google group <earthlife-durban@googlegroups.com>

Dear Earthlifers

Below is a report-back of the public meeting, which formed part of the EIA for offshore exploration drilling off our coast. If you would like to get involved in the campaign against offshore drilling, please let me know.

Yours for justice

Alice

On 08 Feb 2018, at 4:14 PM, Alice Thomson <alicetho@ispace.co.za> wrote:

We certainly did rattle them!

I spoke about climate change – the situation in the Western Cape should be a massive wake-up call to all of us that we need to avert climate catastrophe. I pointed out that of all the fossil fuel reserves that already exist, we can only afford to use 20%. 80% of all our coal, oil and gas must stay under the ground if we are to avert catastrophic climate change. Thus Eni could find themselves in the position that many of their existing wells will become “stranded assets”. In other words their investments will be useless. This will happen if governments around the world take the Paris Climate Agreement seriously and keep temperatures below 2 degrees above pre-industrial levels. It really is stupid to explore for more oil and gas when we know we cannot afford to use what has already been discovered.

The Managing Director at Eni responded by saying that he is concerned about climate change, but that we will still need some oil and gas as we transition away from fossil fuels. I would have liked to respond. This transition should lead to a reduction in Eni’s operations and yet they want to expand operations and therefore expand supply. It is clear that they have no idea about the carbon bubble and they are betting that our governments will not take climate change seriously enough to cut emissions to what is required by science.

Eni together with Shell are involved in the biggest oil corruption scandal ever – they paid a minister in Nigeria \$1.3 billion in a dirty deal for a license to explore for oil in a valuable oil block. The case will go to court in Milan in March. Read more

here <https://unearthed.greenpeace.org/2017/02/10/shell-and-eni-hit-with-corruption-charges-over-nigerian-oil-deal/>

<https://www.globalwitness.org/en-gb/press-releases/nigeria-files-billion-dollar-claim-against-jp-morgan-over-shell-and-eni-2011-oil-deal/>

<https://www.globalwitness.org/en/campaigns/oil-gas-and-mining/shell-knew/>

<https://www.nytimes.com/2017/12/20/business/energy-environment/shell-eni-italy-nigeria.html>

Eni has a shocking track record in Nigeria with an average of 4 spills per week in 2015 <https://unearthed.greenpeace.org/2016/02/22/arctic-oil-eni-nigeria-spills/> Environmental Rights Action says that oil spills result in loss of livelihoods, loss of health and reduction in lifespan. Amnesty International says that Eni have poor reporting systems and the number of spills is likely to be far higher than what they report. Spills lead to the destruction of fishing grounds, deaths and sickness. In spite of the 50 year oil boom in Nigeria and the fact that it is a very wealthy country, 80% of the citizens live on less than \$2 per day. The poor do not realise the benefits of the oil industry.

This is perhaps why the room disrupted when the Eni spokesman blamed poor communities on the oil spills, saying that most of them were due to sabotage and theft from oil pipelines. However, if the oil revenues were used to give every Nigerian decent health, education, sanitation, water and electricity, people wouldn't see the need to "steal" from the pipelines.

ERM admitted that very few local jobs will be created as there will be mostly highly specialised work which will be brought in from other countries.

On 08 Feb 2018, at 7:45 AM, Desmond <desmond@sdceango.co.za> wrote:

Hi Everyone

Last night's meeting was a shocker for the consultants as they never expected to be taken on by a well-informed youth from UMLAZI and KWAMKUTHA, I was proud these guys rocked up with 3x full taxis loads and 2x taxis loads of KZN fisherfolk at the Tropicana Hotel on Durban's Golden Mile. The company must have thought they could get away with just a tick box exercise instead they must return and provide a series of answers that they and their consultants had to answer and this went on till late in fact the meeting closed after 21.30pm as clearly the consultants EMR [David Shandler] and ENI were exhausted and could not take the fiery probing questions launched at them.

These are the questions that must be passed onto the guys attending the Port Shepstone meeting today details below. Please encourage people you know to attend.

The major points

- Sasol their strategic partner was not available?
- They did not advertise for this meeting as they decided that they will work only with people who registered. Not in ISIZULU or even the English media.
- There are key areas all along the coast that they did not engage that will be affected and will have to decide where this is public participation? [See below the areas where the meetings are held]
- The presentation by ENI was flawed and gave a one sided view of the oil and gas exploration in at least 9 African countries, Nigeria, Kenya, Ivory Coast, Ghana, Mozambique, South Africa Etc. They presented the benefit of the oil & gas exploration and some jobs they create, answer to climate change nothing to do with the atrocities and destruction their facilities have contributed throughout the continent.

- They have a renewable energy programme no facts or investment when they intend carrying this out but will be done after the oil& gas is explored .
- The time frame is limited and they want to present the scoping report before the regulator within 30days. They conceded to print all documents and the scoping report in ISIZULU
- They are looking to drill and recover 3.4 billion litres of oil and gas.[Green gases is the terminology they use]
- Safety a message issue which they failed to respond
- They refused to respond to certain question regarding the millions of jobs , small business and doing a social enhancement study that shows that these jobs could be lost .
- They have already determined that certain aspects of their development will not be investigated .
- EMR will do inhouse research and we raised this as conflict of interest .
- No research on the impacts of the coastline.
- We demanded them explain and show the benefits and clearly there are none .
- They conceded that their language and information must be brought to the level of ordinary people and in their language
- They have conceded to a peer review and this appointment must be done in full collaboration of the communities
- They put across the notion that the long term benefit will be cheaper fuel.
- Nothing on the loss of livelihoods
- Scoping documents will be done and put into libraries which we disagreed and requested everyone gets either hard copies or electronic
- On the pathetic history in Africa they blamed sabotage and theft
- On the corruption scandal they did not respond but merely to say they had a proud history .

Clean air vs industrial development: Durban court case explained

South Durban environmental alliance brings case to court

The High Court in Durban is to rule on an application to prevent a new industrial development in South Durban. Photo: Nomfundo Xolo

By [Mluleki Marongo](#)
8 February 2018

What is the right balance between economic development and environmental protection? This is the issue raised in a court battle over a new industrial development in south Durban.

On 11 December 2017, the High Court in Durban heard a case brought by the South Durban Community Environmental Alliance, a civic organisation which aims to protect air, water, and soil quality. The alliance challenged the decision of the KwaZulu-Natal MEC for Economic Development, Tourism and Environmental Affairs to grant environmental authorisation for the construction of a logistics and distribution park.

The site of the park is in the South Durban Industrial Basin, very close to the suburbs of Clairwood, Mobeni and Jacobs, which are already part of an industrial hub. The plan approved by the MEC includes warehouses, buildings, parking places and a yard to service heavy lorries.

The alliance believes that the development will cause a danger to the health, air quality and wellbeing of the surrounding communities. They are also concerned about the noise from the trucks and that children, most of whom walk to school, will be in danger from the trucks.

The alliance, which has a long history of fighting for clean air in the area, says under apartheid people were deliberately housed in the area to facilitate easy access to cheap labour for industry. As a result, residents live near toxic dumps, sewage treatment plants, and polluting industries and bear the public health costs associated with the petrochemical industry. These health costs include high levels of asthma, severe chest complaints, and cancer, says the alliance.

The land on which the park would be built is owned by Capital Property Fund, which made an application to the MEC's department in order to develop the land and comply with the requirements of the National Environmental Management Act (NEMA).

Before the Department could grant approval it had to consult interested and affected parties. An environmental assessment practitioner was appointed to investigate the potential damage to the environment. An environmental impact report was compiled and issued. On 29 May 2015, the department granted the environmental authorisation. The alliance appealed, unsuccessfully, to the MEC and then approached the High Court seeking an order to compel the MEC to reconsider their appeal.

The alliance presented four major arguments to support their requests. They said:

- the MEC had failed to consider two major health studies in coming to his conclusion showing the damage caused by polluting industries and vehicle trucking emissions. The studies also showed that such industries are major causes of ill health such as cancer, asthma and other respiratory diseases;
- the report on which the MEC had based his decision contained no assessment of the health of the community, such as the number of children who are asthmatic and suffer from respiratory diseases;
- the MEC relied on a particular report which did not use appropriate methodology and was written by a person whose qualifications were omitted from the report; and
- the MEC failed to consider the principle of environmental justice. This principle would require him to take into account environmental damage and ensure that they this did not unfairly discriminate against people.

The MEC opposed the challenge, arguing that the authorisation was done in terms of the law, that the environmental impact report had met all legal requirements. He said the report had considered the air quality issue and concluded that the increased emissions would only have a minor impact on the air quality. He also said he had considered the two health studies and available evidence suggested no need to investigate the matter further.

Capital Property Fund also opposed the alliance's challenge. Its reasons closely mirror the MEC's. The Fund argued that there would be no significant danger to the health of local communities from the development and the use of heavy haulage vehicles during the construction and operation of the park; that the air quality issue had been assessed and addressed; and that the alliance had not proved that the park would generate disproportionate vehicular emissions.

The key question raised by this case is the balance between economic development on the one hand and environmental impact on the other. Section 24 of the Constitution gives everyone the right "to an environment that is not harmful to their health or well-being" and requires that laws are passed to "secure ecologically sustainable development". South Africa has many laws that aim to strike a sound balance between the two, and the Community Alliance's case shows that the interpretation of these laws and their implementation remains an issue of concern for communities seeking to protect their constitutional right to a healthy environment.

The Court reserved judgement.

Legal fight over R4.5bn logistics park in Durban

15/09/2017 🧑 Tania Broughton, News24 correspondent

Durban - Residents of Clairwood are expected to turn out in their numbers at the KwaZulu-Natal High Court in Durban on Friday when their lawyers challenge the provincial government's approval of a massive R4.5bn logistics park at the old Clairwood Racecourse - once the only green lung in the area.

The South Durban Environmental Alliance - through the Legal Resource Centre - want a judge to overrule the decision which, they say will only worsen the pollution-related illnesses the community suffers.

These are claimed to include cancer, asthma and other respiratory diseases.

The 76.4ha site is to be developed by Capital Property Fund which has approval for warehouses, buildings, parking and a distribution yard to service heavy haulage vehicles transporting containers to and from the logistics park.

In heads of argument, it is argued that the approved development abuts the residential suburb and the community - comprising 22 000 households and 200 000 residents - is already surrounded by heavy industry.

It is in close proximity to several major hazard installations, including two petrochemical refineries, a large paper mill, motor manufacturer and a major tank storage area where hazardous chemicals are stored and pipelines carrying inflammable substances in large volumes.

"The location of Clairwood in the South Durban Industrial Basin (SDIB) is a legacy of apartheid era town planning which deliberately located industry and working class communities in close proximity to each other.

"The objective was to ensure control of the disenfranchised in resource challenged townships while simultaneously ensuring the provision of labour for the burgeoning exclusively white industry."

'Not our duty'

The alliance alleges that in approving the development - and turning down its subsequent appeal - the then MEC for economic development Mike Mabuyakhulu had not taken into account the findings of two major health studies probing the effect of air pollution.

He also had not taken into account "the prevailing air quality conditions" and the impact the development could have on the well-being of the residents.

The present MEC, Sihle Zikalala, in his affidavit, claims these were taken into consideration.

But he adds that if the alliance "felt strongly about this aspect", it should have put up a more recent air impact assessment into the effects the development would have in the South Durban basin.

The alliance says that is not its job.

"It is plainly not our duty to provide the competent authority with the information necessary to reach a decision on an application for environmental authorisation."

'No genuine dispute'

Capital Property Fund, in its heads of argument, says the environmental impact of the park was assessed.

"There is no significant danger to the health of local communities as a result of the development and the consequent use of heavy haulage vehicles during the construction and operation of the logistics and distribution park. The effect on air quality will be negligible.

"Air quality was not overlooked or ignored during the Environmental Impact Assessment process. An appropriately qualified air quality risk assessor investigated air quality impact. His substantive findings have not been challenged in a meaningful way.

"The applicant [the alliance] may disagree with those findings, but it has not raised a genuine dispute. Simple disagreement with the outcome is not a valid basis for judicial review," it argues.

The matter is expected to be heard by Judge Rashid Vahed and judgment is expected to be reserved.

- 9 Feb 2018
- The Mercury
- Bernadette Wolhuter

EnviroServ fight continues

THE Upper Highway Air (UHA) group is not giving up its fight against EnviroServ and has returned to court, this time to challenge the Minister of Environmental Affairs' December decision to relax the terms of a suspension notice issued to the waste disposal giant.

The EnviroServ Shongweni landfill site's operating licence was suspended last April after a barrage of complaints from locals who alleged "toxic" emissions from the hazardous waste site were making them sick.

But then in December, Environmental Affairs Minister Edna Molewa relaxed the terms of the suspension and granted EnviroServ permission to accept, treat and dispose of solid waste at the site.

Now, the UHA wants a judge to set aside Molewa's decision and lodged its application in the Durban High Court on Tuesday.

In her founding affidavit, UHA director Lauren Johnson said the minister's December decision constituted "procedurally and substantively unfair administrative action".

Johnson said the suspension could only be lifted when the department was satisfied there was "no longer a threat to human health or environment arising from operations".

And it was not "a scenario where (EnviroServ) could be rewarded from lessening the threat its operations pose and the harm caused," she went on.

Johnson claimed that EnviroServ was being rewarded for "alleged reductions in emissions", while the impacts on the communities remained.

And she labelled the analysis EnviroServ submitted to the minister in November and December 2017, "which allegedly demonstrated the existence of another mystery polluter in the area", as "palpably flawed" and of "selected portions of monitoring data, culled from the totality of monitoring data available".

EnviroServ spokesperson Thabiso Taaka said yesterday afternoon that the company was aware of the court action.

"EnviroServ has noted the application by the Upper Highway Air, for a review of the minister's decision and is consulting its legal team on the matter," Taaka said.

"We are confident that the minister has considered all the facts presented to her pertaining to our remedial programme, scientific reports and continuous monitoring."

The UHA group also filed its replying affidavit this week in the ongoing civil proceedings to have the site shut down permanently.

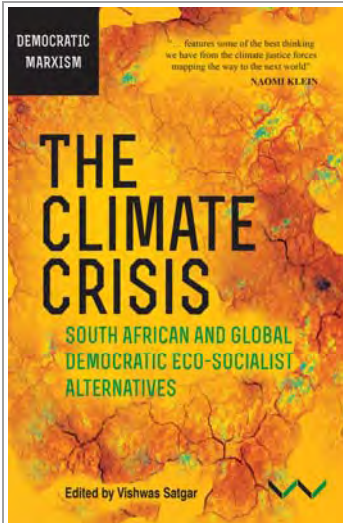
And the criminal case – in which EnviroServ chief executive Dean Thompson, coastal operations manager Clive Kidd, group technical director Esmé Gombault and treatment and disposal specialist Dr Johan Schoonraad stand accused of contravening the National Air Quality Act – was also in court this week.

The case was adjourned until next month.

<http://witspress.co.za/catalogue/the-climate-crisis/>

The Climate Crisis

South African and Global Democratic Eco-Socialist Alternatives



[Buy this book](#)

Editor(s): [Vishwas Satgar](#)

- **Publication Date:** February 2018
- **Dimensions and Pages:** 336pp; 229 x 152mm

‘This volume reminds us that fossil fuel corporations, petro states and ruling elites are the key forces deepening the climate crisis. Hurricanes like Harvey and Irma have once again demonstrated the ways that extreme weather events disproportionately impact working people, the poor and Black lives. The wealthy, meanwhile, take cover in their wine cellars on private islands. Only systemic change, led from below, holds out the hope for a safe and sturdy future. This volume features some of the best thinking we have from the climate justice forces who are already mapping the way to that next world.’

— **Naomi Klein, author of *No Is Not Enough, This Changes Everything, The Shock Doctrine* and *No Logo***

Capitalism’s addiction to fossil fuels is heating our planet at a pace and scale never before experienced. Extreme weather patterns, rising sea levels and accelerating feedback loops are a commonplace feature of our lives. The number of environmental refugees is increasing and several island states and low-lying countries are becoming vulnerable. Corporate-induced climate change has set us on an ecocidal path of species extinction. Governments and their international platforms such as the Paris Climate Agreement deliver too little, too late. Most states, including South Africa, continue on their carbon-intensive energy paths, with devastating results. Political leaders across the world are failing to provide systemic solutions to the climate crisis. This is the context in which we must ask ourselves: how can people and class agency change this destructive course of history?

Volume three in the Democratic Marxism series, *The Climate Crisis* investigates ecosocialist alternatives that are emerging. It presents the thinking of leading climate justice activists, campaigners and social movements advancing systemic alternatives and developing bottom-up, just transitions to sustain life. Through a combination of theoretical and empirical work, the authors collectively examine the challenges and opportunities inherent in the current moment. This volume builds on the class-struggle focus of Volume 2 by placing ecological issues at the center of democratic Marxism. Most importantly, it explores ways to renew historical socialism

with democratic, ecosocialist alternatives to meet current challenges in South Africa and the world.

1 The Climate Crisis and Systemic Alternatives **Vishwas Satgar**

PART ONE :THE CLIMATE CRISIS AS CAPITALIST CRISIS

2 The Limits of Capitalist Solutions to the Climate Crisis **Dorothy Grace Guerrero**

3 The Anthropocene and Imperial Ecocide: Prospects for Just Transitions **Vishwas Satgar**

PART TWO: DEMOCRATIC ECO-SOCIALIST ALTERNATIVES IN THE WORLD

4 The Employment Crisis, Just Transition and the Universal Basic Income Grant **Hein Marais**

5 The Rights of Mother Earth **Pablo Sólón**

6 Buen Vivir: An Alternative Perspective from the Peoples of the Global South **Alberto Acosta and Mateo Martínez Abarca**

7 Challenging the Growth Paradigm: Marx, Buddha and the Pursuit of 'Happiness' **Devan Pillay**

8 Ubuntu and the Struggle for an African Eco-socialist Alternative **Christelle Terreblanche**

9 The Climate Crisis and the Struggle for African Food Sovereignty **Nnimmo Bassey**

PART THREE: DEMOCRATIC ECO-SOCIALIST ALTERNATIVES IN SOUTH AFRICA

10 The Climate Crisis and a 'Just Transition' in South Africa: An Eco-Feminist-Socialist Perspective **Jacklyn Cock**

11 Energy, Labour, and Democracy in South Africa **Michelle Williams**

12 Capital, Climate and the Politics of Nuclear Procurement in South Africa **David Fig**

13 Climate Jobs at Two Minutes to Midnight **Brian Ashley**

14 Deepening the Just Transition Through Food Sovereignty and the Solidarity Economy **Andrew Bennie and Athish Satgoor**

15 Eco-Capitalist Crises in the 'Blue Economy': Operation Phakisa's Small, Slow Failures **Desné Masie and Patrick Bond**

CONCLUSION: **Vishwas Satgar**



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Vanishing Present Productions
+27 837891067
17 February 2018

ERM Southern Africa (Pty) Ltd
2nd Floor
Great Westerford
240 Main Road
Rondebosch
Cape Town
7700

Dear Ms Lindsey Bungartz,

**SCOPING REPORT: EIA FOR EXPLORATION DRILLING WITHIN OFFSHORE BLOCK ER236, KZN, SOUTH AFRICA;
ERM Ref: 0414229 pertains.**

I appreciate the opportunity to comment on the above-mentioned Scoping Report, especially considering the potential impact to the marine environment and shoreline that the proposed activities pose.

Below you'll find my main areas of concern, which include, but are not limited to, the points made. Specifics to comments on seismic surveys, biodiversity and waste management await the release of the EIA and its annexes before further elucidation. It would be of value to have the following dealt with in the final EIA:

1. INCIDENT MANAGEMENT

Transparency is needed with regards to Oil Spill Response, Planning and Capacity necessary for public health and welfare and the marine and coastal environment. An annex to the EIA should include the blowout management protocol for Eni South Africa BV (Eni), and Sasol Africa Limited (Sasol) for this project. Included in this annex should be highlighted any deficit of technological expertise or resources or difficulty of effective co-ordination with all government or conservation agencies that have a statutory responsibility for some aspect of offshore oil and gas activities regarding incident management. The delegated National Incident Commander, along with the intended lines of responsibility for interagency efforts, should be made public information in this annex. The public needs assurance that incident management is fully informed, and has capacity to deal with, the latest technology, practices and risks associated with, and due to, the different geological and ocean environments being explored, prior to commencement of drilling.

2. LIABILITIES AND FINANCIAL RESPONSIBILITY FOR OIL SPILL REMEDIATION

Further to 1. the Scoping Report makes no mention of what appropriate insurance safeguards Eni or Sasol have in place for remediation against oil spills and other environmental damages. Considering the serious toll a spill would have on safe recreation at beaches, healthy habitats for wildlife, industries such as tourism and fishing, the South African taxpayer and the general public, the EIA should produce proof of these insurance safeguards and a reasonable level of fiscal readiness for long term cleanup and repair process, in the event of a major disaster.

3. CLIMATE CHANGE

The EIA requires a more thorough investigation with regards to climate change, rather than just implications of the project vessels.

An assessment of the end output of the project, i.e. the expected barrel delivery, must be measured for its increase in carbon emissions to South Africa's peak, plateau and decline commitments to the global economy.

4. OPERATIONAL WASTE

Not only must the drill cuttings' offshore treatment and discharge to sea be assessed for in terms of impact on seafloor/ benthic community, water column biology and expected dispersion, but also composition of these emissions and effluents regarding their toxicity, biodegradation, polynuclear aromatic hydrocarbons content, and metals content, need to be made public. In addition, an explanation as to how these toxins will be mitigated by the "natural dispersion, dilution and assimilative capacity of water" is required.

Please also provide practicable steps in the EIA to prevent this 'dumping at sea' considering Eni's preferred option is to 'off-shore treat and discharge cuttings' given that that dumping permits are not required.

5. NOISE POLLUTION

Please broaden your key species of concern to include Short-finned Pilot Whales and Cuvier's beaked whale since both acoustically sensitive species are vulnerable to anthropogenic noise pollution, and are resident in the region. The EIA should consider observations that show how they actively select the shelf-break edge, indicating that this is an important foraging area for these species. Consideration should also be made for elevated levels of nitrogen in deep diving whales making them more susceptible to anthropogenic disturbances. High levels of anthropogenic marine noise impact Short-finned Pilot Whales (Hohn et al. 2006).

The mitigation of Vertical Seismic Profiling cannot simply be an issue of 'short duration'. These airguns are capable of inducing significant acoustic trauma. The use of airguns producing high decibels and amplitudes of sound in a marine environment requires mitigation.

Please fully address the adverse effects of subsurface man-made noise and vibration during these operations. Noise emissions from drilling operations often produce noise that includes strong tonal components at low frequencies, including infra-sonic frequencies in some cases, thereby leading to potential disturbance, damage or interference to a variety of marine species. Please assess the full scale of this acoustic footprint including impacts caused by vibration through drill string and casing, vibration into the seabed and vibration of the drill bit.

6. AIR POLLUTION

Gas flaring and venting must be mitigated during well testing and production operations to prevent emission of CO₂, methane and other forms of gases which contribute to global warming causing climate change / environmental degradation both at a local and global level. Ambient winds averaging 10 knots along this coastline may affect flaring efficiency and requires consideration. If gas must be flared, an accurate means to determine volume of gas flared, its emissions quantity and concentration must be agreed upon. An annual and public report of flaring volumes by Eni and Sasol would be required. Flaring negates commitments made by South Africa under the United Nations Framework Convention on Climate Change (UNFCCC), Kyoto Protocol and the Paris Agreement.

7. LIGHT POLLUTION

Operations at oil fields introduce considerable amounts of artificial light (e.g., electric lighting, gas flares) that can potentially affect ecological processes in the upper ocean, such as diel vertical migration of plankton. Artificial night light also affects numerous species, including squid, large predatory fishes, and birds. Please evaluate for migration the effect of lights and the physical presence of ships on the movement of sensitive species.

8. PHYSICAL DAMAGE TO THE SEA FLOOR AND IMPORTANT HABITATS

The disruption that drilling causes to the seafloor habitat and the benthic community was not adequately dealt with in the Scoping Report. Impacts of drilling on the seabed are not necessarily localised or short-term and must be assessed further. Cognisance must be taken of the hazards of drill cuttings disposal onto the seabed because they are often contaminated with drilling lubricants, synthetic-based drilling fluids (SBFs) and other non-aqueous drilling fluids (NAFs). The EIA must include mitigation against sediments contaminated with petroleum products, heavy metals and salts, which do not biodegrade and can accumulate in high concentrations affecting reproduction of marine life, and biomagnify toxic substances in the food chain.

9. INVASIVE SPECIES

Ships, drilling equipment and rigs are used and relocated all around the world. Negative impacts on native biodiversity from invasive species colonising drilling infrastructure should be mitigated.

10. BASELINE STUDIES NEEDED

The occurrence of deep-water corals in Block ER 236 and the areas of interest are unknown. Therefore potential gains and/or losses at the inter- and intra-species levels; changes in species abundances; loss of habitat; loss of physical connectivity between habitats, and ecosystems and the unknown impacts on seabed features as well as undiscovered species are unaccounted for. Consequently, there is a need for planned, coherent, and consistent ecological data to inform this EIA to develop robust physical and biological baselines. The effectiveness of implemented mitigation measures with well-designed and consistent environmental monitoring is a critical next step.

11. TIMING OF IMPACT

The timing of this exploratory drilling is critical for least possible impact on seasonal breeding, feeding and migrations. Best practice is to mitigate negative impacts of oil exploration on endangered marine life is to separate them in time, space, or both. There should be no leeway given in the proposed temporal window of this survey, except to reduce the schedule duration, given the degree of threat due to the survey area overlapping Humpback whale, Southern Right whale, sardine and critically endangered Leatherback and endangered Loggerhead turtle migration routes.

10. WELL ABANDONMENT

More information is required with regards to well abandonment and its mitigation. How will Eni and Sasol ensure monitoring will be carried out after production has ceased and throughout de-commissioning?

Yours sincerely,
Janet Solomon

Reinett Mogotshi

Subject: FW: SCOPING REPORT; ERM Ref: 0414229 pertains.

From: Lindsey Bungartz
Sent: Tuesday, February 20, 2018 10:24 PM
To: 'janet solomon' <correspond@janetsolomon.com>
Subject: RE: SCOPING REPORT; ERM Ref: 0414229 pertains.

Hi Janet

Thank you for your comment. Your comments, along with a response from the project team will be included in the Final Scoping Report.

Warm regards
Lindsey

From: janet solomon [<mailto:correspond@janetsolomon.com>]
Sent: Tuesday, February 20, 2018 10:15 PM
To: Lindsey Bungartz <Lindsey.Bungartz@erm.com>
Subject: SCOPING REPORT; ERM Ref: 0414229 pertains.

Dear Ms. Bungartz,

SCOPING REPORT: EIA FOR EXPLORATION DRILLING WITHIN OFFSHORE BLOCK ER236, KZN, SOUTH AFRICA; ERM Ref: 0414229 pertains.

Herewith you'll find my review of the Scoping Report for the above-mentioned project. I trust the above matters will be taken into consideration during the EIA phase.

For any further queries, please do not hesitate to contact me.

Yours sincerely,

Janet

JANET SOLOMON

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Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 22 February 2018 06:02 PM
To: 'Hoosen'; ERM South Africa Project ENI Offshore Exploration
Subject: RE: re draft report

Good Day Hoosen

Thank you for your email. You have been registered as an Interested and Affected Party (I&AP) and will be kept informed throughout the EIA process.

The Draft Scoping Report is complete and is available on the project website: www.erm.com/eni-exploration-eia

Please let me know if you have any trouble downloading the report.

Kind Regards
Reinett Mogotshi

From: Hoosen [mailto:hoosen@bobats.co.za]
Sent: Wednesday, February 21, 2018 2:58 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: re draft report

ERM

A printed version of your presentation was not available at your Durban presentation.

Kindly forward a copy of that draft report.

Please register me interested party and send all future correspondence to me

Thank you

Regards,

Hoosen Bobat, BCom, CFP

Cell:	+27 (0)83 786 5983	196 Gordon Road
Tel:	+27 (0)31 309 7861	Morningside, Durban, 4001
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www.bobats.co.za



Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 22 February 2018 06:09 PM
To: Salmaan D
Cc: ERM South Africa Project ENI Offshore Exploration
Subject: RE: No oil rigs!!

Dear Salmaan D

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

-----Original Message-----

From: Salmaan D [mailto:salmaandanka08@gmail.com]
Sent: Wednesday, February 21, 2018 1:37 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: : No oil rigs!!

>
> Hi
>
>
> We rather have less wealth but more life!
>
> Our oceans are important!
>
> The risks of oil rigs is too high.
>
> Stop the oil rigs!
>
> Thanks
>
> Salmaan D
>

Reinett Mogotshi

From: Elise Tempelhoff <eliset@24.com>
Sent: 15 February 2018 04:58 PM
To: ERM South Africa Project ENI Offshore Exploration
Subject: RE: Public Meeting Reminder: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Thank you, Lindsey

Much appreciated!

Please keep in touch

Groete/Kind regards
Elise Tempelhoff
Omgewingsspesialis joernalis/Environmental specialist journalist
Epos: eliset@24.com
Sel: 083 309 1192
Twitter: @elisetempelhoff
Webtuiste: www.Netwerk24.com

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[Word 'n intekenaar](#)

From: ERM South Africa Project ENI Offshore Exploration [mailto:eni.exploration.eia@erm.com]
Sent: Thursday, 15 February 2018 16:47
To: Elise Tempelhoff <eliset@24.com>
Cc: Charlene Jefferies <Charlene.Jefferies@erm.com>
Subject: RE: Public Meeting Reminder: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Hi Elise

The Draft Scoping Report is complete and is available on the project website: www.erm.com/eni-exploration-eia

Please let me know if you have any trouble downloading the report.

Warm regards
Lindsey

From: Elise Tempelhoff [mailto:eliset@24.com]
Sent: Thursday, February 15, 2018 10:47 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: RE: Public Meeting Reminder: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Thank you, Charlene.

To which website do I go?

When will the scoping report be completed?

Groete/Kind regards

Elise Tempelhoff

Omgewingsspesialis joernalis/Environmental specialist journalist

Epos: eliset@24.com

Sel: 083 309 1192

Twitter: @elisetempelhoff

Webtuiste: www.Netwerk24.com

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[Word 'n intekenaar](#)

From: ERM South Africa Project ENI Offshore Exploration [<mailto:eni.exploration.eia@erm.com>]

Sent: Wednesday, 07 February 2018 11:10

To: Elise Tempelhoff <eliset@24.com>; ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>

Cc: Lindsey Bungartz <Lindsey.Bungartz@erm.com>

Subject: RE: Public Meeting Reminder: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Dear Elise

Thank you for your interest in the Project. During the Scoping Phase of the EIA process, public participation activities have been focused around Durban and Richards Bay as this is where the potential impacts may be felt, and where many of our stakeholders are based. While Block ER236 extends along a large portion of the KZN coastline, the onshore logistics base will be located in either Richards Bay or Durban. Should it be determined that the public participation programme needs to be expanded, based on the outcomes of the impact assessment, this will be considered by the EIA team.

The presentation from the public meetings will be made available on the Project website. All comments and questions raised at the meetings, along with a response, will be included in the final Scoping Report which will be made available to the public.

You have been registered as an Interested and Affected Party (I&AP) and will be kept informed throughout the EIA process.

Yours sincerely,

Charlene Jefferies (*on behalf of Lindsey Bungartz*)

ERM

2nd Floor | Great Westerford | 240 Main Road | Rondebosch | 7700 | Cape Town | South Africa

T +27 21 681 5400 | **F** +27 21 686 0736 | **M** +27 82 532 7231

E charlene.jefferies@erm.com | **W** www.erm.com



The business of sustainability

From: Elise Tempelhoff [<mailto:eliset@24.com>]

Sent: Monday, February 05, 2018 1:00 PM

To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>

Subject: RE: Public Meeting Reminder: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Dear Lindsey

Will there be no public meetings regarding this very important issue in Johannesburg?

Many interested and affected parties stay in Johannesburg and Pretoria.

Groete/Kind regards

Elise Tempelhoff

Omgewingsspesialis joernalis/Environmental specialist journalist

Epos: eliset@24.com

Sel: 083 309 1192

Twitter: @elisetempelhoff

Webtuiste: www.Netwerk24.com

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[Word 'n intekenaar](#)

From: ERM South Africa Project ENI Offshore Exploration [<mailto:eni.exploration.eia@erm.com>]

Sent: Monday, 05 February 2018 12:54

To: Lindsey Bungartz <Lindsey.Bungartz@erm.com>

Subject: Public Meeting Reminder: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Dear Stakeholder,

RE: Environmental Impact Assessment for Exploration Drilling within Block ER236, off the East Coast of South Africa

You are reminded that the Scoping Phase public meetings for the EIA for Exploration Drilling within Block ER236 take place this week. ERM will present more information about the project and the EIA. Details of the public meetings are as follows:

Date: 6 February 2018

Venue: Premier Hotel The Richards, 3 Hibberd Dr, Meer En See, Richards Bay

Time: 17:30, the project team will be available at the venue from 16:00

Date: 7 February 2018

Venue: Gooderson Tropicana Hotel, 85 OR Tambo Parade, South Beach, Durban

Time: 17:30, the project team will be available at the venue from 16:00

Date: 8 February 2018

Venue: Port Shepstone Country Club, Port Shepstone

Time: 17:30, the project team will be available at the venue from 16:00

We look forward to your participation.

Yours Sincerely

Lindsey

Lindsey Bungartz

Senior Consultant

ERM Southern Africa (Pty) Ltd

2nd Floor | Great Westerdor | 240 Main Road | Rondebosch | 7700 | Cape Town | South Africa

T +27 21 681 5400 | **F** +27 21 686 0736 |

W www.erm.com



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Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:24 AM
To: bruce Blake; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN OFFSHORE BLOCK ER236 EAST COAST OF SOUTH AFRICA

Good Day Bruce

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: bruce Blake [mailto:brublebla@gmail.com]
Sent: Friday, February 23, 2018 12:26 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN OFFSHORE BLOCK ER236 EAST COAST OF SOUTH AFRICA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHORE BLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Yours sincerely,
Bruce Blake
20 The Oaks
Bracknell UK
SA Citizen

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:22 AM
To: Catherine Lea; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Objection to Exploration Drilling within Offshore block ER236 East Coast of South Africa

Good Day Catherine

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Catherine Lea [mailto:catflealea@gmail.com]
Sent: Thursday, February 22, 2018 4:40 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Objection to Exploration Drilling within Offshore block ER236 East Coast of South Africa

Re: Environmental Impact Assessment for drilling within Block 236 off the East Coast of South Africa

Due to the negative Environmental impact that this project will have on the ocean, marine life, our environment and our living conditions, I strongly disagree and object with ALL offshore exploration and / or drilling.

Warm regards

Catherine Lea
8 Queen Elizabeth Drive, Durban, 3629

Catherine
Catherine Human Remedial, Tutoring and Au Pairing
0793231385



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Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:21 AM
To: Hoosen; ERM South Africa Project ENI Offshore Exploration
Subject: RE: re KZN exploration

Good Day Hoosen

Thank you for your email. You have been registered as an Interested and Affected Party (I&AP) and will be kept informed throughout the EIA process.

Kind Regards
Reinett Mogotshi

From: Hoosen [mailto:hoosen@bobats.co.za]
Sent: Thursday, February 22, 2018 12:07 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: re KZN exploration

Hi

Please register me as an interested party

Send me all notices of meetings etc

Thanks

Regards,

Hoosen Bobat, BCom, CFP

Cell:	+27 (0)83 786 5983	196 Gordon Road
Tel:	+27 (0)31 309 7861	Morningside, Durban, 4001
Fax:	+27 (0)86 663 4559	PO Box 786, Durban, 4000
Mail:	hoosen@bobats.co.za	

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Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:22 AM
To: Jared Evans; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Objection to exploration drilling within offshore block ER236 east coast South Africa. Message

Good Day Jared

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Jared Evans [mailto:jaredevans31@gmail.com]
Sent: Thursday, February 22, 2018 12:40 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Objection to exploration drilling within offshore block ER236 east coast South Africa. Message

Re: environmental impact assessment for drilling within Block 236 off the East Coast of South Africa On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, I strongly object to ALL offshore exploration and/or drilling.

Jared Evans

Sent from Jared Evans

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 22 February 2018 07:37 PM
To: 'Jennifer Olbers'; ERM South Africa Project ENI Offshore Exploration
Cc: Boyd Escott; Scotty Kyle; Jenny Longmore; Tamsyn Livingstone
Subject: RE: Notification of Draft Scoping Report: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Dear Jennifer

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards

Reinett Mogotshi (*on behalf of Lindsey Bungartz*)

From: Jennifer Olbers [mailto:olbersj@kznwildlife.com]
Sent: Thursday, February 22, 2018 11:56 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Cc: Boyd Escott <Boyd.Escott@kznwildlife.com>; Scotty Kyle <rkyle@iafrica.com>; Jenny Longmore <Jenny.Longmore@kznwildlife.com>; Tamsyn Livingstone <Tamsyn.Livingstone@kznwildlife.com>
Subject: RE: Notification of Draft Scoping Report: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Dear Lindsey,

Please find Ezemvelo's comments related to the above Scoping notification.

Thank you.

Regards,
Jennifer

*Jennifer Olbers, PhD
Marine Ecologist
Ezemvelo KZN Wildlife, Scientific Services
UCT Honorary Research Associate
Tel: +2731 312 2769 | Cell: +2784 406 5907
Postal Address: Private Bag X3, Congella, Durban, 4001, KZN, South Africa
Email: Jennifer.olbers@kznwildlife.com
Pr.Nat.Sci. #400405/14 (https://www.researchgate.net/profile/Jennifer_Olbers)*

From: ERM South Africa Project ENI Offshore Exploration [<mailto:eni.exploration.eia@erm.com>]
Sent: 22 January 2018 11:23 AM
To: Lindsey Bungartz
Subject: Notification of Draft Scoping Report: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

ERM Ref: 0414229

Dear Stakeholder,

RE: Environmental Impact Assessment for Exploration Drilling within Block ER236, off the East Coast of South Africa

Eni South Africa BV (Eni), and Sasol Africa Limited (Sasol) hold an Exploration Right 12/3/236 (ER 236) off the East Coast of South Africa. Eni has the operatorship of Block ER 236. Eni and Sasol are considering the possibility of conducting an exploration drilling programme in Block ER 236 to assess the commercial viability of the hydrocarbon reservoir for future development.

The project requires Environmental Authorisation (EA) from the National Department of Mineral Resources (DMR) under the National Environmental Management Act (NEMA) (Act No. 107 of 1998), as amended, through an Environmental Impact Assessment (EIA) process.

ERM released a Draft Scoping Report on 26 October 2017, which was subsequently withdrawn on 07 November 2017, as Eni and Sasol wished to reconsider the scope of the project.

Notice is hereby given that the revised Draft Scoping Report is available for comment. Changes made to the Draft Scoping Report are largely in the Project Description, Chapter 4, as the ER236 holders are now considering drilling up to six wells, instead of the four wells which were planned in the previous 2017 Draft Scoping Report. Key edits to the project scope have been underlined in the text of the Draft Scoping Report, other edits are outlined below.

All	<ul style="list-style-type: none">• Updated maps to reflect southern area of interest.• Minor editorial edits.
Chapter 1 (Introduction)	<ul style="list-style-type: none">• Inclusion of southern area of interest in <i>Section 1.1</i>
Chapter 4 (Project Description)	<ul style="list-style-type: none">• Section 4.1 and Section 4.2 edited to include the southern area of interest
Chapter 5 (Baseline)	<ul style="list-style-type: none">• Updates made throughout to reflect the addition of the southern area of interest
Chapter 6 (EIA Process)	<ul style="list-style-type: none">• Public consultation details edited to reflect re-release of Draft Scoping Report
Chapter 8 (Plan of Study for EIA)	<ul style="list-style-type: none">• Provisional EIA schedule updated to reflect new timeframe

All comments received from stakeholders with regard to the previous Draft Scoping Report have been considered and included in the 2018 Draft Scoping Report, in the Comments and Responses Report (CRR) (*Annex C*). Stakeholders are encouraged to ensure that their comments are captured in the CRR and are welcome to submit further comment to ERM.

The comment period will have a duration of 30 calendar days from 22 January 2018 to 22 February 2018. The Report is available on the Project website: www.erm.com/eni-exploration-eia as well as on request, from ERM, and at the following public locations:

- Durban Central Lending Public Library
- Richards Bay Library
- Port Shepstone Library
- ERM offices, Suite S005, 17 The Boulevard, Westway Office Park, Westville

A Zulu or Afrikaans version of the executive summary can be made available on request.

Stakeholders are invited to attend one of the below listed public meetings where ERM will present more information about the project and the EIA. During the meeting the participants will also have the opportunity to ask questions to the Project team. Details of the public meetings are as follows:

Date: 6 February 2018

Venue: Premier Hotel The Richards, 3 Hibberd Dr, Meer En See, Richards Bay
Time: 17:30, the project team will be available at the venue from 16:00

Date: 7 February 2018

Venue: Gooderson Tropicana Hotel, 85 OR Tambo Parade, South Beach, Durban
Time: 17:30, the project team will be available at the venue from 16:00

Date: 8 February 2018

Venue: Port Shepstone Country Club, Port Shepstone
Time: 17:30, the project team will be available at the venue from 16:00

You are invited to submit your comments on the Draft Scoping Report to ERM:

Email: eni.offshore.eia@erm.com

Post: Postnet Suite 90, Private Bag X12, Tokai, 7966

Tel: 021 681 5400

Website: www.erm.com/eni-exploration-eia

Your comments, and our response, will be incorporated into the Final Scoping Report to be submitted to PASA for consideration.

Please ensure that your comments reach ERM on or before 22 February 2018.

Thank you for your participation in this process.

Yours Sincerely

Lindsey Bungartz
Senior Consultant

ERM Southern Africa (Pty) Ltd

2nd Floor | Great Westerford | 240 Main Road | Rondebosch | 7700 | Cape Town | South Africa

T +27 21 681 5400 | **F** +27 21 686 0736 |

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Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:24 AM
To: Jody Carlson; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING

Good Day Jody

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

-----Original Message-----

From: Jody Carlson [mailto:jodycarlson3@icloud.com]
Sent: Thursday, February 22, 2018 7:54 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING

OBJECTION to exploration drilling within offshore block ER236 East Coast South Africa.

Re: environmental impact assessment for drilling within Block 236 off the East Coast of South Africa.

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, I STRONGLY OBJECT to ALL offshore exploration and/or drilling.

Jody Carlson
9 Armstrong Avenue
LaLucia
4051
Durban

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:23 AM
To: Jonathan Caramanus; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Objection to exploration drilling within offshore block ER236 east coast South Africa.

Good Day Jonathan

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

-----Original Message-----

From: Jonathan Caramanus [mailto:jonncarr@gmail.com]
Sent: Thursday, February 22, 2018 4:52 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Objection to exploration drilling within offshore block ER236 east coast South Africa.

Re: environmental impact assessment for drilling within Block 236 off the East Coast of South Africa On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, I strongly object to ALL offshore exploration and/or drilling.

Your truly
Jonn Carr

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 22 February 2018 06:20 PM
To: Matiehda Schooling; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN OFFSHORE BLOCK ER236 EAST COAST OF SOUTH AFRICA

Dear Matiehda

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Matiehda Schooling [mailto:schoolingm@gmail.com]
Sent: Thursday, February 22, 2018 10:48 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN OFFSHORE BLOCK ER236 EAST COAST OF SOUTH AFRICA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHORE BLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

I Mrs Matiehda Schooling, from Radiokop in Johannesburg,

Take a stand, this will affect our entire coast line !

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 01 March 2018 08:35 AM
To: Melita Steele; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Greenpeace Africa submission on Eni and Sasol Draft Scoping Report

Good Day Melita

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Melita Steele [mailto:melita.steele@greenpeace.org]
Sent: Thursday, February 22, 2018 9:06 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Greenpeace Africa submission on Eni and Sasol Draft Scoping Report

Please find the Greenpeace Africa submission attached.

Kind Regards

Melita

--

Melita Steele
Senior Climate and Energy Campaign Manager
Greenpeace Africa

293 Kent Avenue, Randburg, Johannesburg, South Africa

Mobile: +27 (0) 725608703

Tel: +27 (0) 11 482 4696

skype: melita_steele

twitter: @melita_steele



www.greenpeace.org/africa/en/



**Greenpeace Africa submission on the proposed Offshore exploration drilling programme
by Eni and Sasol**

22 February 2018

Greenpeace Africa is an independent environmental campaigning organization with a vision of *'an Africa where people live in harmony with nature in a peaceful state of environmental and social justice'*. Our mission is to work with others to foster environmental consciousness whereby Africa's people seek social and economic prosperity in ways that protect the environment for the benefit of humans, the planet and the future. In South Africa, we campaign for a just transition away from coal and nuclear power, towards renewable energy and energy efficiency. We do not accept any money from government or corporations, and environmental and social justice is at the core of our work.

As a civil society organisation, and citizens, working towards the achievement of environmental and social rights, environmental and energy justice in our communities across South Africa, Greenpeace Africa would like to lodge our strong opposition to the granting of the authorisation for the proposed drilling programme by Eni and Sasol, for not four by six wells.

Greenpeace Africa is confused about why the South African government would even entertain the applications by these controversial companies for offshore oil exploration drilling programmes.

Any move to allow oil drilling in the area will put the biodiversity of the Kwa-Zulu Natal coastline - and the tourism that relies so heavily on the area's rich marine life - at risk, while also creating the potential for oil spills off the coast of South Africa. Putting the interests of companies like Eni and Sasol first will only create the perception that the South African government does not have the best interests of South Africans at heart.

Greenpeace believes that harmful seismic studies and potential oil spills are reason enough to steer clear of oil drilling off the coast of South Africa, but this is especially true given the escalating global movement for a shift away from fossil fuels in the face of catastrophic climate change. South Africa is already the largest emitter on the African continent, and the current water crisis makes it clear that climate change is a clear and present danger. This country cannot afford to support fossil fuels in any way, shape or form, and that includes oil drilling off the coast.

Sasol (along with Eskom) is one of the two biggest emitters in South Africa, and the company should not be investing in more fossil fuel production, but should instead be fundamentally changing its business model.



Italian oil company Eni has a very controversial and questionable background, with the company facing alleged international corruption charges, as exposed by Global Witness. <https://www.globalwitness.org/en/campaigns/oil-gas-and-mining/shell-eni-company-executives-face-corruption-charges/> The question is, why is the South African government inviting such questionable companies into South African waters?

It is entirely likely that seismic testing could have a significant impact on marine life in the proposed drilling areas. Whales and dolphins can be injured and possibly killed because of seismic testing, which can also have impacts on sea turtles and fish. Clearly, there is always the potential for an oil spill, which would have a catastrophic impact on sea life in the area.

We call on the Department of Mineral Resources to respect the public opposition that has already been voiced, and to reject the applications out of hand.

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 22 February 2018 07:27 PM
To: 'Nicky Koekemoer'; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Dear Nicky

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Nicky Koekemoer [mailto:Nicky.Koekemoer@durban.gov.za]
Sent: Thursday, February 22, 2018 11:23 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Nicky Koekemoer
9 Marion Avenue
Scottburgh
4180

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 22 February 2018 06:09 PM
To: 'Salmaan D'
Cc: ERM South Africa Project ENI Offshore Exploration
Subject: RE: No oil rigs!!

Dear Salmaan D

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

-----Original Message-----

From: Salmaan D [mailto:salmaandanka08@gmail.com]
Sent: Wednesday, February 21, 2018 1:37 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: : No oil rigs!!

>
> Hi
>
>
> We rather have less wealth but more life!
>
> Our oceans are important!
>
> The risks of oil rigs is too high.
>
> Stop the oil rigs!
>
> Thanks
>
> Salmaan D
>

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:24 AM
To: Taneal O'Sullivan; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Objection to exploration drilling within offshore block ER236 east coast South Africa.

Good Day Taneal

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

-----Original Message-----

From: Taneal O'Sullivan [mailto:tanealosullivan@gmail.com]
Sent: Thursday, February 22, 2018 7:26 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Objection to exploration drilling within offshore block ER236 east coast South Africa.

Re: environmental impact assessment for drilling within Block 236 off the East Coast of South Africa

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, I strongly object to ALL offshore exploration and/or drilling.

Taneal O'Sullivan
Melrose Avenue
Dbn

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:23 AM
To: Timothy lubbe; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Objection to exploration drilling within offshore block ER236 east coast South Africa.

Good Day Timothy

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Timothy lubbe [mailto:tlubbe@hotmail.com]
Sent: Thursday, February 22, 2018 4:54 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Objection to exploration drilling within offshore block ER236 east coast South Africa.

Re: environmental impact assessment for drilling within Block 236 off the East Coast of South Africa On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, I strongly object to ALL offshore exploration and/or drilling.

Regards
Tim Lubbe

7 Gordon Drive
La Lucia
Durban
4053

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:26 AM
To: Dot Devitt; ERM South Africa Project ENI Offshore Exploration
Subject: RE:

Good Day Dot

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Dot Devitt [mailto:dotdevitt84@gmail.com]
Sent: Friday, February 23, 2018 8:20 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject:

Object most strongly

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:27 AM
To: 'Jenny Burton'; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Jenny

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Jenny Burton [mailto:admin@jenson.co.za]
Sent: Friday, February 23, 2018 10:42 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

NAME AND ADDRESS:

DW BURTON
34 RAYMOND AVENUE
SCOTTBURGH SOUTH
4180

2018-02-23

daveburton@telkomsa.net

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:27 AM
To: Jenny Burton; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Jenny

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Jenny Burton [mailto:admin@jenson.co.za]
Sent: Friday, February 23, 2018 10:42 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

NAME AND ADDRESS:

DW BURTON
34 RAYMOND AVENUE
SCOTTBURGH SOUTH
4180

2018-02-23

daveburton@telkomsa.net

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:25 AM
To: margiestella66; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING EITHIN OFFSHORE BLOCK ER236 EAST VOAST OF SOUTH AFRICA

Good Day Margaret

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: margiestella66 [mailto:margiestella66@gmail.com]
Sent: Friday, February 23, 2018 4:25 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING EITHIN OFFSHORE BLOCK ER236 EAST VOAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, I strongly object to offshore exploration and/or drilling for oil.

This will effect our entire coastline.

Margaret Stella
60 Bisett Street
Umkomaas
4170

Sent from my Samsung Galaxy smartphone.

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:25 AM
To: megan@badseyproperties.co.za; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Objection to exploration drilling within offshore block ER236 east coast South Africa

Good Day Megan

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: megan@badseyproperties.co.za [mailto:Megan@badseyproperties.co.za]
Sent: Friday, February 23, 2018 8:05 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Objection to exploration drilling within offshore block ER236 east coast South Africa

To Whom It May Concern,

Re: environmental impact assessment for drilling within Block 236 off the East Coast of South Africa

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, as well as to tourism in the areas, people don't want to sit on the beach looking at this off shore. I strongly object to ALL offshore exploration and/or drilling. Please find this email as my written objection to any offshore exploration and drilling, seismic activity included.

Regards

Megan De Oliveira – Sales and Rental agent

084 660 3615

megan@badseyproperties.co.za



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OF SOUTH AFRICA

MEGAN OSBORNE
ESTATE AGENT
08/05/2017 - 09h56

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P

PRIVY
SEAL

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:27 AM
To: Megan Muller (Santam); ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO OFFSHORE DRILLING WITHIN OFFSHORE BLOCK ER 236 EAST COAST SA

Good Day Megan

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Megan Muller (Santam) [mailto:Megan.Muller@santam.co.za]
Sent: Friday, February 23, 2018 1:12 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO OFFSHORE DRILLING WITHIN OFFSHORE BLOCK ER 236 EAST COAST SA

Good day

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly strongly object to offshore exploration and/or drilling for oil.

Please take note of our objection accordingly.

Regards



Megan Muller
Relationship Manager
Tel 031 203 4000
Cell 073 244 0361
Megan.muller@santam.co.za
www.santam.co.za

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Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:30 AM
To: Brigitte Lawrie; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Brigitte and Ian

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: brigitte@tranzact.co.za [mailto:brigitte@tranzact.co.za] **On Behalf Of** Brigitte Lawrie
Sent: Sunday, February 25, 2018 5:12 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Brigitte and Ian Lawrie
47 Marlin Drive
Pennington

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:31 AM
To: Chad Wheeler; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Chad

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Chad Wheeler [mailto:Chad.Wheeler@fphcare.co.nz]
Sent: Sunday, February 25, 2018 8:22 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Chad Wheeler

32 Stephen Road,
Scottburgh South
4180
Kwazulu-Natal
South Africa

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:32 AM
To: Delyse; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Delyse

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Delyse [mailto:delyseramos@telkomsa.net]
Sent: Sunday, February 25, 2018 4:14 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

To whom it may concern,

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

We must think of our children's future, as well as all the generations to come. A very wise saying of Native Americans is: "When the last tree has been cut down, the last fish caught, the last river poisoned, only then will we realise that one cannot eat money."

If you have a conscience please consider future generations.

Sincerely

Delyse Ramos
22 Widenham Drive
Umkomaas
KZN

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:28 AM
To: GARTH BESTER; ERM South Africa Project ENI Offshore Exploration
Cc: Umdoni Action Group
Subject: RE: Undeliverable: Objection to Exploration Drilling within Block236 East Coast SA

Follow Up Flag: Follow up
Flag Status: Flagged

Good Day Garth

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: GARTH BESTER [mailto:bsafe2010@gmail.com]
Sent: Sunday, February 25, 2018 3:25 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Cc: Umdoni Action Group <umdoni.action.group@iafrica.com>
Subject: Fwd: Undeliverable: Objection to Exploration Drilling within Block236 East Coast SA

2nd attempt

Final-Recipient: rfc822;<eni.exploration.eni@erm.com>
Action: failed
Status: 5.1.1
Diagnostic-Code: smtp;550 5.1.1 RESOLVER.ADR.RecipNotFound; not found

From: GARTH BESTER <bsafe2010@gmail.com>
Subject: Objection to Exploration Drilling within Block236 East Coast SA
Date: 25 February 2018 at 3:09:52 PM SAST
To: <eni.exploration.eni@erm.com>

Subject : OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN
OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Garth and Shirley Bester

6 Wesley Road

Freeland Park, Scottburgh

KwaZulu, Natal.

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:31 AM
To: Gavin Roberts; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Gavin

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Gavin Roberts [mailto:gavin.surfagencies@gmail.com]
Sent: Sunday, February 25, 2018 8:17 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Gavin Roberts
4 Lindsay Drive
Scottburgh
4180



Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:30 AM
To: Jane Downey; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Objection to Exploration Drilling Within Block ER226 East Coast South Africa

Good Day Jane

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Jane Downey [mailto:jane.downey@seeff.com]
Sent: Sunday, February 25, 2018 4:24 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Objection to Exploration Drilling Within Block ER226 East Coast South Africa

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Jane Downey & John Besseling
3 Natalia Cres – PO Box 669
Pennington



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JANE DOWNEY
FULL STATUS AGENT (PPRE)
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Jane Downey
Professional Practitioner in Real Estate
NQF 4, Sectional Title Specialist Realtor (UCT)
(O) 039 975 1255 (C) 083 631 5458 (F) 039 975 1073
Email: jane.downey@seeff.com



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Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:29 AM
To: Kim; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Objection to exploration drilling within block ER236 East Coast SA

Good Day Kim

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

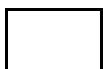
From: Kim [mailto:kim@kurhulalodge.com]
Sent: Sunday, February 25, 2018 4:03 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Objection to exploration drilling within block ER236 East Coast SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Kim Verburgh
7 Bushy Grove
Freeland Park, Scottburgh



Virus-free. www.avg.com

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:31 AM
To: Lou Jacobs; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Lou

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Lou Jacobs [mailto:louj@tiscali.co.za]
Sent: Sunday, February 25, 2018 7:15 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

L.C. Jacobs
27 Marlin Drive
Pennington
4184

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:28 AM
To: salroux@gmail.com; ERM South Africa Project ENI Offshore Exploration
Subject: RE: FW: Extension of Comment Period: EIA for Exploration Drilling within Block ER236, off the East Coast of South Africa

Good Day Sal

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Sal Roux [mailto:salroux@gmail.com]
Sent: Sunday, February 25, 2018 11:55 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Fwd: FW: Extension of Comment Period: EIA for Exploration Drilling within Block ER236, off the East Coast of South Africa
Importance: High

Subject : OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Eugen and Sal Roux

40 Salmon Drive Pennington 4184

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:30 AM
To: Sander; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Sander

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Sander [mailto:sander@kurhulalodge.com]
Sent: Sunday, February 25, 2018 4:05 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Sander Verburgh
7 Bushy Grove
Freeland Park, Scottburgh



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Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 02:53 PM
To: Annien Koulountis; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Annien

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Annien Koulountis [mailto:annien@rockybay.co.za]
Sent: Monday, February 26, 2018 12:41 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Annien Koulountis
Old Main Road
Park Rynie
4182



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Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 10:53 AM
To: Caroline van Hilten; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Caroline

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Caroline van Hilten [mailto:caroline.vanhilten@gmail.com]
Sent: Monday, February 26, 2018 10:13 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

ddress : eni.exploration.eia@erm.com
Subject : OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Caroline van Hilten
24 Dolphin Drive
PENNINGTON 4184
KZN

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 10:56 AM
To: Ewan Bell; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Ewan

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Ewan Bell [mailto:ehbell@polka.co.za]
Sent: Monday, February 26, 2018 4:21 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Address : eni.exploration.eia@erm.com
Subject : OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Ewan & Betty Bell, 75 Lakeview Village, 2, Olive Road, Freeland Park, Scottburgh

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 02:53 PM
To: George Watson; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day George

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: George Watson [mailto:georgebw60@gmail.com]
Sent: Monday, February 26, 2018 1:22 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Kind regards

George B Watson
44 Green Lane
Umzumbe
4225
Cell : 082 902 5505
PO Box 82
Umzumbe
4225

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 10:51 AM
To: Jan; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Subject : OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Jan

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Jan [mailto:cafeconsult@scottburgh.co.za]
Sent: Monday, February 26, 2018 9:40 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Subject : OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Hein Jan van Hilten
24 Dolphin Drive
Pennington 4184

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 02:45 PM
To: ibux@itmkn.co.za; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Drilling

Good Day Imraan

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: ibux@itmkn.co.za [mailto:ibux@itmkn.co.za]
Sent: Monday, February 26, 2018 4:32 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Drilling

I am opposed to any sort of drilling on our coast. I am not convinced of your reasoning and your rational.

Kind Regards

Imraan Bux
IMRAAN TEXTILE MILLS.
Southern Home, Old Main Road, Mtwalume, Kwa-Zulu Natal.
Telephone: +27 (39)9777001 | **Facsimile:** +27 (39) 9777000
Cellphone: +27 (83) 3253243
Email: ibux@itmkn.co.za

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 10:52 AM
To: Ione Bowman; ERM South Africa Project ENI Offshore Exploration
Subject: RE: `OBJECTION TO OFFSHORE DRILLING ?????`

Good Day Ione

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Ione Bowman [mailto:ione@telkomsa.net]
Sent: Monday, February 26, 2018 10:12 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: `OBJECTION TO OFFSHORE DRILLING ?????`

WE TOTALLY AND COMPLETELY OBJECT TO OFFSHORE DRILLING. THIS WILL HAVE DEVESTATING CONSEQUENCES TO THE MARINE LIFE.

MRS IONE BOWMAN
MR ROB BOWMAN

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 02:44 PM
To: 'James'; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day James

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: James [mailto:jamesnan@telkomsa.net]
Sent: Monday, February 26, 2018 4:23 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

M.C. Henderson
46 Oceanic Grove
Park Rynie. 4182

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 09:32 AM
To: Tim Crookes; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Tim

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Tim Crookes [mailto:timcrookes@icloud.com]
Sent: Monday, February 26, 2018 8:05 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHOM IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Timothy Crookes
Ellingham Estate Pty Ltd
PO Box 3
Park Rynie
4182

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 26 February 2018 11:54 AM
To: Trish du Preez; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Trish

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Trish du Preez [mailto:trishdupreez@gmail.com]
Sent: Monday, February 26, 2018 11:46 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Trish Du Preez

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 02:56 PM
To: Brent Coetsee; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Subject : OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Brent

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards

Reinett Mogotshi

From: Brent Coetsee [mailto:brentcoetsee@gmail.com]

Sent: Tuesday, February 27, 2018 10:45 AM

To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>

Subject: Subject : OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Dear Sir

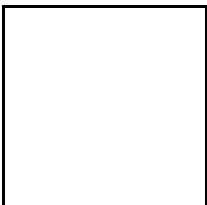
NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

YOUR NAME AND ADDRESS

Brenton Coetsee



Supporter of Save SA

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 06 March 2018 06:03 AM
To: Dexter Biyela; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Registration

Good day Dexter

Thank you for your kind request. Please note that the Specialist Studies Team has been appointed for the project already.

You have been added to our stakeholders database and will be kept informed throughout the EIA process.

Kind Regards
Reinett Mogotshi

From: Dexter Biyela [mailto:dbiyela@samsa.org.za]
Sent: Tuesday, February 27, 2018 12:06 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Registration

Good morning Charlene

Attached to this mail please find my registration sheet. I would sincerely appreciate to be provided with information and reports pertaining to the EIA for Exploration Drilling in Richards Bay. I also have a keen interest to partake in the Specialist Studies once a go ahead is given.

Regards 

Dexter Biyela (MICS)

Maritime Specialists

Chief Examiner's Office: [Quality Management and Auditing](#)

Centre For Seafarers: [South African Maritime Safety Authority \[SAMSA\]](#)

Office: +27 12 366 2619 | Mobile: +27 798851565
www.samsa.org.za | E-Mail: dbiyela@samsa.org.za

146 Lunnun Road | Hillcrest | 0183



Reinett Mogotshi

From: Jenny Evans <jenny@scotttnet.co.za>
Sent: 27 February 2018 09:27 AM
To: ERM South Africa Project ENI Offshore Exploration
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN OFFSHORE BLOCK ER236 EAST COAST OF SOUTH AFRICA

Follow Up Flag: Follow up
Flag Status: Completed

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHORE BLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, I strongly object to offshore exploration and/or drilling for oil.

Jenny Evans
19 Lagoon Drive
Freeland Park
Scottburgh 4180

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 02:56 PM
To: John William Broderick; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day John

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: John William Broderick [mailto:jwbroderick@gmail.com]
Sent: Tuesday, February 27, 2018 11:00 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHORE BLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

John Broderick

11 Beefwood Road Pennington



Virus-free. www.avast.com

Reinett Mogotshi

From: Lindsey Bungartz
Sent: 05 March 2018 01:58 PM
To: Reinett Mogotshi
Subject: FW: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

From: Lindsey Bungartz
Sent: Tuesday, February 27, 2018 2:56 PM
To: 'Mark Beyl' <mark@mblaw.co.za>
Cc: 'Phillip Marx' <phillip@maximsec.co.za>
Subject: RE: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Afternoon Mark

I acknowledge receipt of your email. We will discuss internally and with Eni and I will revert back to you with a response.

Warm regards
Lindsey

From: Mark Beyl [<mailto:mark@mblaw.co.za>]
Sent: Tuesday, February 27, 2018 1:29 PM
To: Lindsey Bungartz <Lindsey.Bungartz@erm.com>
Cc: 'Phillip Marx' <phillip@maximsec.co.za>
Subject: RE: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Hi Lindsay,

Thank you for the e-mail, the contents whereof have been noted.

The fact of the matter remains that SADSAA was not aware of the public participation meeting, and consequently did not attend. It has thus very little information to base its comments on (other than those concerns addressed to you in November 2017).

SADSAA is being prejudiced, in that an area which is being used for Marlin and Tuna Fishing will be subjected to exploration drilling albeit now towards the end of 2019, and our rights in this regard is being reserved in toto.

SADSAA has at its council meeting on 23 February 2018 resolved to obtain quotations for a scientific study of our own to provide us with credible scientific data on the effect of exploration on recreational fishing.

We again repeat our request for a meeting to obtain more information from ENI, and would not like to wait until May 2018 for the EIA to consider our position.

I look forward to your reply.

Kind Regards,
Mark Beyl

From: Lindsey Bungartz <Lindsey.Bungartz@erm.com>
Sent: Monday, February 26, 2018 11:52 AM

To: Mark Beyl <mark@mblaw.co.za>

Subject: RE: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Morning Mark,

We acknowledge your request for meeting to further understand the potential impact of the project on fish stocks. At present our specialists are conducting studies, so in terms of timing, we would be able to present this information in the EIA phase, which would most likely be around May. Let me know if you are happy with this.

In terms of the extent of the exploration area of interest, please refer to Draft Scoping Report and presentation that I sent through on 08 February 2018 for maps showing the Project Area.

Yours sincerely

Lindsey

Lindsey Bungartz

Senior Consultant

ERM Southern Africa (Pty) Ltd

2nd Floor | Great Westerford | 240 Main Road | Rondebosch | 7700 | Cape Town | South Africa

T +27 21 681 5400 | **F** +27 21 686 0736 | **M** +27 829415005

E lindsey.bungartz@erm.com | **W** www.erm.com



From: Mark Beyl [<mailto:mark@mblaw.co.za>]

Sent: Tuesday, February 13, 2018 4:10 PM

To: Lindsey Bungartz <Lindsey.Bungartz@erm.com>

Cc: dickpratt@ivanhoe.co.za; President (Phillip Marx) <phillip@zwn.co.za>

Subject: RE: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa



M Beyl (B Proc)
R Jones (B Comm. LLB)
D van Heerden (LLB)

4th Floor Schreiner Chambers
No 94 Pritchard Street
Johannesburg
2196
mbeyl@mblaw.co.za

P O Box 2469
Johannesburg 2000
Docex 75 JHB
Tel: 011 333 7790
Fax: 086 623 1471

Hi Lindsay,

Apologies for only replying now, but I am involved in an urgent application in Pietermaritzburg.

Firstly, yes the intended drilling now scheduled to be late 2019, is indeed good news, but obviously I require formal proof of that to submit to SADSAA.

Secondly, because SADSAA was not invited to the Public participation meetings, it does not know the extent of the intended exploration.

As such I request an in persona meeting with persons of authority at ENI, so that information can be supplied and perhaps more importantly we require the scientific data in support of the environmental impact on fish stocks, so that SADSAA can consider its position. Maybe when Mr Gelmetti attends Johannesburg, we can arrange such a meeting?

Kind Regards,
Mark Beyl

From: Lindsey Bungartz [<mailto:Lindsey.Bungartz@erm.com>]
Sent: Thursday, 08 February 2018 5:05 PM
To: Mark Beyl <mark@mblaw.co.za>
Subject: RE: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa
Importance: High

Hi Mark

I have forwarded your letter on to Alessandro Gelmetti the MD for Eni South Africa and he has confirmed that the earliest the drilling is expected to start is late 2019 (November – December). I hope that this comes as good news to you.

As I noted in the email below, SADSAA are welcome to submit additional comments before the close of the comment period, 22 February 2018. Please can I ask that if you send additional comments, that you send to me and to the dedicated project email: eni.offshore.eia@erm.com That way there is less chance of an email being missed.

Please let me know if you have any questions.

Warm regards
Lindsey

From: Lindsey Bungartz
Sent: Thursday, February 08, 2018 3:37 PM
To: 'Mark Beyl' <mark@mblaw.co.za>
Subject: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Afternoon Mark

Thank you for calling me back. As I explained on the phone, I completely missed your email last year, and as a result you were not included on the stakeholder database for the EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa. Please accept my apologies for this error. You have now been included on the database and will be kept informed throughout the process going forward.

By way of an update, the revised draft Scoping Report was released for comment on 22 January 2018, and the comment period closes on the 22 February 2018. Public meetings were undertaken this week, and the meeting in Port Shepstone takes place this evening, see details below. I have attached a copy of the presentation for your reference, there is a link to a video on Slide 15 which you will find here: <https://www.youtube.com/watch?v=c0bHP3yYVuk>. I have also attached a copy of the draft Scoping Report (which is available on the project website: www.erm.com/eni-exploration-eia). Timing around the exploration activities has not been confirmed and Page 53 of the Report states *"The initial drilling activities are currently proposed in 2019, the time of year has not as yet been confirmed."*

In terms of a way forward, the comments that you have sent will be included in the comments and responses report as part of the final Scoping Report. You are also welcome to submit additional comments before the close of the comment period, 22 February 2018. Upon approval of the Scoping Report by Petroleum Agency South Africa (PASA), ERM will complete the Environmental Impact Assessment (EIA), and the draft EIA will be made available for a thirty (30) day comment period (this will likely be in May 2018). Once the Draft EIA has been released, there will be further public meetings to disclose the findings of the EIA.

I will forward your letter on to Eni today so that they can review and understand the concerns of the SADSAA & RBSBC. I suggest as a first step, let's see if Eni can provide more clarity around the drilling schedule. From there we can see if a meeting between yourself, ERM and Eni is required.

Please let me know if you have any further questions at this stage.

Yours sincerely
Lindsey

Public Meeting Schedule:

6 February 2018

Venue: Premier Hotel The Richards, 3 Hibberd Dr, Meer En See, Richards Bay

Time: 17:30, the project team will be available at the venue from 16:00

Date: 7 February 2018

Venue: Gooderson Tropicana Hotel, 85 OR Tambo Parade, South Beach, Durban

Time: 17:30, the project team will be available at the venue from 16:00

Date: 8 February 2018

Venue: Port Shepstone Country Club, Port Shepstone

Time: 17:30, the project team will be available at the venue from 16:00

Lindsey Bungartz

Senior Consultant

ERM Southern Africa (Pty) Ltd

2nd Floor | Great Westerford | 240 Main Road | Rondebosch | 7700 | Cape Town | South Africa

T +27 21 681 5400 | **F** +27 21 686 0736 | **M** +27 829415005

E lindsey.bungartz@erm.com | **W** www.erm.com



ERM *The business of sustainability*

From: Mark Beyl [<mailto:mark@mblaw.co.za>]

Sent: Thursday, February 08, 2018 11:00 AM

To: Lindsey Bungartz <Lindsey.Bungartz@erm.com>

Cc: 'Phillip Marx' <phillip@zwn.co.za>; 'Gerrie Delport' <Gerrie.Delport@expresspros.co.za>; 'First Call Maintenance' <firstcall@mweb.co.za>; Bruce Mann <bruce@ori.org.za>; dickpratt@ivanhoe.co.za

Subject: RE: Exploration Drilling off Richardsbay- in re Scoping Report



4th Floor Schreiner Chambers
No 94 Pritchard Street
Johannesburg
2196
mbeyl@mblaw.co.za

P O Box 2469
Johannesburg 2000
Docex 322 JHB
Tel: 011 333 7790
Fax: 086 623 1471

Hi Lindsay,

I refer to my previous letter on 8 November 2017.

Kindly inform me what is the status of the exploration drilling of the above project is, and in particular when the interested and affected parties meeting will take place?

Look forward to hear from you soon.

Kind Regards,
Mark Beyl

From: Mark Beyl

Sent: 08 November 2017 12:27 PM

To: lindsey.bungartz@erm.com

Cc: 'Phillip Marx' <phillip@zwn.co.za>; 'Gerrie Delport' <Gerrie.Delport@expresspros.co.za>; 'First Call Maintenance' <firstcall@mweb.co.za>; Bruce Mann <bruce@ori.org.za>; dickpratt@ivanhoe.co.za

Subject: Exploration Drilling off Richardsbay- in re Scoping Report



1. We refer to the above matter, and more specifically to our telephonic conversation earlier today.
2. We wish respond to the invitation to comment and attend to the public participation meetings on 13 November 2017, which has now been postponed to early next year.

BRIEF BACKGROUND OF SADSAA & RBSBC

3. Our organization, the SOUTH AFRICAN DEEP ANGLING SEA ORGANISATION ("SADSAA") is the national governing body of all recreational deep sea anglers in South Africa, is made up of all the geographical provinces, and in the provinces in turn is made up of various clubs, which has approximately 8000 members countrywide. Amongst our members are highly regarded marine scientists and biologists, which assist us with credible scientific data. Writer is the national environmental officer of SADSAA, and a member of the RBSBC.

4. SADSAA's objectives relevant to the above issue is *inter alia* to liaise and co-operate with all levels of government, private enterprise and other concerned and/or interested bodies for the protection and/or conservation of marine fish, their habitats and food fish and/or sport fishing grounds.
5. SADSAA is affiliated to various international organization's such as IGFA, the Billfish Foundation and International Light Tackle Association, and is also recognized by SASCOC.

RBSBC

6. This letter is also addressed to you on behalf of one of our constituent clubs, the Richards Bay Ski Boat Club ("RBSBC"), which is affiliated to Zululand, and the latter is one of SADSAA's constituent provinces.
7. RBSBC has a direct interest in the above intended exploration drilling as the area of interest is approximately 60 km from the Richards Bay Port, which will probably be used as a basis for the drilling vessels.

INTERESTED AND AFFECTED PARTIES

8. The RBSBC and SADSAA request to be awarded the status as interested and affected party in terms of the National Environmental Management Act (NEMA), and we shall be pleased to receive confirmation as such.

COMMENTS

9. Naturally both SADSAA & the RBSBC will forward more detailed comments after the public participation meetings early next year, but in the main our current concerns are briefly set out hereinafter.

10. SADSAA & the RBSBC is hosting an international Game & Bill Fish Tournament in February 2019, and your client's intended drilling is scheduled for late 2018 and early 2019.
11. The area of interest is close to a renowned marlin and tuna fishing area and it is within the Agulhas current that flows southward following the shelf edge, that is believed to be the path of migratory bill and gamefish. To an extent these environmental concerns have been identified by yourselves, although not specifically bill and gamefish.
12. Common sense dictates if it affects various fish species and mammals , it will affect Marlin, Tuna and game fishing. We are concerned the intended drilling causes the migratory fish to avoid the area of interest, which could result in little or no fish being caught, and notwithstanding a well-run tournament hosted by SADSAA and the RSBC, any international participant will be loath to return to this venue.
13. We look forward to your reply, as well as the new dates for the meeting once they are determined.

Yours Faithfully,

Mark Beyl

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Please visit ERM's web site: <http://www.erm.com>

This electronic mail message may contain information which is (a) LEGALLY PRIVILEGED, PROPRIETARY IN NATURE, OR OTHERWISE PROTECTED BY LAW FROM DISCLOSURE, and (b) intended only for the use of the Addressee (s) names herein. If you are not the Addressee (s), or the person responsible for delivering this to the Addressee (s), you are hereby notified that reading, copying, or distributing this message is prohibited. If you have received this electronic mail message in error, please contact us immediately and take the steps necessary to delete the message completely from your computer system. Thank you.

Please visit ERM's web site: <http://www.erm.com>

Reinett Mogotshi

From: Lindsey Bungartz
Sent: 01 March 2018 10:32 PM
To: Reinett Mogotshi
Subject: FW: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

[And this...](#)

[You can also include my replies.](#)

From: Mark Beyl [mailto:mark@mblaw.co.za]
Sent: Tuesday, February 27, 2018 1:29 PM
To: Lindsey Bungartz <Lindsey.Bungartz@erm.com>
Cc: 'Phillip Marx' <phillip@maximsec.co.za>
Subject: RE: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Hi Lindsay,

Thank you for the e-mail, the contents whereof have been noted.

The fact of the matter remains that SADSAA was not aware of the public participation meeting, and consequently did not attend. It has thus very little information to base its comments on (other than those concerns addressed to you in November 2017).

SADSAA is being prejudiced, in that an area which is being used for Marlin and Tuna Fishing will be subjected to exploration drilling albeit now towards the end of 2019, and our rights in this regard is being reserved in toto.

SADSAA has at its council meeting on 23 February 2018 resolved to obtain quotations for a scientific study of our own to provide us with credible scientific data on the effect of exploration on recreational fishing.

We again repeat our request for a meeting to obtain more information from ENI, and would not like to wait until May 2018 for the EIA to consider our position.

I look forward to your reply.

Kind Regards,
Mark Beyl

From: Lindsey Bungartz <Lindsey.Bungartz@erm.com>
Sent: Monday, February 26, 2018 11:52 AM
To: Mark Beyl <mark@mblaw.co.za>
Subject: RE: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Morning Mark,

We acknowledge your request for meeting to further understand the potential impact of the project on fish stocks. At present our specialists are conducting studies, so in terms of timing, we would be able to present this information in the EIA phase, which would most likely be around May. Let me know if you are happy with this.

In terms of the extent of the exploration area of interest, please refer to Draft Scoping Report and presentation that I sent through on 08 February 2018 for maps showing the Project Area.

Yours sincerely

Lindsey

Lindsey Bungartz
Senior Consultant

ERM Southern Africa (Pty) Ltd

2nd Floor | Great Westerford | 240 Main Road | Rondebosch | 7700 | Cape Town | South Africa

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ERM *The business of sustainability*

From: Mark Beyl [<mailto:mark@mblaw.co.za>]

Sent: Tuesday, February 13, 2018 4:10 PM

To: Lindsey Bungartz <Lindsey.Bungartz@erm.com>

Cc: dickpratt@ivanhoe.co.za; President (Phillip Marx) <phillip@zwn.co.za>

Subject: RE: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa



M Beyl (B Proc)
R Jones (B Comm. LLB)
D van Heerden (LLB)

4th Floor Schreiner Chambers
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Johannesburg
2196
mbeyl@mblaw.co.za

P O Box 2469
Johannesburg 2000
Docex 75 JHB
Tel: 011 333 7790
Fax: 086 623 1471

Hi Lindsay,

Apologies for only replying now, but I am involved in an urgent application in Pietermaritzburg.

Firstly, yes the intended drilling now scheduled to be late 2019, is indeed good news, but obviously I require formal proof of that to submit to SADSAA.

Secondly, because SADSAA was not invited to the Public participation meetings, it does not know the extent of the intended exploration.

As such I request an in persona meeting with persons of authority at ENI, so that information can be supplied and perhaps more importantly we require the scientific data in support of the environmental impact on fish stocks, so that SADSAA can consider its position. Maybe when Mr Gelmetti attends Johannesburg, we can arrange such a meeting?

Kind Regards,
Mark Beyl

From: Lindsey Bungartz [<mailto:Lindsey.Bungartz@erm.com>]
Sent: Thursday, 08 February 2018 5:05 PM
To: Mark Beyl <mark@mblaw.co.za>
Subject: RE: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa
Importance: High

Hi Mark

I have forwarded your letter on to Alessandro Gelmetti the MD for Eni South Africa and he has confirmed that the earliest the drilling is expected to start is late 2019 (November – December). I hope that this comes as good news to you.

As I noted in the email below, SADSAA are welcome to submit additional comments before the close of the comment period, 22 February 2018. Please can I ask that if you send additional comments, that you send to me and to the dedicated project email: eni.offshore.eia@erm.com That way there is less chance of an email being missed.

Please let me know if you have any questions.

Warm regards
Lindsey

From: Lindsey Bungartz
Sent: Thursday, February 08, 2018 3:37 PM
To: 'Mark Beyl' <mark@mblaw.co.za>
Subject: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

Afternoon Mark

Thank you for calling me back. As I explained on the phone, I completely missed your email last year, and as a result you were not included on the stakeholder database for the EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa . Please accept my apologies for this error. You have now been included on the database and will be kept informed throughout the process going forward.

By way of an update, the revised draft Scoping Report was release for comment on 22 January 2018, and the comment period closes on the 22 February 2018. Public meetings were undertaken this week, and the meeting in Port Shepstone takes place this evening, see details below. I have attached a copy of the presentation for your reference, there is a link to a video on Slide 15 which you will find here: <https://www.youtube.com/watch?v=c0bHP3yYVuk> . I have also attached a copy of the draft Scoping Report (which is available on the project website: www.erm.com/eni-exploration-eia). Timing around the exploration activities has not been confirmed and Page 53 of the Report states *"The initial drilling activities are currently proposed in 2019, the time of year has not as yet been confirmed."*

In terms of a way forward, the comments that you have sent will be included in the comments and responses report as part of the final Scoping Report. You are also welcome to submit additional comments before the close of the comment period, 22 February 2018. Upon approval of the Scoping Report by Petroleum Agency South Africa (PASA), ERM will complete the Environmental Impact Assessment (EIA), and the draft EIA will be made available for a thirty (30) day comment period (this will likely be in May 2018). Once the Draft EIA has been released, there will be further public meetings to disclose the findings of the EIA.

I will forward your letter on to Eni today so that they can review and understand the concerns of the SADSAA & RBSBC. I suggest as a first step, let's see if Eni can provide more clarity around the drilling schedule. From there we can see if a meeting between yourself, ERM and Eni is required.

Please let me know if you have any further questions at this stage.

Yours sincerely
Lindsey

Public Meeting Schedule:

6 February 2018

Venue: Premier Hotel The Richards, 3 Hibberd Dr, Meer En See, Richards Bay

Time: 17:30, the project team will be available at the venue from 16:00

Date: 7 February 2018

Venue: Gooderson Tropicana Hotel, 85 OR Tambo Parade, South Beach, Durban

Time: 17:30, the project team will be available at the venue from 16:00

Date: 8 February 2018

Venue: Port Shepstone Country Club, Port Shepstone

Time: 17:30, the project team will be available at the venue from 16:00

Lindsey Bungartz
Senior Consultant

ERM Southern Africa (Pty) Ltd

2nd Floor | Great Westford | 240 Main Road | Rondebosch | 7700 | Cape Town | South Africa

T +27 21 681 5400 | **F** +27 21 686 0736 | **M** +27 829415005

E lindsey.bungartz@erm.com | **W** www.erm.com



From: Mark Beyl [<mailto:mark@mblaw.co.za>]

Sent: Thursday, February 08, 2018 11:00 AM

To: Lindsey Bungartz <Lindsey.Bungartz@erm.com>

Cc: 'Phillip Marx' <phillip@zwn.co.za>; 'Gerrie Delport' <Gerrie.Delport@expresspros.co.za>; 'First Call Maintenance' <firstcall@mweb.co.za>; Bruce Mann <bruce@ori.org.za>; dickpratt@ivanhoe.co.za

Subject: RE: Exploration Drilling off Richardsbay- in re Scoping Report



M Beyl (B Proc)
R Jones (B Comm LLB)
D van Heerden (LLB)

4th Floor Schreiner Chambers
No 94 Pritchard Street
Johannesburg
2196
mbeyl@mblaw.co.za

P O Box 2469
Johannesburg 2000
Docex 322 JHB
Tel: 011 333 7790
Fax: 086 623 1471

Hi Lindsay,

I refer to my previous letter on 8 November 2017.

Kindly inform me what is the status of the exploration drilling of the above project is, and in particular when the interested and affected parties meeting will take place?

Look forward to hear from you soon.

Kind Regards,
Mark Beyl

From: Mark Beyl

Sent: 08 November 2017 12:27 PM

To: lindsey.bungartz@erm.com

Cc: 'Phillip Marx' <phillip@zwn.co.za>; 'Gerrie Delport' <Gerrie.Delport@expresspros.co.za>; 'First Call Maintenance' <firstcall@mweb.co.za>; Bruce Mann <bruce@ori.org.za>; dickpratt@ivanhoe.co.za

Subject: Exploration Drilling off Richardsbay- in re Scoping Report

*South African Deep Sea
Angling Association*
GOVERNING BODY OF SPORT FISH
ANGLING FROM CRAFT AT SEA IN SOUTH AFRICA



*Suid Afrikaanse Diep-
seehengelassosiasie*
BEHEER LIGAAM VAN SPORTVIS HENGEL
VAN VAARTUIG TER SEE IN SUID

1. We refer to the above matter, and more specifically to our telephonic conversation earlier today.
2. We wish respond to the invitation to comment and attend to the public participation meetings on 13 November 2017, which has now been postponed to early next year.

BRIEF BACKGROUND OF SADSAA & RBSBC

3. Our organization, the SOUTH AFRICAN DEEP ANGLING SEA ORGANISATION (“SADSAA”) is the national governing body of all recreational deep sea anglers in South Africa, is made up of all the geographical provinces, and in the provinces in turn is made up of various clubs, which has approximately 8000 members countrywide. Amongst our members are highly regarded marine scientists and biologists, which assist us with credible scientific data. Writer is the national environmental officer of SADSAA, and a member of the RBSBC.
4. SADSAA’s objectives relevant to the above issue is *inter alia* to liaise and co-operate with all levels of government, private enterprise and other concerned and/or interested bodies for the protection and/or conservation of marine fish, their habitats and food fish and/or sport fishing grounds.
5. SADSAA is affiliated to various international organization’s such as IGFA, the Billfish Foundation and International Light Tackle Association, and is also recognized by SASCOC.

RBSBC

6. This letter is also addressed to you on behalf of one of our constituent clubs, the Richards Bay Ski Boat Club (“RBSBC”), which is affiliated to Zululand, and the latter is one of SADSAA’s constituent provinces.
7. RBSBC has a direct interest in the above intended exploration drilling as the area of interest is approximately 60 km from the Richards Bay Port, which will probably be used as a basis for the drilling vessels.

INTERESTED AND AFFECTED PARTIES

8. The RBSBC and SADSAA request to be awarded the status as interested and affected party in terms of the National Environmental Management Act (NEMA), and we shall be pleased to receive confirmation as such.

COMMENTS

9. Naturally both SADSAA & the RBSBC will forward more detailed comments after the public participation meetings early next year, but in the main our current concerns are briefly set out hereinafter.
10. SADSAA & the RBSBC is hosting an international Game & Bill Fish Tournament in February 2019, and your client's intended drilling is scheduled for late 2018 and early 2019.
11. The area of interest is close to a renowned marlin and tuna fishing area and it is within the Agulhas current that flows southward following the shelf edge, that is believed to be the path of migratory bill and gamefish. To an extent these environmental concerns have been identified by yourselves, although not specifically bill and gamefish.
12. Common sense dictates if it affects various fish species and mammals , it will affect Marlin, Tuna and game fishing. We are concerned the intended drilling causes the migratory fish to avoid the area of interest, which could result in little or no fish being caught, and notwithstanding a well-run tournament hosted by SADSAA and the RSBC, any international participant will be loath to return to this venue.
13. We look forward to your reply, as well as the new dates for the meeting once they are determined.

Yours Faithfully,

Mark Beyl

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Please visit ERM's web site: <http://www.erm.com>

This electronic mail message may contain information which is (a) LEGALLY PRIVILEGED, PROPRIETARY IN NATURE, OR OTHERWISE PROTECTED BY LAW FROM DISCLOSURE, and (b) intended only for the use of the Addressee (s) names herein. If you are not the Addressee (s), or the person responsible for delivering this to the Addressee (s), you are hereby notified that reading, copying, or distributing this message is prohibited. If you have received this electronic mail message in error, please contact us immediately and take the steps necessary to delete the message completely from your computer system. Thank you.

Please visit ERM's web site: <http://www.erm.com>

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 02:57 PM
To: Marthina Broderick; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Marthina

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

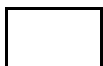
From: Marthina Broderick [mailto:marthinabroderick@gmail.com]
Sent: Tuesday, February 27, 2018 11:23 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Fwd: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Marthina Broderick
11 Beefwood Road Pennington



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Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 02:55 PM
To: Nkosikhona Fakude; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Asking For Help

Good Day Nkosinathi

Thank you for your interest in this project. The documents submitted shall be forwarded to Eni for consideration.

Kind Regards
Reinett Mogotshi

From: Nkosikhona Fakude [mailto:nkosikhona14@gmail.com]
Sent: Tuesday, February 27, 2018 10:31 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: RE: Asking For Help

Dear Sir/ Madam

I have a BSc Environmental Science degree and I have never worked before. I would like to be considered for any available positions related to my degree, in order to gain work experience. Please find the attached CV and supporting documents. Thank you

Regards,
Nkosikhona Fakude

On 26 Feb 2018 08:00, "ERM South Africa Project ENI Offshore Exploration"
<eni.exploration.eia@erm.com> wrote:

Good Morning Nkosinathi

Thank you for your interest in this project. The documents submitted shall be forwarded to Eni for consideration.

Kind Regards
Reinett Mogotshi

From: Nkosikhona Fakude [mailto:nkosikhona14@gmail.com]
Sent: Wednesday, February 07, 2018 8:22 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Asking For Help

Dear Sir/ Madam

I have a BSc Environmental Science degree and I have never worked before. I would like to be considered for any available positions related to my degree, in order to gain work experience. Please find the attached CV and supporting documents. Thank you

Regards,

Nkosikhona Fakude

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 02:51 PM
To: Patrick Russell; ERM South Africa Project ENI Offshore Exploration
Subject: RE:

Good Day Patrick

Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.

Kind Regards
Reinett Mogotshi

-----Original Message-----

From: Patrick Russell [mailto:tinkhukhu@gmail.com]
Sent: Tuesday, February 27, 2018 6:15 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject:

Patrick Russell
12 Milkwood, 26 Gumtree Road, Pennington 4184

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 03:00 PM
To: ATHOL LAWRENCE; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Extension of Comment Period: EIA for Exploration Drilling within Block ER236, off the East Coast of South Africa

Good Day Athol

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: ATHOL LAWRENCE [mailto:27798778748@VODAMAIL.CO.ZA]
Sent: Wednesday, February 28, 2018 7:10 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Fw: Extension of Comment Period: EIA for Exploration Drilling within Block ER236, off the East Coast of South Africa
Importance: High

Address : eni.exploration.eia@erm.com
Subject : OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Athol Lawrence
Unit 3 Casuarina Sands
6 Coral Road
Pennington
4184

From: ERM South Africa Project ENI Offshore Exploration [<mailto:eni.exploration.eia@erm.com>]
Sent: 22 February 2018 08:59 AM
To: undisclosed-recipients:
Subject: RE: Extension of Comment Period: EIA for Exploration Drilling within Block ER236, off the East Coast of South Africa

ERM Ref: 0414229

Dear Stakeholder

RE: Environmental Impact Assessment for Exploration Drilling within Block ER236, off the East Coast of South Africa

As per the email below, the Draft Scoping Report for the proposed Exploration Drilling project was released for comment on the 22 January 2018. Based on requests made during the Public Meetings held on the 6th, 7th and 8th February 2018 an isiZulu version of the Executive Summary has been prepared and uploaded to the website (<https://www.erm.com/eni-exploration-eia>) for review. **We have therefore made the decision to extend the comment period to 1 March 2018 to allow additional time for the review of the isiZulu version.**

Your comments and our responses will be incorporated into the Final Scoping Report to be submitted to PASA for consideration.

Thank you for your participation in this process.

Yours Sincerely

Lindsey Bungartz
Senior Consultant

ERM Southern Africa (Pty) Ltd

2nd Floor | Great Westerford | 240 Main Road | Rondebosch | 7700 | Cape Town | South Africa

T +27 21 681 5400 | **F** +27 21 686 0736

W www.erm.com



From: "ERM South Africa Project ENI Offshore Exploration" <eni.exploration.eia@erm.com>

To: "Lindsey Bungartz" <Lindsey.Bungartz@erm.com>

Sent: Monday, 22 January, 2018 11:23:07 AM

Subject: Notification of Draft Scoping Report: EIA for Exploration Drilling within Offshore Block ER236, KZN, South Africa

ERM Ref: 0414229

Dear Stakeholder,

RE: Environmental Impact Assessment for Exploration Drilling within Block ER236, off the East Coast of South Africa

Eni South Africa BV (Eni), and Sasol Africa Limited (Sasol) hold an Exploration Right 12/3/236 (ER 236) off the East Coast of South Africa. Eni has the operatorship of Block ER 236. Eni and Sasol are considering the possibility of conducting an exploration drilling programme in Block ER 236 to assess the commercial viability of the hydrocarbon reservoir for future development.

The project requires Environmental Authorisation (EA) from the National Department of Mineral Resources (DMR) under the National Environmental Management Act (NEMA) (Act No. 107 of 1998), as amended, through an Environmental Impact Assessment (EIA) process.

ERM released a Draft Scoping Report on 26 October 2017, which was subsequently withdrawn on 07 November 2017, as Eni and Sasol wished to reconsider the scope of the project.

Notice is hereby given that the revised Draft Scoping Report is available for comment. Changes made to the Draft Scoping Report are largely in the Project Description, Chapter 4, as the ER236 holders are now considering drilling up to six wells, instead of the four wells which were planned in the previous 2017 Draft Scoping Report. Key edits to the project scope have been underlined in the text of the Draft Scoping Report, other edits are outlined below.

All	<ul style="list-style-type: none"> • Updated maps to reflect southern area of interest. • Minor editorial edits.
Chapter 1 (Introduction)	<ul style="list-style-type: none"> • Inclusion of southern area of interest in <i>Section 1.1</i>
Chapter 4 (Project Description)	<ul style="list-style-type: none"> • Section 4.1 and Section 4.2 edited to include the southern area of interest
Chapter 5 (Baseline)	<ul style="list-style-type: none"> • Updates made throughout to reflect the addition of the southern area of interest
Chapter 6 (EIA Process)	<ul style="list-style-type: none"> • Public consultation details edited to reflect re-release of Draft Scoping Report
Chapter 8 (Plan of Study for EIA)	<ul style="list-style-type: none"> • Provisional EIA schedule updated to reflect new timeframe

All comments received from stakeholders with regard to the previous Draft Scoping Report have been considered and included in the 2018 Draft Scoping Report, in the Comments and Responses Report (CRR) (*Annex C*). Stakeholders are encouraged to ensure that their comments are captured in the CRR and are welcome to submit further comment to ERM.

The comment period will have a duration of 30 calendar days from 22 January 2018 to 22 February 2018. The Report is available on the Project website: www.erm.com/eni-exploration-eia as well as on request, from ERM, and at the following public locations:

- Durban Central Lending Public Library
- Richards Bay Library
- Port Shepstone Library
- ERM offices, Suite S005, 17 The Boulevard, Westway Office Park, Westville

A Zulu or Afrikaans version of the executive summary can be made available on request.

Stakeholders are invited to attend one of the below listed public meetings where ERM will present more information about the project and the EIA. During the meeting the participants will also have the opportunity to ask questions to the Project team. Details of the public meetings are as follows:

Date: 6 February 2018

Venue: Premier Hotel The Richards, 3 Hibberd Dr, Meer En See, Richards Bay

Time: 17:30, the project team will be available at the venue from 16:00

Date: 7 February 2018

Venue: Gooderson Tropicana Hotel, 85 OR Tambo Parade, South Beach, Durban

Time: 17:30, the project team will be available at the venue from 16:00

Date: 8 February 2018

Venue: Port Shepstone Country Club, Port Shepstone

Time: 17:30, the project team will be available at the venue from 16:00

You are invited to submit your comments on the Draft Scoping Report to ERM:

Email: eni.offshore.eia@erm.com

Post: Postnet Suite 90, Private Bag X12, Tokai, 7966

Tel: 021 681 5400

Website: www.erm.com/eni-exploration-eia

Your comments, and our response, will be incorporated into the Final Scoping Report to be submitted to PASA for consideration.

Please ensure that your comments reach ERM on or before 22 February 2018.

Thank you for your participation in this process.

Yours Sincerely

Lindsey Bungartz

Senior Consultant

ERM Southern Africa (Pty) Ltd

2nd Floor | Great Westerford | 240 Main Road | Rondebosch | 7700 | Cape Town | South Africa

T +27 21 681 5400 | **F** +27 21 686 0736 |

W www.erm.com



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Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 02:59 PM
To: Colleen Crookes; ERM South Africa Project ENI Offshore Exploration
Subject: RE: NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

Good Day Colleen

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Colleen Crookes [mailto:colleen@scottnet.co.za]
Sent: Tuesday, February 27, 2018 5:21 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Colleen Crookes
4 Woodford Road
Freeland Park
Scottburgh
4180

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 03:01 PM
To: Lorraine Johnson; ERM South Africa Project ENI Offshore Exploration
Cc: dwyersam9@gmail.com
Subject: RE: Objection to drilling offshore

Good Day Lorraine

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Lorraine Johnson [mailto:lorraine@ljconsulting.co.za]
Sent: Wednesday, February 28, 2018 9:28 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Cc: dwyersam9@gmail.com
Subject: Objection to drilling offshore

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK
ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

LORRAINE JOHNSON
1 CASUARINA SANDS
6 CORAL ROAD
PENNINGTON
4184

Thanks and Regards
Lorraine
Cell: 0829551306/0798194263

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**OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST
COAST OF SOUTH AFRICA**

**NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING
WITHIN OFFSHORE BLOCK ER236 EAST COAST OF SOUTH AFRICA**

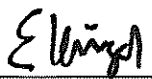
TO WHOM IT MAY CONCERN

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

SIGNED AT EMALAHLENI BY:


JM KRÜGEL

28/2/2018
DATE


E KRÜGEL

28/2/2018
DATE

(PROPERTY OWNERS - PENNINGTON)

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 03:05 PM
To: Marie Roos; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Marie

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Marie Roos [mailto:marie@krugels.co.za]
Sent: Wednesday, February 28, 2018 2:31 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Sir / Madam

Kindly find attached hereto correspondence from our offices.

Regards

MARIE ROOS

KRÜGEL HEINSEN INCORPORATED

Reg Nr: 2001/001786/21 Vat No: 4680210509

Facebook: 

Route N4 Business Park, Proffice Building 23 Corridor Crescent, Benfleur, Emalahleni

Tel: (013) 653 6400 Fax: (013) 653 6401

E-mail: marie@krugels.co.za Website: www.krugelheinsen.co.za, Docex 53 Witbank Sentinel

This e-mail and any attachments are confidential. If you are not the intended recipient of this e-mail, please immediately delete its contents and notify us. This e-mail was checked for virus contamination before being sent - nevertheless, it is advisable to check for any contamination.

PLEASE TAKE NOTE :

Our office will never change or amend our trust banking details via email or other electronic forum. Please contact our offices for formal verification should you receive any correspondence of such nature.

PLEASE NOTE OUR E-MAIL DOMAIN is known as @krugels.co.za – Please do not accept any e-mails not sent from our domain address and please report same to us.

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 03:00 PM
To: Sam Dwyer; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Sam

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Sam Dwyer [mailto:dwyersam9@gmail.com]
Sent: Wednesday, February 28, 2018 7:33 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Sam Dwyer
1 Casuarina Sands
Coral Road
Pennington, KZN
4184

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 03:01 PM
To: SHELLEY - KETON COMP; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good Day Shelley

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: SHELLEY - KETON COMP [mailto:info@keton.co.za]
Sent: Wednesday, February 28, 2018 8:59 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Yours sincerely

Shelley de Beer
No. 8 Casuarina Sands
Coral Road
Pennington

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 03:03 PM
To: vivienne v; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Extension of Comment Period: EIA for Exploration Drilling within Block ER236, off the East Coast of South Africa

Good Day Vivienne

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: vivienne v [mailto:vivsdesigns@gmail.com]
Sent: Wednesday, February 28, 2018 12:10 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Re: Extension of Comment Period: EIA for Exploration Drilling within Block ER236, off the East Coast of South Africa

please let it also be noted that the Bluff, whom I represent, relies heavily on tourism – including large numbers of local day visitors. Our Ward is branded as the Whale Ward with a Whale Festival held annually. Our deep concern is the impact of the interference not only of the whales but our coastal marine life.
many thanks

On Wed, Feb 28, 2018 at 11:43 AM, vivienne v <vivsdesigns@gmail.com> wrote:

thank you for this opportunity to respond....basically any future developments regarding the exploration of coal, gas, oil etc definitely DOES NOT HAVE THE FUTURE OF THIS EARTH & US, THE PEOPLE, & OUR BEST INTERESTS in the right place!!!! we all are very aware in this 21st century the damage this has caused and we should all be saying NO!!!! the alternatives have more than proven themselves and that is what should be explored.....there is more than enough sun, wind, waves of the sea etc for sustainable living,,,
so lets make the right choices for this century and our futures!!!! and be SUSTAINABLE IN ITS TRUE SENSE!!!



Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 28 February 2018 03:02 PM
To: vivienne v; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Extension of Comment Period: EIA for Exploration Drilling within Block ER236, off the East Coast of South Africa

Good Day Vivienne

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: vivienne v [mailto:vivsdesigns@gmail.com]
Sent: Wednesday, February 28, 2018 11:44 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: Re: Extension of Comment Period: EIA for Exploration Drilling within Block ER236, off the East Coast of South Africa

thank you for this opportunity to respond....basically any future developments regarding the exploration of coal, gas, oil etc definitely DOES NOT HAVE THE FUTURE OF THIS EARTH & US, THE PEOPLE, & OUR BEST INTERESTS in the right place!!!! we all are very aware in this 21st century the damage this has caused and we should all be saying NO!!!! the alternatives have more than proven themselves and that is what should be explored.....there is more than enough sun, wind, waves of the sea etc for sustainable living,,,
so lets make the right choices for this century and our futures!!!! and be SUSTAINABLE IN ITS TRUE SENSE!!!



Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 01 March 2018 11:23 AM
To: toddell@absamail.co.za; ERM South Africa Project ENI Offshore Exploration
Subject: RE: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

Good day Ashly

Thank you for your email. You have been registered as an Interested and Affected Party (I&AP) and will be kept informed throughout the EIA process.

Kind Regards
Reinett Mogotshi

From: toddell@absamail.co.za [mailto:toddell@absamail.co.za]
Sent: Thursday, March 01, 2018 7:49 AM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: OBJECTION TO EXPLORATION DRILLING WITHIN BLOCK ER236 EAST COAST SA

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHO IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

YOUR NAME AND ADDRESS

Ashly Phillips

4Casuarina Sands

Penninton

Kwazulu Natal



COASTWATCH KZN

135-408 NPO

P.O. Box 1586

Ballito

4420

coastwatch@telkomsa.net

ERM Southern Africa (Pty) Ltd

For Attention: Lindsey Bungartz

eni.exploration.eia@erm.com

Coastwatch, WESSA Durban Branch and Birdlife Port Natal, non-governmental organisations formed by volunteers and operating with support of people interested and/or affected by issues relating to the area share interest in development and change of land use applications in the eThekweni area. The organisations serve to ensure that development in the eThekweni area is appropriate, sustainable and legally compliant. The following comments are submitted on behalf of these organisations.

Proposed Exploration Drilling within Block ER236, off the East Coast of South Africa

Applicant: Eni South Africa BV (Eni) and Sasol Africa Limited (Sasol)

COMMENT ON THE DRAFT SCOPING REPORT (1 March 2018):

Coastwatch, in collaboration with the abovementioned organisations, has reviewed the draft document and we raise the following issues which we believe need to be addressed;

- 1) A desktop marine impact assessment is insufficient to provide adequate information for the placing of the wells. The deep ocean, especially on the KwaZulu-Natal coast is extremely data deficient and thus data is likely to be gleaned from numerous historic studies, none of which are likely to have been undertaken in the area of interest itself or within a reasonably recent timeframe thus allowing for the use of appropriate current technologies. We would expect that at least a brief physical survey to be undertaken in order to verify conclusions drawn by the desk top study. In addition, this information and imagery should be made available to the public to ensure transparency.
- 2) Please could you provide the Terms of Reference for all specialist studies to be included in the EIA report so that we are able to assess the scope of the studies being undertaken, particularly with regards to the marine specialist component.
- 3) Will the applicant be restricted to a certain drilling time, in terms of when drilling may occur and for how long. Will drilling occur during the whale migration, turtle nesting and hatching, or during the sardine run and will the impacts of this be explored in the marine assessment. This is a particular concern for migratory species such as birds which follow the sardine run have been known to be adversely affected by drilling platforms.
- 4) The KwaZulu-Natal coastline is notorious for rough seas and this raises a concern of the ability of the drilling ship to handle extreme conditions, such as "freak waves".
- 5) Is there a clean-up plan in place should the blow out preventer fail?



c/o 100 Brand Road, Durban 4001
Coastwatch operates as a Friend of WESSA, committed to the well-being of the KwaZulu-Natal Coast
Reg. No. 05/04658/08 (Incorporated Association not for gain) FRN 01 1000 78 000 3

- 6) Who will be responsible for monitoring and maintenance of the capped wells into the future should the drilling not detect deposits worth exploiting. It is felt that regular monitoring of the wells is required to ensure that no leaks occur that may cause adverse impacts to the environment.

Please note that these comments pertain only to the exploration drilling outlined in this report and that in the event of a positive result a new EIA process would then be required as per the regulations prior to commercial extraction.

Furthermore, while it is noted that it is not under the control of the applicant, CoastWatch is concerned with Petroleum Agency South Africa's ability to act as both the promoters of the oil and gas industry as well as the adjudicators in these decisions. It is felt that this should be the role of the Department of Environmental Affairs, whose mandate it is to ensure that the environment is not harmful to the health and wellbeing of the citizens of South African and to protect the environment for the benefit of present and future generations.

Yours faithfully,

The Chairman
CoastWatch

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 01 March 2018 01:08 PM
To: Kendyl Le Roux; ERM South Africa Project ENI Offshore Exploration; Coastwatch
Subject: RE: EIA for Exploration Drilling within Block ER236, off the East Coast of South Africa: Meeting Minutes

Good Day Kendyl

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Kendyl Le Roux [mailto:kendyllr@gmail.com]
Sent: Thursday, March 01, 2018 12:55 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>; Coastwatch <coastwatch@telkomsa.net>
Subject: Re: EIA for Exploration Drilling within Block ER236, off the East Coast of South Africa: Meeting Minutes

Dear Lindsey

Please find attached comments on the Draft Scoping Report for the proposed drilling in Block ER236.

Please feel free to contact us should you require clarification on any of the comments.

Kind regards,
Kendyl

On Tue, Feb 27, 2018 at 12:56 PM, ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com> wrote:

ERM Ref: 0414229

Dear Stakeholder

RE: Environmental Impact Assessment for Exploration Drilling within Block ER236, off the East Coast of South Africa

Attached please find the meeting minutes from the public meeting which took place in Durban, 7 February 2018.

Yours sincerely,

Lindsey Bungartz
Senior Consultant

ERM Southern Africa (Pty) Ltd

2nd Floor | Great Westerford | 240 Main Road | Rondebosch | 7700 | Cape Town | South Africa
T +27 21 681 5400 | **F** +27 21 686 0736 |
W www.erm.com



Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 02 March 2018 09:34 AM
To: 'Mac'; ERM South Africa Project ENI Offshore Exploration
Subject: RE: EIA for Exploration Drilling within Block ER236, off the East Coast of South Africa

Good day Michelle

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Mac [mailto:entwae@gmail.com]
Sent: Thursday, March 01, 2018 4:14 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: EIA for Exploration Drilling within Block ER236, off the East Coast of South Africa

NOTIFICATION DRAFT SCOPING REPORT. EIA FOR EXPLORATION DRILLING WITHIN OFFSHOREBLOCK ER236 EAST COAST OF SOUTH AFRICA

TO WHOM IT MAY CONCERN:

On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, we strongly object to offshore exploration and/or drilling for oil.

Yours concerned,

Michelle Macdonald
6 Watervale
Moodie Lane
Freeland Park
Scottburgh

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 05 March 2018 10:47 AM
To: Hoosen; ERM South Africa Project ENI Offshore Exploration
Subject: RE: Oil Spill Presentation

Good day Hoosen

Thank you for your email. We have received your comments, which, together with a response from the Project Team will be included in the Final Scoping Report to be submitted to PASA.

Kind Regards
Reinett Mogotshi

From: Hoosen [mailto:hoosen@bobats.co.za]
Sent: Sunday, March 04, 2018 9:04 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Cc: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Subject: FW: Oil Spill Presentation

ENI/ERM

I am a private citizen, born and raised in Durban. I am doing this out of love of nature and our environment. Our coastline is the proverbial 'Goose that has laid the golden egg'... destroy it and East coast SA is doomed !

I attach my presentation which I meant to present at the Austerville meeting.

I will go through each slide and make comments.

Slide 1

Your map of the area affected shows the KZN coast with three little dots ie. Richards Bay, Durban and Port Shepstone as being the only affected area. This map trivializes the whole project as if only 3 places affected.

Actually the entire eastern seaboard from Kosi mouth to around East London is affected..

You do not even show the Transkei coastline which is under threat with your area off Port Shepstone.

Shockingly, Your map does not even show all the major rivers, wetlands, little towns and villages along the east coast. What kind of an EIA process. Very shoddy. In case you ERM, is not aware, this is one of the most biodiverse marine environments in the world.

Slide 2 shows South Africa mapthis is what you should have shown first and then move on to show area by affected area,

taking area by area.

Slide 3 shows a detailed stretch of the coast from Kosi to St Lucia lighthouse...this is the iSimangaliso wetland park, South Africa's first World Heritage site since 1999. This is 280 km of pristine coastline and includes 3 of South Africa's RAMSAR sites.

Did you go and present to the Tonga people of Kosi who have done sustainable subsistence fishing here for over 700 years.

Did you present to the custodians of Lake Sibaya, a Ramsar site.

Did you present to KZN Wildlife who the custodians of the RAMSAR sites.

Have you presented to the board of the iSimangaliso Wetland park ?

Slide 4.. this is Sodwana Bay within iSimangaliso Wetland Park

Did you present to the local community there, who rely on the marine environment for their livelihood ?

This stretch has 3 of South Africa's world renowned reefs.

It is the most important area for turtle nesting. Turtles are already under threat of extinction, probably in 35/50 years time.

The hatchlings swim out to join the Agulhas current 10/20 kms offshore,thereafter they are carried south by the Agulhas current.

YOUR drilling area is smack in their paths.

Sodwana is the home of the only known living Coelacanth, a truly pre-historic creature.

Your drilling area off Richards Bay is far too close to the deepwater canyons that they inhabit.Sound travels greater distances underground than in the open air or underwater.

Slide 5 is a quote by Nelson Mandela.A very profound quote,recognizing the importance of the park.An oil spill in this area would be catastrophic.It is horrific to think that you are trying to plunder this area.

Slide 6 : ERM Please read this slide carefully.This is a Marine protected area !!!!! Operation Phakisa,which you and ENI so glibly quote has in fact extended the marine protected 54 km offshore at Kosi mouth and upto 93km off St Lucia lighthouse.

Slide 7 shows distribution of mangroves on the east coast.Mangroves are an integral and unique part of our coast.

The heavier concentration in the Transkei area would be under massive threat.

You do not even show the Transkei on your map.

Did you present to the communities south of Port Shepstone eg Mtentu,Msikaba, Port ST Johns etc. ?

Slide 8 refers to an annual pelagic event that has played out over millions of years, the Sardine run.

Acknowledged the world over as the 'Greatest Shoal" on earth.Already under threat by pollution and global warming....

An oil spill would be a disaster of epic proportions....for the sardines,a multitude of marine species eg whales,dolphins,seals, dozens of fish species,birdlife and humans.

Slide 8 shows the major currents off SA. Our main interest is the Agulhas current....where your drilling rigs would be located.

In fact this map you ERM,should be showing to interested parties. It would show how an oil spill would be carried by this Agulhas current,which moves upto 3 meters per second.....in 12 hours a spill could be over 100 kmsand depending on winds at that time any easterlies,south easterly or a south westerly would drive it onshore.Disaster.

Slide 9 the potential disaster. The deepwater Horizon spill is still being felt 7 years later.

ERM

All you are aiming to do is rubber stamp this EIA as quickly and quietly as possible so as to meet your deadline before the concession expires.This presentation is just one aspect of the potential threat of this drilling.

I attended both the Tropicana and Austerville meetings.I was surprised by your firms arrogance, the impatience of the facilitator.

All the tech info by ENI does not matter because ENI CANNOT GUARANTEE THAT THERE WILL NEVER BE A SPILL. Period.

Your EIA process is extremely flawed.

Regards,

Hoosen Bobat, BCom, CFP

Cell: +27 (0)83 786 5983
Tel: +27 (0)31 309 7861
Fax: +27 (0)86 663 4559
Mail: hoosen@bobats.co.za







196 Gordon Road
Morningside, Durban, 4001
PO Box 786, Durban, 4000

The current map of where ENI intend to drill trivializes the extent of the Eastern Coast line as well and depicts it as a small portion of Kwa-ZuluNatal



SOUTH AFRICA

Capital,
Pretoria, administrative;
Cape Town, legislative and
Bloemfontein, judicial

-  National capital
 Provincial capital
 Town, village
 Major airport
 International boundary
 Provincial boundary

© Nations Online Project





iSimangaliso Wetland Park, South Africa's very first World Heritage site since 1999 (Unesco), it is also the third largest protected area in South Africa.



Sodwana Bay



“iSimangaliso must be the only place on the globe where the oldest land mammal (the rhinoceros) and the world’s biggest terrestrial mammal (the elephant) share an ecosystem with the world’s oldest fish (the coelacanth) and the world’s biggest marine mammal (the whale)”
-Nelson Mandela

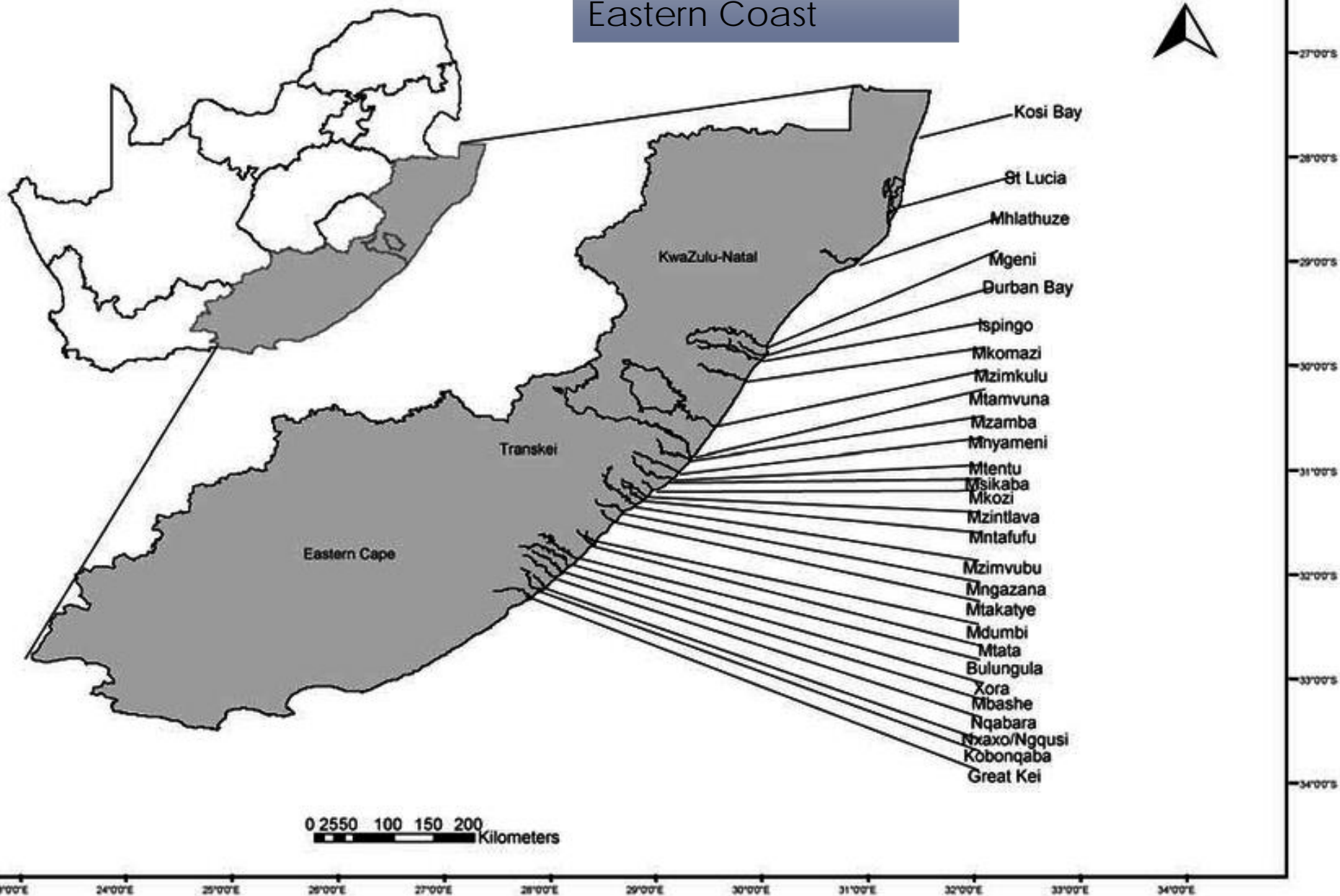


iSimangaliso Wetland Park is the largest marine protected area (MPA) in South Africa. Up until February 2016 the country conserved roughly 21 Marine Protected Areas, when an announcement by the government outlined its intention to add a further network of 22 new Marine Protected Areas - part of an initiative known as Operation Phakisa.



Operation Phakisa intends withdrawing these two Marine Protected Areas and extending the boundaries of the iSimangaliso Marine Protected Area even further. It will stretch from the border with Mozambique to Cape St Lucia lighthouse in the south, 54 KM offshore in the north and as much as 93 KM miles offshore in the south (most of the iSimangaliso Wetland Park and the coastline, in other words).

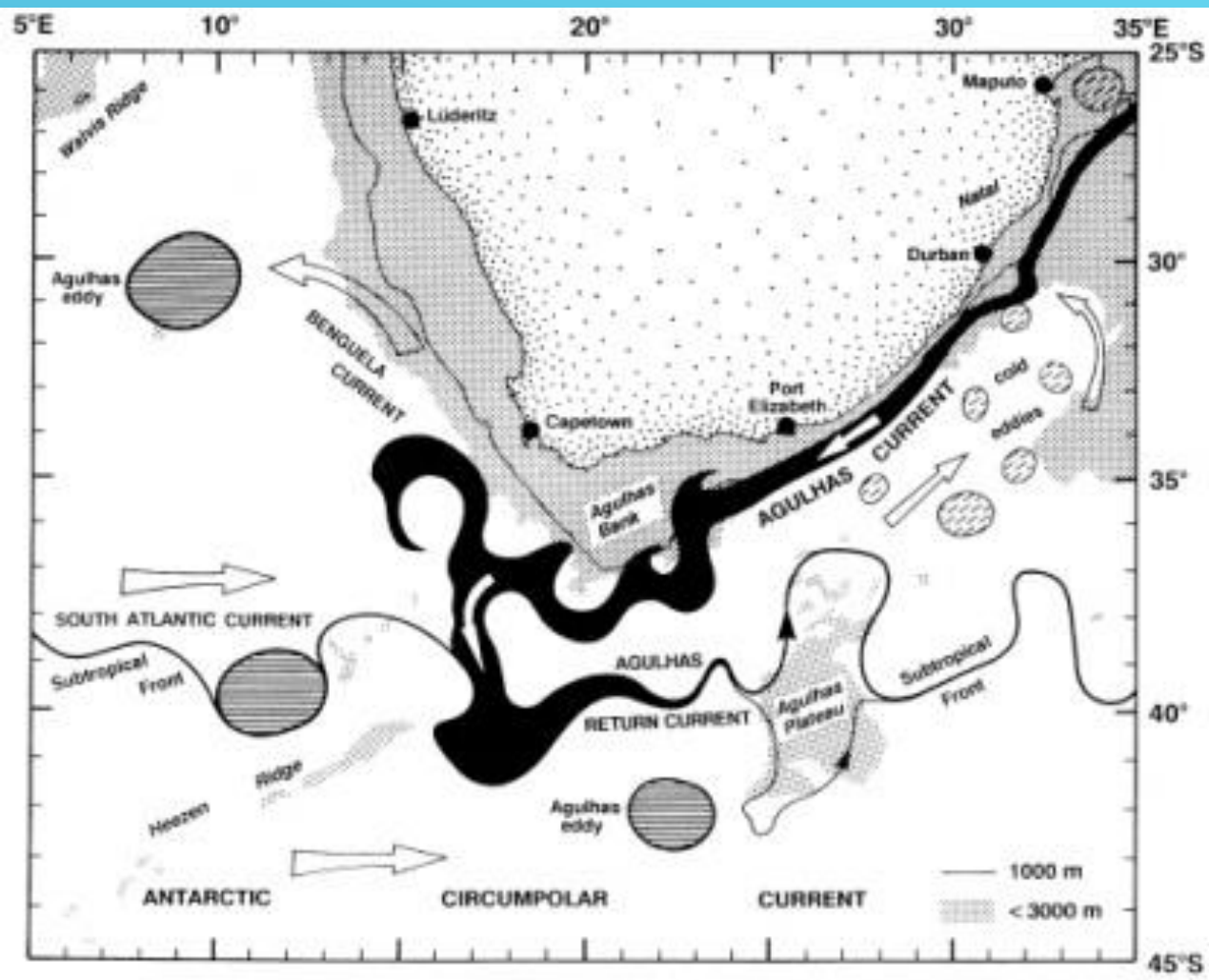
Mangrove Distribution along the Eastern Coast





The greatest Shoal on
Earth, The East coasts
Sardines Run





This warm water current runs south along the east coast of southern Africa from ~25°S to 40°S, and is the Western Boundary Current of the South Indian Ocean.

It is narrow (approx. 100 km wide), swift (up to 3 m/s) and deep (2 km).

The amount of water transported amounts to about 70 million cubic metres per second, making it one of the largest western Boundary Currents in the world.



Do we want the Oil
Spill Risk in our Hands?



Reinett Mogotshi

From: Thando <thando@sdceango.co.za>
Sent: 05 March 2018 04:13 PM
To: ERM South Africa Project ENI Offshore Exploration; david.shandler@planet.capital; Lindsey Bungartz
Cc: 'Desmond'; 'Bobby Peek'; shanusha@sdceango.co.za; shanice@sdceango.co.za; joanne@sdceango.co.za; alicetho@ispace.co.za; olbersj@kznwildlife.com; samuel@groundwork.org.za
Subject: Objection comments- block ER236 offshore oil and gas drilling
Attachments: oil and gas comments 3 March 2018.pdf

Hi
Charlene Jefferies

We at the South Durban Community Environmental Alliance (SDCEA) **object** to the proposed exploration drilling within block ER236, offshore of the East Coast of South Africa.

Please see attached for comments regarding the objection of the proposed exploration drilling within block ER236, offshore of the East Coast of South Africa.

Thank You
Regards
Sherelee Odayar
SDCEA Project Officer



Exploration Drilling Within Block ER236, Offshore of the East Coast of Southern Africa.

Charlene Jefferies

ERM Southern Africa

Postnet Suite 90, Private Bag x12, Tokai, 7966

Tel: (021) 681 5400

E-mail: eni.offshore.eia@erm.com

Date: 05 March 2018

Re: Comments submission of objection to Gas and Oil exploration activities in the East Coast of South Africa by the South Durban Community Environmental Alliance (SDCEA).

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Background

The South Durban Community Environmental Alliance (SDCEA) is a non-governmental Organisation with a coalition of 16 community and environmental organisations concerned with environmental justice and sustainable development in South Durban and Kwa Zulu Natal. There are numerous concerns that we have risen regarding the Oil and Gas Exploration activities proposed for our coast and find many discrepancies glaring throughout all the processes thus far concerning these activities.

Kwa Zulu Natal is a hugely popular place and tourist destination because of the cities warm subtropical climate and extensive beautiful beaches. Healthy oceans are critically important to marine life and to coastal communities whose economies rely on tourism, fishing and recreational activities. Opening up new offshore areas to drilling, risks permanent damage to our oceans and beaches without reducing our dependence on oil. Our coast could be subject to huge oil spills equivalent to the BP oil spill in the Gulf of Mexico, with calamitous long-term costs for the tourism and fishing industries. If these plans were to go ahead, the climate crisis which is not factored in and taken seriously would be intensified and South Africa's own carbon-budget strategy of reducing greenhouse gas emissions by 34% in 2020 would not be achieved. The Climate Crisis is in fact a reality and should be taken seriously- now more than ever.

Appointment and the Role of Independent Consultants

The developer must appoint a consultant as per the Environmental Impact Assessment EIA regulations to ensure that the public meetings they intend holding are independent and unbiased. Terms of reference of the independent consultant must be circulated to all stakeholders including Interested and Affected Parties (I&AP).

General Requirements for EAPs and Specialists according to NEMA 1998 (ACT NO. 107 OF 1998)

1) An EAP and a specialist, appointed in terms of regulation 12(1) or 12(2), must—

(a) be independent

(b) have expertise in conducting environmental impact assessments or undertaking specialist work as required, including knowledge of the Act, these Regulations and any guidelines that have relevance to the proposed activity;

(c) ensure compliance with these Regulations;

(d) 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 application;

(e) take into account, to the extent possible, the matters referred to in regulation 18 when preparing the application and any report, plan or document relating to the application; and

(f) disclose to the proponent or applicant, registered interested and affected parties and the competent authority all material information in the possession of the EAP and where applicable, the specialist, that reasonably has or may have the potential of influencing—

(i) any decision to be taken with respect to the application by the competent authority in terms of these Regulations; or

(ii) the objectivity of any report, plan or document to be prepared by the EAP or specialist, in terms of these Regulations for submission to the competent authority; unless access to that information is protected by law, in which case it must be indicated that such protected information exists and is only provided to the competent authority.

The Role of Experts

The consultant together with the developer must first identify through the process, the experts that will be required for the research that will provide a professional platform. The terms and references must also include the appointment jointly agreed by all stakeholders an independent review of the expert's knowledge to diffuse any conflict. The experts must be independent from the consultants. Appointed consultants cannot be deemed and appointed as experts for this project. The consultants must only identify and give their independent opinion, which must include impacts that will affect people and the natural environment. The appointed experts must have a history of independent thinkers and extensive experience in this field. They must not have done any previous work for the same consultant and developer in any country.

Public Participation

Advertising

The independent consultants must advertise the development to the I&AP through local media, mainstream print, electronic media as well as community radio in all languages specifically English, IsiZulu and Xhosa. All users and affected people must be contacted and informed. There must also be notification by way of the distribution of pamphlets throughout the affected areas, using the knock and drop method, to reach as many people as possible. [Only some mainstream media] and no knock and drop was done excluding a vast population who survive on the sea.

According to Department of Environmental Affairs (2017), All potential and I&APs have a right to be informed early and in an informative and proactive way regarding proposals that may affect their lives or livelihoods. Early communication can aim to build trust among participants, allow more time for public participation, and improve community analysis and increases opportunities to modify the proposal in regards to the comments and information gathered during the Public Participation Process.

The level of public participation must be at a minimum be informed by –

- *the scale of anticipated impacts of the proposed project;*
- *the sensitivity of the affected environment and the degree of controversy of the project;*
and
- *the characteristics of the potentially affected parties.*

Notification of a proposal to all I&APs may be given through a number of methods including fixing of notice boards, providing written notice, placing advertisements etc.

ERM, ENI and Sasol admitted that they did not advertise the meeting of the 6th, 7th, & 8th of February 2018 which was held in Richards Bay, Durban and Port Shepstone. They admitted that these meetings were not identified with and they only contacted people that were in their mailing list. In the meeting in Port Shepstone only 4 people showed up because there was no advertising at all in Port Shepstone.

Hosting of the Public Meeting

Public meetings must be hosted in venues that are suitable and accessible to the public. Transport must be provided for if people have to travel as many affected people do not have vehicles of their own. The timing of the public meeting must be held when most people are available to attend and not only suit the developer's time and availability. They must allow for sufficient time for the communities to come and gain insight of the proposed project and not rush off and close the meetings because they have another appointment as was done at the Tropicana Hotel in Durban. The presentation of the meeting must be done in layman's terms and there must be professional translation on the outset of the meeting. They left out huge gaps for the public meetings because they did not advertise in all areas especially a huge area along the Indian Ocean. According to the consultants, the reason being for the lack of advertising in all areas was due to the fact that they were overwhelmed with work. As the Indian Ocean stretches across

quite a substantial number of small towns and cities there should have been more public meeting in every coastal town. There was an absence of the Sasol shareholder, and their presentations and responses were done by the consultants who could not answer to any questions put forward to the joint development .A request to the consultants of why SASOL was not present was not responded to. The groups present residents stated must be present. We also wish to know if the commercial fishing industry has been consulted as they too have a vested interest in activities that could either (a) limit their freedom of the sea or (b) impact negatively on sea harvests.

Report Back Meeting

The report back meeting was held on the 28th of February at the Austerville Civic Centre in Durban. At this meeting interested and affected communities were angry as the consultants failed to address the 20 page concerns raised at a previous meetings and the manner in which the entire participation was been conducted and the undermining nature from the majority shareholder of the ER236 oil and gas exploration activities which is Sasol who we requested previously to be in attendance at the public meeting. This complete disregard was unacceptable and therefore we as the community feel that the developers and consultants want to get away with a tick box exercise rather than engaging in meaning fully participation .A formal request was previously made by the SDCEA and other groups that the government departments responsible for this project which is the Department of Mineral Resources , department of Environmental Affairs and Petroleum Agency of South Africa should have also been present to present on how permission was granted on Seismic testing to Eni and Sasol to explore the shores of Kwa Zulu Natal.

Background Information Document

The back-ground information document was requested at the TROPICANA hotel to be provided in English and ISIZULU however a few copies were made available in English , IsiZulu .A further request that these documents including the scoping document must be given well in advance and in addition to ISIZULU , English ,XHOSA must be included . It must be simple and easy for the community to understand and grasp the impact of the development . The developer must be prepared to answer questions and respond to the community. The identified impacts must come through the scoping or the background meetings that are identified and raised by the I&AP and communities. All issues raised by the affected communities must be tested and all expert opinions sought after. A review mechanism must be developed and review experts chosen and paid for by the developer.

The Proposed Development

All the options including alternatives must be investigated and considered as this forms part of crucial information and must not be left out. All information must be fully accessible, open and transparent. This includes all documentation between Sasol and Eni, documentation between the government and the initiators of the project and documentation between ERM and Sasol.

International Conventions and Treaty Commitments South Africa

The International Conventions and Treaty Commitments of South Africa must be included as part of the investigation by the appointed consultants. South Africa has signed the Paris Agreement on climate change to reduce its emissions that contribute and this must be factored and the science must be placed before the regulator. “The Agreement is a comprehensive framework which will guide international efforts to limit greenhouse gas emissions and to meet all the associated challenges posed by climate change. It signals the change in pace towards the low carbon development from 2020

onwards through commitments of countries in ambitious national plans called Nationally Determined Contributions” (DEA, 2016). South Africa’s commitment must be adhered to and there must be an obligation that if this development exacerbates and violates the commitment therefore the decision must not be approved .

Impacts of Offshore Oil and Gas Drilling

Impact on the communities, people and environment

When oil spills occur they can bring catastrophic harm to marine life and devastating losses for local businesses. Even routine exploration and drilling activities bring harm to many marine species. Expanded offshore drilling poses the risk of oil spills ruining our beaches, bringing harm to those who live, work and vacation along the coasts, as well as harming habitats critical to plants and animal species. Oil spills can quickly traverse vast distances. Exploration of oil and gas presents multiple forms of environmental degradation. Oil pollution also damages fishing equipment and pollutes drinking water in wells. Oil spills and waste dumping have also seriously damaged agricultural land. Long term effects include damage to soil fertility and agricultural productivity, which in some cases can last for decades. Economically, the costs of those products become exorbitant given the law of supply and demand. The negative impact of environmental consequences of the oil industry activities are mainly localized within the host communities. However, some of the effects have trans-boundary implications. Gas flaring is a contributing factor to global warming and these are risks no community is willing to take especially South Durban and the communities all along the KZN coastline from the north to the South given the fact that this area is already a marginalized and affected group of communities that experience these kind of environmental disasters more often than a residential area should or ever at all.

Impact on fisherfolk

These developments and projects will not only cause catastrophic destruction with the above-mentioned impacts but will also destroy livelihoods to over 50 000 subsistence fisher folk who eke out a living daily. When seismic tests are conducted, they clearly have an impact on marine life. The fish are either killed or forced to leave the area. There will be no fish for the subsistence fishermen, who fish areas all along the coast. This impact will increase poverty and lead to more people joining unemployment line. Thereby increasing to the millions of people who are unemployed and this development will require specific skills which the majority of the population do not possess therefore there is no job creation in these projects. In the public participation process, this group of marginalised fisherfolk must be given notice and opportunity to comment and voice their concerns.

Emissions to air

The oil and gas industry is a significant source of greenhouse gas emissions as well as toxic volatile organic compounds (VOCs). VOC in combination with NO_x contribute to the formation of ground-level ozone and is a known causal agent of acid rain.

The atmospheric pollution will have measurable impacts on the surrounding ocean but also become potentially entrapped in air masses moving towards the coastline where it will be deposited as acid rain. The drilling of wells and production process require vast amounts of energy usually provided by the burning of gas and diesel. The impact of this activity needs to accurately assessed in terms of tons of fuel burnt and hydrocarbons released. Assuming that oil or gas is discovered then this would no doubt need to be flared off until such time as it can be capped and processed. During this time vast quantities of particulate matter and volatile organic compounds will be released into the atmosphere, indeed continuing throughout the production process. In addition the associated fugitive emissions from retrieved product is an additional source of toxic

pollutants as the venting from either onsite (barge/tanker) or onshore (storage tanks and pipeline valves) must be evaluated. The carbon generated from flaring will also add to the existing problem and create added negative consequences in terms of climate change

Physical Effects of Offshore Oil Rigs

Any floating platform will attract pelagic fish and seabirds as well as certain marine mammal species. A consequence of this for seabirds is that bird mortality has been associated with physical collisions with the rigs especially at night, as well as incineration by the flare. Birds settling on the water surrounding the rig may come in contact with oil residues and leaks leading to their death following contact with such pollutants. Fish aggregating around the drilling rig may be exposed to high levels of pollutants which are then biomagnified up the food chain ending up in apex predators such as sharks and marine mammals such as dolphins and toothed whales. It has long been suspected that drilling activity around oil rigs in the of Gulf of Mexico is associated with elevated levels of mercury in fish.

South African Coastline

Our coastline is recognised as being one of the most hostile and formidable to shipping. Large freak waves, storms and the presence of a year round strong (4 knot) north-south current all spell trouble for any stationery vessel anchored in place. The impact of the dynamic Agulhas current and its vital role in important biological processes must be evaluated. The positioning of the rig is fairly and squarely within this current that is in effect the highway for fish and mammal species travelling down the Eastern seaboard of South Africa to the nutrient rich and breeding grounds of the Agulhas bank. Anything that occurs off KZN coastline will end up being swept to the Agulhas such is the inevitable nature of the current. It will not simply disperse over the vastness of the

ocean as you are effectively discharging hazardous waste into a fast flowing offshore river. In addition it is suspected that the south flowing Agulhus current is of critical importance to the spawning patterns of many fish species that move northwards inshore up our coastline with larval formations carried south by the current. Allowing the presence of ecologically destructive drilling and oil/gas extraction is foolhardy and flies in the face of the precautionary principle.

Cyclones and intense Cold Fronts

Due to global warming the likelihood of tropical cyclone formations drifting further southwards has vastly increased. Tropical cyclones feed off warm water masses and statistically will be enhanced by the presence of elevated and sustained water temperatures. Contemplated now is that oil and gas drilling rigs will be sited along a potential cyclone track. But this is not the Bay of Mexico which has a relatively benign water mass. We are talking about an area of the earth's ocean that is well known amongst shipping for being both violent and unpredictable. In addition, during winter ferocious cold front polar systems sweep up our coastline generating long deep period swell systems. These systems encounter the south flowing Agulhas current with consequences usually expressed in the appearance of enormous open ocean swells. Ships have simply disappeared (Waratah) and in some cases had their bows sheared off by the force of these waves. How then will these rigs survive significant storms events without environmental mishap?

Health, safety and rescue considerations

In this context consider that the drilling operation lies beyond the rescue envelope of traditional South African rescue services. South Africa simply does not have any capability or capacity to provide long distance rescue effort and certainly not in the weather conditions likely to precipitate a disaster. For example we have no exiting offshore rescue craft capable of providing a rapid response. The NSRI is strictly inshore

and the Naval capability virtually non-existent. Furthermore, it is not the navy's role to provide standby services for private institutions. In addition aerial support also requires specialist aircraft that South Africa simply does not possess. The key limitations are restrictions placed on aviation flying over water meaning that specialist aircraft would be required. Where and what are these and who will fund them? Where will they be based? Would they really be able to respond in time in order to assist in event of ecological or human calamity? Consider what occurred on Piper Alpha...and there you had state of the art first world facilities whereas in South Africa things are significantly more third world. The odds therefore that a plant upset could become a runaway uncontrolled event impacting on both life and the environment are therefore significantly greater than the norm of rigs in the 1st World North Sea or Gulf of Mexico where, as we know, enormous ecological harm has been wreaked by this industry despite the proximity of state of the art rescue and repair facilities.

Agulhas Current

The Agulhas current has many unique features. There are little understood but regular upwelling events are associated with either (a) the strength/velocity of the current (b) its unexplained meanderings (c) its collision with undersea topographic features - all of which lead to the potential that constituents of the offshore water column are pushed inshore to the beaches. Consequently, in the event of an offshore rig disaster there is a distinct possibility that the southward bound current will provide a mechanism to drive the toxic consequences of the oil and gas industry into our nearshore waters and indeed even onto our beaches. This is an invariable fact of the Agulhas Current that sweeps along our coast with regular gyres (reverse currents) spinning off inshore meaning toxic by-products can be expected to be deposited along our sensitive shoreline including Marine protected Areas, sensitive breeding colonies (penguins/seals) and primary fish recruitment areas (Agulhas banks). No area of our Eastern coastline would be spared.

Impacts of Drilling

Discharges from drilling consist mainly of crushed material from the borehole (cuttings) and chemicals used during the operation. In addition brought to the surface is “produced water” that will contain trace elements of oil assuming oily condensate is discovered. This requires evaluation. With regard to the drill cuttings it is not known what alternatives are proposed or whether the cheapest option of discharge into the nearby ocean is the only option being considered. For example is it not possible to injecting everything back into suitable geological formations or take it to shore for further treatment. More drilling muds and fluids are discharged into the ocean during exploratory drilling than in developmental drilling because exploratory wells are generally deeper consequently this is a very real threat to the environment.

Literature on the discharge of drill cuttings and associated drilling fluids indicate that it will cause the death of the benthic (bottom-living) organisms living in and on sediments covered by cuttings in the immediate vicinity of the discharge point. We therefore would demand that a full survey of such benthic biota is established prior to the drilling process and that this be monitored as to its state of health. It is also known that offshore rigs can dump tons of drilling fluid, metal cuttings, including toxic metals, such as lead chromium and mercury, as well as carcinogens, such as benzene, into the ocean all of which must be assessed.

The prospect of a catastrophic spills and blowouts is a documented threat from offshore drilling operations and the near impossibility of introducing a successful capping of the blowout at the depths cited are of deep concern to us. We require significant detail to be presented on this aspect given the learnings of Deep Water Horizon disaster.

The iSimangaliso Wetland Park

The iSimangaliso Wetland Park is South Africa's very first World Heritage site since 1999 (Unesco), it is also the third largest protected area in South Africa. Nelson Mandela stated that *“iSimangaliso must be the only place on the globe where the oldest land mammal (the rhinoceros) and the world's biggest terrestrial mammal (the elephant) share an ecosystem with the world's oldest fish (the coelacanth) and the world's biggest marine mammal (the whale)”*.

The consultants are prone to making wild and unsubstantiated and absolutely unverifiable claims. Consider the following:

“The Goodlad Canyon differs significantly in morphology from those in Northern KZN, where coelacanths have been reported and therefore it is unlikely that coelacanths will be found here”.

How can they possibly state this? The first coelacanth was discovered in East London off the Chalumna River. No-one knows where it came from but it certainly did not swim there all the way from Sodwana bay in Northern Zululand. Almost no exploration has taken place in the deep canyons and offshore waters of KZN largely on account of access as there simply are no deep water submersibles available with which to do so, nor is there any funding. The discovery of the coelacanth off northern KZN was purely due to the inshore proximity of the canyon that allowed scuba divers the opportunity of witnessing them. By no stretch of the imagination can it be concluded that they therefore do not occur elsewhere in deep waters off our continental shelf. This statement is therefore entirely false and unprovable and one can only wonder why such bias would present itself in such a report when the coelacanth is considered to be “the most endangered order of animals in the world”¹ One shudders to think what the impact on the coelacanth population has been due to the intensive seismic testing that has taken place in these areas during the reconnaissance permit stage!

¹ <https://en.wikipedia.org/wiki/Coelacanth>

Effects of Offshore Oil Rigs

Offshore oil rigs may also attract seabirds at night due to their lighting and flaring and because fish aggregate near them. Bird mortality has been associated with physical collisions with the rigs, as well as incineration by the flare and oil from leaks. This process of flaring involves the burning off of fossil fuels which produces black carbon.

Black carbon contributes to climate change as it is a potent warmer both in the atmosphere and when deposited on snow and ice. Drilling activity around oil rigs is suspected of contributing to elevated levels of mercury in Gulf of Mexico fish.

The Marine Ecosystem

Exploratory drilling may impact marine mammals based on disturbance by sound emitted during drilling, during seismic profiling of the well, and from support vessels or aircraft. Drilling can also result in oil spills, which can affect marine mammals directly by contact, inhalation, or ingestion, or indirectly by affecting marine mammal prey or habitat.

Seismic Survey Impacts

Seismic testing is still taking place and proved to be very negative toward marine life. The Oceana website reports that blasts from seismic air-guns, towed behind ships, are repeated every ten seconds, 24 hours a day, for days and weeks at a time. Sound travels more easily under water than through the air and the noise from a single seismic survey can travel tens of thousands of square kilometres. An article in the Canadian Journal of Zoology reports that seismic surveys increase noise levels to twice the normal level, and impact marine life. Such surveys disturb the communication, navigation and eating habits essential to the survival of marine wildlife. These sonic waves can also damage fish with air bladders, destroy marine wildlife eggs and larvae, and cause fish and other marine species to temporarily migrate away from the affected area. The effect of these blasts of sound on marine life is disturbing and can have

catastrophic results: Seals have been found to display dramatic avoidance behaviour, a slower heart rate, ceasing feeding and hauling out of the ocean. Turtles have shown reduced hearing sensitivity at a distance of 1km from the blasts. There has been damage to fish ears at distances of 500m to several kilometres, a reduction of 40 – 80% of catch rates in the North Atlantic and increased embryonic mortality. Zooplankton, which are essential for the health and productivity of global marine ecosystems have suffered significant mortality and the impact has been observed at a range of 1,2km from the blasting sites. Impacts include temporary and permanent hearing loss, abandonment of habitat, disruption of mating and feeding, and even beach strandings and death. For whales and dolphins, which rely on their hearing to find food, communicate, and reproduce, being able to hear is a life or death matter. Whales simply stop “talking” to each other.

Impacts of Oil and Gas Drilling on Marine life

Sea birds are attracted to offshore drilling platforms by lights, burning flares and human food that can be scavenged. Birds are killed or injured after colliding with the structures, becoming contaminated with oil and related chemicals, and even being burned by flares. Birds’ feathers can get coated with oil, preventing them from being able to keep warm and reducing their ability to float. Roughly 200,000 migratory birds are killed each year near offshore drilling rigs in the Gulf of Mexico. They often fly circles around platforms for hours at a time, exhausting themselves or colliding with platforms or other birds.

Deep-divers, like the endangered sperm whale, spend large amounts of time resting at the surface of the ocean, increasing the risk of collision with vessels. Oil can affect survival or the reproductive success of marine mammals through exposure to hydrocarbons and by affecting distribution, abundance, or availability of prey.

Increased vessel traffic around platforms may increase collisions with sea turtles. Sea turtles are difficult to sight from moving vessels and often rest on or just below the surface of the ocean.

Alleged Commercial Advantage

The consultant's to this process claim a project motivation based on economics. In the Project Motivation they state:

“South Africa's current crude oil demand is over 600 000 barrels / day. South Africa currently imports approximately 70 percent of its liquid fuel, which comprises crude oil and finished products. The other approximately 30 percent is sourced from the local production of synfuels from coal and gas. Crude oil prices combined with the Rand/Dollar exchange rate therefore have major impact on fuel prices in South Africa.” With respect this is all unproven.

SASOL currently sources' gas from Mozambique but does not pass this “saving” onto us as consumers. Rather their cost of production falls but prices are set by virtue of the ubiquitous pricing mechanism that has been in place since the apartheid era, one that prices the domestic prices of fuels by reference to (a) international crude oil prices, (b) international supply and demand balances for petroleum products and (c) the Rand/US Dollar exchange rate.² This means that there is absolutely no requirement for any producer of petroleum products to pass any such savings from home grown sources onto the consumer. Rather, given the fact that there is considerable secrecy regarding operating refiner input costs, there exists abundant opportunities to make windfall profits by processing locally extracted gas and oil whilst having a Government set international benchmark for refined product. The idea that the oil and gas industry would somehow pass these benefits on to the consumer is repugnant. Secondly, it is not clear what

² http://www.energy.gov.za/files/esources/petroleum/petroleum_pricestructure.html

“increase in government revenues” they refer to? Again, there is enormous secrecy regarding any refiners input cost in terms of crude oil processing costs and how these are disclosed. It is however clear that the Government derives an enormous benefit from the fuel levy and pipeline transfer fees but these refers to the finished product and not the raw input. We therefore demand further clarity and exposition on these loosely cobbled statements as to economic benefit to South Africa besides that relating to reduced need for foreign exchange.

Accountability of oil and gas industry

Our waters are rich in marine sea life and our fisheries and integral part of the SA economy that must be preserved, protected and nurtured for both current and future generations. The protection of our marine resource is also fundamental to South Africa’s food security. Allowing what amounts to indiscriminate drilling by a single vested interest that will without fail lead to the introduction of toxic wastes and products whether from industrial accident or working process. Massive industrial upsets such as the BP Deep Horizon blowout in the Gulf of Mexico and the shocking consequences of oil releases (such as the Exxon Valdez) highlight the fragility of the oceans but also the lack of accountability of the oil and gas industry. This industrial grouping has shown that it is secretive, opaque in terms of communication and known to act irresponsibly and negligently in ecological matters. One need look no further than what has happened in the Nigeria Delta region to witness the results. This industry will not make pleasant bedfellows for neighbouring onshore communities nor for fisherfolk or our resurgent tourism industry. Imagine the scale of the dam should oil residues coat our shores from KZN through to Cape Town – as they will give the peculiarities of our coastal water movements.

Alternatives

No alternatives were investigated such as investments in renewable energy which desperately require. There is no social enhancement study presented in any of the documents we have come across so far and this is a crucial part of this type of activity and leaving it out simply gives us the clear indication that this is not taken seriously or properly considered. The social enhancement study must research into the jobs created by small businesses, fishing boats , tourism industry and all who use the Indian Ocean for major sporting and recreation events

Demands

We as representatives of the community demand that...

- There be a proper public participation process which includes sufficient advertising.
- That all historical contexts of oil and gas drilling including incidents and the historical operations of the company must be looked at.
- The accurate funding information must be made available.
- That they indicate upfront how and for whom they will be creating employment opportunities for.
- They give us with accurate and unaltered information when investigating the impacts of climate change.
- They give us all information with regards to the work and incidents they did in Ghana, Nigeria, Kenya, Mozambique and the Ivory Coast.

- They provide an emergency plan and how they are going to implement it if something happens.
- They provide a social impact assessment of all the people “employed by the ocean” including fishing, commercial fishing, mariculture , tourism and recreation, shipping and transportation ,whale watching , ports and harbors, ship and boat building ,major recreation and sporting events, renewable energy production (wind and wave) and aquarium fishing.
- They must provide a social impact study of how the livelihoods of fisherman will be affected and how they are going to compensate them and deal with it.
- They must provide all the information they have about the coast and the seismic information.
- They must look at impacts, of seismic surveys that have affected marine life, depletion of fish stock, expert knowledge, quota system of fish stock and the advice to produce fish.
- They must look at marine life that are protected and that are currently in recovery and how this will impact it.
- They investigate the semi static current of the waves, including the freak waves, tide impacts and aggressive waves considering that there has been quite a few in Durban and also investigation of the Mozambique current.
- The terms of reference of the consultant and any experts that has been appointed.
- Proper risk assessments be done by appointed experts
- All specific targets must be provided including drilling, testing and chemical information

- They investigate what kind of noise, the noise volume and noise impacts due to the development
- They investigate the canyons, estuaries, wetlands and nurseries which serve as breeding grounds for South Africa's rich biodiversity.
- The independent study that Sasol has conducted must be provided for.
- Surveys must be done over a longer period of time
- That they consider the no go option as an alternative

All the demands stated above need to be in the EIA process. There should be no flexibility and variance in this process. The consulting company cannot be providing expert opinions because their opinion will be biased. Desktop studies will not be acceptable as this can be construed as misinformation.

Conclusion

In conclusion we find that there is no emergency plan drawn up in the case of a disaster such as an oil spill that we know will destroy the ocean marine life. Even if there is an emergency plan, could we still guarantee that absolutely no oil will be spilt? The Gulf of Mexico oil spill can be made an example of how important it is to have a disaster emergency plan and of how offshore oil and gas drilling causes detrimental effects to the ecosystem. We are under the impression that all tiers of Government are promoting the idea of allowing these activities to go ahead without proper and meaningful consultation with the public communities. This type of reaction from Government is contradictory because whilst they are promoting tourism with the main focus on the Sardine shoals, whales and dolphin sighting points, beautiful marine nurseries, various

bird life and small B&Bs which thrive on our beautiful beaches and ocean, they are destroying or allowing the destruction of this beautiful ocean we have. It seems that the offshore oil and gas project will only benefit the elite and rich people of society whereby once again the poor gets dealt a raw deal.

Therefore we object completely to these activities and the way it has been presented to the people and urge the Department of Minerals and Energy to reconsider and re start this entire public process and consultation and meaningfully engage with all stakeholders and affected communities.

Submitted by:

Desmond Mathew D'Sa

SDCEA Coordinator

Goldman Environmental Prize winner: Africa 2014

Reinett Mogotshi

From: Reinett Mogotshi on behalf of ERM South Africa Project ENI Offshore Exploration
Sent: 06 March 2018 01:06 PM
To: 'Carmen Cupido'; ERM South Africa Project ENI Offshore Exploration
Cc: Paul Cooney
Subject: RE: SEACOM SA Registration as Interested and Affected Party

Dear Carmen

Thank you for the email. You has been registered as an Interested and Affected Party (I&AP) and will be kept informed of public meetings to be held throughout the EIA process.

Kind Regards
Reinett Mogotshi

From: Carmen Cupido [mailto:carmen.cupido@seacom.mu]
Sent: Tuesday, March 06, 2018 12:40 PM
To: ERM South Africa Project ENI Offshore Exploration <eni.exploration.eia@erm.com>
Cc: Paul Cooney <paul.cooney@seacom.mu>
Subject: SEACOM SA Registration as Interested and Affected Party

Dear Ms Jefferies

Find attached the registration of SEACOM South Africa (Pty) Ltd as an I&AP in relation to the Exploration Drilling in Block ER236, offshore of the East Coast, South Africa.

We trust you will find it in order.

Kind regards

Carmen Cupido

HEAD OF LEGAL | **SEACOM**

T + 27 11 461 6355 | Ext: 5012 | M +27 76 122 0131 | E carmen.cupido@seacom.mu

Building 7, Design Quarter District, Leslie Avenue, Magaliessig, Johannesburg

<http://seacom.mu/email-disclaimer>

Registration and Comment Sheet

EIA FOR EXPLORATION DRILLING WITHIN BLOCK ER236, OFFSHORE OF THE EAST COAST, SOUTH AFRICA

Should you have any queries, comments or suggestions regarding the proposed Project, please note them below.

Return this comment sheet to:

Charlene Jefferies of ERM Southern Africa

Email: eni.offshore.eia@erm.com


Tel: 021 681 5400;

Postnet Suite 90, Private Bag X12, Tokai, 7966

Project Website: www.erm.com/eni-exploration-eia

I want to formally register as an Interested and Affected Party (I&AP) and be provided with further information and notifications during the EIA process	<input checked="" type="radio"/> Yes	<input type="radio"/> No
I would like to receive my notifications by:	<input checked="" type="radio"/> Email	<input type="radio"/> Post <input type="radio"/> Fax

Comments

I am registering on behalf of SEACOM SA who owns the submarine cable off the coast at Mtunzini in the area identified for mining activities			
Title and Name:	Carmen Cupido / Paul Cooney		
Organisation:	SEACOM South Africa (Pty) Ltd		
Telephone:	0761220131 (Carmen)	Fax:	
Cell:	(Paul) 064 758 4408	Email:	carmen.cupido@seacom.mt paul.cooney@seacom.mt
Postal Address:	Building 7, Design Quarter District, Leslie Avenue Fourways, Johannesburg,		
Name	Signature	Date	
CARMEN CUPIDO		6 March 2018	

Thank you for your participation!



Petroleum Agency SA



COMMENTS: EXPLORATION DRILLING WITHIN BLOCK ER 236, OFF THE EAST COAST OF SOUTH AFRICA

Item	Page No. (where applicable)	Comments
Project Schedule	Pg 23, 4.3	Timelines associated with drilling of a first well are clear. Considering the applicant proposes to drill up to 6 wells, how long would it take for the applicant to drill subsequent wells? Clarity is necessary to avoid possible assumptions that all wells will be drilled at the same time or immediately after the completion of a first well.
Main Project Components	Pg 26, 4.3.3	Shore Base infrastructure: The assessment should not be limited to offshore drilling activities but should include activities associated with the proposed drilling operations. For instance the draft scoping report indicates that the shorebase will have storage facilities, a possible mud plant and bunkering services – however no identification and assessment of potential impacts associated with the shore base activities have been undertaken. Thresholds of the storage facilities should also be indicated.
Mobilisation Phase: Pre-drilling activities	Pg 29, 4.5.1	Clarity seeking questions: <ul style="list-style-type: none">• Pre-drilling activities: what is the duration of the pre-drilling

Item	Page No. (where applicable)	Comments
		<p>activities?</p> <ul style="list-style-type: none"> Will the actual drilling positions be identified once the drill ship is on site or will it be done before mobilisation of rig on site? Clarity is necessary.
Handling and transportation of NADFs		Potential impacts associated with handling and transportation of NADFs and other hazardous substances should be identified and assessed, unless there is a compelling reason for not including such issues.
Socio-Economic Baseline	Pg 84, 5.4.1	The Scoping Report only makes reference to municipalities in Richard's Bay (King Cetshwayo and City of Umhlathuze) and Durban (eThekweni Metro) and no reference is made to Ugu District Municipality. The socio-economic issues associated with Ugu and other affected municipalities (if any omitted) must be assessed.
Scoping Phase	pg110, 6.3 (last bullet point before 6.3.1)	Finalisation of Scoping Report for submission to the Petroleum Agency SA instead of DEA.
Public Participation Tasks	Pgs 113 and 114	<p>Newspaper coverage: concerned that there could be limited coverage in Port Shepstone. The EAP needs to consider local newspapers such as South Coast Herald.</p> <p>Erection of site notices: The erection of site notices were only limited to eThekweni Municipality, and Umhlathuze Local Municipality. Distribution of site notices should be extended to the South Coast part of the application e.g. Port Shepstone area.</p>
Potential Impacts	Pg 122 – Table 7.3	Detailed information on the amount of excess cement to be disposed

Item	Page No. (where applicable)	Comments
<ul style="list-style-type: none"> Disposal of excess cement overboard Well abandonment 		<p>is necessary in order to establish whether the activity does not deserve further assessment.</p> <p>Are there any anticipated suspension activities? If so, the assessment shall make provision for the suspension of the well – in this regard the potential impacts associated with this must be assessed and appropriate mitigation measures provided.</p>
<p>Plan of Study</p> <ul style="list-style-type: none"> Additional consultation Assessment of identified impacts and risks 	Ch 8	<p>Issues raised above concerning consultation must be catered for in the Plan of Study for EIA.</p> <p>The EIA Regulations require the assessment of impacts and risks identified to include the nature, significance and consequence of the risk; extent and duration; the probability of occurrence; <u>the degree to which the impact and risk can be reversed; the degree to which the impact and risk may cause irreplaceable loss of resources;</u> and the degree to which the impact and risk can be mitigated. The methodology prescribed in the plan of study does not make provision for the highlighted issues and must therefore be considered.</p>
Financial Provisions		Regulations for Financial Provisioning, 2015 requires the applicant to determine financial provision to undertake rehabilitation and remediation of the adverse environmental impacts of exploration operates through a detailed itemisation of all rehabilitation activities

Item	Page No. (where applicable)	Comments
		<p>and costs, calculated based on the actual costs of implementation. The said determination must be carried out by a specialist(s). It is hence expected that the applicant appoints a specialist to determine financial provision for decommissioning and rehabilitation.</p>