

Annex B6

Comments and Responses Report

Name	Surname	Organisation	Comment	Comment Received	Response Sent
Pre-application Phase					
Janet Solomon	Vanishing Present	Please may I register as an interested and affected party?	16.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	18.09.2017
Judy Bell	Fracfreeza Productions	Please would you notify all the I&P's where this block is located so that they know if this is a local issue for them or not. Please note this in your comments register in the documentation submitted to the authorities	15.09.2017	ERM distributed an initial notification email to all stakeholders on our I&P Database on Friday 15 September. A Background Information Document was attached to the email which provides further information about the Project and includes a map on page 2. The map shows where Eni's exploration block (ER236) is located, as well as the area of interest for the exploration drilling. As such, people who have received the initial notification should be able to see where the Project is located and decide whether or not they wish to participate. The BID is also available to the Project website: http://www.erm.com/eni-exploration-eia	18.09.2017
Judy Bell	Fracfreeza	No it doesn't. They have to wade through a 2 mb document, which many do not open unless they see in the email (subject line preferably) that it is something in which they are interested or will be affected by it. People without antennae will not be able to open such a big attachment. It is not conducive to effective participation, which is a principle of NEIA.	18.09.2017	Thank you for raising your concerns. We are currently in the early phase of the EIA (pre-application and pre Scoping) and as such there will be further communication to stakeholders on the database from the EIA team during the Scoping and EIA phases. In terms of ensuring effective participation we have, in addition to sending out the Background Information Document (BID), to our stakeholder database, placed newspaper adverts in four papers and we will be placing hard copies of the BID in the main Richards Bay and Durban libraries.	18.09.2017
Jennifer Olbers	Wildlife and Environment Society of South Africa (WESSA) KZN	Please may I register as an interested and affected party?	15.09.2017	Should you wish to receive a hard copy of the BID, please let us know and we would be happy to send you one.	18.09.2017
Andie Hector	Hacky Fishing (Pty) Ltd	Please register Hacky Fishing (Pty) Ltd as an interested and affected party. They hold fishing rights which are utilised in the proposed area.	18.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	18.09.2017
Sandy Camminga	Richards Bay Clean Air Association (RBCCA)	The email below which was forwarded to me by a colleague has reference Kindly register the Richards Bay Clean Air Association (RBCCA) as an Interested and Affected Party.	17.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	18.09.2017
Sean O'Donoghue	Personal	Please add me as an I&P.	18.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	18.09.2017
Janet Cuthbertson	Suni Ridge	Phone call response to advert. Registered as an I&P		Thank you for getting in touch with ERM re the EIA for exploration drilling within Block ER2356, you have been added to our stakeholder database and will be kept informed throughout the EIA process. Attached please find a copy of the Background Information Document, which provides further information about the Project and associated EIA.	
Percy Langa	Richards Bay Industrial Development Zone	Please register the RBIDZ as an I&P.	18.09.2017	As discussed you are welcome to pass this email on to your contacts, and they can respond directly to us if they wish to register as an I&P.	
Sharneice Gomes	South Durban Community Environmental Alliance (SDCEA)	Please could you register me as an IAP	18.09.2017	Please do not hesitate to contact me if you have any further questions.	
Madimolleja Lephoto	Alecrona Consulting (Pty) Ltd	No Objection to the Project	18.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	19.09.2017
Adrian Nel	University of KZN	Please could you register me as an IAP	18.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	19.09.2017
Petrus Vliviers		Please could you register me as an IAP	19.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	19.09.2017
Chadley Joseph	South Durban Community Environmental Alliance (SDCEA)	Please could you register me as an IAP	19.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	19.09.2017

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Sabine	Wintner	Kwazulu-Natal Sharks Board	Please register me as an I&AP for the Oil Exploration Drilling within Offshore Block ER236, South Africa.	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process. 19.09.2017
Duminsani	Myeni		Duminsani would like to register for a proposed project. He is staying in Richards bay and his participation is two fold 1) for education and as a local citizen	Thank you for your email. You have been added to the stakeholder database and will be kept 19.09.2017
Suvana	Ahakram	Resident	This email is in response to the invitation to be registered as an I&AP for Exploration Drilling off the East coast of South Africa as advertised in the Zululand Observer. I am a resident of Richards Bay and being an environmentalist would be very interested to be part of the public participation process. I have an inherent love for the environment and would like to keep abreast on environmental issues in my area. I do have a qualification in environmental management and am currently unemployed. I would also like to get more exposure to the public participation process. Looking forward to hearing from you.	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process. 20.09.2017
Kevin	Cole	East London Museum	Attached the registration and comment sheet –EIA for the exploration drilling within Blocks ER236, Offshore of the East Coast, South Africa	Thank you for your email. You have been added to the stakeholder database and will be kept 20.09.2017
Lourens	Britz		Telephonic registration. Lourens would like to know when and where the first Public Participation meeting will be held	Thank you for registering as an I&AP for the above mentioned project. At this stage we anticipate that a public meeting will be held in November, following the release of the draft Scoping Report. As an I&AP, you will receive notification of the meeting. 21.09.2017
Riette	Bennett	Advantage Tours	Can I please kindly register as an affected party as I am a Boat Based Whale Watching legal Government permit holder from Department of Environmental Affairs Oceans and Coast.	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process. 21.09.2017
Debbie	Smith	Stokkiesdraai	Please find attached my registration form. It would appreciate , to be kept informed about your drilling venture on the East Coast.	Thank you for your email. You have been added to the stakeholder database and will be kept 23.09.2017
Alex and Ann	Pareta-Brosens	Kwalaqua Enterprises (Pty) Ltd	Register as AP	Thank you for your email. You have been added to the stakeholder database and will be kept 23.09.2017
Adel	Scheidle	Avalone Guesthouse	Drilling not beneficial for marine which directly influences hospitality industry in St.Lucia. I am against the proposed drilling	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process. 24.09.2017
	Scheidle	Avalone Guesthouse	Against drilling. Beautiful coastline needs to preserved for future generations	The impacts associated with drilling will be explored further in the EIA, and where adverse impacts are identified, mitigation measures will be developed to manage these impacts. 24.09.2017
Eisa	Karam		Property Owner, I mrs H E Karam want to register as an interested And affected party against exploration of east coast of SA that describes our concern.	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process. 24.09.2017
John	Field	Private	I am a resident of St.Lucia Estuary (1 Shadlaan), I will attach an article from new scientist that describes our concern.	Thank you for your email. You have been added to the stakeholder database and will be kept 25.09.2017
Barend	Vorster	Fishermans Restaurant & Wave Dancer Charters Ezemvelo KZN Wildlife	Register as IAP Please see attached my registration form to register as an I&AP for the proposed offshore drilling.	We acknowledge the receipt of the article which speaks to your concerns. Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process. 25.09.2017
Caroline	Fox	Mbanamibi Traditional Authority	Please could you register me as an IAP	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process. 26.09.2017
Simphewe	Mbonambi	POD and Icewatch SA	Please could you register me as an IAP	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process. 26.09.2017
Norma	Fairrick	J.S Greyling Trust	Please could you register me as an IAP	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process. 26.09.2017
Eghard	Greyling			27.09.2017

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Siboniso	Mbenze	iSimangaliso Wetland Park Authority	26.09.2017 The iSimangaliso Wetland Park is a UNESCO World Heritage Site, protected under international conventions and South African law. Its management authority the iSimangaliso Wetland Park Authority is charged with custody of this protected area which includes a large marine component. The applicable South African laws include among others the World Heritage Convention Act and the National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003) (South African domestic law) and associated Regulations.	27.09.2017 Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.
				The impacts associated with drilling will be explored further in the EIA, and where adverse impacts are identified, mitigation measures will be developed to manage these impacts. As an I&AP you will have the opportunity to review and comment on the findings of the EIA, and raise concerns about the project.
Deon	Steyn	Elephant Lake Group	27.09.2017 Register as I&AP	27.09.2017 Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.
Norma	Hall		27.09.2017 keep me informed of what plans are being made off the East Coast of South Africa/St Lucia as I highly object to this kind of activity which destroys our natural shoreline, fishing and Tourism in general in the area.	28.09.2017 Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.
Jon	Marshall	Coastwatch KZN	28.09.2017 Please include following email address when responding chris.wrightza@gmail.com; kendylt@gmail.com; karinl@gcs-sabiz	28.09.2017 Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process; the email addresses provided have been added to our stakeholder database.
Bonisile	Mthembu	Department of Education	02.10.2017 Please could you register me as an I&P	02.10.2017 Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.
Donald	Pitindrich	Indus Automation & Systems Intergration	05.10.2017 Interested Party Application	05.10.2017 Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.
McDonald	Mutswangwa		05.10.2017 Registration as an I&P for Richards bay exploration project	06.10.2017 Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.
John	Cawood		05.10.2017 I would like to register as an interested and affected party please	06.10.2017 Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.
Sharin	Govender	Department City Development	09.10.2017 The City of uMhlathuze hereby registers its interest in the attached application. Please forward us the necessary reports as and when they are available so that we duly inform the EIA process. Please note that the information must be submitted in soft copy format. In doing so kindly cc further correspondence to our Central Registry: creg@umhlathuze.gov.za	09.10.2017 Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process, the email addresses provided have been added to our stakeholder database.
Tamlyn	Jolly	Zululand Observer	03.10.2017 The document doesn't state when the EIA process will begin. If it hasn't already begun, do you have a time frame for the process to begin?	03.10.2017 We are currently in the pre-application phase of the EIA, which means that we have notified stakeholders of the commencement of an EIA, but we have not yet submitted an EIA application form to the competent authority (which will be the Department of Mineral Resources (through the Petroleum Agency South Africa -PASA) in this case). We intend to submit an application to the DMR and release a draft Scoping Report in the next few months.
Niall	Kramer	SAOGA	03.10.2017 Is there a deadline by which people must register as interested and affected parties?	03.10.2017 Stakeholders are welcome to register as interested parties at any point of the EIA process, there is no deadline. However, the earlier they register the better, in this way they can be part of the process from the beginning.
Desmond	D'Sa	South Durban Community Environmental Alliance (SDCEA)	09.10.2017 Please register me as an interested party	09.10.2017 Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.
				Initial acknowledgement - 10.10.2017 Noted and additional email addresses have been included in the stakeholder database.
				The drilling area of interest is located almost 100 km from the closest MPA, iSimangaliso. Potential impacts related to the proposed project will be assessed in the EIA as per Chapter 7 of the Scoping Report. A specialist oil spill study will be undertaken in order to understand the fate and transport of unplanned hypothetical oil spills.
				The drilling activities proposed, can be characterised as deep water will be near Marine Protected Areas which are detrimental to our ocean ecosystem. Deep water drilling is amongst the most hazardous and technically challenging of all drilling operations and presents unusually high risk of upset relative to onshore and/or shallow water drilling. This is a direct consequence of extreme depth and pressure accentuated by local factors such as current and weather.

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			<p>The incidents of Piper Alpha in the North Sea (1988), the Texas City, Texas refinery explosion (2005), and the Macondo deepwater Gulf of Mexico blowout and spill in 2010 have made it abundantly clear that personnel safety and process safety cannot be treated interchangeably. In our view the inhospitable character of our offshore sea state, together with certainty of increasing cyclonic disturbances associated with global warming presents very serious hazards particularly as the offshore location is in known track of departing cyclonic systems originating in the Mozambique Channel.</p> <p>The distance offshore and the extreme depth poses technical considerations for our country. At this point it is highly doubtful whether we have any capability to launch a sophisticated response capability as is possible in similar operations in North Sea or Gulf of Mexico where even there the incidents referred to above occurred. We also do not believe that there exists any capability at local South African level to cap a blowout or to launch an offshore rescue as the distance is simply beyond what the NSRI or maritime response is capable of. We ask therefore who exactly will be providing such services?</p>	<p>A specialist oil spill modelling study will be undertaken in order to understand the fate and transport of unplanned hypothetical oil spills. Eni will develop an Oil Spill Contingency Plan prior to drilling commencement. In addition Eni will prepare a detailed Emergency Response Plan and Strategy prior to drilling activities. The contents of this plan will be considered in the EIA. The capacity in South Africa for oil spill response will also be looked at in the EIA. Eni is a Participant Member of Oil Spill Response Limited (OSRL), an international industry funded cooperative which exists to respond to oil spills wherever in the world they may occur. OSRL have a stacking cap currently located and stored in Saldanha Bay, South Africa.</p>
			<p>The drill site is located off the East coast of South Africa and squarely within the North/South Agulhas current. This means that in the event of an uncontrolled and unmitigated release of hydrocarbons that the potential for such hydrocarbons to pollute our entire coastline becomes very real. The impact will certainly not be limited to localised KZN area. The offshore consequences will therefore be determined by severity of the harm so caused together with current strength and direction. It is imperative therefore that appropriate and detailed sea current and weather modelling data be obtained and assessed as a minimum precaution and that this data is used to determine end consequence in event of spill or blow out prior to any grant of approval. A formal evaluation of the risk to the environment would be grossly defective without actual real time data on sea conditions generally relevant to the exploration zone and specific to the water column where the drilling is to take place. We do not believe this information exists at present time and we therefore request detail on how it will be obtained in order that considered decisions are made in accordance with principles espoused by NEMA, in particular the precautionary principle.</p>	<p>A specialist oil spill modelling study will be undertaken in order to understand the fate and transport of unplanned hypothetical oil spills. Analysis will be performed over a historical dataset of metocean data. From the beginning of the activity daily forecast data of marine currents and winds will be available. The Terms of Reference for the Oil Spill Modelling Study is provided in Chapter 7 of the Draft Scoping Report.</p>
			<p>With the base in Richards Bay, and the need to charter supplies from base to the drilling rig, supplies such as the diesel and drilling fluid could spill into the ocean causing great harm to the ecosystem. We therefore would wish to ensure that given the fact that the South African coastline is regarded by mariners as notoriously dangerous and unpredictable how safe ship to rig transfers of fuels, consumables and personnel will take place.</p> <p>It is noted that the drill site is a significant distance offshore which by implication makes timely intervention in event of mishap very problematic. The form of mishap such as in a spill or blowout presents not only in the form of obvious environmental outcomes but also in directly negative consequences to workers health and safety in form of fire with death by explosion and burns the leading cause of documented death according to the Oil and Gas Producers Association (OGP). How will such incidents be managed?</p>	<p>The EIA and associated spill modelling will investigate and simulate this possible scenario, and also identify any measures to reduce the risks of spills and to mitigate any potential impacts which will be provided in the Environmental Management Programme in the EIA.</p>
			<p>Again, noting the distance from shore we wish to enquire how workers would be evacuated from such a rig in the event of accident necessitating such action. Specifically is our view that offshore airborne rescue capability and assistance would not be possible given the limitation and restriction placed on aircraft operating offshore our waters. This technical safety detail must be provided.</p>	<p>Eni will prepare a detailed Emergency Response Strategy and Plan prior to drilling activities. The contents of this plan will be considered in the EIA.</p>
			<p>It is common cause that a drilling rig will create negative externalities related to the "normal operation" of the rig itself. Such polluting activates that have not, and must be defined relate to the quantity and toxicity of drilling muds, brine wastes, deck runoff water and flow line and pipeline leaks. Drilling muds and produced water are disposed of daily by offshore rigs. Offshore rigs also 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. The quantity of these substances and resultant impact on neighbouring environment must be assessed.</p>	<p>Chapter 7 of the Draft Scoping Report identifies the impacts to be assessed in the EIA phase. This includes seawater and sediment quality degradation/contamination due to operational discharges and cuttings discharge. A Waste Management Plan will be prepared prior to drilling activities.</p>
			<p>The SDCEA represents close to twelve thousand subsistence fishermen whose livelihoods depend on the ocean. For most of them, fishing is their only means of income. There will be a depletion in fish stocks in the area which will cause a devastating impact in the subsistence fisher folk's livelihood.</p>	<p>The potential impact of the project on fishing will be explored in EIA in an independent specialist study to be undertaken by David Japp and Sarah Wilkinson of CapMarine.</p>

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			With the majority of the East coast of South Africa (Richards Bay to Mossel Bay) earmarked for seismic testing by PGs, the coast might be under tremendous stress if both these proposals are accepted. There is therefore distinct potential for compounding of environmental insults from a multiplicity of sources. This is a concern for all that depend on the ocean as a means of living. The area under consideration is also a known deep water fishing area with vessels operating out of Richards Bay. The concerns and interests of this user group must be fully examined. In addition the downstream and seashore impacts of spills on the order of the Deep Water Horizon incident can have huge untold impacts of the regional and national economy. Included here are the subsistence fisherfolks, the small business who use the ocean, the hotel industry, the tourism industry of South Africa could be threatened.	This is noted. Please see our responses regarding the public consultation process below.	The timing of the PGS survey and these proposed drilling activities will be decided on by PASA when it assesses the different exploration activities. The potential impact of the project on fishing will be explored in EIA in an independent specialist study to be undertaken by David Japp and Sarah Wilkinson of CapMarine.
			Public participation is one of the most important aspects of the environmental authorisation process. It is considered so important that it is the only requirement for which exemption cannot be given. This is because people have a right to be informed about potential decisions that may affect them and to be afforded an opportunity to influence those decisions. Effective public participation also facilitates informed decision making by the competent authority and may result in better decisions as the views of all parties are considered.	ERM are of the view that public participation is a vital part of the EIA process. Thank you for your suggestions around engagement, we would like to note the following: The project was advertised in four newspapers; The Mercury and Isolezwe (in Zulu) with distribution around Durban, and The Zululand Observer and Illanga Newspaper (in Zulu), with distribution around Richards Bay. ERM will continue to advertise the availability of reports and public meetings in these four papers throughout the EIA process.	As per the NEMA EIA Regulations, both the EAP and specialists are required to be independent and sign declarations stating as such. Both the Marine Fauna and Fisheries assessments will be undertaken by subcontractors (PSCs and CapMarine). A peer review of the oil spill modelling study will be undertaken by PRDW, an independent specialist.
			Consultants need to make a more valued impact during an EIA project process, such as advertising an EIA notice in the local newspaper, making sure that all Zulu speaking individuals are also catered for. Notification must also be given through local community and major radio stations and proof must be provided that the consultants have done so. The experts and scientists who conducted the studies must be at the meetings to present their own work, the consultant should not be speaking on their behalf. Notification must be given in all communities from the border of Mozambique up until Mossel Bay. And public participation meetings must be held in all communities from Kosi Bay to Mossel Bay. The consultants must ensure that every local councillor and interested and affected party is informed and the information is easily available to them.	Therefore, the public participation process needs to be conducted thoroughly, with notices going into all local newspaper publications, Zulu, Afrikaans and English. Since the proposed drilling will affect all those in the coastal communities, public meetings must be held in venues on the coast, knock and drop pamphlets delivered to local fishing shops, fishing clubs, surfing clubs, BrB's and small businesses who eke a livelihood from the ocean. An independent facilitator must be appointed for the public meetings. And an independent scientific study by independent scientist not attached to the EAP must be done on the potential impacts the project will have.	ERM will hold public meetings during the EIA phase to disclose the findings of the EIA. Public participation activities have been focused around Durban and Richards Bay at this stage as it 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 KNZ coastline, the area of interest for drilling is an area within the Block roughly in line with Richards Bay; the onshore logistics base will be located in either Richards Bay or Durban. Meetings for the Scoping Phase will be held in Richards Bay and 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. ERM has distributed a notification email and Background Information Document to authorities within local/F175 municipalities along the KNZ coast. We will continue to keep them informed as the EIA progresses. ERM has appointed an independent facilitator to be present at the public meetings. We are considering the attendance of certain specialists at the EIA meetings to explain their findings and answer questions. ERM has appointed specialists to undertake the following studies: <ul style="list-style-type: none">• Marine Fauna – an assessment of the proposed projects' impact to marine fauna (e.g whales, turtles, seabirds etc);• Fishing – an assessment of the proposed projects' impact on fishing activities in the area.• Oil spill – modelling to identify the predicted dispersion of oil in an unplanned event.• Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. As per the NEMA EIA Regulations, both the EAP and specialists are required to be independent and sign declarations stating as such. Both the Marine Fauna and Fisheries assessments will be undertaken by subcontractors (PSCs and CapMarine). A peer review of the oil spill modelling study will be undertaken by PRDW, an independent specialist.

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			<p>Effective communication is key in the EIA Process. It ensures all registered interested and affected parties are properly notified of public hearings, all information concerning the exploration project is distributed to all parties and all parties are kept in the loop of all the different process within the EIA.</p> <p>Therefore it is important that information is communicated and circulated to all parties timely and efficiently. This will ensure all parties have enough time to comment and send through their concerns and issues regarding the exploration project.</p>	<p>ERM are committed to effective and timely communication with stakeholders. Comment periods on draft reports will be 30 days as per the requirements of NEMA and the EIA Regulations.</p>
			<p>We need independent research done by appointed independent scientist not linked to the EAP on the impacts of this project in regard to people's livelihoods, quality of life and a cost base analysis done on how fisherman's livelihoods will be directly impacted. The tourism industry will suffer severely with the pollution of beaches and unsightly infrastructure from offshore oil rigs erected in our oceans.</p> <p>Must include the loss of food security, employment, and local businesses and how this will impact on their aquaculture and sustainability.</p>	<p>ERM has not appointed a social specialist at this stage. The project will be located at least 60 km from the shoreline and will not be visible from the shore. It is anticipated that it would take up to 71 days to drill one well. Given the location and temporary nature of the project, it is not anticipated that the project will have an adverse effect on local tourism and recreational operators along the coast. The potential impact of the project on local fisheries will be explored through a fisheries study as part of the EIA.</p>
			<p>We require a copy of the emergency plan of how they will respond to possible disasters such as oil spills and rig explosions. The plan must be detailed as to what communities in danger must do in an event of disaster, where they must go to and what numbers they need to call in such an event. Is there a designated task team in case of emergencies such as spillages and explosions? Do they have the necessary equipment to handle these situations?</p>	<p>A specialist oil spill modelling study will be undertaken in order to understand the fate and transport of unplanned hypothetical oil spills. Based on this Eni will prepare an Emergency Preparedness and Response Plan and Oil Spill Contingency Plan (OSCP) to address appropriate responses to accidental releases of hydrocarbons associated with the proposed offshore drilling. Eni will have the necessary equipment for emergency and oil spill responses both at the drilling site and logistics base. Eni is also Participant Member with OSRL, a global provider for oil spill response resources and services. The OSCP will be addressed in the EIA report.</p>
			<p>The health of people who depend on fish for sustenance and for those who only eat a fish based diet will be affected as it is known and experienced that the contamination will affect the fish we eat through oil leakages and toxic waste dumping. The affected fish will carry hydrocarbons that is poisonous for human consumption.</p>	<p>The potential impact of the project on fishing will be explored in the EIA in an independent specialist study to be undertaken by David Japp and Sarah Wilkinson of CapMarine. The potential impact of the project on marine fauna will be assessed in the EIA in an independent specialist study to be undertaken by Andrea Pulfitch of Pices Environmental Services.</p>
			<p>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 eThekweni (the broader Durban municipal area). There are numerous concerns that we have risen regarding the Oil and Gas Exploration activities proposed for our coast.</p> <p>Therefore we request that all the information in the EIA process be couriered to our offices timely as it will give us sufficient time to provide comments in response. All information must be provided to interested and affected parties all along the entire Indian Ocean coastline.</p> <p>A case study around the Deep Water Horizon incident was presented in the letter received from SDCEA (refer to Annex B).</p> <p>Taking this disaster into consideration, this shows that even at an international level, anything could happen. What if the same events that took place in the Gulf of Mexico were to occur here, with the exploration rig just a near 62km's from the shore. This is why we have cause for concern for this proposed project.</p>	<p>ERM will deliver electronic copies (on a CD) of draft reports to SDCEA as they become available. During the EIA process Interested and Affected Parties as per our database (which will be continually updated during the process) will be notified of the availability of information.</p>
Imke	Summers		<p>Please may you register me as an IAP on the EIA for Exploration Drilling within Block ER236, Offshore of the East Coast, South Africa.</p> <p>We would like to register as an interested and affected party on this application, Kindly advise on how to proceed. Please see attached and we will be submitting comments shortly.</p>	<p>Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.</p>
Samuel	Chademan	Groundwork		<p>Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.</p>
Jacolette	Adamson	Exigent Environmental	<p>Register as I&AP</p>	<p>Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.</p>
Dee	Fischer	Department of Environmental Affairs	<p>Register as a stakeholder for the EIA for offshore exploration.</p>	<p>Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.</p>

Name	Surname	Organisation	Comment Received	Response Sent
Khalid	Mather	KZN Environmental Network	<p>The proposed off-shore drilling at the already embattled coast of Richards Bay poses yet another risk to the well-being of the ecological integrity of the North Coast. Oil spills and oil-stick sand are a common site across Richards Bay beaches, heavily impacting indigenous efforts to derive a living from the sea. The drilling poses an assortment of documented pollution risks including kinetic, atmospheric, noise and oil pollution. The proposed area is also within 50km of an ecologically vulnerable zone identified by the National Biodiversity Assessment. I have personally confirmed this utilizing shapefile data from SANBI.</p>	<p>Potential impacts related to both operational activities and unplanned events will be assessed in the EIA Report. This will include potential impacts relating to atmospheric and marine pollution and will include consideration of impacts to protected areas, sensitive species and habitats.</p>
Fred	Kockott	Roving Reporters	<p>Roving Reporters is following up on ENI Offshore Drilling Scoping Report for the exploration drilling programme on the KwaZulu-Natal coast (www.erm.com/eni-exploration-eia) and will appreciate it if you could assist with these queries below. Please could Environmental Resources Management (ERM) advise whether it has received any formal objections to the proposed drilling programme so far, and if possible, provide an account of what the principle objections are.</p> <p>As I read it, if the environmental authorisation is granted as per the planned EIA schedule, Eni South Africa BV (Eni) and Sasol Africa Limited (Sasol) will be drilling for oil and gas reserves within a 1,840 km² area stretching from Port Shepstone in the south to St Lucia in the north, within nine to ten months from now.</p>	<p>ERM has received a number of comments from stakeholders. All comments received in relation to the EIA for Exploration Drilling within Block ER236 are captured in this Comments and Responses Report, which will be updated throughout the EIA process and made available to the public at various stages of the EIA process.</p> <p>The EIA process may be concluded within 12 to 15 months, however, the timeframe for the commencement of the project is dependent on a number of other factors, such as the availability of the drill ship. To clarify, this EIA is for the drilling of exploration wells only, and another permitting process would need to be undertaken should it be determined that full-scale production is viable.</p> <p>It should also be noted that although ER236 stretches from Port Shepstone in the south to St Lucia in the north, drilling will only be undertaken within the areas of interest as indicated in Figure 1.1 of the Scoping Report.</p> <p>An oil spill modelling study has been commissioned as part of the EIA, which will look at the likely consequences of a spill arising from the project. The timeframe for an EIA is sufficient to allow such a study to be completed. In addition a peer review of the oil spill modelling study will be undertaken.</p> <p>A drill cuttings dispersion modelling study has been commissioned as part of the EIA to determine the water column suspended sediment concentrations and the bottom accumulation of the drill cuttings ("footprint") to assess potential impacts to aquatic and benthic organisms. Further information will be provided in the EIA with regards to the treatment and disposal of drill cuttings. Drilling operations will be undertaken in accordance with national and international regulations, standard and best practice.</p> <p>Operational emissions from the drillship would be similar in scale to those from a similar size ocean-going vessel. The potential impacts related to the operational discharges will be discussed and assessed in the EIA.</p> <p>The noise impact associated with drilling activities will be assessed by the ERM team with input from specialists as needed.</p>
			<p>Please advise whether the EIA approval process gives ERM sufficient time to properly assess:</p> <ol style="list-style-type: none"> the risk of oil/gas blowouts arising from offshore drilling operations <p>2. significant environmental impacts that the offshore drilling will cause, including:</p> <ol style="list-style-type: none"> 2.1 SEA FLOOR DEGRADATION 2.2 SEDIMENT POLLUTION: generation of vast plumes of sediment arising from the disposal of cuttings to the seabed and overboard during drilling" which, as the scoping report states, will "disturb the marine habitats, benthic communities and marine fauna present in the area". ERM states that this issue will be assessed further in the EIR process, including "a discussion around the treatment and base fluid content of these muds and cuttings prior to disposal". Please explain what is meant by this, and what, if any legal enforcement measures would be in place to prevent unnecessarily destructive environmental practices by the drilling operators. <p>2.3 EFFLUENT POLLUTION: High levels of pollution arising from wastewater and operational discharges from the drillships and other project vessels with possible lasting impact on fish life, marine mammals and turtles. The scoping report states that this impact will be assessed further in the EIR "including a discussion around the mitigation of this impact by ensuring all vessel discharges are compliant with MARPOL 73/8 Annex I, Annex V and Annex IV". Please could you explain in layman terms what this exactly means and in a way that the envisaged pollution impact will be fully understood by people living along this coast, including subsistence and commercial fishermen.</p> <p>2.4 NOISE POLLUTION: Noise generated by drillship's "could lead to disturbances to marine habitats and fauna, especially to marine mammals and fish". Please advise how the impact of underwater noise will be assessed and by whom in the further EIA process.</p>	

Name	Surname	Organisation	Comment Received	Response Sent
			<p>2.5 CLIMATE CHANGE: The scoping report states that "there are climate change implications from the burning of fossil fuels by the project vessels". For context, please provide our readers an idea of how much fossil fuel is consumed in gas/oil explorations and whether Sasol and ENI are investing in developing cleaner fuels for the future.</p>	<p>Further information on fuel consumption and related atmospheric emissions and climate change impacts will be discussed and assessed in the EIA. Operational emissions from the drillship would be similar in scale to those from a similar size ocean-going vessel.</p> <p>ENI have indicated that they are currently developing cleaner fuels in its Green Refinery Project (please refer to ENI's website for further information).</p>
			<p>2.6 MARINE PROTECTED AREAS: The scoping report states the Block ER236 overlaps with the proposed Tugela Banks Protea Banks Alwai Shoal and Simangaliso Wetland Park marine protected areas, but says there is "no overlap of the area of interest with proposed protection areas". Please explain what "no overlap of the area of interest" means in this case.</p>	<p>The area of interest refers to the portion of Block ER2356 in which ENI has identified as desirable to drill exploration wells. While Block ER2356 extends from Port Shepstone to St Lucia, and intersects with the proposed Protea Banks MPA and the extension of the Simangaliso MPA, the part of the Block where ENI proposes to drill exploration wells, does not infringe on these areas, as shown in Figure 5.19 of the Draft Scoping Report, January 2018.</p> <p>It should be noted that sections of the original ER236 which overlapped with the existing Simangaliso and Alwai Shoal MPAs were relinquished during the Exploration Right renewal process in 2016.</p>
			<p>2.7 COELACANTH POPULATIONS: The scoping report states that although the southern point of the area of interest overlaps with a portion of the Goodlad Canyon, it is "unlikely that coelacanths will be found here" as this canyon "differs significantly in morphology from those in northern KZN, where coelacanths have been reported". Please advise whether any marine scientists involved in recent coelacanth research can back this assertion. ERM also states that seismic data indicates that there are deep water canyons present in the centre of the area of interest. This appears to nullify the earlier comment about coelacanth populations not being affected. In addressing this question, please advise whether ENI, ENI or Sasol has commissioned any recent marine science research to map out the rich, biodiverse marine habitats within the area of interest. The comment that the "occurrence of deep water corals in Block ER236 and the area of interest are unknown" appears to indicate that no such research has been done.</p>	<p>There have been no baseline studies of the canyons in the area of interest. However, the following publication:</p> <p>Wiles, E., Green, A., Walker, M., Jokat, W. & Kroeker, R., 2013. <i>The evolution of the Tugela Canyon and submarine fan: A complex interaction between margin erosion and bottom current sweeping, southwest Indian Ocean, South Africa. Marine and Petroleum Geology</i>. 44: 60-70. studied the morphology of the canyon and Andrea Pürlrich (marine specialist) has based her conclusion on this evidence. As stated in the report these canyons therefore differ significantly in morphology from those in northern KwaZulu-Natal, where coelacanths have been reported. Firstly, the canyon heads lack the amphitheatre-shaped head morphology. Secondly, they are located at far greater depth than the Sodwana canyons and lack connectivity to the shelf, and finally, they show no significant tributary branches (Wiles et al. 2013). Although terraces are present and may provide shelter in the form of caves and overhangs, they occur at depths (> 1,500 m), well beyond those at which coelacanths have been recorded to date.</p> <p>ERM has added the following text to the Draft Scoping Report "Evidence of deep water canyons at depths (> 1,500 m) were found during a seismic survey conducted in the northern area of interest." "Due to the depth of the canyon coelacanths are unlikely to be present."</p> <p>In addition ENI can confirm that no drilling activity will occur in the Goodlad Canyon.</p>
			<p>2.8 IMPACT ON WHALES: The scoping report mentions that 36 species of cetaceans are likely to be found within Block ER236, including the Antarctic Blue whale is critically endangered, the Indo-Pacific humpback dolphin, fin whale and sei whale (endangered), the Ifafi-Kosi Bay subpopulation of the Indo-Pacific bottlenose dolphin, Sperm whale and Bryde's whale (vulnerable). It also states Block ER236 lies within the migratory route of Humpback and Southern Right whales but does not provide any specific detail on the impact that offshore drilling is likely have on these migrations and potential long-term impact on cetacean populations on the East Coast.</p>	<p>The potential impact of the project on marine mammals will be explored in the EIA in an independent specialist study to be undertaken by specialist Andrea Pürlrich of Pisces Environmental Services.</p>

Name	Surname	Organisation	Comment Received	Response Sent
			<p>2.9 Further to above, please could ERM provide an account of the surveys took place - and over what period - to determine the presence of oil and gas reserves in Block ER236, and what the outcomes of these surveys were, including the estimated value of the gas/oil reserves that Sasol and ENI plan to tap into.</p>	<p>A multi-client 2D seismic survey was undertaken over the entire ER236 in 2013 and 2014 under an approved EMP by PASA to identify the potential areas of interest. A further multi-client 3D seismic survey was undertaken in 2016 by a geophysical contractor (Schlumberger - Western Geo) under a specific Reconnaissance Permit granted by PASA, over a portion of the Durban basin which also include the central part of block ER236.</p> <p>Eni and Sasol have decided to licence the data relevant to ER236 from the geophysical contractor to further clarify the northern area of interest.</p>
			<p>Although this might not be relevant to the Offshore Drilling Scoping Report, Roving Reporters established last year seismic surveys for gas and oil on the KwaZulu-Natal coast extended into the whale migratory period last year. This earned the wrath of leading marine scientists who accused the petroleum industry of renegeing on an agreement made through Operation Phakisa that seismic surveys would not occur during the period June to November. Coincidentally, Ezemvelo KZN Wildlife marine ecologist, Jennifer Oubers, states that the highest number of whale strandings were recorded on the KZN coast last year. I would appreciate ERM's comment on the associated concerns that Oubers raises in a presentation reviewing global literature on the effects of seismic surveys. This research, says Oubers, states that seismic blasts can interrupt the communication, reproduction, navigation and eating habits essential to the survival of marine life, including whales, dolphins, turtles and fish and even plankton.</p> <p>"In the best case, marine mammals manage to escape from the noise in time. But in the worst case, the extreme sound pressure causes blood vessels to rupture and deafness. In a study of stranded/mangled animals in Florida, USA, researchers found that between 36-57% of bottlenose dolphins and rough-toothed whales had profound hearing loss, implying that impaired hearing could have led to their stranding/entanglement. In addition to this, it is suggested that even if impacts are fatal, only 2% of all whale or dolphin carcasses are detected and recovered. Such massive under-reporting of cetacean mortalities could be hiding very severe impacts. Currently, in South Africa, there is a lacuna in the mining legislation regarding reconnaissance surveys and their environmental authorisation pertaining to seismic surveys, effectively allowing these activities to occur without environmental input and potentially ignoring the harmful effects to the environment. Seismic surveys pose an unacceptable risk to marine fauna (at an individual and population level), the full extent of which will not be understood until long after the harm has occurred."</p> <p>The questions arises: Do Sasol/ENI intend to conduct / commission further seismic surveys during the exploratory drilling phase?</p>	<p>Seismic campaigns are performed prior to drilling activities as it is necessary to determine possible reservoir targets. Currently Eni/Sasol have no plans to operate any seismic campaign in South Africa. They could however license new data acquired by geophysical contractors who operate in terms of Reconnaissance Permits granted by DMR/PASA subsequent to the undertaking of an environmental assessment process.</p> <p>In particular, a new multi-client 2D-3D seismic survey is proposed by another geophysical contractor (PGS) along the Eastern coast of South Africa in early 2018, and this has been assessed in a separate environmental process. Eni and Sasol are currently assessing their interest in licensing the portion of 3D multiclient data which may cover the southern portion of the block.</p> <p>Your concern around the impacts associated with seismic surveys is noted, however, this EIA process is for exploration drilling, which is a different process to seismic surveys, as described in Chapter 4.5 of the Draft Scoping Report, 2018.</p>
			<p>Lastly, on blowout risks. While the scoping report acknowledges obvious disastrous marine pollution consequences - and health and safety risks – it provides no risk assessment. Please could ERM advise, based on its experience in the field and studies it has conducted, how often blowouts of oil/gas occur in other drilling explorations around the world.</p> <p>In addressing the above queries, we would appreciate if ERM (or Sasol/ENI) could also summarise in 100-200 words what benefits are expected to arise from the proposed exploration drilling programme, or more specifically: Who will ultimately benefit the most and at what cost to the environment?</p>	<p>A well blow-out is an unplanned event, the risk and impact of which will be assessed further in the EIA.</p>
Sharin	Goverender	City of uMhlanga	<p>My previous correspondence with regards to this process refers. Please ensure that all communication is sent to me as well.</p>	<p>I can confirm that you are on our stakeholder database, however your email was captured with a typo, which is why you did not receive the latest communication. Please accept our apologies, the error has been amended.</p>
Fiona	McCarthy	Starlite Aviation Oper	<p>Please could you provide me with a draft scoping report for the above project. I understand that the public meeting has been moved to January 2018 but would like to read up on the project prior to this meeting.</p>	<p>The draft Scoping Report which was released in October has been withdrawn and a revised Scoping Report will be released next year prior to the meetings. The October version of the Scoping Report is subject to change and I would recommend waiting until the revised report is released so that you are prepared with the latest information.</p>
Matthew	Hemming	Private	<p>Please register me as an I&AP. I am a resident of KZN.</p>	<p>Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.</p>
Jennifer	Oubers	Ezemvelo KZN Wildlife, Scientific Services	<p>Please note that my details have been captured incorrectly in Annex1 and Annex4.</p>	<p>Thank you for letting us know, please accept our apology. We have corrected you details in the stakeholder database.</p>
Frans	Van der Walt	GS2000	<p>Why am I not receiving these notifications ? I thought I had confirmation that I am registered as I&AP ? (I received this from Sandy Cammings – similarly to the original notice of the meeting)</p>	<p>Please accept our apology, it appears that you were omitted from the mailing list on error. I can confirm that you are now on the stakeholder database and that you will receive notification going forward.</p>

Name	Surname	Organisation	Comment Received	Comment Received	Response Sent
Samuel	Chademan	Groundwork	I was wondering why has ENI decided to change the scope of their application? What were the reasons given?	[09.11.2017] Eni are looking at additional information that may inform the location of their exploration wells. Any changes will be presented in the revised Scoping Report.	10.11.2017
Cheryl	Smart	Advocates Group Seven North	Would you please register me as an I&AP?	[13.11.2017] Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	15.11.2017
Willem	Holland	Private	In am using this temporary email as I am having issues in sending from my normal Outlook 2010's sending function. Please however continue to use my normal email address willem@hoffland.co.uk	[13.11.2017] Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	15.11.2017
Nuala	Gage	Interlink Industry Services	Please, register Interlink Industry Services as an interested party.	[06.12.2017] Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	06.12.2017
Clive	Reid	SynergyWorldWideLogistics	We are a ships agent and oil & gas contractors (customs clearing and forward agents) and we would certainly be interested in representing principles in our fields and exposure. jason@synergyports.co.za	[06.12.2017] Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	06.12.2017
Enrico	Gantier	Falconmere (Pty) Ltd	Register Falconmere (Pty) Ltd as an interested party	[06.12.2017] Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	06.12.2017
Andrew	Dippenaar	PetroSA	Please register me as an interested party for the ENI/Sasol EIA.	[14.12.2017] Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	14.12.2017
Nicole	Joubert	Lovemore Bros Machine Movers and Riggers	I believe the public meeting has been moved out to Jan/Feb 2019. I request that we be documented as an interested party to obtain relevant information	[09.01.2018] Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	09.01.2018
Paul	Phelan	Private	Please register me as an Interested and Affected Party	[26.10.2017] Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	26.10.2017
Anne	Louw	ICM People South Africa	would like to register our company as an I&AP for the Block ER236 East Coast of SA exploratory drilling please.	[01.11.2017] Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	01.11.2017
Tamlyn	Jolly	Zululand Observer	Please can you add me to your list of interested and affected parties, to ensure I get all correspondence relating to this?	[26.10.2017] Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	26.10.2017
Nontsundu	Ndonga	City of uMhlatuze	The City of uMhlatuze has reviewed the above report in respect of the proposed exploration drilling. We submit the following comments for due consideration: The Municipality notes the issues identified in terms of Marine and Socio Economic Impacts, and shall reserve further comment until the relevant specialist studies have been conducted.	[22.12.2017] Your comment is noted. You are invited to attend the public meeting on 06 February 2018, at the Premier Hotel at 17:00. After the first round of public meetings, there will be a further round of public meetings during the EIA phase comment period. During both sessions or by email you are welcome to provide further requests for clarification. In addition ERM will be in contact to possibly arrange a separate meeting with the City of uMhlatuze if possible and desired.	This Report
2018 Scoping Phase			To facilitate such engagement with the Municipality, the project applicant is hereby requested to contact Ms. Sharin Govender of the office of the Deputy Municipal Manager: City Development on Tel: 035 9075174; Mobile: 0824504187, ar email: Sharin.Govender@umhlatuze.gov.za.	Noted, Sharin Govender has been included on the Stakeholder Database.	
Anne	Louw	ICM people	Kindly confirm if there has been any update yet regarding the below? If, not yet, please advise more or less when you expect to have an update?	[11.01.2018] We are currently in the process of updating the Scoping Report and anticipate that it will be released in the next two weeks. We will notify stakeholders when the Draft Scoping Report is available for comment and advise them of the dates and venues for the public meetings.	15.01.2018
Cheryl	Smart	Advocates Group Save response	Please confirm that I am still registered as an interested party? I look forward to your response	[22.01.2018] Yes you are still registered and should be receiving a notification email with regard to the availability of the Draft Scoping Report shortly.	22.01.2018

Name	Surname	Organisation	Comment Received	Comment Received	Response Sent
Shaun	Roseware	Ukimate Aviation	We are a well established helicopter company with bases in Johannesburg and Cape Town. We have been advised that there will be exploratory drilling on block ER236 this year and we would like to offer our helicopters to support the crew changes. Please can you advise the contact person we can speak to at ERI / Sasol for us to quote on the helicopter deployments.	22.01.2018 Thank you for your interest in this project. The information provided shall be forwarded to Eni for consideration.	05.03.2018
Raymond	Kramer	Pacifico Group	As per our conversation this afternoon, I appreciate your assistance and offer to put me in contact with your project manager in charge of Eni's Exploration Drilling within Block ER236 , off the East Coast of South Africa. Our partner company Aerios Global Aviation (AGA, with Head office based out of Cape Town International Airport and Helipad at Cape Town Harbour, has the highest accreditations and experience within the Oil and Gas industry. For your information please refer to website – www.aeriosglobal.co.za I look forward to your response.	22.01.2018 Thank you for your interest in this project. The information provided shall be forwarded to Eni for consideration. <i>Eni contact details were forwarded to stakeholder on 06/03/2018</i>	05.03.2018
Rob	Dean	LBH South Africa	In order to attend the public meeting please advise if I need to register or can I just pitch at the meeting in Durban on 7th February 2018?	23.01.2018 Thank you for your email. You are welcome to attend the meeting without registering as an I&AP. We would, however, recommend that you register, as then you will be added to our stakeholder database and be kept informed throughout the EIA process.	23.01.2018
Rob	Dean	LBH South Africa	Many thanks your email, I would like to register, how do I go about it?	23.01.2018 Thank you , you have been added to our stakeholders database.	29.01.2018
Jean	Harris	WildOceans	Please add WILDOCEANS as a stakeholder in this process. We also intend to attend this meeting.	24.01.2018 Thank you , you have been added to our stakeholders database.	29.01.2018
Judy	Bell	FrackFreeSA	Hi Lindsey It is extremely distressing to see that this project is carrying on despite the threat to the marine environment which supports our lives and livelihoods. The planet needs all the support we can provide at the moment, not carrying on with business as usual. Surely the Cape bombing disaster sufficiently highlights the limits to growth? Please record the following in the comments register and address the issues raised: • Increased number of wells - is it legal to change the scope during the EIA? This is a significant increase! • The focus of the impact of seismic surveys has been only on the larger creatures in the sea. What about the other marine fauna and flora about which we know so little, but seem gung ho to bllism without a thought of the consequences to ecosystem functioning?	24.01.2018 The EIA application lodged with PASA in October 2017, along with the Draft Scoping Report released on 27 October 2017, were withdrawn on 7 November 2017. The EIA process was recommended in January 2018 and a revised Scoping Report was released on 22 January 2018, and a new EIA application was lodged with PASA. As such the scope of the EIA was not changed but rather a new EIA process was started.	This Report Your concern around the impacts associated with seismic surveys is noted, however, this EIA process is for exploration drilling, which is a different process to seismic surveys, as described in Chapter 4.5 of the Scoping Report, 2018. The potential impacts associated with drilling activities will be assessed in the EIA Phase.
			• What does drilling for hydrocarbons mean in the context of a fossil free future and climate change commitments to reduce our emissions of greenhouse gases		Eni have indicated that they are currently developing an integrated strategy with the aim of making the transition towards a low-carbon energy futures. The strategy is divided into three main areas: reducing and offsetting greenhouse gas (GHG) emissions; a low-carbon portfolio; and a commitment to renewables. For the last point Eni is performing research on energy mix diversification and green businesses, development of Biofuels and green refinery and created an energy solution division for integrating renewables into the business model. (please refer to Eni's website for further information).

Name	Surname	Organisation	Comment Received	Comment Provided	Response Sent
		• What say there is a spill while drilling or afterwards, when everyone has upped anchors and headed for shore?	Small spills on the deck of the drillship will be contained with the equipment on-board. Spills at sea will be immediately contained by the supply vessels, which host on-board offshore booms and skimmers, plus dispersants spraying systems, and a small volume of dispersants for immediate response. Additional oil spill response equipment will be stored at the logistic base in a readily deployable state. In the unlikely case of larger spills, Eni has a contract with a global provider, Oil Spill Response Limited, which will intervene in 24-48 hours providing oil spill response equipment and oil spill dispersants. In case of loss of control of the well, Oil Spill Response Limited can mobilise a well sealing device (capping stack) from its base in Saldanha Bay within the Country. Another capping stack can be provided by Wild Well Control from Singapore.	All the drilling personnel are constantly trained to perform their activities as safely as possible. The personnel who fill key roles are selected based on their field experience in the role and general skills and attitude. Weekly drills are performed to maintain rig crew training and capability to promptly react in case of anomalies and emergency situations, e.g. fire fighting, kick detection and well control, escape, gas release, man overboard rescue, etc. In the case of a serious emergency, a technical and logistic team is located onshore to support the offshore crew at any time.	
		• How long will the wells remain a risk to the environment? Who and how will they be monitored for integrity?	Once drilling is completed, the well will be plugged (sealed) and abandoned. The open hole section of a wellbore is abandoned by setting an open hole cement plug across above the reservoir and with an additional cement plugs in open hole and into the casing. Plug testing confirm their integrity and prevent future leaks. A closure certificate will have to be approved by the relevant authorities after plugging and abandonment.	In case of successful well's discovery, a temporary abandonment could be performed to allow future re-entry of the well in a safe manner. It is to be highlighted that also the temporary abandonment will involve setting of cement plugs inside the wellbore and testing them for integrity.	
		• Will the companies have to provide money up front into a fund? How much? How far will this go - when considering the scale and cost of hydrocarbon spills that have occurred around the world?	Further information on the financial provision for closure and potential environmental damage will be provided in the EIA.	Although Block ER236 overlaps with the proposed Protea Banks MPA and the extension of the iSimangaliso Wetland Park MPA, there is no overlap of the drilling areas of interest with the proposed protection areas.	
		• What about the marine protected areas? How will they (including the strategic Thukela Banks) be protected from: o The impacts of seismic testing – what is considered a "sufficient" acoustic buffer zone? o The impacts of spills?	It should be noted that sections of the original ER236 which overlapped with the existing iSimangaliso and Aluwai Shoal MPAs were relinquished during the Exploration Right renewal process in 2016 to avoid direct impacts to key areas for biodiversity.	The potential impact on marine mammals will be assessed through a Marine Faunal Specialist Study and reported on in the EIA Report.	
				The impact of underwater noise and vibrations on marine fauna will be assessed further in the EIA Report. This project is for Exploration Drilling, the impact of seismic surveys will therefore not be considered.	
				The potential impacts associated with a spill will be explored further in the EIA through an Oil Spill Modelling Study.	
				Please note that Coastwatch has sent a letter to the DEA asking that seismic surveys become a listed activity requiring an Environmental Authorisation. Here is the petition: https://www.change.org/persist-the-dea-challenges-seismic-surveying-of-our-coastline/u/21072886 Please make sure that this petition is acknowledged and the precautionary principle applied accordingly.	Thank you, this is acknowledged. It is reiterated that this EIA process is for exploration drilling, which is a different process to seismic surveys, as described in Chapter 4.5 of the Draft Scoping Report, 2018.
				ERM apply the precautionary principle when undertaken an impact assessment.	

Name	Surname	Organisation	Comment	Comment Received	Response Sent
Njabulo	Gumede	Trio Trading Services	I hope this find you well and happy new year. My name is Njabulo Gumede, I'm the Managing Director of a small company (Ompisihlo Shipping (Pty) Ltd). I would like to know what is required of me to attend your presentation that is scheduled for the 6th of February 2018 in Richards Bay Library. I'm very much interested in attending.	26.01.2018 At this stage due to a bit of a hectic diary, I can unfortunately only tentatively confirm my intention to attend the Public Meeting in Richards Bay on 06/02/2018.	Thank you for the email. You been registered as an interested and Affected Party (I&AP) and will be kept informed regarding public meetings to be held throughout the EIA process. Nothing is required for you to be able to attend the public meeting, you are welcome.
Frans	Van Der Walt	QS2000	Thank you very much.	22.01.2018 At this stage due to a bit of a hectic diary, I can unfortunately only tentatively confirm my intention to attend the Public Meeting in Richards Bay on 06/02/2018.	Thank you for the email. You have 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.
Nerissa	Filiay	Ezemvelo Wildlife	Many thanks for your email below. As per the Standard Operation Procedure of Ezemvelo's IEM Planning Division, please may I request a hardcopy of the new Draft Scoping report for comprehensive reviewing. Ezemvelo's courier and postage details are as follows: Addressee: Mr Andy Blackmore – Head IEM and Protected Area Planning Postal: P O Box 13053 Cascades 1 Peter Brown Drive Montrose 32021 Fax: 033 - 845 1499 (5pg max.). Maps should not be faxed unless they are produced in black & white and have an appropriate key.	24.01.2018 At this stage due to a bit of a hectic diary, I can unfortunately only tentatively confirm my intention to attend the Public Meeting in Richards Bay on 06/02/2018.	It looks like the EII report was addressed to Jennifer Olbers. Please let me know if we should send another version addressed to Andy Blackmore. Thanks. ** Jennifer Olbers confirmed receipt of the Scoping Report and provided comments to ERM which have been included in the Report.
David	Wattemayer	Private	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 ALL offshore exploration and/or drilling for oil.	05.02.2018 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.	This Report Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none">• Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc).• Fishing – an assessment of the proposed Projects' impact on fishing activities in the area.• Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component.• Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event.• Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Daphne	Naslund	Private	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.	04.02.2018 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.	This Report Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none">• Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc).• Fishing – an assessment of the proposed Projects' impact on fishing activities in the area.• Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component.• Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event.• Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Taylor	Fitzsimmons	Private	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!!!!!!	05.02.2018 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!!!!!!	This Report Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none">• Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc).• Fishing – an assessment of the proposed Projects' impact on fishing activities in the area.• Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component.• Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event.• Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.

Name	Surname	Organisation	Comment Received	Response Sent
Angelique	Wallace	Private	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!!!!!!	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Kwanele	Langa	Private	Registers as IAP	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.
Fiona	Petersen	Private	I strongly object to you ruining our coast and harming sea life	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Elise	Templehoff	Private	Will there be no public meetings regarding this very important issue in Johannesburg? Many interested and affected parties stay in Johannesburg and Pretoria.	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 FF236 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.
P	Govender	Private	Durban meeting kept me posted	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
Alison	Truscott	Private	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 for oil.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Jennifer	Olbets	Wildlife and Environment Society of South Africa (WESSA) KZN	Please find acknowledgement of receipt attached.	The acknowledgement has been received, thank you very much.

Name	Surname	Organisation	Comment Received	Comment	Response Sent
Rosemarie	Ebindon	Private	07/02/2018	<p>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 for oil.</p> <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (e.g whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill – modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA. 	<p>Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA:</p> <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (e.g whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill – modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Mark	Beyl	Private	08/02/2018	<p>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.</p>	<p>The email sent on 8 November 2017 was missed in the inbox and as a result you were not included on the stakeholder database for the EIA or Exploration Drilling within Offshore Block ER236_KZN_South Africa . Please accept our apologies for this error. You have now been included on the database and will be kept informed throughout the process going forward.</p> <p>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 during this week ("the week of 5 February 2018), and the meeting in Port Shepstone took place this evening (8 February 2018), 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=ccbHP3jYVuk. Also attached is copy of the draft Scoping Report (which is available on the project website: www.erm.com/eni-exploration-eia).</p>
Mark	Beyl	Private	08/11/2017	<p>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 3000 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.</p> <p>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.</p> <p>5. SADSAA is affiliated to various international organizations such as IGFA, the Billfish Foundation and International Light Tackle Association, and is also recognized by SASSOC, RBSBC</p> <p>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.</p> <p>7. RBSBC has a direct interest in the above intended exploration drilling as the area of interest is approximately 50 km from the Richards Bay Port, which will probably be used as a basis for the drilling vessels.</p> <p>INTERESTED AND AFFILIATED PARTIES</p> <p>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.</p> <p>COMMENTS</p>	<p>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 yet been confirmed".</p> <p>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.</p> <p>SADSAA & RBSBC. I suggest as a first step, let's see if Eni can provide more clarity around the drilling schedule. From here 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.</p> <p><i>**Eni have subsequently confirmed that the earliest the drilling is expected to start is late 2019 (November – December).</i></p> <p><i>Subsequent Response sent to relay this information:</i></p> <p>I have forwarded your letter on to Alessandro Gelatti 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.</p> <p>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 overlooked.</p>

Name	Surname	Organisation	Comment Received	Comment Received	Response Sent
			<p>9. Naturally both SADSAA & the RBSEC 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:</p> <p>10. SADSAA & the RBSCC 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.</p> <p>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 those environmental concerns have been identified by yourselves, although not specifically bill and gamefish.</p> <p>12. Common sense dictates if it affects various fish species and mammals, it will affect Marin, 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.</p> <p>13. We look forward to your reply, as well as the new dates for the meeting once they are determined.</p>	See above response.	
Mark	Beyl	Private	<p>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.</p> <p>Secondly, because SADSAA was not invited to the Public participation meetings, it does not know the extent of the intended exploration.</p> <p>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?</p>	13/02/2018	<p>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.</p> <p>In terms of the extent of the exploration area of interest, please refer to Draft Scoping Report and presentation that sent through on 08 February 2018 for maps showing the Project Area.</p>
Brenda	Grant	Dargle Conservancy	<p>Please register the Dargle Conservancy as an interested and affected party in the above matter</p>	09/02/2018	<p>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.</p> <p>Thank you for your comment. ENI will appoint a suitable qualified Heritage Consultant to undertake an HIA. The Scoping Report has been updated with the terms of reference for the HIA (refer to Chapter 8.3 of Final Scoping Report), and are provided below.</p> <ul style="list-style-type: none"> • A description of the existing marine heritage characteristics within Block ER 236 and the areas of interest for well-drilling (eg distribution of ship wrecks). • An introduction presenting a brief background to the study and an appreciation of the requirements stated in the specific terms of reference for the study. • Details of the approach to the study where activities performed and methods used are presented. • Assessment of potential impacts on marine heritage using prescribed impact rating methodology. • A description of any assumptions made and any uncertainties or gaps in knowledge. • Recommendation of mitigation measures, where appropriate.

Name	Surname	Organisation	Comment Received	Comment Response	Response Sent
Kwanele	Langa	Private	Large Oil Spill Contingency Plan in Environmental Management Programme. Ensure reasonably practicable compliance for ecological sustainability. Transparency Policy (community benefit) listed activities and careers.	Thank you for your comment. Eni will be required to develop an Oil Spill Contingency Plan for this project, this plan will need to be approved by the Department of Transport, DEA and PASA prior to drilling activities commencing. Further information on the management of oil spills will be included in the EIA and EMPI Report.	22/02/2018
Ingrid	Nanni	SANBI	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 for the email. You have been registered as an Interested and Affected Party (I&AP) and will be kept informed throughout the EIA process.	22/02/2018
Elise	Templehoff	Private	Thank you, Charlene. To which website do I go? When will the scoping report be completed?	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.	15/02/2018
Naureen	Craig	Private	What about the whales? In your quest for wealth have you considered other creatures, including people????	Thank you for your email. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Project's impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Project's impact on fishing activities in the area. • Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling – dispersion simulation of drill cuttings during drilling activities. • Dispersion modelling – dispersion simulation of oil spills during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of the EIA.	19/02/2018
Janet	Solomon	Vanishing Present Productions	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. INCIDENCE 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 or technological expertise or resources or difficulty of effective coordination 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.	Eni will be required to develop an Oil Spill Contingency Plan for this project, this plan will need to be approved by the Department of Transport, DEA and PASA prior to drilling activities commencing. All the drilling personnel are constantly trained to perform their activities as safely as possible. The personnel who fill key roles are selected based on their field experience, experience in the role and general skills and attitude. Weekly drills are performed to maintain rig crew training and capability to promptly react in case of anomalies and emergency situations, e.g., fire fighting, kick detection and well control, escape, gas release, man overboard rescue, etc. In the case of a serious emergency, a technical and logistic team is located onshore to support the off-shore crew at any time. Further, South Africa's National Contingency Plan for the Prevention and Combating of Pollution from Ships and Offshore Installations is an overall plan for South Africa, setting out the policies of the Department of Environmental Affairs and SAMSA, for the Department of Transport towards their responsibilities for preventing and combating pollution of the sea by oil. It provides an overview of the actions to be taken by SAMSA, DEA and other relevant Authorities in preparation for, and in the event of the threat of an oil spill, and outlines the formation of a Joint Response Committee.	20/02/2018
				The Department of Environmental Affairs (DEA) and the Department of Transport (DoT) through the South African Maritime Safety Authority (SAMSA) are two key role players with regards to vessel-source marine pollution, and particularly oil pollution. Oil Spill Response Limited (OSRL) has a capping stack located in Saldanha Bay, which could be used in case of a well blow out. In addition they have stock piles of dispersant in Cape Town and which could be mobilised in the case of an emergency. Further information regarding oil spill response will be included in the EIA and EMPI.	
				Further information on the financial provision for closure and potential environmental damage will be provided in the EIA.	
				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 clean-up and reparation process, in the event of a major disaster.	

Name	Surname	Organisation	Comment Received	Response Sent
			<p>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.</p>	Potential impacts related to the proposed project will be assessed in the EIA as per Chapter 7 of the Scoping Report. Given that the scope of the project covers only exploration drilling the EIA will assess the impact to climate change from drilling ship, vessels and helicopter emissions, as well as estimated well emissions during well testing (of the appraisal well only). Given the stage of the project it is not possible to estimate expected barrel delivery at this time. If a discovery during exploratory phase will be confirmed, and decision will be taken to move to the development phase, including production of the discovered natural resources, a further EIA will be required.
			<p>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.</p>	A drill cuttings dispersion modelling study will be undertaken in order to assess the impact to marine fauna. Information regarding the composition of the drilling fluids is provided in Chapter 4 of the Scoping Report. Further details will be provided in the EIA.
			<p>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 (Johns 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.</p>	Your concern around the impacts associated with seismic surveys is noted; however, this EIA process is for exploration drilling, which is a different process to seismic surveys, as described in Chapter 4.5 of the Draft Scoping Report, 2018. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed further. The noise impact associated with drilling activities (including logs VSP) will be assessed in the EIA. As further clarification, vertical seismic profiles, performed with VSP tools during logging phase, are performed inside the wellbore and not in direct contact with sea water like during seismic campaigns with air guns, a different tool.
			<p>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 emission 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.</p>	Potential impacts related to the proposed project will be assessed in the EIA as per Chapter 7 of the Scoping Report. Given that the scope of the project covers only exploration drilling the EIA will assess the impact to climate change from drilling ship, vessels and helicopter emissions, as well as estimated well emissions during well testing (of the appraisal well only). Given the stage of the project it is not possible to estimate expected barrel delivery at this time. A further EIA will be required should the project continue to production. Air emissions from vessels and flaring will be quantified and included in the EIA report.
			<p>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 nightlight also attracts numerous species, including squid, large predatory fishes, and birds. Please evaluate for mitigation the effect of lights and the physical presence of ships on the movement of sensitive species.</p>	Potential Impacts related to light pollution will be discussed in the EIA Report.

Name	Surname	Organisation	Comment Received	Response Sent
			<p>8. PHYSICAL DAMAGE TO THE SEA FLOOR AND IMPORANT HABITATS</p> <p>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.</p>	<p>A drill cuttings dispersion modelling study has been commissioned as part of the EIA to determine the water column suspended sediment concentrations and the bottom accumulation of the drill cuttings (the "footprint") to assess potential impacts to aquatic and benthic organisms. Further information will be provided in the EIA with regards to the treatment and disposal of drill cuttings. All drilling operations will be undertaken in accordance with national and international regulations, standard and best practice.</p>
			<p>9. INVASIVE SPECIES</p> <p>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.</p>	<p>De- and re-ballasting of project vessels will only be undertaken in adherence to International Maritime Organisation (IMO) guidelines governing discharge of ballast waters at sea. The IMO states that vessels using ballast water exchange should, whenever possible, conduct such exchange at least 200 nm from the nearest land and in water of at least 200 m depth. Where this is not feasible, the exchange should be as far from the nearest land as possible, and in all cases a minimum of 50 nm from the nearest land and preferably in water at least 200 m in depth.</p>
			<p>10. BASELINE STUDIES NEEDED</p> <p>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.</p>	<p>Baseline information has been gathered from existing sources. Prior to drilling, a Remote Operated Vehicle (ROV) survey will be undertaken to survey the seafloor for any potential obstacle or sensitive feature (including coral), the drill site would be relocated as needed. Further information will be provided on this in the EIA.</p>
			<p>11. TIMING OF IMPACT</p> <p>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 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.</p>	<p>A marine faunal specialist study will be undertaken as part of the EIA phase. This study will include mitigation measures, such as potential seasonal restrictions.</p>
			<p>10. WELL ABANDONMENT</p> <p>More information is required with regards to well abandonment and its mitigation. How will Eni and Basol ensure monitoring will be carried out after production has ceased and throughout de-commissioning?</p>	<p>Once drilling is completed, the well will be plugged (sealed) and abandoned. The open hole section of a wellbore is abandoned by setting an open hole cement plug across/above the reservoir and with an additional cement plugs in open hole and into the casing. Plug testing confirm their integrity and prevent future leaks. A closure certificate will have to be approved by the relevant authorities after plugging and abandonment.</p> <p>In case of successful well's discovery, a temporary abandonment could be performed to allow future re-entry of the well in a safe manner. It is to be highlighted that also the temporary abandonment will involve setting of cement plugs inside the wellbore and testing them for integrity.</p> <p>It should be noted that this EIA covers exploration drilling only and does not assess the impact of well abandonment after production period because development and production phases are not included in this drilling campaign and EIA assessment.</p>
Ellise	Templehoff	Private	To which website do I go? When will the scoping report be completed?	<p>15.02.2018</p> <p>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.</p>
Hoosen	Bobat	Private	<p>ERM</p> <p>A printed version of your presentation was not available at your Durban presentation. Kindly forward a copy of that draft report.</p> <p>Please register me interested party and send all future correspondence to me</p> <p>Thank you</p>	<p>21.02.2018</p> <p>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.</p> <p>The Draft Scoping Report is complete and is available on the project website: www.erm.com/eni-exploration-eia</p> <p>Please let me know if you have any trouble downloading the report.</p> <p><i>A copy of the presentation was forwarded along with the Durban meeting minutes.</i></p>
				<p>15.02.2018</p>
				<p>26.02.2018</p>

Name	Surname	Organisation	Comment Received	Response Sent
Salmaan	D	Private	We rather have less wealth but more life! Our oceans are important! The risks of oil rigs is too high. Stop the oil rigs!	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of the ESIA.
Schooling		Private	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.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Nicky	Koekemoer	Private	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.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Jennifer	Olbers	KZN Ezemvelo	Thank you for the opportunity for Ezemvelo KZN Wildlife, the Provincial Biodiversity and Conservation Authority of KwaZulu-Natal (KZN), to review and comment on the Scoping Report for the above mentioned application. It is stated upfront that, following from the review, there is concern that the activities proposed within the scoping do pose a serious and credible threat to marine biodiversity offshore of KZN, but we will reserve specific biodiversity comments until the EIA is released for this application. Ezemvelo would, however, appreciate a number of matters to be dealt with in further detail within the final EIA. These are outlined below: 1. Jobs for the local communities of KZN: Thorough social studies on job creation and income generation for the local market and unskilled community members should be undertaken. In addition, the ratio and number of local jobs versus expatriate jobs to be created as a result of the exploratory phase should be made available. In the event of an accident or spill, either severe or minor, what would be the loss (or benefit) to the local communities, in terms of how existing jobs and livelihoods would be affected? In addition, how would the livelihoods of the local communities, including the tourism and environmental sectors, be compensated in the event of an accident or spill?	As indicated in the Scoping Report it is anticipated that in the order of 10 local jobs will be created at this stage of the project. The project will use local labour as far as possible based on their existing skills and provide new employees with appropriate training. The temporary creation of local jobs and employment opportunities by this project and the associated possible positive impact on the economy is considered insignificant. Further information will be provided in the EIA regarding impacts associated with unplanned events such as an oil spill.
			2. Noise pollution: Please provide what appropriate mitigation measures are being implemented during the drilling phase to deal with noise pollution. A full report on the effect of noise related to drilling and shipping activities on marine fauna, both vertebrates and invertebrates, including resident and transient species is essential.	Scoping determined that the underwater noise generated during the drilling works and the presence of vessels could lead to disturbances to marine habitats and fauna, especially to marine mammals and fish. The impact of underwater noise and vibrations on marine fauna will therefore be assessed further in the EIA Report, and feasible management measures will be included in the EMF.

Name	Surname	Organisation	Comment	Comment Received	Response Sent
			<p>3. Marine pollution: All discharges at sea, regardless of whether they are within MARPOL guidelines, need to be fully disclosed and explained in detail in terms of composition and dispersion. The general public do not have access to the MARPOL guidelines and regulations.</p>		
			<p>4. Pollution to be discarded in landfills: Landfill sites are to be identified and confirmation obtained from the relevant municipalities or private companies that they will indeed accept such waste and are demonstrably able to effectively deal with it. The details of waste are to be fully disclosed and explained in detail in terms of composition and expected quantity.</p>		
			<p>5. Light pollution: Please provide what appropriate mitigation measures for light pollution will be implemented during all phases of exploration. In addition, a full report on the effect of light related to all exploratory activities on marine fauna, both vertebrates and invertebrates, including resident and transient species is essential. Of particular concern, are those species which will be attracted out of their typical diurnal movements and behaviour.</p>		
			<p>6. Biodiversity Offsets: What biodiversity offsets are being proposed for impacts of the infrastructure, anchors, pipelines, cuttings and other related by-products from exploratory activities. At a minimum, it is recommended that the habitats and species being impacted upon and potentially lost due to the exploratory activities are offset with possible protection in other areas within the South Africa Exclusive Economic Zone (EEZ). This would indicate a willingness, consideration and support by ENI/SASOL to South Africa's national and international environmental and climate obligations.</p>		
			<p>7. Emergency Response Plan: A full and detailed emergency response plan, together with named South African stakeholders and partners, is essential. This document needs to be completed and made available to the general public, prior to any commencement of exploratory drilling.</p>		
			<p>8. Compliance and law enforcement: The current KZN economy and government infrastructure do not allow for adequate offshore marine compliance and law enforcement. There are no consistent and active dedicated patrols taking place with the EEZ off KZN. How do ENI/SASOL propose to engage with authorities in terms of law enforcement and compliance in terms of their activities?</p>		
			<p>9. Drilling vessel positioning/anchoring: The three drilling vessel alternatives need to be expanded upon in terms of full disclosure of structure and impacts related to each so that appropriate comments on the alternatives can be made and the true and full benefits/disadvantages weighed up.</p>		
			<p>10. Alien species: What mitigation measures will ENI/SASOL ensure to prevent the potential effects of alien species from their drilling and support vessels being brought into South African waters?</p>		

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<p>11 . Precautionary principle:</p> <p>While it may be currently assumed that coelacanths may not be resident within the canyons in the area of question, there has not been enough research to fully understand the movement of this species. There is still a possibility of the presence of coelacanths in affected canyons. With this said, a precautionary principle / risk adverse approach should be applied. In addition, vulnerable marine ecosystems, which host number of sensitive species and microhabitats, have been reported in close proximity of the southern proposed exploratory area. Therefore, again, the precautionary principle, enshrined in NEMA, should be applied in this cases such as these.</p>		ERM, together with the appointed specialists will apply the precautionary principle when undertaking the EIA. Eni have indicated that no drilling activities will be undertaken in the canyons.	
			<p>12. Timing - Ecological processes:</p> <p>Given the short period of the exploratory drilling phase, the timing of these activities should be cognisant and not coincide with the migration of various "high profile" species through the proposed drilling areas. The table below indicates the months of occurrence of various species which would be greatly affected by the infrastructure and exploratory activities, see table below showing the timeframes of four significant biological processes and migrations which occur off the east coast of SA. Table 1: Time frames of significant biological processes occurring off the east coast of South Africa.</p>		A marine faunal specialist study will be undertaken as part of the EIA phase. This study will include mitigation measures, such as potential seasonal restrictions.	
			<p>13. Language, comprehension and access:</p> <p>The EIA and related notifications should all be translated into isiZulu and scientific jargon must be avoided in order for all affected parties and stakeholders to be adequately informed of ENI/Sasol's intentions. In addition, all notification and documents are to be made available to the general public, via local and regional press and social media.</p>		<p>Chapter 6 of the Scoping Report documents the public engagement ERM recognise that there is a need to make EIA documentation available in isiZulu. All newspaper adverts placed have been translated into isiZulu and placed in Zulu newspapers: the Isolezwe and Ilanga in isiZulu.</p> <p>The Draft Scoping Report Executive Summary was translated into isiZulu and made available to the public. As requested during Scoping phase, during the EIA phase disclosure a isiZulu translator will be available to support communication between parties.</p>	
			<p>14. Environmental and benthic data:</p> <p>At the Public Participation Meetings, ENI committed to collaborate with South African based institution's by sharing and allowing participation in the monitoring, benthic assessments and gathering of physical and environmental data. This will assist South African marine scientists to gain a better understanding of the offshore environment and the impact of these activities. ENI/SASOL should have a duly signed Memorandum of Agreement / Memorandum of Understanding in place, with a relevant institution, before the exploratory phase commences, together with adequate funding being made available to South African researchers for these purposes.</p>		<p>As far as possible Eni will share physical and environmental gathered with South African based institutions. This will be further discussed going forward once the decision has been made to go ahead with exploration drilling.</p>	
			<p>15. Proof of insurance:</p> <p>ENI/SASOL should produce relevant documentation from insurance companies / underwriters regarding potential spills, blowout or accidents, prior to commencement of exploration activities.</p>		Further information on the financial provision for closure and potential environmental damage will be provided in the EIA.	
			<p>16. Specialist studies:</p> <p>The required marine fauna and fisheries studies need to also identify and include what information and science is lacking in the proposed areas. At the Public Participation Meetings, it was reported that the oil spill and drill cutting modelling will be undertaken by ERM and sent to an independent reviewer. This should be sent to a clearly independent review panel and not a single reviewer, as this could be seen as potential bias.</p>		<p>ERM has appointed specialists to undertake the following studies:</p> <ul style="list-style-type: none"> •Marine Fauna – an assessment of the proposed projects' impact to marine fauna (e.g whales, turtles, seabirds etc); •Fishing – an assessment of the proposed projects' impact on fishing activities in the area. •Oil spill – modelling to identify the predicted dispersion of oil in an unplanned event. •Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. <p>As per the NEMA EIA Regulations, both the EAP and specialists are required to be independent and sign declarations stating as such. Both the Marine Fauna and Fisheries assessments will be undertaken by subcontractors (PSCs and CapMarine).</p> <p>A peer review of the oil spill modelling study will be undertaken by PRDW, an independent specialist.</p>	<p>A new Table 8, Specialist Qualifications has been included in the Scoping report to provide details on the specialists.</p>

Name	Surname	Organisation	Comment Received	Response Sent
			17. Terms of Reference: A full terms of reference from ENI/SASOL to ERM is to be included in the EIA.	ERM have been appointed by ENI to undertake an Environmental Impact Assessment (EIA) for the proposed project in terms of the National Environmental Management Act and associated regulations.
			18. Long term maintenance and monitoring: Information on the responsibilities, details and costs of long term monitoring, assessment and maintenance of the well sites, regardless of abandonment, should be clarified and these activities should be ongoing.	Once drilling is completed, the well will be plugged (sealed) and abandoned. The open hole section of a wellbore is abandoned by setting an open hole cement plug across/above the reservoir and with an additional cement plugs in open hole and into the casing. Plug testing confirm their integrity and prevent future leaks. A closure certificate will have to be approved by the relevant authorities after plugging and abandonment. In case of successful well's discovery, a temporary abandonment could be performed to allow future re-entry of the well in a safe manner. It is to be highlighted that also the temporary abandonment will involve setting of cement plugs inside the wellbore and testing them for integrity.
			19. Table 7.1 - summary of impact sources and receptors: The table is counter-intuitive, flawed in terms of real impacts and should be improved upon to reflect scenarios of varying degrees of severity. One of the many flaws in this table is the absence of any impact to the Seabed Features and Geology by exploratory activities.	The table is merely a tool to identify potential interactions and is not meant to depict degrees of severity. The significance of impacts will be assessed in the EIA phase.
Hoosen	Bobat	Bobats Wealth Solution	Please register me as an interested party Send me all notices of meetings etc	22/02/2018 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.
Jared	Evans	Private	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.	22/02/2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none"> •Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). •Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. •Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component. •Oil spill–modelling to identify the predicted dispersion of oil in an unplanned event. •Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Catherine	Lea	Private	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.	22/02/2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects specialist studies may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none"> •Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). •Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. •Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component. •Oil spill–modelling to identify the predicted dispersion of oil in an unplanned event. •Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of the EIA.
Jonathan	Caramanis	Private	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.	22/02/2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects specialist studies may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none"> •Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). •Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. •Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component. •Oil spill–modelling to identify the predicted dispersion of oil in an unplanned event. •Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.

Name	Surname	Organisation	Comment Received	Response Sent
Timothy	Lubbe	Private	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	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Taneal	O'Sullivan	Private	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.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Jody	Carlson	Private	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.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Melita	Steele	Greenpeace	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.	The project motivation is provided in Chapter 3 of the EIA. The South African Government, through Operation Phakisa, is seeking to grow the country's ocean economy through several industrial sectors. One of Operation Phakisa's aims is to unlock the economic potential of South Africa's oceans. In this regard four priority sectors have been selected as new growth areas in the ocean economy, including: • Marine transport and manufacturing activities, such as coastal shipping, trans-shipment, boat building, repair and refurbishment; • Offshore oil and gas exploration; • Aquaculture; and • Marine protection services and ocean governance.
			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.	As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed further. The decision to grant or refuse Environmental Authorisation lies with the competent authority, DMR. An oil spill modelling exercise will be undertaken during the EIA phase to determine the fate and transport of a potential spill.

Name	Surname	Organisation	Comment Received	Response Sent
		Greenpeace	<p>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.</p> <p>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?</p>	<p>This is an issue that falls within the remit of national government legislation and policy. This EIA process is based on an activity anticipated by Government. The South African White Paper on the Energy Policy (1998) is the overarching policy document which has guided and continues to guide future policy and planning in the energy sector. As outlined in the Ministerial foreword to the White Paper, fossil fuels play a central role in the socio-economic development of the country, while at the same time providing the necessary infrastructure for the country to become an attractive host for foreign investments in the energy sector. The white paper states that 'Government will ensure the optimal and environmentally sustainable exploration and development of the country's natural oil and gas resources to the benefit of all' and undertakes to 'ensure private sector investment and expertise in the exploitation and development of the country's oil and gas resources'. The successful exploitation of these natural resources would contribute to the growth of the economy and relieve pressure on the balance of payments.</p> <p>Government through Operation Phalisa, is seeking to grow the country's ocean economy through several industrial sectors, including the promotion of the oil and gas sector.</p>
Bruce	Blake	Private	<p>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.</p>	<p>It is reiterated that this EIA process is for exploration drilling, which is a different process to Seismic surveys, as described in Chapter 4.5 of the Draft Scoping Report, 2018. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed further. The decision to grant or refuse Environmental Authorisation lies with the competent authority, DMR.</p>
Margaret	Stella	Private	<p>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.</p>	<p>Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA:</p> <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (e.g. whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Megan	De Oliveira	Private	<p>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. Please find this email as my written objection to any offshore exploration and drilling, seismic activity included.</p>	<p>Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA:</p> <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (e.g. whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of the EIA.

Name	Surname	Organisation	Comment	Response Received	Comment Received	Response Sent
ED	Devitt	Private	Object most strongly	23.02.2018	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.	This Report
Jenny	Burton	Private	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.	23.02.2018	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.	This Report
Megan	Muller	Santam	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. Please take note of our objection accordingly.	23.02.2018	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of the EIA.	This Report
Sal	Roux	Private	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.	25.02.2018	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.	This Report
Garth	Bester	Private	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.	25.02.2018	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.	This Report

Name	Surname	Organisation	Comment Received	Comment	Response Sent
Kim	Verburgh	Private	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.	25/02/2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none">• Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc).• Fishing – an assessment of the proposed Projects' impact on fishing activities in the area.• Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component.• Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event.• Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.	This Report
Sander	Verburgh	Private	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.	25/02/2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none">• Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc).• Fishing – an assessment of the proposed Projects' impact on fishing activities in the area.• Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component.• Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event.• Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.	This Report
Jane	Downey	Private	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.	25/02/2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none">• Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc).• Fishing – an assessment of the proposed Projects' impact on fishing activities in the area.• Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component.• Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event.• Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.	This Report
Brightie	Lawrie	Private	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.	25/02/2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none">• Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc).• Fishing – an assessment of the proposed Projects' impact on fishing activities in the area.• Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component.• Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event.• Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.	This Report
Lou	Jacobs	Private	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.	25/02/2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none">• Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc).• Fishing – an assessment of the proposed Projects' impact on fishing activities in the area.• Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component.• Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event.• Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.	This Report

Name	Surname	Organisation	Comment Received	Response Sent
Gavin	Roberts	Private	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.	25/02/2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Chad	Wheeler	Private	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.	25/02/2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Delyse	Ramos	Private	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.	25/02/2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Ewan	Bell	Private	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.	26/02/2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Timothy	Crookes	Private	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.	26/02/2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.

Name	Surname	Organisation	Comment Received	Comment	Response Sent
Hein	van Hiltien	Private	2018/02/26	<p>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.</p> <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA. 	<p>Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA:</p> <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Ione and Rob Bowman		Private	26/02/2018	<p>We totally and completely object to offshore drilling. This will have devastating consequences to the marine life.</p>	<p>Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA:</p> <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Caroline	van Hiltien	Private	26/02/2019	<p>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.</p>	<p>Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA:</p> <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Trish	du Preez	Private	26/02/2018	<p>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.</p>	<p>Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA:</p> <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Annien	Kouloumatis	Private	26/02/2018	<p>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.</p>	<p>Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA:</p> <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.

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George	Watson	Private	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.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
M.C	Henderson	Private	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.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Imraan	Bux	Private	I am opposed to any sort of drilling on our coast. I am not convinced of your reasoning and my rational.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Jenny	Evans	Private	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.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Brent	Coetsee	Private	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.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.

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John	Broderick	Private	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.	27.02.2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none">• Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc).• Fishing – an assessment of the proposed Projects' impact on fishing activities in the area.• Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component.• Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event.• Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.	This Report
Mark	Eyel	Private	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.	27.02.2018 Acknowledge receipt of your email. ERM has sent a copy of the Scoping Report and the public presentation which was shared at the meetings which took place from 6 - 8 February 2018. At this stage, SADSAA has had access to the same level of information as the other stakeholders, and since the specialist studies, and environmental impact assessment have not yet been complete, ERM has no new information to share. Further consultation with the SADSAA will be undertaken to discuss the potential impacts and mitigations. The public meetings held provided no additional information to that provided in the Draft Scoping Report, SADSAA's opportunity to engage and comment on the proposed project has not been prejudiced and comments received have been documented and responded to. Telephonic conversations have been held and additional engagement will be undertaken.	27.02.2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none">• Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc).• Fishing – an assessment of the proposed Projects' impact on fishing activities in the area.• Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component.• Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event.• Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of the EIA.
Martina	Broderick	Private	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.	27.02.2018 Attached to this mail please find my registration sheet. I would sincerely appreciate to be provided with information and reports pertaining to the EIA or Exploration Drilling in Richards Bay, I also have a keen interest to partake in the Specialist Studies once a go ahead is given.	28.02.2018 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 stakeholder's database and will be kept informed throughout the EIA process.
Dexter	Byela	Private	Attached to this mail please find my registration sheet. I would sincerely appreciate to be provided with information and reports pertaining to the EIA or Exploration Drilling in Richards Bay, I also have a keen interest to partake in the Specialist Studies once a go ahead is given.	27.02.2018 Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none">• Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc).• Fishing – an assessment of the proposed Projects' impact on fishing activities in the area.• Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component.• Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event.• Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.	This Report
Colleen	Crookes	Private	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	Surname	Organisation	Comment Received	Response Sent
Athol	Lawrence	Private	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.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Sam	Dwyer	Private	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.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Shelley	de Beer	Private	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.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.
Lorraine	Johnson	Private	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.	Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage - a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill-modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.

Name	Surname	Organisation	Comment Received	Response Sent
Vivienne	V	Private	<p>Thank you for this opportunity to respond...basically any future developments regarding the exploration of coal, gas, oil are 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!!</p> <p>Besides the fact that globally we should not be extracting the last available fossil fuels at huge cost, but instead putting that money to developing sustainable renewable energy options.... South Africa has more than enough sun, wind, waves etc for sustainable living. These alternatives have more than proven themselves.</p> <p>Moreover 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 seismic testing not only the whales but our coastal marine life.</p> <p>The exploration of coal, gas, oil etc is definitely NOT IN THE BEST INTERESTS OF OUR EARTH & US - THE PEOPLE.</p> <p>We all are very aware - in this 21st century - of the damage this has caused, especially climate change and we should all be saying NO!!!</p> <p>So let's make the right choices for this century and our futures!!!</p> <p>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.</p> <p>many thanks</p>	<p>Eni have indicated that they are currently developing cleaner fuels in its Green Refinery Project (please refer to Eni's website for further information). The development of renewable energy sources in the Countries in which Eni operates is a key element in the Company's strategy to move the business model towards a low-carbon scenario.</p> <p>As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA:</p> <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill – modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. <p>Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.</p>
Marie	Foos	Private	<p>On behalf of JM Krugel and E Krugel</p> <p>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.</p>	<p>Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA:</p> <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill – modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. <p>Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.</p>
Ashley	Phillips	Private	<p>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.</p>	<p>Thank you for your email, your objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA:</p> <ul style="list-style-type: none"> • Marine Fauna – an assessment of the proposed Projects' impact to marine fauna (eg whales, turtles, seabirds etc). • Fishing – an assessment of the proposed Projects' impact on fishing activities in the area. • Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component. • Oil spill – modelling to identify the predicted dispersion of oil in an unplanned event. • Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. <p>Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of this EIA.</p>

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Kendy	Le Roux	CoastWatch KZN	<p>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;</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Baseline information has been gathered from existing sources. Prior to drilling an Remote Operated Vehicle (ROV) survey will be undertaken to survey the seafloor for any potential obstacle or sensitive feature (including coral), the drill site would be relocated as needed. Further information will be provided on this in the EIA.</p> <p>The Terms of Reference for all specialist studies have been included in Chapter 8 of the Scoping Report.</p> <p>A marine faunal specialist study will be undertaken as part of the EIA phase. This study will include mitigation measures, such as potential seasonal restrictions.</p>
			<p>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'.</p> <p>5) Is there a clean-up plan in place should the blow out preventer fail?</p>	<p>Sea conditions are taken into account when planning the drilling of the well and the Agulhas current has been and will be considered closely. The drilling ship is built and designed to operate in harsh weather conditions, in particular waves, wind, current, compensating up and down movements and loads. The positioning of the unit is guaranteed by redundancy, stability and positioning control equipment, including thrusters and GPS sensors.</p> <p>The weather is constantly monitored, in particular every day (and at different times of the day). Weather forecasts are analysed by the crew in order to plan the rig activity accordingly. If the weather is particularly poor, the rig is able to physically disconnect the riser from the wellhead and move to a safer location. In doing this the drilling activity is temporarily suspended in the safest way and the BOP closed as a precaution.</p> <p>Finally, it should be noted that a drilling ship, as a vessel, has a marine crew and captain on board 24 hours per day to guarantee the safety of personnel and the vessel.</p> <p>Eni will be required to develop an Oil Spill Contingency Plan for this project, this plan will need to be approved by the Department of Transport, DEA and PASA prior to drilling activities commencing.</p> <p>All the drilling personnel are constantly trained to perform their activities as safely as possible. The personnel who fill key roles are selected based on their field experience, expertise in the role and general skills and attitude. Weekly drills are performed to maintain rig crew training and capability to promptly react in case of anomalies and emergency situations, e.g. fire fighting, kick detection and well control, escape, gas release, man overboard rescue, etc.</p> <p>In the case of a serious emergency, a technical and logistic team is located onshore to support the off-shore crew at any time.</p> <p>Further, South Africa's National Contingency Plan for the Prevention and Combating of Pollution from Ships and Offshore Installations is an overall plan for South Africa, setting out the policies of the Department of Environmental Affairs and SAMS, for the Department of Transport towards their responsibilities for preventing and combating pollution of the sea by oil. It provides an overview of the actions to be taken by SAMS, DEA and other relevant Authorities in preparation for, and in the event of the threat of an oil spill, and outlines the formation of a Joint Response Committee</p> <p>The Department of Environmental Affairs (DEA) and the Department of Transport (DoT) through the South African Maritime Safety Authority (SAMSA) are two key role players with regards to vessel-source marine pollution, and particularly oil pollution. Oil Spill Response Limited (OSRL) has a capping stack located in Saldanha Bay, which could be used in case of a well blow out. In addition they have stock piles of dispersant in Cape Town and which could be mobilised in the case of an emergency.</p> <p>Further information on management of oil spills will be provided in the EIA and EMP.</p>

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			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.		Once drilling is completed, the well will be plugged (sealed) and abandoned. The open hole section of a wellbore is abandoned by setting an open hole cement plug across above the reservoir and with an additional cement plugs in open hole and into the casing. Plug testing confirm their integrity and prevent future leaks. A closure certificate will have to be approved by the relevant authorities after plugging and abandonment. In case of successful well's discovery, a temporary abandonment could be performed to allow future re-entry of the well in a safe manner. It is to be highlighted that also the temporary abandonment will involve setting of cement plugs inside the wellbore and testing them for integrity.	
					Eni would investigate the options associated with hydrocarbon production, including application or a Production Right, which would require an associated EIA process if it determine that extraction is viable. Your comment regarding PASA's role is noted.	
Mitchelle	Macdonald	Private	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 Africa and to protect the environment for the benefit of present and future generations.	01.03.2018	Thank you for your email, you objection is acknowledged. As part of the EIA, the adverse effects drilling activities may have on the marine environment will be explored and assessed. The following specialist studies will be undertaken as part of the EIA: <ul style="list-style-type: none">• Marine Fauna – an assessment of the proposed Projects impact to marine fauna (eg whales, turtles, seabirds etc).• Fishing – an assessment of the proposed Projects' impact on fishing activities in the area.• Marine Heritage – a desktop Heritage Impact Assessment which will include a maritime archaeology component.• Oil spill – modelling to identify the predicted dispersion of oil in an unplanned event.• Dispersion modelling – a dispersion simulation of drill cuttings during drilling activities. Given the nature of the project (offshore), and limited timeframe for the drilling activities, a socio-economic impact study will not be undertaken as part of the EISIA.	This Report
Hoosen	Bobat	Private	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 map ... this is what you should have shown first and then move on to show area by affected area, taking area by area.	04.03.2018	Thank you for your email. At the Scoping Stage, the maps presented are high level, intended to orientate the reader. The Scoping Report maps do not provide much detail of land based features as the project and associated area of interest is located over 60 km offshore. Updated, more detailed maps will be presented in the EIA Report to show findings of specialist studies and highlight locations where potential impacts may occur . . .	This report

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			Comment	Comment
			<p>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.</p> <p>Did you go and present to the Tonga people of Kosi who have done sustainable subsistence fishing here for over 700 years.</p> <p>Did you present to the custodians of Lake Shabaya, a Ramsar site.</p> <p>Have you presented to the board of the iSimangaliso Wetland park?</p>	<p>ERM has not presented the Project to the Tonga or Kosi people specifically, however, the iSimangaliso Wetland Park are registered stakeholders. ERM selected meeting locations based on the geographical location of the areas of interest, locations of registered I&APs and the interest shown in the project. The distance of the proposed project offshore (approximately 60 km at the closest point) and the likely minimal impacts on coastal communities during normal operations were taken into consideration in deciding on meeting locations.</p> <p>The potential impact of the project on fishing will be explored in the EIA in an independent specialist study to be undertaken by David Japp and Sarah Wilkinson of CapMarine. The potential impact of the project on marine fauna will be assessed in the EIA in an independent specialist study to be undertaken by Andrea Pulfitch of Pices Environmental Services.</p>
			<p>Slide 4.This is Sodwana Bay within iSimangaliso Wetland Park</p> <p>Did you present to the local community there, who rely on the marine environment for their livelihood?</p> <p>This stretch has 3 of South Africa's world renowned reefs.</p> <p>It is the most important area for turtle nesting. Turtles are already under threat of extinction, probably in 35/50 years time.</p> <p>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.</p>	<p>ERM has not presented the Project in Sodwana Bay, however, the iSimangaliso Wetland Park are registered stakeholders. ERM selected meeting locations based on the geographical location of the areas of interest, locations of registered I&APs and the interest shown in the project. The distance of the proposed project offshore (approximately 60 km at the closest point) and the likely minimal impacts on coastal communities during normal operations were taken into consideration in deciding on meeting locations.</p> <p>The potential impact of the project on fishing will be explored in the EIA in an independent specialist study to be undertaken by David Japp and Sarah Wilkinson of CapMarine. The potential impact of the project on marine fauna will be assessed in the EIA in an independent specialist study to be undertaken by Andrea Pulfitch of Pices Environmental Services.</p>
			<p>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.</p>	<p>The potential impacts associated with a spill will be explored further in the EIA through an Oil Spill Modelling Study. A specialist oil spill modelling study will be undertaken in order to understand the fate and transport of unplanned hypothetical oil spills. Eni will develop an Oil Spill Contingency Plan prior to drilling commencement. In addition Eni will prepare a detailed Emergency Response Plan and Strategy prior to drilling activities. The contents of this plan will be considered in the EIA. Eni is a Participant Member of Oil Spill Response Limited (OSRL), an international industry-funded cooperative which exists to respond to oil spills wherever in the world they may occur. OSRL have a stacking cap currently located and stored in Saldanha Bay, South Africa.</p>
			<p>Slide 6 : ERM Please read this slide carefully. This is a Marine protected area!!!</p> <p>Operational Phakisa, which you and ENI so glibly quote has in fact extended the marine protected 54 km offshore at Kosi mouth and up to 93km off St Lucia lighthouses.</p>	<p>Although Block ER236 overlaps with the proposed Protea Banks MPA and the extension of the iSimangaliso Wetland Park MPA, there is no overlap of the drilling areas of interest with the proposed protection areas.</p> <p>It should be noted that sections of the original ER236 which overlapped with the existing iSimangaliso and Alwai Shoal MPAs were felled/dug during the Exploration Right renewal process in 2016 to avoid direct impacts to key areas for biodiversity.</p>
			<p>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 Mertu, Msikaba, Port ST Johns etc ?</p>	<p>ERM has not presented the Project to stakeholders south of Port Shepstone. ERM selected meeting locations based on the geographical location of the areas of interest, locations of registered I&APs and the interest shown in the project. The distance of the proposed project offshore (approximately 60 km at the closest point) and the likely minimal impacts on coastal communities during normal operations were taken into consideration in deciding on meeting locations.</p> <p>The potential impact of the project on the marine environment will be explored in the EIA.</p>
			<p>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....</p> <p>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.</p>	<p>The potential impact of the project on fishing will be explored in the EIA in an independent specialist study to be undertaken by David Japp and Sarah Wilkinson of CapMarine. The potential impact of the project on marine fauna will be assessed in the EIA in an independent specialist study to be undertaken by Andrea Pulfitch of Pices Environmental Services.</p>

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		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 up to 3 meters per second....in 12 hours, a spill could be over 100 km's ...and depending on winds at that time any easterlies, south easterly or a south westerly would drive it onshore. Disaster.	The potential impacts associated with a spill will be explored further in the EIA through an Oil Spill Modelling Study. A specialist oil spill modelling study will be undertaken in order to understand the fate and transport of unplanned hypothetical oil spills and the findings will be presented in the EIA Report.	
		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.	Eni cannot guarantee that there will never be a spill. However, Eni will use the latest technology, industry highest standards and procedures, quality check and audit for contractors capabilities, services and tools, training and certification of staff and contractors to prevent spills and blowouts, refer to Chapter 4.5 of the Scoping Report for further detail.	ERM is obliged to comply with the timeframes stipulated in the Environmental Impact Assessment Regulations (GNI R982/2014). The Regulations allow for 44 days in which to complete a Scoping Report from the date of submission of the Application to PASA, this includes a 30 day comment period.
Desmond	D'Sa	SDCEA	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.	Eni will be required to develop an Oil Spill Contingency Plan for this project, this plan will need to approved by the Department of Transport, DEA and PASA prior to drilling activities commencing. All the drilling personnel are constantly trained to perform their activities as safely as possible. The personnel who fill key roles are selected based on their field experience, experience in the role and general skills and attitude. Weekly drills are performed to maintain rig crew training and capability to promptly react in case of anomalies and emergency situations, e.g., fire fighting, kick detection and well control, escape, gas release, man overboard rescue, etc. In the case of a serious emergency, a technical and logistic team is located onshore to support the off-shore crew at any time. Further, South Africa's National Contingency Plan for the Prevention and Combating of Pollution from Ships and Offshore Installations is an overall plan for South Africa, setting out the policies of the Department of Environmental Affairs and SAMSAA, for the Department of Transport towards their responsibilities for preventing and combating pollution of the sea by oil. It provides an overview of the actions to be taken by SAMSAA, DEA and other relevant Authorities in preparation for, and in the event or the threat of an oil spill, and outlines the formation of a Joint Response Committee The Department of Environmental Affairs (DEA) and the Department of Transport (Dot) through the South African Maritime Safety Authority (SAMSAA) are two key role players with regards to vessel-source marine pollution, and particularly oil pollution. Oil Spill Response Limited (OSRL) has a capping stack located in Saldanha Bay, which could be used in case of a well blow out. In addition they have stock piles of dispersant in Cape Town and which could be mobilised in the case of an emergency.

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			<p>Appointment and the Role of Independent Consultants</p> <p>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).</p> <p>General Requirements for EAPs and Specialists according to NEMA 1998 (ACT NO. 107 OF 1998)</p> <p>1) An EAP and a specialist, appointed in terms of regulation 12(1) or 12(2), must—</p> <ul style="list-style-type: none"> (a) be independent (b) have expertise in conducting environmental impact assessments or undertaking specialists 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 applicant; (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— <p>(i) any decision to be taken with respect to the application by the competent authority in terms of these Regulations; or</p> <p>(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.</p>	<p>ERM has been appointed by Eni to conduct an EIA process in terms of the National Environmental Management Act (NEMA) for their proposed Exploration Drilling project in ER236, offshore South Africa.</p> <p>ERM is a privately owned company registered in South Africa. ERM has no financial ties to, nor is ERM a subsidiary, legally or financially, of Eni. Remuneration for the services by the Proponent in relation to this EIA is not linked to an approval by the decision-making authority. Furthermore, ERM has no secondary or downstream interest in the development.</p> <p>The role of the environmental consultants is to provide credible, objective and accessible information to government and other stakeholders, so that an informed decision can be made about whether the project should proceed or not.</p> <p>The ERM team selected for this project possesses the relevant expertise and experience to undertake this EIA. As such, ERM has signed the legally required declaration of independence to function as an objective Environmental Assessment Practitioner (EAP).</p> <p>Four specialist studies have been identified to be undertaken as part of the EIA process (Marine Fauna, Fisheries, Drill Cuttings Dispersion Modelling and Oil Spill Modelling). The Marine Fauna and Fisheries studies will be undertaken by Pisces Environmental Services and CapMarine respectively and the Drill Cuttings and Oil Spill Modelling by an ERM specialist team. All specialists are required to sign an independence declaration as a component of the specialist work. In addition the Oil Spill Modelling will be peer reviewed by an independent peer reviewer; PRDW, experienced in undertaking modelling studies in the South African marine environment. The Terms of Reference for the studies are provided in Chapter 7 of the Scoping Report.</p>
			<p>The Role of Experts</p> <p>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.</p>	<p>ERM has been appointed as the Environmental Assessment Practitioner in terms of the NEMA EIA regulations. The ERM team selected for this project possesses the relevant expertise and experience to undertake this EIA. As such, ERM has signed the legally required declaration of independence to function as an objective Environmental Assessment Practitioner (EAP). See CVs of the core team in Annex A of the Scoping Report.</p> <p>Four specialist studies have been identified to be undertaken as part of the EIA process (Marine Fauna, Fisheries, Drill Cuttings Dispersion Modelling and Oil Spill Modelling). The Marine Fauna and Fisheries studies will be undertaken by Pisces Environmental Services and CapMarine respectively and the Drill Cuttings and Oil Spill Modelling by an ERM specialist team. All specialists are required to sign an independence declaration as a component of the specialist work. In addition the Oil Spill Modelling will be peer reviewed by an independent peer reviewer; PRDW, experienced in undertaking modelling studies in the South African marine environment. The Terms of Reference for the studies are provided in Chapter 7 of the Scoping Report.</p>

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			<p><u>Public Participation:</u></p> <p>Advertising:</p> <p>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.</p> <p>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.</p> <p>The level of public participation must be at a minimum be informed by –</p> <ul style="list-style-type: none"> • the scale of anticipated impacts of the proposed project; • the sensitivity of the affected environment and the degree of controversy of the project; • the characteristics of the potentially affected parties. <p>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.</p> <p>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.</p>	<p>The public consultation process for the Scoping Phase was designed based on the EIA regulations and the location of the areas of interest for drilling (two areas within ER236 roughly in line with Richards Bay and Port Shepstone); in addition the onshore logistics base will be located in either Richards Bay or Durban. At the Scoping stage, meetings were planned for these areas as it is where the potential impacts may be felt and where many of our stakeholders are based. Should it be determined that the public participation needs to be expanded, based on the outcomes of the impact assessment, this will be considered by the EIA team.</p> <p>As described in Chapter 6 of the Scoping Report the following steps have been taken to notify stakeholders of the project and EIA process:</p> <ul style="list-style-type: none"> • Stakeholder database compiled of authorities (local and provincial), Non-Governmental Organisations, neighbouring landowners, fisheries and other key stakeholders. This database was based on previous project databases for similar projects (both ERM's and other consultancies) and included more than 150 stakeholders. It should be noted that Eastern Cape governmental stakeholders are included on the database and the municipal managers of each municipality along the KZN coastline. • A Background Information Document was developed to give initial project information. This was placed on the website and distributed to all stakeholders on the database. • Initial advertising - The project was advertised in four newspapers; The Mercury and Zululand Observer in English and the Isolezwe and Ilanga in Isizulu. The dates of distribution were as follows: The Mercury – 18 September 2017; The Zululand Observer – 18 September 2017; Ilanga (advert in Isizulu) – 21 September 2017; Isolezwe (advert in Isizulu) – 21 September 2017 • Site notices have been placed at the following locations: o Thembelihle Municipality libraries; Durban North; Durban Central Landing; Amazinti; Warner Beach; Isipingo Beach; Umkomazi; and Tongaat Beach; o uMhlatuze Local Municipality; o Richards Bay Municipality; and o Richards Bay Library; o Entrance to the Port of Richards Bay. • The draft Scoping Report was released for public comment on 22 January 2018. • An advert was published as follows: o The Mercury – 22 January 2018; The Zululand Observer – 22 January 2018; Ilanga (advert in Isizulu) – 22 January 2018; Isolezwe (advert in Isizulu) – 22 January 2018 • Notifications have been sent to all stakeholders on the database and the report was made available online and in the following libraries: o Durban Public Library; Richards Bay Public Library; Port Shepstone Public Library • During the Scoping Phase public meetings have been held as follows: o 6 February 2018, Richards Bay; 7 February 2018, Durban; 8 February 2018, Port Shepstone <p>In response to concerns raised with regards to the meetings (and/or consistent with the response compiled in the SDEA letter dated 27 February 2018):</p> <ul style="list-style-type: none"> • Advertising and notification – the meeting was advertised in the four newspapers indicated in the line above and an invitation was sent to the entire stakeholder database. Which now consists of more than 200 stakeholders. • The timing of the meeting (available from 4pm; 5:30pm presentation start time) allowed people representing an official capacity (government or professionally) to attend at 4 pm as part of their work day and private individuals to attend after typical working hours. • The meeting locations were selected based on the geographical location of the areas of interest and coastal communities, locations of registered I&APs and the interest shown in the project. • The team facilitating the meetings had English, Afrikaans, and Isizulu language capability. It is acknowledged that although a member of the ERM team is a Zulu speaker and was able to provide interpretation, a professional Isizulu translator would be preferable and will be made available for subsequent meetings. <p>With regards to Sasol's attendance at the meetings and as communicated during the meeting, Sasol holds the right to explore Block ER236 together with Eni. Eni is the operator of the block with 40% participating interest. Sasol holds the remaining 60%. The relationship between Eni and Sasol are regulated by a Joint Operating Agreement (JOA), which defines the role, responsibilities and the modus-operandi of each partner. Eni in its role of operator has the responsibility to run the studies, analysis and operations required to assess the hydrocarbon potential of the Exploration Right. Sasol is contributing both financially and in the decision making process for the definition of the technical work program.</p> <p>The commercial fishing industry have been included in notifications regarding the project and will be further consulted during the EIA process.</p>
			<p><u>Hosting of the Public Meeting:</u></p> <p>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.</p>	

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			<p>Report Back Meeting:</p> <p>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 a 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 meaningful 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.</p>	<p>The purpose of the follow up meeting was to provide additional responses to queries raised during the Durban Public Meeting on 7 February 2018. A full written response was also provided (letter dated 27 February 2018) and the intention was to present the response to SDCEA and those from the community attending the meeting. Unfortunately we were prevented from presenting the responses during the meeting, copies of the letter were however distributed at the meeting and is included as an Annex to this report.</p> <p>With regards to Sasol's attendance at the meetings and as communicated during the meeting, Sasol holds the right to explore Block ER236 together with Eni. Eni is the operator of the block with 40% participating interest. Sasol holds the remaining 60%. The relationship between Eni and Sasol are regulated by a Joint Operating Agreement (JOA), which defines their role, responsibilities and the modulus-operandum of each partner. Eni in its role of operator has the responsibility to run the studies, analysis and operations required to assess the hydrocarbon potential of the Exploration Right. Sasol is contributing both financially and in the decision making process or the definition of the technical work program.</p> <p>The request for authority attendance was communicated to the competent authority</p>	
			<p><u>Background Information Document</u></p> <p>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 be made available in English, XHOSA must be included. It must be given 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 export opinions sought after. A review mechanism must be developed and review experts chosen and paid for by the developer.</p>	<p>A Background Information Document was provided at the start of the process to all those on our stakeholder database and to all stakeholders who requested a copy, it was also available on the project website. When the Draft Scoping Report was distributed in January 2018 we indicated that an isizulu copy of the Executive Summary could be made available on request. At the Public Meeting in Durban on 7 February 2018 there was a request made by stakeholders for a translation, which was done. This translated version was distributed to stakeholders via an email notification and copies were sent to the SDCEA office as requested.</p> <p>A description of the impacts identified is provided in Chapter 7 of the Scoping Report. These were summarised during the presentation. Motivations for the exclusion of certain impacts from a full impact assessment are provided in Table 7.3.</p>	
			<p><u>The Proposed Development</u></p> <p>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.</p>	<p>A description of alternatives considered is included in Section 4.8 of the Scoping Report. Eni will discuss with the authorities and other relevant parties regarding making the other documentation referred to available for review. Certain information in these documents is confidential, in which case as per the regulations Eni will provide copies to the authorities.</p>	
			<p><u>International Conventions and Treaty Commitments South Africa</u></p> <p>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.</p>	<p>Additional information on the international conventions and treaties applicable to the project will be included in the legal section of the EIA Report.</p> <p>Potential impacts related to the proposed project will be assessed in the EIA as per Chapter 7 of the Scoping Report. Given that the scope of the project covers only exploration drilling the EIA will assess the impact to climate change from drilling ship, vessels and helicopter emissions, as well as estimated well emissions during well testing.</p>	

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			Impacts of Offshore Oil and Gas Drilling	Potential impacts related to the proposed project will be assessed in the EIA as per Chapter 7 of the Scoping Report. A specialist oil spill study will be undertaken in order to understand the fate and transport of un planned hypothetical oil spills. Please note, although oil spill modelling and mitigation measures associated with impacts relating to major oil spills will be undertaken as part of the EIA, Eni will be required to develop an Oil Spill Contingency Plan (OSCP) closer to the time of possible drilling once all details (exact location, time, vessel, shore base) are confirmed. This plan will need to be approved by the Department of Transport, DEA, and PASA prior to drilling activities commencing. The results of the EIA studies will be included in the OSCP. In fact the OSCP Detailed Plan describing identified scenarios, roles, responsibilities and techniques to respond to any occurring oil spill. Oil Spill modelling for the evaluation of potential oil spill consequences are included within the plan	
				Flaring will only occur if well testing is conducted on the appraisal well and will be limited to the duration of the well test. Estimated emissions to air from flaring during well testing quantified during the EIA process and presented in the EIA report. Potential impacts related to the proposed project will be assessed in the EIA as per Chapter 7 of the Scoping Report.	
				The potential impact of the project on fishing will be explored in EIA in an independent specialist study to be undertaken by David Japp and Sarah Wilkinson of CapMarine. ERM has developed a public participation process appropriate to the nature and scale of the project. Refer to Section 6.6 of the Scoping Report for more detailed information.	
				Potential impacts related to the proposed project will be assessed in the EIA as per Chapter 7 of the Scoping Report. Given that the scope of the project covers only exploration drilling the EIA will assess the impact to climate change from the drilling ship, vessels and helicopter emissions, as well as estimated well emissions during well testing (of the appraisal well only). Air emissions will be quantified and documented in the EIA report. There will be no retrieved product stored or transported.	
				Potential impacts related to the proposed project will be assessed in the EIA as per Chapter 7 of the Scoping Report. Given that the scope of the project covers only exploration drilling the EIA will assess the impact to climate change from the drilling ship, vessels and helicopter emissions, as well as estimated well emissions during well testing (of the appraisal well only). Air emissions will be quantified and documented in the EIA report. There will be no retrieved product stored or transported.	
				Potential impacts related to the proposed project will be assessed in the EIA as per Chapter 7 of the Scoping Report. The proposed drilling will be undertaken by a drilling ship. The ship will only be at the drill site temporarily (max drilling time of 1 well is 71 days) and potential impacts associated with fish aggregation and potential bird mortality will be limited. During the top hole drilling with sea water and cement job, chemicals used are classified as environmental compatible including avoidance of mercury content.	
				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 flares. 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 Gulf of Mexico is associated with elevated levels of mercury in fish.	

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			<p>South African Coastline:</p> <p>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 stationary 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 Agulhas 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.</p>	<p>Sea conditions are taken into account when planning the drilling of the well and the Agulhus current has been and will be considered closely. The drilling ship is built and designed to operate in harsh weather conditions, in particular waves, wind, current, compensating up and down movements and loads. The positioning of the unit is guaranteed by redundancy stability and positioning control equipment, including thrusters and GPS sensors.</p> <p>The weather is constantly monitored, in particular every day (and at different times of the day). Weather forecasts are analysed by the crew in order to plan the rig activity accordingly. If the weather is particularly poor, the rig is able to physically disconnect the riser from the wellhead and move to a safer location. In doing this the drilling activity is temporarily suspended in the safest way and the BOP closed as a precaution.</p> <p>Finally, it should be noted that a drilling ship, as a vessel, has a marine crew and captain on board 24 hours per day to guarantee the safety of personnel and the vessel.</p> <p>An oil spill modeling study is being undertaken as part of the EIA to understand the fate and transport of a potential oil spill.</p>		
			<p>Cyclones and intense Cold Fronts:</p> <p>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 (Wairatah) 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?</p>	<p>Please note, oil spill modelling and mitigation measures associated with impacts relating to major oil spills will be undertaken as part of the EIA. An emergency evacuation plan and an oil spill contingency plan (OSCP) will be developed closer to the time of possible drilling once all details (exact location, time, vessel, shore base) are confirmed. The results of the EIA studies will be incorporated into the OSCP. The OSCP Detailed Plan describes identified scenarios, roles, responsibilities and techniques to respond to any occurring oil spill. Oil Spill modelling for the evaluation of potential oil spill consequences are included within the plan.</p> <p>The Oil Spill Contingency and Response Plan must be submitted to the relevant South Africa Department (PASA) for approval before the start of any drilling operation, so not only international but also local requirements will be taken into consideration. The Department of Environmental Affairs (DEA) and the Department of Transport (DoT) through the South African Maritime Safety Authority (SAMSA) are two key role players with regards to vessel-source marine pollution, and particularly oil pollution.</p> <p>Eni's approach was to join international consortiums for main equipment and to develop in-house technologies to improve the intervention capability. Eni is a member of Oil Spill Response Limited (OSRL) who will be contracted to provide oil spill emergency response equipment. OSRL has a capping stack located in Saldanha Bay, which could be used in case of a well blow out. In addition they have stock piles of dispersant, which could be mobilised in the case of an emergency. Additional equipment can be brought in as needed.</p>		
			<p>Health, safety and rescue considerations:</p> <p>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 existing 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.</p>			

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			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 offshore 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.	Please see a detailed response above regarding the vessel design and stability. Sea conditions are taken into account when planning the drilling of the well and the Agulhas current has been and will be considered closely. An oil spill modelling study is being undertaken as part of the EIA. The historical meteocean data, including Agulhas current, are included in the models.	
			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.	Chapter 7 of the Final Scoping Report identifies the impacts to be assessed in the EIA phase. This includes seawater and sediment quality degradation /contamination due to operational discharges and cuttings discharge. A Waste Management Plan will be prepared prior to drilling activities. A specialist modelling study will be undertaken in order to understand the fate and transport of the drill cuttings and muds.	

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			<p>The Simangaliso 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 "Simangaliso 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)".</p> <p>The consultants are prone to making wild and unsubstantiated and absolutely unverifiable claims. Consider the following:</p> <p>"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".</p> <p>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 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 be 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!</p>	<p>Eni have updated the northern area of interest to exclude the Goodlad Canyon as no drilling activity will occur in this canyon.</p> <p>Dr Andrea Pulfrich (marine specialist) based her conclusion about the likelihood of finding coelacanths in this canyon on the scientific evidence provided in the following publication: Wilies, E., Green, A., Watkeys, M., Jolka, W. & Kroeker, R., 2013. The evolution of the Tugela Canyon and submarine fan: A complex interaction between margin erosion and bottom current sweeping, southwest Indian Ocean, South Africa. <i>Marine and Petroleum Geology</i> 44: 60–70.</p> <p>As stated in the scoping report these canyons therefore differ significantly in morphology from those in northern KwaZulu-Natal, where coelacanths have been reported. Firstly, the canyon heads lack the amphitheatre-shaped head morphology. Secondly, they are located at far greater depth than tributary branches (Wilies et al. 2013). Although terraces are present and may provide shelter in the form of caves and overhangs, they occur at depths (>1,500 m) well beyond those at which coelacanths have been recorded to date.</p> <p>ERM has added the following text to the Final Scoping Report "Evidence of deep water canyons at depths (>1,500 m) were found during a seismic survey conducted in the northern area of interest. The canyon was found to be in the centre of the area of interest. (Figure 5.2). Due to the depth of the canyon coelacanths are unlikely to be present. No drilling will occur within the canyon."</p>	
			<p>Effects of Offshore Oil Rigs:</p> <p>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.</p>		<p>Potential Impacts related to the proposed project will be assessed in the EIA as per Chapter 7 of the Scoping Report. The proposed drilling will be undertaken by a drill ship. The ship will only be at the drill site temporarily (max drilling time of 1 well is 71 days) and potential impacts associated with fish aggregation and potential bird mortality will be of limited duration and scope.</p>
			<p>The Marine Ecosystem</p>		<p>Potential Impacts related to the proposed project will be assessed in the EIA as per Chapter 7 of the Scoping Report. This will include the impact of sound on marine fauna. The project does not involve the undertaking of a seismic survey, although during drilling a log called Vertical Seismic Profiling (VSP) could be undertaken. This activity would be performed in the hole and it will have a very limited duration. Further information will be provided in the EIA and the noise impacts will be assessed in the EIA and mitigation measures will be provided.</p>
			<p>Seismic Survey Impacts:</p> <p>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.</p>		<p>Exploratory drilling 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.</p>

Name	Surname	Organisation	Comment	Comment Received	Response Sent
			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.	Potential impacts related to the proposed project will be assessed in the EIA as per Chapter 7 of the Scoping Report. The proposed drilling will be undertaken by a drill ship. The ship will only be at the drill site temporarily (max drilling time of 1 well is 71 days) and potential impacts associated with fish aggregation and potential bird mortality will be of limited duration and scope.	
			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.	This statement included in the project motivation was obtained from the South African Department of Energy's website - http://www.energy.gov.za/files/petroleum_frame.html . This Exploration Phase project would not have any direct macro-economic benefit to South Africa and any long term benefit would only be felt should exploration be successful and production occur. Should production occur the government of South Africa would gain revenue through the part share in the production right, taxes and royalties. Destination of produced hydrocarbon to local market would reduce South Africa dependence on importation with direct benefit for the country. Should gas be discovered in commercial quantity its utilization for electricity production would help offsetting the current role of coal, contributing to the reduction of greenhouse gases.	
			SASOL currently sources gas from Mozambique but does not pass this "saving" onto us as consumers. Rather their cost of production fails 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/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 increase in government revenues ³ 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.	This comment is noted.

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			Alternatives: No alternatives were investigated such as investments in renewable energy which desperately require.	<p>This is an issue that falls within the remit of national government legislation and policy. This EIA process is based on an activity anticipated by Government. The South African White Paper on the Energy Policy (1998) is the overarching policy document which has guided and continues to guide future policy and planning in the energy sector. As outlined in the Ministerial foreword to the White Paper, fossil fuels play a central role in the socio-economic development of the country, while at the same time providing the necessary infrastructural base for the country to become an attractive host for foreign investments in the energy sector. The white paper states that 'Government will ensure the optimal and environmentally sustainable exploration and development of the country's natural oil and gas resources to the benefit of all' and undertakes to 'ensure private sector investment and expertise in the exploitation and development of the country's oil and gas resources'. The successful exploitation of these natural resources would contribute to the growth of the economy and relieve pressure on the balance of payments.</p> <p>It is acknowledged that renewable energy is an excellent alternative for the production of electricity, however as indicated by the Integrated Energy Plan (IEP, 2016) diversity of supply sources and primary sources of energy is a key objective of the South African government.</p> <p>Government, through Operation Phakisa, is seeking to grow the country's ocean economy through several industrial sectors, including the promotion of the oil and gas sector.</p>	
				<p>No social impact assessment has been included as the project will create only a limited number of jobs as described in Chapter 7 of the Scoping Report. Further information will be provided in the EIA regarding impacts related to oil spills.</p>	
				<p>1. This is responded to in full in the above responses and details of the engagement process are provided in Chapter 6 of the Scoping Report. Some details of actions have been and will be taken going forward (as communicated in the response letter dated 27 February 2018). 2. A detailed response on Eni's Environmental Performance is provided in the response letter dated 27 February 2018 (see attached). 3. Please see additional information in the response to this query in the Port Shepstone meeting comments below. 4. As indicated previously a limited number of local jobs (in the order of 10) will be created by the project. These jobs will be in either Durban or Richards Bay depending on the location of the shore base. Further detail is not available at this stage. 5. The impact to climate change from the drilling activity itself will be assessed in the EIA. 6. Please see the response provided by Eni in the response letter dated 27 February 2018 (see attached) with regards to Nigeria. No major work incidents have been recorded in the mentioned countries, please refer to this link where environmental and safety performance of overall Eni are published: https://www.eni.com/en/. 7. Further information on Emergency and Oil Spill response will be provided in the EIA and EMPR. 8. Due to the nature and scale of the project and the limited jobs a social impact assessment will not be undertaken. 9. An assessment of the potential impact related to an oil spill will be included in the EIA. 10. Baseline information has been presented in Chapter 5 of the Scoping Report. The results of the seismic survey have been licensed by Eni from the geophysical contractor and PASA. The information is not able to be made publicly available. 11. A fisheries specialist study will be undertaken as part of the impact assessment. The project is for Exploration Drilling and the study will therefore not cover seismic survey impacts. 12. A marine faunal specialist study will be undertaken as part of the EIA process. 13. Please see the responses above regarding the consideration of the hydrodynamics and the drillship capabilities.</p>	
			Demand(s) We as representatives of the community demand that... 1. There be a proper public participation process which includes sufficient advertising. 2. That all historical contexts of oil and gas drilling including incidents and the historical operations of the company must be looked at. 3. The accurate funding information must be made available. 4. That they indicate up front how and for whom they will be creating employment opportunities for. 5. They give us with accurate and unaltered information when investigating the impacts of climate change. 6. They give us all information with regards to the work and incidents they did in Ghana, Nigeria, Kenya, Mozambique and the Ivory Coast. 7. They provide an emergency plan and how they are going to implement it if something happens. 8. 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 harbours, ship and boat building , major recreation and sporting events, renewable energy production (wind and wave) and aquarium fishing. 9. They must provide a social impact study of how the livelihoods of fishermen will be affected and how they are going to compensate them and deal with it. 10. They must provide all the information they have about the coast and the seismic information. 11. 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. 12. They must look at marine life that are protected and that are currently in recovery and how this will impact it. 13. 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.		

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			<p>14. The terms of reference of the consultant and any experts that has been appointed.</p> <p>15. Proper risk assessments be done by appointed experts</p> <p>16. All specific targets must be provided including drilling, testing and chemical information</p> <p>17. They investigate what kind of noise, the noise volume and noise impacts due to the development</p> <p>18. They investigate the canyons, estuaries, wetlands and nurseries which serve as breeding grounds for South Africa's rich biodiversity.</p> <p>19. The independent study that Sasol has conducted must be provided for.</p> <p>20. Surveys must be done over a longer period of time</p> <p>21. That they consider the no go option as an alternative</p> <p>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.</p>	
			<p><u>Conclusion</u></p> <p>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 split? 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.</p> <p>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.</p>	<p>14. ERM has been appointed to undertake an EIA for exploration drilling in terms of NEVA. The terms of Reference for the specialist studies are provided in Chapter 8 of the Scoping Report.</p> <p>15. An oil spill modelling specialist study will be undertaken. The assessment of the oil spill impact will include a discussion regarding the risk of occurrence.</p> <p>16. Detailed project description information is provided in Chapter 4 of the Scoping Report.</p> <p>Additional information will be included in the Project Description in the EIA.</p> <p>17. An assessment of the noise associated with exploration drilling will be undertaken in the EIA.</p> <p>18. A detailed baseline description has been provided in Chapter 5 of the Scoping Report, some additional information will be included in the baseline chapter of the EIA.</p> <p>19. It is unclear what independent Sasol study is being referred to here.</p> <p>20. No marine baseline surveys have been conducted for this project, baseline information presented has been gathered through a desktop study.</p> <p>21. The no-go option will be considered as an alternative.</p>
				<p>As previously indicated an Oil Spill Contingency Plan will be prepared and submitted to the authorities for approval prior to drilling activities. Further detail on the contents of this plan will be provided in the EIA.</p> <p>The strategic decision to promote oil and gas is an issue that falls within the remit of national government legislation and policy. This EIA process is based on an activity anticipated by Government. The South African White Paper on the Energy Policy (1998) is the overarching policy document which has guided and continues to guide future policy and planning in the energy sector. As outlined in the Ministerial foreword to the White Paper, fossil fuels play a central role in the socio-economic development of the country, while at the same time providing the necessary infrastructure base for the country to become an attractive host for foreign investments in the energy sector. The white paper states that 'Government will ensure the optimal and environmentally sustainable exploration and development of the country's natural oil and gas resources to the benefit of all and undertakes to ensure private sector investment and expertise in the exploitation and development of the country's oil and gas resources'. The successful exploitation of these natural resources would contribute to the growth of the economy and relieve pressure on the balance of payments.</p>
				<p>This report</p> <p>The drilling of one well will take approximately 71 days. This timing refers to each of the six wells proposed and not merely the first well. As indicated on page 1 of the Scoping Report, subsequent to the first well the time sequence of the possible additional wells will be dependent on the results of the first exploration well, and will not occur immediately after the drilling of the initial well. Wells will not be drilled at the same time.</p>
				<p>Additional information will be included in the EIA with regards to the shore base, including thresholds for storage facilities in terms of the EIA regulations. It is anticipated that the service infrastructure required to provide the necessary onshore support is currently in place at both the Port of Durban and Richards Bay and no additional onshore infrastructure would be necessary for this project. Likewise, no new facilities or construction would be needed for helicopter support.</p>
				<p>Once in position, the drillship will carry out its pre-drilling activities comprising seabed survey; remote operated vehicle (ROV) dive, positioning; beacon placement and dynamic positioning (DP) trials. These activities will be followed up with safety checks, drills, communication tests and drilling of the pilot hole. This will take approximately 9 days to complete.</p> <p>A drilling location will be identified prior to mobilisation of the drillship on the basis of the results of the analysis of available seismic data. Once on site, prior to start drilling operations, the drillship will undertake an Remote Operated Vehicle (ROV) survey to ensure that there are no seabed hazards or sensitivities at the selected location. Should any obstacles/sensitivities be identified the drilling location, the well would be relocated to a nearby location where no obstacles/sensitivities are located.</p>
Phumla	Ngesi	Petroleum Agency South Africa (PASA)	<p>Timeline 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.</p> <p><u>Shore Base Infrastructure:</u> 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.</p> <p>Pre-drilling activities: what is the duration of the pre-drilling activities? (Pg29 4.5.1)</p>	<p>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.</p>

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		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.	Measures for the handling and transport of NADFs and hazardous substances will be included in the EIA. There will be no impacts associated with the handling and transport under normal operating conditions. The EIA will include further information on the management of small oil or chemical spills.	
		The Scoping Report only makes reference to municipalities in Richard's Bay (King Cetshwayo and City of Umlahluzi) and Durban (EThekwini 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.	As indicated in the Scoping Report the socio-economic baseline is focused on the local municipalities in which the onshore logistics base may be located (ie Richard's Bay (King Cetshwayo and City of Umlahluzi) and Durban (EThekwini Metro)) as most of the activities associated with the project will take place offshore, with the exception of activities associated with the onshore logistics base. Fisheries information is provided for a wider offshore area. Based on the specialist studies the scope of the baseline may be increased to cover areas potentially impacted by unplanned events.	
		Finalisation of Scoping Report for submission to the Petroleum Agency SA instead of DEA.	Error corrected.	
		Newspaper coverage: concerned that there could be limited coverage in Port Shepstone. The EAP needs to consider local newspapers such as South Coast Herald. Erection of site notices: The erection of site notices were only limited to EThekweni Municipality, and Umlahluzi Local Municipality. Distribution of site notices should be extended to the South Coast part of the application e.g. Port Shepstone area.	Additional advertising in 10 local newspapers along the coast will be undertaken during the EIA phase, this will include the South Coast Herald. Additional site notices will be placed in areas along the south coast.	
		Detailed information on the amount of excess cement to be disposed is necessary in order to establish whether the activity does not deserve further assessment.	Based on comments received we have elected to include the assessment of the impact to marine fauna due to the disposal of excess cement in the impact assessment. An estimation of quantity of excess cement will be included in the EIA.	
		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.	Suspension refers to when well operation is suspended without removing the well control, for example during waiting out of extreme weather. This is a standard operation and, prior of any disconnection of the marine riser from BOP and wellhead, the well will be suspended in the safest way according to international best practises. A different issue is when drilling has terminated and the well will be plugged (sealed) and abandoned according to a P&A programme developed as per company and international standards. The open hole section of a wellbore is abandoned by setting an open hole cement plug across above the reservoir and with an additional cement plugs in open hole and into the casing. Plug testing confirm their integrity and prevent future leaks. A closure certificate will have to be approved by the relevant authorities after plugging and abandonment. In case of successful well discovery, a temporary abandonment could be performed to allow future re-entry of the well in a safe manner. It is to be highlighted that also the temporary abandonment will involve setting of cement plugs inside the wellbore and testing them for integrity. Monitoring of permanently plug and abandoned wells is not a standard practice and is not required by international standards/regulation or by local South African legislation. For temporarily abandoned subsea wells, a program for visual observation with RCV shall be established.	
		Issues raised above concerning consultation must be catered for in the Plan of Study for EIA.	The Plan of Study included in Chapter 8 of the Scoping Report has been updated to include the additional consultation activities.	
		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; the degree to which the impact and risk can be reversed; the degree to which the impact and risk may cause irreparable loss of resources; 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.	The EIA methodology in Chapter 8 of the Scoping Report has been updated to include the highlighted items.	

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			Regulations for Financial Provisioning, 2015 requires the applicant to determine financial provision to undertake rehabilitation and remediation of the adverse environmental impacts of exploration or operation through a detailed itemisation of all rehabilitation activities 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.	Additional text has been included on page 13 of the Scoping Report as follows: <i>At the end of the operation (ie drilling and well completion), the well will be plugged and abandoned. This will involve setting cement plugs inside the wellbore and testing them for integrity. The ROP will be then retrieved at surface and the drillship and support vessels will depart the area. A decommissioning plan and financial provisions for decommissioning will be required and will be submitted to the Minister as part of the Environmental Authorisation application process. This will be undertaken by an appropriate specialist.</i>	

Name	Surname	Organisation	Comment	Comment Received	Response
					Initial response sent
Sherelee	Odayar	South Durban Community Environmental Alliance (SDCEA); and Adrian Pole Attorneys	<p>COMMENT'S on ERM - Exploration Drilling within Offshore Block EPR236</p> <p>1. Need and Desirability Motivation fails to highlight negative aspects of anticipated oil and/or gas exploration "success". It is noted that in the Policy Framework section of the Need and Desirability motivation contained in the Draft Scoping Report, it is stated that the discovery of a commercially viable oil and/or gas reserve offshore South Africa would assist in meeting the objectives included in the Integrated Energy Plan (IEP, 2016):</p> <p>"The development of a National Integrated Energy Plan (IEP) was envisaged in the White Paper on the Energy Policy of the Republic of South Africa of 1998 and, in terms of the National Energy Act, 2008 (Act No. 34 of 2008), the Minister of Energy is mandated to develop and, on an annual basis, review and publish the IEP in the Government Gazette. The purpose of the IEP is to provide a roadmap of the future energy landscape for South Africa which guides future energy infrastructure investments and policy development. (DoE, 2016). Key objectives of the IEP (2016) include the following:</p> <ul style="list-style-type: none"> • Security of supply; • Minimising the cost of energy; and • Diversification of supply sources and primary sources of energy. <p>The discovery of a commercially viable reserve of oil and/or gas offshore South Africa would assist in meeting the above objectives."</p> <p>It is pointed out that section 6 of the National Energy Act, 2008 (NEA) is the relevant section dealing with integrated energy planning, and is also the enabling provision for the development of an IEP. Importantly, section 6 of the NEA has not yet commenced (the date of commencement is to be proclaimed). The legal status of the IEP2 is thus unclear. This has not been pointed out in the Draft Scoping Report (Appendix 2 to the Environmental Impact Assessment Regulations, 2014 stipulates that one of the objectives of scoping process is to identify the relevant policies and legislation relevant to the activity).</p>	16.03.2018	This comment is acknowledged and a note to this effect will be included in the EIA. However, regardless of the status of Section 6 of the National Energy Act, the integrated Energy Plan (IEP) was published by the South African government indicating the government's intentions with regards to energy in South Africa.

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			<p>2. Assessment of socio-economic impacts of a worst-case scenario spill deep water, according to the following description on page 1 of the Scoping Report:</p> <p>"ENI is considering drilling up to six deep water wells within Block ER236, four wells within a northern 1,840 km² area of interest, in water depths ranging between 1,500 m and 2,100 m and two wells within a southern 290.5 km² area of interest (Figure 1.1), in water depth ranging between 2,600 m and 3,000 m."</p> <p>According to Dr. Chernailk,3 this puts the project on par with one of the worst environmental catastrophes of the new century: the Deepwater Horizon oil spill of 2010.</p> <p>Dr. Chernailk points out that details of the short and long-term effects of the Deepwater Horizon spill can be found on the U.S. National Oceanic and Atmospheric Administration's (NOAA) website: https://response.restoration.noaa.gov/oil-and-chemical-spills/significant-incidents/deepwater-horizon-oil-spill.</p> <p>For example, the NOAA reports on its website that on 4 April 2016:</p> <p>"the court approved a settlement with BP for natural resource injuries stemming from the Deepwater Horizon oil spill. This settlement concludes the largest natural resource damage assessment ever undertaken. We will now begin implementing the restoration as laid out in the Trustees' comprehensive restoration plan. Under this settlement, BP will pay the Trustees up to \$8.8 billion for restoration to address natural resources injuries and lost recreational uses".</p>	<p>This will include the assessment of impact to water quality and thereby marine fauna and fisheries, as well as impact to community and workforce health and safety, and tourism.</p>	As indicated in Table 7.2 of the Scoping Report the impact of a blowout will be assessed in the EIR.
			<p>Dr. Chernailk notes that the draft ENI Scoping Report seems to require assessment of a worst-case spill (as it should);</p> <ul style="list-style-type: none"> Physical and chemical environmental impacts on surface waters from potential hydrocarbon spills will be assessed using a comprehensive modelling approach. In the comprehensive modelling approach, a single model, GEMSS® (Generalized Environmental Modelling System for Surfacewaters), is used to determine the fate and transport of unplanned hypothetical oil spills. The following scenarios will be assessed: <ul style="list-style-type: none"> Scenario 1 - diesel spill associated with vessel collision happening either during drilling of wells; Scenario 2 - release of NADP due to the accidental disconnection of the riser occurring; Scenario 3 – blowout of crude oil at the wellhead on the seabed. For each scenario, the "worst cases" will be determined using three different criteria: the conditions that result in the shortest time for oil to contact shoreline, the case with the most amount of shoreline oiling, and the conditions in which the most amount oil spreads across the water surface. Impacts will be assessed in terms of the probability of the presence of a visible hydrocarbon slick on the surface, probability of oil contacting shorelines, and dissolved aromatic concentrations in the water column. For the riser disconnect scenario, impacts will also include an evaluation of the suspended solids concentration and untreated NADF contamination on the sea floor using the GIFT module. Results of the modelling will be provided as a stand-alone report, included as an annex to the main EIA report.⁴ 	<p>However, while the Draft Scoping Report makes reference to an assessment of worst-case scenario impacts "in terms of probability", no mention is made of assessing the nature, significance, consequence, extent and duration of socio-economic impacts that would arise in the event of a worst-case spill scenario materializing, including the degree to which such impacts can be reversed and may cause irreparable loss of resources (e.g. clean-up costs; the extent to which the environment could be restored following significant ecological damage; impacts on natural resources such as fishing; impacts on tourism; impacts on recreational users of natural resources etc.).⁵</p>	<p>It is submitted that the Draft Scoping Report should make provision for a detailed assessment in the Draft Environmental Impact Report (DEIR) of the nature, significance, consequence, extent and duration of socio-economic impacts that would arise in the event of a worst-case spill scenario materializing.</p>

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			<p>3. Failure to require redundancy (e.g. an acoustic control system) for activating the blowout preventer in case of a spill</p> <p>According to Dr. Chemnuk, one of the defects identified in the Deepwater Horizon EIA was a failure to require redundancy (e.g. an acoustic control system) for activating the blowout preventer in case of a spill. Dr. Chemnuk comments that with respect to the Draft Scoping Report for the Exploration Drilling within Offshore Block ER236, it seems that this defect may be repeated. With respect to blowout prevention, the Draft Scoping Report for the Exploration Drilling within Offshore Block ER236:</p> <p>Secondary well control is provided by the installation of mechanical device, such as the float collar in the drilling string and the blowout preventer (BOP) at seabed, installed on top of the wellhead after the running and setting of the surface casing. The BOP effectively closes and seals the annulus if there is a sudden influx of formation fluids into the well bore, by the use of a series of hydraulically/electrically actuated rams. In addition, this device allows the formation fluids to be safely vented or pumped at the surface with the well closed, thereby enabling other methods to be applied to restore a sufficient hydrostatic head of mud on the well bore, for example pumping a higher density volume of mud, the so called 'kill mud'. The capacity and pressure rating of equipment, safety device and the BOP rating exceed the predicted reservoir pressures.⁶</p> <p>Dr. Chemnuk advises further that the existence of a blowout preventer at seabed, while essential, does no good if an explosion or other catastrophic event prevent the ability to activate (switch on) the BOP. The fundamental reason why the Deepwater Horizon oil spill lasted so long and was such a catastrophe.</p> <p>It is submitted that the Draft Scoping Report for the Exploration Drilling within Offshore Block ER236 should require a robust discussion in the DEIR for the project of redundancies that would be employed by the project to activate the BOP under each and every accident scenario.</p>	<p>The blow out preventor (BOP) equipment can be used in the case of loss of control during well operations. BOPs used by Eni are built using stringent specific manufacturing, functioning and testing protocols defined by ISO/API procedures. The BOP's activation and closure time are consistent with API/ISO standards. The function testing and pressure testing are mandatory and regularly performed as per ISO/API standards in order to guarantee the functioning, efficiency and integrity of this important emergency system. The redundancy activation systems (e.g. acoustic) must be periodically tested as per API/ISO. Please note that on board the rig there are at least three different and redundant activation and control systems/panels located in three different areas, specifically: driller's panel, kumey/well control manifold, and tool pusher panel. This is necessary to activate the system in the case of unpredicted malfunctioning or inoperability of one specific panel.</p>
			<p>4. Oil Spill Response Plan</p> <p>Dr Chemnuk notes that the Draft Scoping Report alludes to the possibility of there being an Oil Spill Response Plan forming part of the DEIR for the project: "Eni will develop and implement an Oil and Chemical Spill Response Plan in the event of an accidental release of oil offshore."⁷</p> <p>Dr. Chemnuk advises that is must be ensured that an Oil Spill Response Plan is indeed part of the DEIR for the project.</p> <p>Dr. Chemnuk goes on to state that the Oil Spill Response Plan also needs to conform to guidelines about what information needs to be in the plan. An example of such guidelines is the Guidelines for Offshore Oil Spill Response Operators (API TECHNICAL REPORT 1145, SEPTEMBER 2013), available online at: http://www.oilspillprevention.org/-/media/oil-spill-prevention/spill-prevention/-and-d-spill-response-planning/1145-e1-final.pdf.</p> <p>In Dr. Chemnuk's view, one of the most important elements of a good Oil Spill Response Plan is the identification of available resources for responding to a major spill. If an Oil Spill Response Plan correctly describes what to do in case of a major spill, but the required equipment or trained personnel are not available to rapidly implement the plan, then correctly describing what to do is of no use. This is why guidelines for Oil Spill Response Plans require such plans to identify response resources, such as section 4.2 of the guidelines cited above, which provides as follows:</p> <p>4.2 Resource Inventories and Mobilization Times</p> <p>Identify the primary Oil Spill Removal Organizations that are under contract or can provide key response resources (boom, skimmers, barges, dispersants and application platforms, etc.) and how they will likely be utilized in a response. For example, due to varying capabilities between Oil Spill Removal Organizations, some may be more suited or pre-designated for offshore containment and recovery whereas others may only provide shoreline cleanup services. If company owned equipment will be utilized, it should be identified in this section as well.</p>	<p>Oil spill modelling and identification of mitigation measures associated with impacts relating to major oil spills will be undertaken as part of the EIA. An emergency evacuation plan and an oil spill contingency plan (OSCP) will be developed closer to the time of drilling once all details (exact location, time, vessel, shore base) are confirmed. The results of the EIA studies will be incorporated into the OSCP. The OSCP Detailed Plan describes identified scenarios, roles, responsibilities and techniques to respond to any occurring oil spill. Oil Spill modelling for the evaluation of potential oil spill consequences are included within the plan.</p> <p>The OSCP must be submitted to the relevant South African Authority (PASA and SAMSA) for approval before the start of any drilling operation, so not only international but also local requirements will be taken into consideration. The Department of Environmental Affairs (DEA) and the Department of Transport (DoT) through the South African Maritime Safety Authority (SAMSA) are two key role players with regards to vessel-source marine pollution, and particularly oil pollution.</p> <p>Eni's approach is to join international consortiums for main equipment and to develop in-house technologies to improve the intervention capability. Eni is a member of Oil Spill Response Limited (OSRL) who will be contracted to provide oil spill emergency response equipment. OSRL's Saldanha Bay base houses an integrated subsea well intervention system which includes a capping stacks suitable for international use and two hardware kits for debris clearance, BOP intervention and the subsea application of dispersant at a wellhead. This would be used, as appropriate, in case of a well blow out. In addition they have stock piles of dispersant, which could be mobilised in the case of an emergency. Additional equipment can be brought in as needed.</p> <p>The EIR will include details on the required contents of the OSCP and information regarding South African response capacity, however the plan itself will be developed once the details, as outlined above, are known.</p>

Name	Surname	Organisation	Comment	Comment Received	Response Sent
			Resource inventory lists of the major response equipment and personnel should be included for the company and primary Oil Spill Removal Organizations. The lists should include at least those resources that could be mobilized to the site(s) in the first 24 hours to make the Oil Spill Response Plan as stand-alone as possible for the initial response phase. Alternatively, Oil Spill Removal Organizations websites or those that maintain compilations of resource inventories such as the Response Resource Inventory can be referenced for that information."		
			Dr. Chemnuk goes on to point out that the question of response resources available to be mobilized in the first 24 hours of a spill may be very critical in the context of South Africa given its relative lack of experience in offshore oil and gas projects, and advises that if South Africa lacks local equipment or trained personnel to respond rapidly (within 24 hours) to a major spill from an offshore oil and gas facility, then this is an issue the DEIR for the Exploration Drilling within Block ER236, off the East Coast of South Africa needs to explore.		
			In light of the above, it is submitted that the Draft Scoping Report should require the DEIR includes a description of the available resources to respond to a major oil spill.		
Mandy		Sea Harvest	Thank you for your email.	13.08.2018	Noted
Rudi		Sea Harvest	In future please use my new email address: mandy@seaharvest.co.za	13.08.2018	Noted
Cheryl	Smart	Advocates Group Seven North	Thank you for your email. In future please use my new email address: rudib@seaharvest.co.za	13.08.2018	Noted
Christina	Hagen	Pamela Isdell Fellow of Penguin Conservation	You refer to Section 21 of the EIA Regulations. Could you please send me a copy of the regulations you refer to?	14.08.2018	ERM sent a copy of the NEMA EIA Regulations as requested.
Kimishka	Chefty	Groundwork	I look forward to your urgent response		14.08.2018
Alan	Boyd	Department of Environmental Affairs	Please can you add me to the mailing list for the above project? I would like to receive notification of the EIA report when it is available.	05.06.2018	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.
Petrus	Viviers	Private	Kindly register myself and my colleague Niven as R&Ps for the abovementioned project.	05.06.2018	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.
Eliese	Templehoff	Newer24	Please send us any related documentation for this project.	05.06.2018	Noted.
Gill	Gough-Palmer	Private	Thank you for this update.	05.06.2018	
			Please do keep me informed regarding the process.		
Petrus	Viviers	Private	Thank you for the update.	05.06.2018	Noted.
Eliese	Templehoff	Newer24	Thank you for this notification	06.06.2018	Noted.
Gill	Gough-Palmer	Private	Please register me as an I & A person, using the above email address. My details are Dr G Gough-Palmer, 0813097194. Please also register Monica Merle with email address: monica.merle@gmail.com & M Fraser - mikefraser@mweb.co.za.	06.06.2018	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.
Warren	Hale	Private	Please acknowledge receipt & action in this matter. Thank you.	07.06.2018	
Shona	Aylward	South Coast Herald	Thank you for the correspondence. Please would you provide me with a copy of the final scoping report?	07.06.2018	Afternoon Warren Apologies for the delayed response, your email seems to have been lost in the inbox. Attached please find a copy of the Final Scoping Report.
					The report, along with all the annexes is also available on the project website: https://www.erm.com/en/-offshore-eia
					ERM experienced unforeseen delays in the finalising of specialist studies which resulted in subsequent delays in the drafting of the EIA Report. The meetings were cancelled as the Project team was not in a position to share the findings of the EIA.
					This report.
					The potential impacts associated with the Project are discussed in Chapters 7 and 8 of this EIA.

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Ann	Mc Donnell	KZN Democratic Alliance	Please advise the extent of this block – seems you have consulted from Richards Bay to Port Elizabeth. Does it extend to the Isimangaliso Park, a world Heritage site? Also how far into the ocean?	22.06.2018	The Block is located offshore, and extends from off the coast of Port Shepstone to just south of the border with Mozambique, see map below. However, the areas that Eni proposed to undertake exploration activities are located off the coast of Richards Bay and Port Shepstone. We understand the sensitivities associated with the Isimangaliso Park, and while we have not had meetings in St Lucia, and representatives from the Park are on our stakeholder database and are aware of the project.	18.07.2018
Heidi	Cox	Private	Please register me as an interested and affected party with regard to the seismic exploration taking place off the KZN coast.	26.07.2018	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	