

Annex C

Comments and Responses
Report, and Meeting
Minutes

Annex C1

Comments and Responses Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Pre-application Phase						
Janet	Solomon	Vanishing Present Productions	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	Frackfreesa	Please would you notify all the IAP'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&AP 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 Please let me know if this addresses your query to your satisfaction.	18.09.2017
Judy	Bell	Frackfreesa	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 airtime will not be able to open such a big attachment. It is not conducive to effective participation, which is a principle of NEMA.	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. Should you wish to receive a hard copy of the BID, please do let us know and we would be happy to send you one. Please do let us know should you have any additional queries.	18.09.2017
Jennifer	Oibers	Wildlife and Environment Society of South Africa (WESSA) KZN	Please may I register as an interested and affected party?	15.09.2017	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
Andre	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.	
Sandy	Camminga	Richards Bay Clean Air Association (RBCAA)	The email below which was forwarded to me by a colleague has reference. Kindly register the Richards Bay Clean Air Association (RBCAA) 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&AP.	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&AP		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. 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&AP. Please do not hesitate to contact me if you have any further questions.	18.09.2017
Percy	Langa	Richards Bay Industrial Development Zone	Please register the RBIDZ as an I&AP.	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
Shanice	Gomes	South Durban Community Environmental Alliance (SDCEA)	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
Madimetja	Lephoto	Alectrona Consulting (Pty)Ltd	No Objection to the Project	18.09.2017		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	Viviers		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
Sabine	Wintner	Kwazulu-Natal Sharks Board	Please register me as an I&AP for the Oil Exploration Drilling within Offshore Block ER236, South Africa.	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
Duminsani	Myeni		Duminsanie 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	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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Suvana	Alakram	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.	20.09.2017	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
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	20.09.2017	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
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.	
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.	21.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	
Debbie	Smith	Stokkiesdraai	Please find attached my registration form. It would appreciate , to be kept informed about your drilling venture on the East Coast.	23.09.2017	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
Alex and Ann	Paretas-Brosens	Kwalucia Enterprises (Pty)Ltd	Register as AP	23.09.2017	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
Adel	Scheidle	Avalone Guesthouse	Drilling not beneficial for marine which directly influences hospitality industry in St.Lucia, I am against the proposed drilling	24.09.2017	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.	26.09.2017
	Scheidle	Avalone Guesthouse	Against drilling. Beautiful coastline needs to be preserved for future generations	24.09.2017	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.	26.09.2017
Elsa	Karam		Property Owner, I Mrs H E Karam want to register as an interested And affected party against exploration of east coast of SA	24.09.2017	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
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.	25.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process. We acknowledge the receipt of the article which speaks to your concerns.	
Barend	Vorster	Fishermans Restaurant & Wave Dancer Charters	Register as IAP	25.09.2017	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
Caroline	Fox	Ezemvelo KZN Wildlife	Please see attached my registration form to register as an I&AP for the proposed offshore drilling.	25.09.2017	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
Simphiwe	Mbonambi	Mbanambi Traditional Authority	Please could you register me as an IAP	26.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	27.09.2017
Norma	Patrick	POD and Icebwatch SA	Please could you register me as an IAP	26.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	27.09.2017
Eghard	Greyling	J.S Greyling Trust	Please could you register me as an IAP	26.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	27.09.2017
Siboniso	Mbense	iSimangaliso Wetland Park Authority	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. As the authority mandated to protect and develop the iSimangaliso Wetland Park, a proclaimed World Heritage Site[1], the iSimangaliso is required by law[2] to ensure that development and activities happening within and adjacent to the Park do not negatively affect the Park's World Heritage values.	26.09.2017	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.	27.09.2017
Deon	Steyn	Elephant Lake Group	Register as IAP	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.	27.09.2017
Norma	Hall		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.	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.	28.09.2017

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Jon	Marshall	Coastwatch KZN	Please include following email address when responding chris.wrightza@gmail.com; kendyllr@gmail.com; karini@gcs-sa.biz	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.	28.09.2017
Bonisile	Mthembu	Department of Education	Please could you register me as an IAP	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.	02.10.2017
Donald	Pittindrigh	Indus Automation & Systems Intergration	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.	05.10.2017
McDonald	Mutsvangwa		Registration as an I&AP for Richards bay exploration project	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.	06.10.2017
John	Cawood		I would like to register as an interested and affected party please	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.	06.10.2017
Sharin	Govender	Department:City Development	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. We will send soft copy reports to your office as they become available.	09.10.2017
Tamiyn	Jolly	Zululand Observer	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.	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 as affected 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.	03.10.2017
Niall	Kramer	SAOGA	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.	09.10.2017
Desmond	D'Sa	South Durban Community Environmental Alliance (SDCEA)	Please see our attached letter of our concerns and advice on your company's background document to explore for oil and gas off our coastline. (Concern letter attached) please include the following email address in reponse chadley@sdceango.co.za; samuel@groundwok.org.za; roc@tiscali.co.za, bobby@groundwork.org.za; adrian@adrianpole.co.za	09.10.2017	Noted and additional email addresses have been included in the stakeholder database.	Initial acknowledgement - 10.10.2017
			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.		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 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 present's very serious hazards particularly as the offshore location is in known track of departing cyclonic systems originating in the Mozambique Channel. The distance offshore and the extreme depth poses technical considerations for our country. At this point 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?		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.	

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			<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 offsite 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 enquire 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>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>It is noted that the drill site is a significant distance offshore which by implication makes timeous 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>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>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 it 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. In addition to helicopters, a stand-by vessel will be always be in the vicinity of the drillship. 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 activities 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 neighboring 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>	
			<p>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 a 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.</p>		<p>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.</p>	
			<p>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.</p>		<p>This is noted. Please see our responses regarding the public consultation process below.</p>	

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			<p>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.</p>		<p>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:</p> <p>The project was advertised in four newspapers; The Mercury and Isolezwe (in Zulu) with distribution around Durban, and The Zululand Observer and Ilanga 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.</p>	
			<p>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, BnB'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.</p>		<p>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 KZN 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.</p> <p>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.</p> <p>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.</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 (eg 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 (Pisces and CapMarine).</p> <p>A peer review of the oil spill modelling study will be undertaken by PRDW, an independent specialist.</p>	
			<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 timeous 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 fishermen'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>	

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			<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 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. 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>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 Pulfrich of Pices Environmental Services.</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> <p>This concern is noted. As per the above responses 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.</p>	
Imke	Summers		Please may you register me as an IAP on the EIA for Exploration Drilling within Block ER236, Offshore of the East Coast, South Africa	10.10.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	11.10.2017
Samuel	Chademana	Groundwork	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	11.10.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	11.10.2017
Jacquette	Adamson	Exigent Environmental	Register as I&AP	11.10.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	13.10.2017
Dee	Fischer	Department of Environmental Affairs	Register as a stakeholder for the EIA for offshore exploration.	19.10.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	19.10.2017
2017 Scoping Phase						
Khalid	Mather	KZN Environmental Network	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 spillages and oil-slick sand are a common site across Richards Bay beaches, heavily impeding 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 shape-file data from SANBI.	30.10.2017	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.	This Report
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>Please advise whether the EIA approval process gives ERM sufficient time to properly assess:</p> <ol style="list-style-type: none"> 1. the risk of oil/gas blows arising from offshore drilling operations 	06.11.2017	<p>ERM has received a number of comments from stakeholders. All comments received in relation to the EIA for Exploration Drilling within Block ER2356 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.</p> <p>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>	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<p>2. significant environmental impacts that the offshore drilling will cause, including:</p> <p>2.1 SEA FLOOR DEGRADATION</p> <p>2.2 SEDIMENT POLLUTION: generation of vast plumes of sediment arising from the "disposal of cuttings to the seafloor 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 a discussion, and what, if any legal enforcement measures would be in place to prevent unnecessarily destructive environmental practices by the drilling operators.</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>2.3 EFFLUENT POLLUTION: High levels of pollution arising from wastewater and operational discharges from the drillship/s 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 73/78 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>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>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>		<p>The noise impact associated with drilling activities will be assessed by the ERM team with input from specialists as needed.</p>	
			<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 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, Aliwal Shoal and iSimangaliso 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 iSimangaliso 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 iSimangaliso and Aliwal Shoal MPA's were relinquished during the Exploration Right renewal process in 2016.</p>	

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<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 scientist/s 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 ERM, 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: <i>Wiles, E., Green, A., Watkeys, M., Jokat, W. & Krockner, 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. Marine and Petroleum Geology 44: 60-70.</i> studied the morphology of the canyon and Andrea Pulfrich (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 Pulfrich of Pisces Environmental Services.</p>	
			<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 EMPr 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 Geco) under a specific Reconnaissance Permit granted by PASA, over a portion of the Durban basin which also include the central part of block ER236. 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>	

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<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 Olbers, 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 Olbers raises in a presentation reviewing global literature on the effects of seismic surveys. This research, says Olbers, 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/entangled 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>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>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>	
					A well blow-out is an unplanned event, the risk and impact of which will be assessed further in the EIA.	
					The need and desirability of the project are discussed in Chapter 3 of the Draft Scoping Report, January 2018.	
Sharin	Govender	City of uMhlatuze	My previous correspondence with regards to this process refers. Please ensure that all communication is sent to me as well.	09.11.2017	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.	09.11.2017
Fiona	McCarthy	Starlite Aviation Opera	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.	11.11.2017	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 release so that you are preparing with the latest information.	14.11.2017
Matthew	Hemming	Private	Please register me as an I&AP. I am a resident of KZN.	10.11.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	10.11.2017
Jennifer	Olbers	Ezemvelo KZN Wildlife, Scientific Services	Please note that my details have been captured incorrectly in Annexb1 and Annexb4. Please see signature below and update your records/documentation.	30.10.2017	Thank you for letting us know, please accept our apology. We have corrected your details in the stakeholder database.	This Report
Frans	Van der Walt	QS2000	Why am I not receiving these notifications ? I thought I had confirmation that I am registered as I&AP ? (I received this from Sandy Camminga – similarly to the original notice of the meeting !)	09.11.2017	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.	09.11.2017
Samuel	Chademana	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	Hofland	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@hofland.co.uk People register me as an interested party and keep me fully informed	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	Intertek Industry Services	Please, register Intertek 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

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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	Ganter	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 Bro's 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	I 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 uMhlathuze	The City of uMhlathuze 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. The strategic nature of the project in terms of Government's Phakisa Programme within the Ocean Economy warrants alignment with strategic planning initiatives driven at a regional and local scale. To this end, the Municipality requests a meeting with project proponents to understand the initiative at a macro scale. 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; or email: Sharin.Govender@umhlathuze.gov.za.	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 uMhlathuze if possible and desired. Noted, Sharin Govender has been included on the Stakeholder Database.	This Report
2018 Scoping Phase						
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 Seve	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
Shaun	Roseveare	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 Heliport 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.

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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	<p>Hi Lindsey</p> <p>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 looming drought disaster sufficiently highlights the limits to growth? Please record the following in the comments register and address the issues raised:</p> <ul style="list-style-type: none"> • 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 gungh ho to bliksem without a thought of the consequences to ecosystem functioning? • 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 • What say there is a spill while drilling or afterwards, when everyone has upped anchors and headed for shore? • How long will the wells remain a risk to the environment? Who and how will they be monitored 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? 	24.01.2018	<p>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 recommenced 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.</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 Scoping Report, 2018. The potential impacts associated with drilling activities will be assessed in the EIA Phase.</p> <p>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).</p> <p>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.</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, 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.</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>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>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.</p> <p>Further information on the financial provision for closure and potential environmental damage will be provided in the EIA.</p>	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<p>• What about the marine protected areas? How will they (including the strategic Thukela Banks) be protected from:</p> <ul style="list-style-type: none"> o The impacts of seismic testing – what is considered a “sufficient” acoustic buffer zone? o The impacts of spills? 		<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 Aliwal Shoal MPAs were relinquished during the Exploration Right renewal process in 2016 to avoid direct impacts to key areas for biodiversity.</p> <p>The potential impact on marine mammals will be assessed through a Marine Faunal Specialist Study and reported on in the EIA Report.</p> <p>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.</p> <p>The potential impacts associated with a spill will be explored further in the EIA through an Oil Spill Modelling Study.</p>	
			<p>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/p/insist-the-dea-challenges-seismic-surveying-of-our-coastline/u/21072886 Please make sure that this petition is acknowledged and the precautionary principle applied accordingly.</p>		<p>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.</p> <p>ERM apply the precautionary principle when undertaken an impact assessment.</p>	
Njabulo	Gumede	Trio Trading Services	<p>I hope this find you well and happy new year. My name is Njabulo Gumede, I'm the Managing Director of a small company (Ompisholo 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.</p>	26.01.2018	<p>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.</p>	05.03.2018
Frans	Van Der Walt	QS2000	<p>Thank you very much.</p> <p>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.</p>	22.01.2018	<p>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.</p>	05.03.2018
Nerissa	Pillay	Ezemvelo Wildlife	<p>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:</p> <p>Addressee: Mr Andy Blackmore – Head IEM and Protected Area Planning Postal: P O Box 13053 Courier: Queen Elizabeth Park Cascades Cascades 3202 1 Peter Brown Drive Montrose 3201</p> <p>Fax: 033 - 845 1499 (5pg max.). Maps should not be faxed unless they are produced in black & white and have an appropriate key.</p>	24.01.2018	<p>It looks like the Eni report was addressed to Jennifer Olbers. Please let me know if we should send another version addressed to Andy Blackmore. Thanks.</p> <p><i>**Jennifer Olbers confirmed receipt of the Scoping Report and provided comments to ERM which have been included in the Report.</i></p>	24.01.2018
David	Watermayer	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 ALL offshore exploration and/or drilling for oil.</p>	05.02.2018	<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>	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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	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
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	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
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!!!!!!!!!!!!!!!!!!!!!!	05.02.2018	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
Kwanele	Langa	Private	Registers as IAP	05.02.2018	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	06.02.2018
Fiona	Petersen	Private	I strongly object to you ruining our coast and harming sea life	05.02.2018	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
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.	05.02.2018	Thank you for your interest in the Project. During the Scoping Phase of the EIA process, public participation activities have been focused around Durban and Richards Bay as this is where the potential impacts may be felt, and where many of our stakeholders are based. While Block ER236 extends along a large portion of the KZN coastline, the onshore logistics base will be located in either Richards Bay or Durban. Should it be determined that the public participation programme needs to be expanded, based on the outcomes of the impact assessment, this will be considered by the EIA team.	06.02.2018
P	Govender	Private	Durban meeting keep me posted	06.02.2018	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	06.02.2018

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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.	06.02.2018	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
Jennifer	Olbers	Wildlife and Environment Society of South Africa (WESSA) KZN	Please find acknowledgement of receipt attached.	07.02.2018	The acknowledgement has been received, thank you very much.	22.02.2018
Rosemarie	Bindon	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.	07.02.2018	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	Beyl	Private	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.	08.02.2018	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 for 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. 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=c0bHP3yYvuk . Also attached is a copy of the draft Scoping Report (which is available on the project website: www.erm.com/eni-exploration-eia).	

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Mark	Beyl	Private	<p>1. We refer to the above matter, and more specifically to our telephonic conversation earlier today.</p> <p>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.</p> <p>BRIEF BACKGROUND OF SADSAA & RBSBC</p> <p>3. Our organization, the SOUTH AFRICAN DEEP ANGLING SEA ORGANISATION ("SADSAA") is the national governing body of all recreational deep sea anglers in South Africa, is made up of all the geographical provinces, and in the provinces in turn is made up of various clubs, which has approximately 8000 members countrywide. Amongst our members are highly regarded marine scientists and biologists, which assist us with credible scientific data. Writer is the national environmental officer of SADSAA, and a member of the RBSBC.</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 organization's such as IGFA, the Billfish Foundation and International Light Tackle Association, and is also recognized by SASCOO.</p> <p>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 60 km from the Richards Bay Port, which will probably be used as a basis for the drilling vessels.</p> <p>INTERESTED AND AFFECTED 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>	08.11.2017	<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 as 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>I will forward your letter on to Eni today so that they can review and understand the concerns of the SADSAA & RBSBC. I suggest as a first step, let's see if Eni can provide more clarity around the drilling schedule. From there we can see if a meeting between yourself, ERM and Eni is required. Please let me know if you have any further questions at this stage.</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 Gelmetti the MD for Eni South Africa and he has confirmed that the earliest the drilling is expected to start is late 2019 (November – December). I hope that this comes as good news to you.</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>	08.02.2018
			<p>9. Naturally both SADSAA & the RBSBC will forward more detailed comments after the public participation meetings early next year, but in the main our current concerns are briefly set out hereinafter.</p> <p>10. SADSAA & the RBSBC is hosting an international Game & Bill Fish Tournament in February 2019, and your client's intended drilling is scheduled for late 2018 and early 2019.</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 these 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 Marlin, Tuna and game fishing. We are concerned the intended drilling causes the migratory fish to avoid the area of interest, which could result in little or no fish being caught, and notwithstanding a well-run tournament hosted by SADSAA and the RBSBC, 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>	26.02.2018
Brenda	Grant	Dargle Conservancy	Please register the Dargle Conservancy as an interested and affected party in the above matter	09.02.2018	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.	22.02.2018

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Briege	Williams	SAHRA	<p>The South African Heritage Resources Agency would like to thank you for submitting the "Draft Scoping Report for Exploration Drilling within Offshore Block ER236, KZN, South Africa". With regard to the Draft Scoping Report it is noted that it contains no mention of maritime and underwater cultural heritage such as shipwrecks. In terms of the National Heritage Resources Act, No 25 of 1999 (NHRA), heritage resources, including any wreck being a vessel or aircraft or any part thereof older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority.</p> <p>The East coast of South Africa has historically been a very busy shipping channel and whilst there has been no shipwrecks positively identified directly in the exploration area there are three reports of ships being lost in the study area. Two of the reported wrecking's are those of the Nova Scotia (1942) and the Aelybryn (1943) which were both lost during the 2nd World War. Both vessels were torpedoed by German U-Boats with a great loss of life, especially the Nova Scotia who was transporting Italian internees when she was hit, resulting in the loss of 858 people. The Nova Scotia is known to have gone down in the northern part of the exploration area whilst the Aelybryn may lie to the east of the area, both would be considered war graves. Another well known vessel thought to have been wrecked in the area is that of the Waratah which went missing in July 1909, enroute from Durban to Cape Town, she disappeared with 211 passengers and crew aboard and no trace of her has ever been found.</p> <p>As the proposed exploration drilling is undergoing an Environmental Authorisation (EA) Application process and National Environmental Management Act, No 107 of 1998 (NEMA), it is incumbent on the developer to ensure that a Heritage Impact Assessment (HIA) is done as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). This must include a maritime archaeology component and any other applicable heritage components. The HIA must be conducted as part of the EA Application in terms of NEMA and the 2017 NEMA EIA Regulations.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p>	13.02.2018	<p>Thank you for your comment. ERM 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. 	This Report
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.	14.02.2018	<p>Thank you for your comment.</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. Further information on the management of oil spills will be included in the EIA and EMP Report.</p>	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	14.02.2018	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?	15.02.2018	<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>	15.02.2018
Naureen	Craig	Private	What about the whales? In your quest for wealth have you considered other creatures, including people????	19.02.2018	<p>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:</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 the ESIA.</p>	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Janet	Solomon	Vanishing Present Productions	<p>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:</p> <p>1. INCIDENT MANAGEMENT</p> <p>Transparency is needed with regards to Oil Spill Response, Planning and Capacity necessary for public health and welfare and the marine and coastal environment. An annex to the EIA should include the blowout management protocol for Eni South Africa BV (Eni), and Sasol Africa Limited (Sasol) for this project. Included in this annex should be highlighted any deficit of technological expertise or resources or difficulty of effective co-ordination with all government or conservation agencies that have a statutory responsibility for some aspect of offshore oil and gas activities regarding incident management. The delegated National Incident Commander, along with the intended lines of responsibility for interagency efforts, should be made public information in this annex. The public needs assurance that incident management is fully informed, and has capacity to deal with, the latest technology, practices and risks associated with, and due to, the different geological and ocean environments being explored, prior to commencement of drilling.</p>	20.02.2018	<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, 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.</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 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 or 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 regarding oil spill response will be included in the EIA and EMPr.</p>	20.02.2018
			<p>2. LIABILITIES AND FINANCIAL RESPONSIBILITY FOR OIL SPILL REMEDIATION</p> <p>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.</p>		<p>Further information on the financial provision for closure and potential environmental damage will be provided in the EIA.</p>	
			<p>3. CLIMATE CHANGE</p> <p>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>		<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 explorative phase will be confirmed and a decision will be taken to move to the development phase, including production of the discovered natural resources, a further EIA will be required.</p>	
			<p>4. OPERATIONAL WASTE</p> <p>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>		<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> <p>Eni's waste management principle is to do the following; in the order of priority: reduce, reuse, recycle, recover, treat, dispose. A project specific Waste Management Plan (covering all wastes generated offshore and onshore) would be developed in accordance with MARPOL requirements, South African regulations and Eni's waste management guidelines. All vessels would have equipment, systems and protocols in place for prevention of pollution by oil, sewage and garbage in accordance with MARPOL 73/78.</p> <p>Further inform around waste and waste management will be included in the EIA Report and EMPr.</p>	

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<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 (Hohn et al. 2006). The mitigation of Vertical Seismic Profiling cannot simply be an issue of 'short duration'. These airguns are capable of inducing significant acoustic trauma. The use of airguns producing high decibels and amplitudes of sound in a marine environment requires mitigation. Please fully address the adverse effects of subsurface man-made noise and vibration during these operations. Noise emissions from drilling operations often produce noise that includes strong tonal components at low frequencies, including infra-sonic frequencies in some cases, thereby leading to potential disturbance, damage or interference to a variety of marine species. Please assess the full scale of this acoustic footprint including impacts caused by vibration through drill string and casing, vibration into the seabed and vibration of the drill bit.</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 emissions quantity and concentration must be agreed upon. An annual and public report of flaring volumes by Eni and Sasol would be required. Flaring negates commitments made by South Africa under the United Nations Framework Convention on Climate Change (UNFCCC), Kyoto Protocol and the Paris Agreement.</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.	
			<p>8. PHYSICAL DAMAGE TO THE SEA FLOOR AND IMPORTANT HABITATS The disruption that drilling causes to the seafloor habitat and the benthic community was not adequately dealt with in the Scoping Report. Impacts of drilling on the seabed are not necessarily localised or short-term and must be assessed further. Cognisance must be taken of the hazards of drill cuttings disposal onto the seabed because they are often contaminated with drilling lubricants, synthetic-based drilling fluids (SBFs) and other non-aqueous drilling fluids (NAFs). The EIA must include mitigation against sediments contaminated with petroleum products, heavy metals and salts, which do not biodegrade and can accumulate in high concentrations affecting reproduction of marine life, and biomagnify toxic substances in the food chain.</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>9. INVASIVE SPECIES Ships, drilling equipment and rigs are used and relocated all around the world. Negative impacts on native biodiversity from invasive species colonising drilling infrastructure should be mitigated.</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>10. BASELINE STUDIES NEEDED The occurrence of deep-water corals in Block ER 236 and the areas of interest are unknown. Therefore potential gains and/or losses at the inter- and intra-species levels; changes in species abundances; loss of habitat; loss of physical connectivity between habitats, and ecosystems and the unknown impacts on seabed features as well as undiscovered species are unaccounted for. Consequently, there is a need for planned, coherent, and consistent ecological data to inform this EIA to develop robust physical and biological baselines. The effectiveness of implemented mitigation measures with well-designed and consistent environmental monitoring is a critical next step.</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.	

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<p>11. TIMING OF IMPACT The timing of this exploratory drilling is critical for least possible impact on seasonal breeding, feeding and migrations. Best practice is to mitigate negative impacts of oil exploration on endangered marine life is to separate them in time, space, or both. There should be no leeway given in the proposed temporal window of this survey, except to reduce the schedule duration, given the degree of threat due to the survey area overlapping Humpback whale, Southern Right whale, sardine and critically endangered Leatherback and endangered Loggerhead turtle migration routes.</p> <p>10. WELL ABANDONMENT More information is required with regards to well abandonment and its mitigation. How will Eni and Sasol ensure monitoring will be carried out after production has ceased and throughout de-commissioning?</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>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. 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>	
Elise	Templehoff	Private	To which website do I go? When will the scoping report be completed?	15.02.2018	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
Hoosen	Bobat	Private	ERM A printed version of your presentation was not available at your Durban presentation. Kindly forward a copy of that draft report. Please register me interested party and send all future correspondence to me Thank you	21.02.2018	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. 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. <i>A copy of the presentation was forwarded along with the Durban meeting minutes.</i>	26.02.2018
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!	21.02.2018	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 ESIA.	This Report
	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.	22.02.2018	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

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Nicky	Koekermoer	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.	22.02.2018	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
Jennifer	Olbers	KZN Ezemvelo	<p>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 abovementioned application.</p> <p>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:</p> <p>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?</p> <p>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.</p> <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>	22.02.2018	<p>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.</p> <p>Further information will be provided in the EIA regarding impacts associated with unplanned events such as an oil spill.</p> <p>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 EMPr.</p> <p>Eni's waste management principle is to do the following; in the order of priority: reduce, reuse, recycle, recover, treat, dispose. A project specific Waste Management Plan (covering all wastes generated offshore and onshore) would be developed. Further information around wastes generated and waste management will be included in the EIA Report.</p> <p>Eni's waste management principle is to do the following; in the order of priority: reduce, reuse, recycle, recover, treat, dispose. A project specific Waste Management Plan (covering all wastes generated offshore and onshore) would be developed. Further information around waste and waste management will be included in the EIA Report.</p> <p>The potential impact associated with light pollution will be discussed in the EIA Report.</p> <p>Based on our current understanding of the potential impacts to biodiversity of normal operation, no biodiversity offsets are being considered at this time.</p>	23.02.2018

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<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>Eni will produce a detailed Oil Spill Contingency and Response Plan, which will provide information on the management of spills should they occur. This plan will need to be approved by the Department of Transport, DEA and PASA prior to drilling activities commencing. Eni have confirmed that this plan can be disclosed as required.</p> <p>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.</p> <p>Further information on the management of oil spills will be included in the EIA and EMPr.</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/SASAOL propose to engage with authorities in terms of law enforcement and compliance in terms of their activities?</p>		<p>As part of the Exploration Right agreement (as well as requirements that will be incorporated into the EIA/EMPr) Eni/Sasol will be required to audit compliance with the requirements of the EMPr. Results of the audits will be submitted to PASA.</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>Further information on the three alternative drilling vessel types can be provided in the EIA report. An explanation of the motivation for the use of a drill ship is currently provided in Chapter 4 of the Scoping Report.</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>		<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>11. Precautionary principle: 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 a 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>		<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>	
			<p>12. Timing - Ecological processes: 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>		<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>13. Language, comprehension and access: 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>	

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			<p>14. Environmental and benthic data: 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>		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>15. Proof of Insurance: 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: 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 (eg 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 (Pisces 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 8.1 Specialist Qualifications has been included in the Scoping report to provide details on the specialists.</p>	
			<p>17. Terms of Reference: A full terms of reference from ENI/SASOL to ERM is to be included in the EIA.</p>		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.	
			<p>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.</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. 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>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.</p>		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.	26.02.2018
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	<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>	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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 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 ESIA.	This Report
Jonathan	Caramanus	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 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
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	22.02.2018	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
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.	22.02.2018	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
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.	22.02.2018	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	Comment Received	Response	Response Sent
Melita	Steele	Greenpeace	<p>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.</p> <p>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.</p> <p>Any move to allow oil drilling in the area will put the biodiversity of the Kwa-Zulu Natal coastline and the tourism that relies so heavily on the area's rich marine life - at risk, while also creating the potential for oil spills off the coast of South Africa. Putting the interests of companies like Eni and Sasol first will only create the perception that the South African government does not have the best interests of South Africans at heart.</p> <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. 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>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>	22.02.2018	<p>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:</p> <ul style="list-style-type: none"> • 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. <p>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.</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 infrastructural economic 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>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>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>	This Report
Bruce	Blake	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>	23.02.2018	<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>	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Margaret	Stella	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.	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: <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
Megan	De Oliveira	Private	On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, as well as to tourism in the areas, people don't want to sit on the beach looking at this off shore. I strongly object to ALL offshore exploration and/or drilling. Please find this email as my written objection to any offshore exploration and drilling, seismic activity included.	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: <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 ESIA.	This Report
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: <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
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: <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
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: <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 ESIA.	This Report

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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: <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
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: <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
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

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Brigitte	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
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.	This Report
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.	This Report
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.	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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.	This Report
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.	This Report
Hein	van Hilten	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.	2018.02.26	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
Ione and Rob	Bowman	Private	We totally and completely object to offshore drilling. This will have devastating consequences to the marine life.	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.	This Report
Caroline	van Hilten	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.	26.02.2019	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	Comment Received	Response	Response Sent
Trish	du Preez	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.	This Report
Annie	Koulountis	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.	This Report
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.	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.	This Report
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.	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.	This Report
Imraan	Bux	Private	I am opposed to any sort of drilling on our coast. I am not convinced of your reasoning and your rational.	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.	This Report

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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.	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 ESIA.	This Report
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.	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
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	Beyl	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	I 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
Marthina	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 the ESIA.	This Report
Dexter	Biyela	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 for 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 kind request. Please note that the Specialist Studies Team has been appointed for the project already. You have been added to our stakeholders database and will be kept informed throughout the EIA process.	28.02.2018

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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.	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
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.	28.02.2018	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
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.	28.02.2018	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
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.	28.02.2018	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
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.	28.02.2018	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	Comment Received	Response	Response Sent
Vivienne	V	Private	<p>thank you for this opportunity to respond...basically any future developments regarding the exploration of coal, gas, oil etc definitely DOES NOT HAVE THE FUTURE OF THIS EARTH & US, THE PEOPLE, & OUR BEST INTERESTS in the right place!!!! we all are very aware in this 21st century the damage this has caused and we should all be saying NO!!!! the alternatives have more than proven themselves and that is what should be explored.....there is more than enough sun, wind, waves of the sea etc for sustainable living,...</p> <p>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>	28.02.2018	<p>Thank you for your email, your objection is acknowledged.</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>	28.02.2018
Marie	Roos	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>	28.02.2018	<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>	This Report
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>	01.03.2018	<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>	This Report
Kendyl	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>	01.03.2018	<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>	This report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			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.		The Terms of Reference for all specialist studies have been included in <i>Chapter 8</i> of the Scoping Report.	
			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.		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.	
			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".		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 guarantee by redundancy stability and positioning control equipment, including thrusters and GPS sensors. 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. 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.	
			5) Is there a clean-up plan in place should the blow out preventer fail?		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 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 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 (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 on management of oil spills will be provided in the EIA and EMPr.	
			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.	

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<p>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.</p> <p>Furthermore, while it is noted that it is not under the control of the applicant, CoastWatch is concerned with Petroleum Agency South Africa's ability to act as both the promoters of the oil and gas industry as well as the adjudicators in these decisions. It is felt that this should be the role of the Department of Environmental Affairs, whose mandate it is to ensure that the environment is not harmful to the health and wellbeing of the citizens of South African and to protect the environment for the benefit of present and future generations.</p>		<p>Eni would investigate the options associated with hydrocarbon production, including application for a Production Right, which would require an associated EIA process if it is determine that extraction is viable.</p> <p>Your comment regarding PASA's role is noted.</p>	
Michelle	Macdonald	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>	01.03.2018	<p>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:</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 the ESIA.</p>	This Report
Hoosen	Bobat	Private	<p>ENI/ERM I am a private citizen, born and raised in Durban. I am doing this out of love of nature and our environment. Our coastline is the proverbial 'Goose that has laid the golden egg'... destroy it and East coast SA is doomed! I attach my presentation which I meant to present at the Austerville meeting. I will go through each slide and make comments. Slide 1 Your map of the area affected shows the KZN coast with three little dots ie. Richards Bay, Durban and Port Shepstone as being the only affected area. This map trivializes the whole project as if only 3 places affected. Actually the entire eastern seaboard from Kosi mouth to around East London is affected. You do not even show the Transkei coastline which is under threat with your area off Port Shepstone. Shockingly, your map does not even show all the major rivers, wetlands, little towns and villages along the east coast. What kind of an EIA process. Very shoddy. In case you ERM, is not aware, this is one of the most biodiverse marine environments in the world. Slide 2 shows South Africa mapthis is what you should have shown first and then move on to show area by affected area, taking area by area.</p>	04.03.2018	<p>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. .</p>	This report
			<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. Did you go and present to the Tonga people of Kosi who have done sustainable subsistence fishing here for over 700 years. Did you present to the custodians of Lake Sibaya, a Ramsar site. Did you present to KZN Wildlife who the custodians of the RAMSAR sites. Have you presented to the board of the iSimangaliso Wetland park?</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 Pulfrich of Pisces Environmental Services.</p>	
			<p>Slide 4..this is Sodwana Bay within iSimangaliso Wetland Park Did you present to the local community there, who rely on the marine environment for their livelihood? This stretch has 3 of South Africa's world renowned reefs. It is the most important area for turtle nesting. Turtles are already under threat of extinction, probably in 35/50 years time. The hatchlings swim out to join the Agulhas current 10/20 kms offshore, thereafter they are carried south by the Agulhas current. YOUR drilling area is smack in their paths. Sodwana is the home of the only known living Coelacanth, a truly pre-historic creature. Your drilling area off Richards Bay is far too close to the deepwater canyons that they inhabit. Sound travels greater distances underground than in the open air or underwater.</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 Pulfrich of Pisces Environmental Services.</p>	

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			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.		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.	
			Slide 6 : ERM Please read this slide carefully. This is a Marine protected area!!!! Operation Phakisa, which you and ENI so glibly quote has in fact extended the marine protected 54 km offshore at Kosi mouth and up to 93km off St Lucia lighthouse.		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. It should be noted that sections of the original ER236 which overlapped with the existing iSimangaliso and Aliwal Shoal MPAs were relinquished during the Exploration Right renewal process in 2016 to avoid direct impacts to key areas for biodiversity.	
			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 Mntentu, Msikaba, Port ST Johns etc. ?		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. The potential impact of the project on the marine environment will be explored in the EIA.	
			Slide 8 refers to an annual pelagic event that has played out over millions of years, the Sardine run. Acknowledged the world over as the "Greatest Shoal" on earth. Already under threat by pollution and global warming.... An oil spill would be a disaster of epic proportions....for the sardines, a multitude of marine species eg whales, dolphins, seals, dozens of fish species, birdlife and humans.		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 Pulfrich of Pices Environmental Services.	
			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 kmsand 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.		ERM is obliged to comply with the timeframes stipulated in the Environmental Impact Assessment Regulations (GNR 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.	

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			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.		<p>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.</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, 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.</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 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 or 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>	
Desmond	D'Sa	SDCEA	<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 Kwa Zulu Natal. There are numerous concerns that we have risen regarding the Oil and Gas Exploration activities proposed for our coast and find many discrepancies glaring throughout all the processes thus far concerning these activities.</p> <p>Kwa Zulu Natal is a hugely popular place and tourist destination because of the cities warm subtropical climate and extensive beautiful beaches. Healthy oceans are critically important to marine life and to coastal communities whose economies rely on tourism, fishing and recreational activities. Opening up new offshore areas to drilling, risks permanent damage to our oceans and beaches without reducing our dependence on oil.</p>	05.03.2018	This comment/background is noted.	This document
			<p><u>Appointment and the Role of Independent Consultants</u></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> <p>(a) be independent</p> <p>(b) have expertise in conducting environmental impact assessments or undertaking specialist work as required, including knowledge of the Act, these Regulations and any guidelines that have relevance to the proposed activity;</p> <p>(c) ensure compliance with these Regulations;</p> <p>(d) perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the application;</p> <p>(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</p> <p>(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> <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>	

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			<p><u>The Role of Experts</u> 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>	
			<p><u>Public Participation</u> Advertising: The independent consultants must advertise the development to the I&AP through local media, mainstream print, electronic media as well as community radio in all languages specifically English, IsiZulu and Xhosa. All users and affected people must be contacted and informed. There must also be notification by way of the distribution of pamphlets throughout the affected areas, using the knock and drop method, to reach as many people as possible. [Only some mainstream media] and no knock and drop was done excluding a vast population who survive on the sea. According to Department of Environmental Affairs (2017), All potential I&APs have a right to be informed early and in an informative and proactive way regarding proposals that may affect their lives or livelihoods. Early communication can aim to build trust among participants, allow more time for public participation, and improve community analysis and increases opportunities to modify the proposal in regards to the comments and information gathered during the Public Participation Process. The level of public participation must be at a minimum be informed by – • the scale of anticipated impacts of the proposed project; • the sensitivity of the affected environment and the degree of controversy of the project; and • the characteristics of the potentially affected parties. Notification of a proposal to all I&APs may be given through a number of methods including fixing of notice boards, providing written notice, placing advertisements etc. ERM, ENI and Sasol admitted that they did not advertise the meeting of the 6th, 7th, &8th of February 2018 which was held in Richards Bay, Durban and Port Shepstone. They admitted that these meetings were not identified with and they only contacted people that were in their mailing list. In the meeting in Port Shepstone only 4 people showed up because there was no advertising at all in Port Shepstone.</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 programme 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: • 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 eThekweni Municipality libraries: Durban North; Durban Central Lending; Amanzimtoti; Warner Beach; Isipingo Beach; Umkomaas; and Tongaat Beach; o uMhlathuze 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. o An advert was published as follows: 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 o Notifications have been sent to all stakeholders on the database and the report was made available online and in the following libraries: 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>	

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			<p>Hosting of the Public Meeting: Public meetings must be hosted in venues that are suitable and accessible to the public. Transport must be provided for if people have to travel as many affected people do not have vehicles of their own. The timing of the public meeting must be held when most people are available to attend and not only suit the developer's time and availability. They must allow for sufficient time for the communities to come and gain insight of the proposed project and not rush off and close the meetings because they have another appointment as was done at the Tropicana Hotel in Durban. The presentation of the meeting must be done in layman's terms and there must be professional translation on the outset of the meeting. They left out huge gaps for the public meetings because they did not advertise in all areas especially a huge area along the Indian Ocean. According to the consultants, the reason being for the lack of advertising in all areas was due to the fact that they were overwhelmed with work. As the Indian Ocean stretches across quite a substantial number of small towns and cities there should have been more public meeting in every coastal town. There was an absence of the Sasol shareholder, and their presentations and responses were done by the consultants who could not answer to any questions put forward to the joint development. A request to the consultants of why SASOL was not present was not responded to. The groups present residents stated must be present. We also wish to know if the commercial fishing industry has been consulted as they too have a vested interest in activities that could either (a) limit their freedom of the sea or (b) impact negatively on sea harvests.</p>		<p>In response to concerns raised with regards to the meetings (and consistent with the response compiled in the SDCEA 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 in 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 meeting 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 translation, 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>Report Back Meeting: The report back meeting was held on the 28th of February at the Austerville Civic Centre in Durban. At this meeting interested and affected communities were angry as the consultants failed to address the 20 page concerns raised at a previous meetings and the manner in which the entire participation was been conducted and the undermining nature from the majority shareholder of the ER236 oil and gas exploration activities which is Sasol who we requested previously to be in attendance at the public meeting. This complete disregard was unacceptable and therefore we as the community feel that the developers and consultants want to get away with a tick box exercise rather than engaging in meaning fully participation. A formal request was previously made by the SDCEA and other groups that the government departments responsible for this project which is the Department of Mineral Resources, department of Environmental Affairs and Petroleum Agency of South Africa should have also been present to present on how permission was granted on Seismic testing to Eni and Sasol to explore the shores of Kwa Zulu Natal.</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 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 request for authority attendance was communicated to the competent authority.</p>	
			<p>Background Information Document The back-ground information document was requested at the TROPICANA hotel to be provided in English and ISIZULU however a few copies were made available in English, isiZulu. A further request that these documents including the scoping document must be given well in advance and in addition to ISIZULU, English, XHOSA must be included. It must be simple and easy for the community to understand and grasp the impact of the development. The developer must be prepared to answer questions and respond to the community. The identified impacts must come through the scoping or the background meetings that are identified and raised by the I&AP and communities. All issues raised by the affected communities must be tested and all expert opinions sought after. A review mechanism must be developed and review experts chosen and paid for by the developer.</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>The Proposed Development All the options including alternatives must be investigated and considered as this forms part of crucial information and must not be left out. All information must be fully accessible, open and transparent. This includes all documentation between Sasol and Eni, documentation between the government and the initiators of the project and documentation between ERM and Sasol.</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>	

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			<p><u>International Conventions and Treaty Commitments South Africa</u> 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>	
			<p><u>Impacts of Offshore Oil and Gas Drilling</u> Impact on the communities, people and environment: When oil spills occur they can bring catastrophic harm to marine life and devastating losses for local businesses. Even routine exploration and drilling activities bring harm to many marine species. Expanded offshore drilling poses the risk of oil spills ruining our beaches, bringing harm to those who live, work and vacation along the coasts, as well as harming habitats critical to plants and animal species. Oil spills can quickly traverse vast distances. Exploration of oil and gas presents multiple forms of environmental degradation. Oil pollution also damages fishing equipment and pollutes drinking water in wells. Oil spills and waste dumping have also seriously damaged agricultural land. Long term effects include damage to soil fertility and agricultural productivity, which in some cases can last for decades. Economically, the costs of those products become exorbitant given the law of supply and demand. The negative impact of environmental consequences of the oil industry activities are mainly localized within the host communities. However, some of the effects have trans-boundary implications. Gas flaring is a contributing factor to global warming and these are risks no community is willing to take especially South Durban and the communities all along the KZN coastline from the north to the South given the fact that this area is already a marginalized and affected group of communities that experience these kind of environmental disasters more often than a residential area should or ever at all.</p>		<p>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. 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</p> <p>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.</p>	
			<p>Impact on fisherfolk: These developments and projects will not only cause catastrophic destruction with the above-mentioned impacts but will also destroy livelihoods to over 50 000 subsistence fisher folk who eke out a living daily. When seismic tests are conducted, they clearly have an impact on marine life. The fish are either killed or forced to leave the area. There will be no fish for the subsistence fishermen, who fish areas all along the coast. This impact will increase poverty and lead to more people joining unemployment line. Thereby increasing to the millions of people who are unemployed and this development will require specific skills which the majority of the population do not possess therefore there is no job creation in these projects. In the public participation process, this group of marginalised fisherfolk must be given notice and opportunity to comment and voice their concerns.</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. 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.</p>	
			<p>Emissions to air: The oil and gas industry is a significant source of greenhouse gas emissions as well as toxic volatile organic compounds (VOCs), VOC in combination with NOx contribute to the formation of ground-level ozone and is a known causal agent of acid rain. The atmospheric pollution will have measurable impacts on the surrounding ocean but also become potentially entrapped in air masses moving towards the coastline where it will be deposited as acid rain. The drilling of wells and production process require vast amounts of energy usually provided by the burning of gas and diesel. The impact of this activity needs to be accurately assessed in terms of tons of fuel burnt and hydrocarbons released. Assuming that oil or gas is discovered then this would no doubt need to be flared off until such time as it can be capped and processed. During this time vast quantities of particulate matter and volatile organic compounds will be released into the atmosphere, indeed continuing throughout the production process. In addition the associated fugitive emissions from retrieved product is an additional source of toxic pollutants as the venting from either onsite (barge/tanker) or onshore (storage tanks and pipeline valves) must be evaluated. The carbon generated from flaring will also add to the existing problem and create added negative consequences in terms of climate change.</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 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.</p>	

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			<p>Physical Effects of Offshore Oil Rigs:</p> <p>Any floating platform will attract pelagic fish and seabirds as well as certain marine mammal species. A consequence of this for seabirds is that bird mortality has been associated with physical collisions with the rigs especially at night, as well as incineration by the flare. Birds settling on the water surrounding the rig may come in contact with oil residues and leaks leading to their death following contact with such pollutants. Fish aggregating around the drilling rig may be exposed to high levels of pollutants which are then biomagnified up the food chain ending up in apex predators such as sharks and marine mammals such as dolphins and toothed whales. It has long been suspected that drilling activity around oil rigs in the Gulf of Mexico is associated with elevated levels of mercury in 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 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.</p>	
			<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>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 (Waratah) and in some cases had their bows sheared off by the force of these waves. How then will these rigs survive significant storms events without environmental mishap?</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. 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. 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 modelling study is being undertaken as part of the EIA to understand the fate and transport of a potential oil spill.</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>		<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 utilised 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>	

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			<p>Agulhas Current:</p> <p>The Agulhas current has many unique features. There are little understood but regular upwelling events are associated with either (a) the strength/velocity of the current (b) its unexplained meanderings (c) its collision with undersea topographic features - all of which lead to the potential that constituents of the offshore water column are pushed inshore to the beaches. Consequently, in the event of an offshore rig disaster there is a distinct possibility that the southward bound current will provide a mechanism to drive the toxic consequences of the oil and gas industry into our nearshore waters and indeed even onto our beaches. This is an invariable fact of the Agulhas Current that sweeps along our coast with regular gyres (reverse currents) spinning off inshore meaning toxic by-products can be expected to be deposited along our sensitive shoreline including Marine protected Areas, sensitive breeding colonies (penguins/seals) and primary fish recruitment areas (Agulhas banks). No area of our Eastern coastline would be spared.</p>		<p>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 meteorocena data, including Agulhas current, are included in the models.</p>	
			<p>Impacts of Drilling:</p> <p>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 inject 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.</p> <p>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.</p> <p>The prospect of a catastrophic spills and blowouts is a documented threat from offshore drilling operations and the near impossibility of introducing a successful capping of the blowout at the depths cited are of deep concern to us. We require significant detail to be presented on this aspect given the learnings of Deep Water Horizon disaster.</p>		<p>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.</p>	
			<p>The iSimangaliso Wetland Park</p> <p>The iSimangaliso Wetland Park is South Africa's very first World Heritage site since 1999 (Unesco), it is also the third largest protected area in South Africa. Nelson Mandela stated that "iSimangaliso must be the only place on the globe where the oldest land mammal (the rhinoceros) and the world's biggest terrestrial mammal (the elephant) share an ecosystem with the world's oldest fish (the coelacanth) and the world's biggest marine mammal (the whale)".</p> <p>The consultants are prone to making wild and unsubstantiated and absolutely unverifiable claims. Consider the following: <i>"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"</i>.</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 there all the way from Sodwana bay in Northern Zululand. Almost no exploration has taken place in the deep canyons and offshore waters of KZN largely on account of access as there simply are no deep water submersibles available with which to do so, nor is there any funding. The discovery of the coelacanth off northern KZN was purely due to the inshore proximity of the canyon that allowed scuba divers the opportunity of witnessing them. By no stretch of the imagination can it be concluded that they therefore do not occur elsewhere in deep waters off our continental shelf. This statement is therefore entirely false and unprovable and one can only wonder why such bias would present itself in such a report when the coelacanth is considered to be "the most endangered order of animals in the world"1 One shudders to think what the impact on the coelacanth population has been due to the intensive seismic testing that has taken place in these areas during the</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: Wiles, E., Green, A., Watkeys, M., Jokat, W. & Krockner, 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. Marine and Petroleum Geology 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 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 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>	

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			<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><u>The Marine Ecosystem</u></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>Seismic Survey Impacts:</p> <p>Seismic testing is still taking place and proved to be very negative toward marine life. The Oceana website reports that blasts from seismic air-guns, towed behind ships, are repeated every ten seconds, 24 hours a day, for days and weeks at a time. Sound travels more easily under water than through the air and the noise from a single seismic survey can travel tens of thousands of square kilometres. An article in the Canadian Journal of Zoology reports that seismic surveys increase noise levels to twice the normal level, and impact marine life. Such surveys disturb the communication, navigation and eating habits essential to the survival of marine wildlife. These sonic waves can also damage fish with air bladders, destroy marine wildlife eggs and larvae, and cause fish and other marine species to temporarily migrate away from the affected area. The effect of these blasts of sound on marine life is disturbing and can have catastrophic results: Seals have been found to display dramatic avoidance behaviour, a slower heart rate, ceasing feeding and hauling out of the ocean. Turtles have shown reduced hearing sensitivity at a distance of 1km from the blasts. There has been damage to fish ears at distances of 500m to several kilometres, a reduction of 40 – 80% of catch rates in the North Atlantic and increased embryonic mortality. Zooplankton, which are essential for the health and productivity of global marine ecosystems have suffered significant mortality and the impact has been observed at a range of 1,2km from the blasting sites. Impacts include temporary and permanent hearing loss, abandonment of habitat, disruption of mating and feeding, and even beach strandings and death. For whales and dolphins, which rely on their hearing to find food, communicate, and reproduce, being able to hear is a life or death matter. Whales simply stop "talking" to each other.</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>Impacts of Oil and Gas Drilling on Marine life:</p> <p>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.</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>	

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			<p><u>Alleged Commercial Advantage:</u> 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.</p> <p>SASOL currently sources' gas from Mozambique but does not pass this "saving" onto us as consumers. Rather their cost of production falls but prices are set by virtue of the ubiquitous pricing mechanism that has been in place since the apartheid era, one that prices the domestic prices of fuels by reference to (a) international crude oil prices, (b) international supply and demand balances for petroleum products and (c) the Rand/US Dollar exchange rate.2 This means that there is absolutely no requirement for any producer of petroleum products to pass any such savings from home grown sources onto the consumer. Rather, given the fact that there is considerable secrecy regarding operating refiner input costs, there exists abundant opportunities to make windfall profits by processing locally extracted gas and oil whilst having a Government set international benchmark for refined product. The idea that the oil and gas industry would somehow pass these benefits on to the consumer is repugnant. Secondly, it is not clear what "increase in government revenues" they refer to? Again, there is enormous secrecy regarding any refiners input cost in terms of crude oil processing costs and how these are disclosed. It is however clear that the Government derives an enormous benefit from the fuel levy and pipeline transfer fees but these refers to the finished product and not the raw input. We therefore demand further clarity and exposition on these loosely cobbled statements as to economic benefit to South Africa besides that relating to reduced need for foreign exchange.</p>		<p>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.</p>	
			<p>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.</p>		<p>This comment is noted.</p>	
			<p>Alternatives: No alternatives were investigated such as investments in renewable energy which desperately require.</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 infrastructural economic 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>	

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			There is no social enhancement study presented in any of the documents we have come across so far and this is a crucial part of this type of activity and leaving it out simply gives us the clear indication that this is not taken seriously or properly considered. The social enhancement study must research into the jobs created by small businesses, fishing boats , tourism industry and all who use the Indian Ocean for major sporting and recreation events.		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>Demands</p> <p>We as representatives of the community demand that...</p> <ol style="list-style-type: none"> 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 upfront 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 fisherman 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. 		<ol style="list-style-type: none"> 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 additional 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 locals 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_IT/sustainability.page 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 publically 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. 	
			<ol style="list-style-type: none"> 14. The terms of reference of the consultant and any experts that has been appointed. 15. Proper risk assessments be done by appointed experts 16. All specific targets must be provided including drilling, testing and chemical information 17. They investigate what kind of noise, the noise volume and noise impacts due to the development 18. They investigate the canyons, estuaries, wetlands and nurseries which serve as breeding grounds for South Africa's rich biodiversity. 19. The independent study that Sasol has conducted must be provided for. 20. Surveys must be done over a longer period of time 21. That they consider the no go option as an alternative <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>		<ol style="list-style-type: none"> 14. ERM has been appointed to undertake an EIA for exploration drilling in terms of NEMA. The Terms of Reference for the specialist studies are provided in Chapter 8 of the Scoping Report. 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. 16. Detailed project description information is provided in Chapter 4 of the Scoping Report. Additional information will be included in the Project Description in the EIA. 17. An assessment of the noise associated with exploration drilling will be undertaken in the EIA. 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. 19. It is unclear what independent Sasol study is being referred to here. 20. No marine baseline surveys have been conducted for this project, baseline information presented has been gathered through a desktop study. 21. The no-go option will be considered as an alternative. 	

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			<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 spilt? The Gulf of Mexico oil spill can be made an example of how important it is to have a disaster emergency plan and of how offshore oil and gas drilling causes detrimental effects to the ecosystem. We are under the impression that all tiers of Government are promoting the idea of allowing these activities to go ahead without proper and meaningful consultation with the public communities. This type of reaction from Government is contradictory because whilst they are promoting tourism with the main focus on the Sardine shoals, whales and dolphin sighting points, beautiful marine nurseries, various bird life and small B&Bs which thrive on our beautiful beaches and ocean, they are destroying or allowing the destruction of this beautiful ocean we have. It seems that the offshore oil and gas project will only benefit the elite and rich people of society whereby once again the poor gets dealt a raw deal.</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>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 infrastructural economic 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>	
Phumla	Ngesi	Petroleum Agency South Africa (PASA)	<p>Timelines associated with drilling of a first well are clear. Considering the applicant proposes to drill up to 6 wells, how long would it take for the applicant to drill subsequent wells? Clarity is necessary to avoid possible assumptions that all wells will be drilled at the same time or immediately after the completion of a first well.</p> <p>Shore Base infrastructure: The assessment should not be limited to offshore drilling activities but should include activities associated with the proposed drilling operations. For instance the draft scoping report indicates that the shorebase will have storage facilities, a possible mud plant and bunkering services – however no identification and assessment of potential impacts associated with the shore base activities have been undertaken. Thresholds of the storage facilities should also be indicated.</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> <p>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.</p> <p>The Scoping Report only makes reference to municipalities in Richard's Bay (King Cetshwayo and City of Umhlatuze) and Durban (EThekweni Metro) and no reference is made to Ugu District Municipality. The socio-economic issues associated with Ugu and other affected municipalities (if any omitted) must be assessed.</p> <p>Finalisation of Scoping Report for submission to the Petroleum Agency SA instead of DEA.</p> <p>Newspaper coverage: concerned that there could be limited coverage in Port Shepstone. The EAP needs to consider local newspapers such as South Coast Herald. Erection of site notices: The erection of site notices were only limited to eThekweni Municipality, and Umhlatuze Local Municipality. Distribution of site notices should be extended to the South Coast part of the application e.g. Port Shepstone area.</p> <p>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.</p>	07.03.2018	<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> <p>Measures for the handling and transport of NADF's 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.</p> <p>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 Umhlatuze) and Durban (EThekweni 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.</p> <p>Error corrected.</p> <p>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.</p> <p>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.</p>	This report

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			<p>Are there any anticipated suspension activities? If so, the assessment shall make provision for the suspension of the well – in this regard the potential impacts associated with this must be assessed and appropriate mitigation measures provided.</p>		<p>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.</p> <p>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.</p> <p>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. 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 ROV shall be established.</p>	
			<p>Issues raised above concerning consultation must be catered for in the Plan of Study for EIA.</p>		<p>The Plan of Study included in Chapter 8 of the Scoping Report has been updated to include additional consultation activities.</p>	
			<p>The EIA Regulations require the assessment of impacts and risks identified to include the nature, significance and consequence of the risk; extent and duration; the probability of occurrence; <u>the degree to which the impact and risk can be reversed; the degree to which the impact and risk may cause irreplaceable loss of resources;</u> and the degree to which the impact and risk can be mitigated. The methodology prescribed in the plan of study does not make provision for the highlighted issues and must therefore be considered.</p>		<p>The EIA methodology in Chapter 8 of the Scoping Report has been updated to include the highlighted items.</p>	
			<p>Regulations for Financial Provisioning, 2015 requires the applicant to determine financial provision to undertake rehabilitation and remediation of the adverse environmental impacts of exploration operates through a detailed itemisation of all rehabilitation activities and costs, calculated based on the actual costs of implementation. The said determination must be carried out by a specialist(s). It is hence expected that the applicant appoints a specialist to determine financial provision for decommissioning and rehabilitation.</p>		<p>Additional text has been included on page 13 of the Scoping Report as follows:</p> <p><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 BOP will be then retrieved at surface and the drillship and support vessels will depart the area .</i></p> <p><i>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></p>	

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Pre-application Phase						
Janet	Solomon	Vanishing Present Productions	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	Frackfreesa	Please would you notify all the IAP'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&AP 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 Please let me know if this addresses your query to your satisfaction.	18.09.2017
Judy	Bell	Frackfreesa	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 airtime will not be able to open such a big attachment. It is not conducive to effective participation, which is a principle of NEMA.	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. Should you wish to receive a hard copy of the BID, please do let us know and we would be happy to send you one. Please do let us know should you have any additional queries.	18.09.2017
Jennifer	Oibers	Wildlife and Environment Society of South Africa (WESSA) KZN	Please may I register as an interested and affected party?	15.09.2017	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
Andre	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.	
Sandy	Camminga	Richards Bay Clean Air Association (RBCAA)	The email below which was forwarded to me by a colleague has reference. Kindly register the Richards Bay Clean Air Association (RBCAA) 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&AP.	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&AP		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. As discussed you are welcome to pass this email on to your contacts, and they can responded directly to us if they wish to register as an I&AP. Please do not hesitate to contact me if you have any further questions.	18.09.2017
Percy	Langa	Richards Bay Industrial Development Zone	Please register the RBIDZ as an I&AP.	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
Shanice	Gomes	South Durban Community Environmental Alliance (SDCEA)	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
Madimetja	Lephoto	Alectrona Consulting (Pty)Ltd	No Objection to the Project	18.09.2017		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	Viviers		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
Sabine	Wintner	Kwazulu-Natal Sharks Board	Please register me as an I&AP for the Oil Exploration Drilling within Offshore Block ER236, South Africa.	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
Duminsani	Myeni		Duminsanie 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	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

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Suvana	Alakram	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.	20.09.2017	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
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	20.09.2017	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
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.	
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.	21.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	
Debbie	Smith	Stokkiesdraai	Please find attached my registration form. It would appreciate , to be kept informed about your drilling venture on the East Coast.	23.09.2017	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
Alex and Ann	Paretas-Brosens	Kwalucia Enterprises (Pty)Ltd	Register as AP	23.09.2017	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
Adel	Scheidle	Avalone Guesthouse	Drilling not beneficial for marine which directly influences hospitality industry in St.Lucia, I am against the proposed drilling	24.09.2017	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.	26.09.2017
	Scheidle	Avalone Guesthouse	Against drilling. Beautiful coastline needs to be preserved for future generations	24.09.2017	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.	26.09.2017
Elsa	Karam		Property Owner, I Mrs H E Karam want to register as an interested And affected party against exploration of east coast of SA	24.09.2017	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
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.	25.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process. We acknowledge the receipt of the article which speaks to your concerns.	
Barend	Vorster	Fishermans Restaurant & Wave Dancer Charters	Register as IAP	25.09.2017	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
Caroline	Fox	Ezemvelo KZN Wildlife	Please see attached my registration form to register as an I&AP for the proposed offshore drilling.	25.09.2017	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
Simphiwe	Mbonambi	Mbanambi Traditional Authority	Please could you register me as an IAP	26.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	27.09.2017
Norma	Patrick	POD and Icebwatch SA	Please could you register me as an IAP	26.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	27.09.2017
Eghard	Greyling	J.S Greyling Trust	Please could you register me as an IAP	26.09.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	27.09.2017
Siboniso	Mbense	iSimangaliso Wetland Park Authority	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. As the authority mandated to protect and develop the iSimangaliso Wetland Park, a proclaimed World Heritage Site[1], the iSimangaliso is required by law[2] to ensure that development and activities happening within and adjacent to the Park do not negatively affect the Park's World Heritage values.	26.09.2017	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.	27.09.2017
Deon	Steyn	Elephant Lake Group	Register as IAP	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.	27.09.2017
Norma	Hall		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.	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.	28.09.2017

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Jon	Marshall	Coastwatch KZN	Please include following email address when responding chris.wrightza@gmail.com; kendyllr@gmail.com; karini@gcs-sa.biz	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.	28.09.2017
Bonisile	Mthembu	Department of Education	Please could you register me as an IAP	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.	02.10.2017
Donald	Pittindrigh	Indus Automation & Systems Intergration	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.	05.10.2017
McDonald	Mutsvangwa		Registration as an I&AP for Richards bay exploration project	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.	06.10.2017
John	Cawood		I would like to register as an interested and affected party please	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.	06.10.2017
Sharin	Govender	Department:City Development	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. We will send soft copy reports to your office as they become available.	09.10.2017
Tamlyn	Jolly	Zululand Observer	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.	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 as affected 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.	03.10.2017
Niall	Kramer	SAOGA	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.	09.10.2017
Desmond	D'Sa	South Durban Community Environmental Alliance (SDCEA)	Please see our attached letter of our concerns and advice on your company's background document to explore for oil and gas off our coastline. (Concern letter attached) please include the following email address in reponse chadley@sdceango.co.za; samuel@groundwok.org.za; roc@tiscali.co.za, bobby@groundwork.org.za; adrian@adrianpole.co.za	09.10.2017	Noted and additional email addresses have been included in the stakeholder database.	Initial acknowledgement - 10.10.2017
			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.		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 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 present's very serious hazards particularly as the offshore location is in known track of departing cyclonic systems originating in the Mozambique Channel. The distance offshore and the extreme depth poses technical considerations for our country. At this point 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?		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.	

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			<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 offsite 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 enquire 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>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>It is noted that the drill site is a significant distance offshore which by implication makes timeous 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>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>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 it 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. In addition to helicopters, a stand-by vessel will be always be in the vicinity of the drillship. 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 activities 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 neighboring 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>	
			<p>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 a 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.</p>		<p>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.</p>	
			<p>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.</p>		<p>This is noted. Please see our responses regarding the public consultation process below.</p>	

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			<p>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.</p>		<p>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:</p> <p>The project was advertised in four newspapers; The Mercury and Isolezwe (in Zulu) with distribution around Durban, and The Zululand Observer and Ilanga 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.</p>	
			<p>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, BnB'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.</p>		<p>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 KZN 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.</p> <p>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.</p> <p>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.</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 (eg 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 (Pisces and CapMarine).</p> <p>A peer review of the oil spill modelling study will be undertaken by PRDW, an independent specialist.</p>	
			<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 timeous 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 fishermen'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>	

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			<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 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. 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>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 Pulfrich of Pices Environmental Services.</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> <p>This concern is noted. As per the above responses 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.</p>	
Imke	Summers		Please may you register me as an IAP on the EIA for Exploration Drilling within Block ER236, Offshore of the East Coast, South Africa	10.10.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	11.10.2017
Samuel	Chademana	Groundwork	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	11.10.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	11.10.2017
Jacquette	Adamson	Exigent Environmental	Register as I&AP	11.10.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	13.10.2017
Dee	Fischer	Department of Environmental Affairs	Register as a stakeholder for the EIA for offshore exploration.	19.10.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	19.10.2017
2017 Scoping Phase						
Khalid	Mather	KZN Environmental Network	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 spillages and oil-slick sand are a common site across Richards Bay beaches, heavily impeding 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 shape-file data from SANBI.	30.10.2017	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.	This Report
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>Please advise whether the EIA approval process gives ERM sufficient time to properly assess:</p> <ol style="list-style-type: none"> 1. the risk of oil/gas blows arising from offshore drilling operations 	06.11.2017	<p>ERM has received a number of comments from stakeholders. All comments received in relation to the EIA for Exploration Drilling within Block ER2356 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.</p> <p>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>	This Report

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			<p>2. significant environmental impacts that the offshore drilling will cause, including:</p> <p>2.1 SEA FLOOR DEGRADATION</p> <p>2.2 SEDIMENT POLLUTION: generation of vast plumes of sediment arising from the "disposal of cuttings to the seafloor 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 a discussion, and what, if any legal enforcement measures would be in place to prevent unnecessarily destructive environmental practices by the drilling operators.</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>2.3 EFFLUENT POLLUTION: High levels of pollution arising from wastewater and operational discharges from the drillship/s 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 73/78 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>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>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>		<p>The noise impact associated with drilling activities will be assessed by the ERM team with input from specialists as needed.</p>	
			<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 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, Aliwal Shoal and iSimangaliso 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 iSimangaliso 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 iSimangaliso and Aliwal Shoal MPA's were relinquished during the Exploration Right renewal process in 2016.</p>	

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			<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 scientist/s 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 ERM, 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: <i>Wiles, E., Green, A., Watkeys, M., Jokat, W. & Krockner, 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. Marine and Petroleum Geology 44: 60-70.</i> studied the morphology of the canyon and Andrea Pulfrich (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 Pulfrich of Pisces Environmental Services.</p>	
			<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 EMPr 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 Geco) under a specific Reconnaissance Permit granted by PASA, over a portion of the Durban basin which also include the central part of block ER236. 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>	

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<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 Olbers, 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 Olbers raises in a presentation reviewing global literature on the effects of seismic surveys. This research, says Olbers, 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/entangled 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>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>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>	
					A well blow-out is an unplanned event, the risk and impact of which will be assessed further in the EIA.	
					The need and desirability of the project are discussed in Chapter 3 of the Draft Scoping Report, January 2018.	
Sharin	Govender	City of uMhlatuze	My previous correspondence with regards to this process refers. Please ensure that all communication is sent to me as well.	09.11.2017	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.	09.11.2017
Fiona	McCarthy	Starlite Aviation Opera	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.	11.11.2017	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 release so that you are preparing with the latest information.	14.11.2017
Matthew	Hemming	Private	Please register me as an I&AP. I am a resident of KZN.	10.11.2017	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	10.11.2017
Jennifer	Olbers	Ezemvelo KZN Wildlife, Scientific Services	Please note that my details have been captured incorrectly in Annexb1 and Annexb4. Please see signature below and update your records/documentation.	30.10.2017	Thank you for letting us know, please accept our apology. We have corrected your details in the stakeholder database.	This Report
Frans	Van der Walt	QS2000	Why am I not receiving these notifications ? I thought I had confirmation that I am registered as I&AP ? (I received this from Sandy Camminga – similarly to the original notice of the meeting !)	09.11.2017	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.	09.11.2017
Samuel	Chademana	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	Hofland	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@hofland.co.uk People register me as an interested party and keep me fully informed	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	Intertek Industry Services	Please, register Intertek 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

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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	Ganter	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 Bro's 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	I 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 uMhlathuze	The City of uMhlathuze 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. The strategic nature of the project in terms of Government's Phakisa Programme within the Ocean Economy warrants alignment with strategic planning initiatives driven at a regional and local scale. To this end, the Municipality requests a meeting with project proponents to understand the initiative at a macro scale. 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; or email: Sharin.Govender@umhlathuze.gov.za.	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 uMhlathuze if possible and desired. Noted, Sharin Govender has been included on the Stakeholder Database.	This Report
2018 Scoping Phase						
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 Seve	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
Shaun	Roseveare	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 Heliport 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.

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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	<p>Hi Lindsey</p> <p>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 looming drought disaster sufficiently highlights the limits to growth? Please record the following in the comments register and address the issues raised:</p> <ul style="list-style-type: none"> • 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 gungh ho to bliksem without a thought of the consequences to ecosystem functioning? • 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 • What say there is a spill while drilling or afterwards, when everyone has upped anchors and headed for shore? • How long will the wells remain a risk to the environment? Who and how will they be monitored 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? 	24.01.2018	<p>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 recommenced 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.</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 Scoping Report, 2018. The potential impacts associated with drilling activities will be assessed in the EIA Phase.</p> <p>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).</p> <p>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.</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, 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.</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>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>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.</p> <p>Further information on the financial provision for closure and potential environmental damage will be provided in the EIA.</p>	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<p>• What about the marine protected areas? How will they (including the strategic Thukela Banks) be protected from:</p> <ul style="list-style-type: none"> o The impacts of seismic testing – what is considered a “sufficient” acoustic buffer zone? o The impacts of spills? 		<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 Aliwal Shoal MPAs were relinquished during the Exploration Right renewal process in 2016 to avoid direct impacts to key areas for biodiversity.</p> <p>The potential impact on marine mammals will be assessed through a Marine Faunal Specialist Study and reported on in the EIA Report.</p> <p>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.</p> <p>The potential impacts associated with a spill will be explored further in the EIA through an Oil Spill Modelling Study.</p>	
			<p>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/p/insist-the-dea-challenges-seismic-surveying-of-our-coastline/u/21072886</p> <p>Please make sure that this petition is acknowledged and the precautionary principle applied accordingly.</p>		<p>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.</p> <p>ERM apply the precautionary principle when undertaken an impact assessment.</p>	
Njabulo	Gumede	Trio Trading Services	<p>I hope this find you well and happy new year. My name is Njabulo Gumede, I'm the Managing Director of a small company (Ompisholo 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.</p>	26.01.2018	<p>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.</p>	05.03.2018
Frans	Van Der Walt	QS2000	<p>Thank you very much.</p> <p>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.</p>	22.01.2018	<p>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.</p>	05.03.2018
Nerissa	Pillay	Ezemvelo Wildlife	<p>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:</p> <p>Addressee: Mr Andy Blackmore – Head IEM and Protected Area Planning Postal: P O Box 13053 Courier: Queen Elizabeth Park Cascades Cascades 3202 1 Peter Brown Drive Montrose 3201</p> <p>Fax: 033 - 845 1499 (5pg max.). Maps should not be faxed unless they are produced in black & white and have an appropriate key.</p>	24.01.2018	<p>It looks like the Eni report was addressed to Jennifer Olbers. Please let me know if we should send another version addressed to Andy Blackmore. Thanks.</p> <p><i>**Jennifer Olbers confirmed receipt of the Scoping Report and provided comments to ERM which have been included in the Report.</i></p>	24.01.2018
David	Watermayer	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 ALL offshore exploration and/or drilling for oil.</p>	05.02.2018	<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>	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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	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
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	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
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!!!!!!!!!!!!!!!!!!!!!!	05.02.2018	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
Kwanele	Langa	Private	Registers as IAP	05.02.2018	Thank you for your email. You have been added to the stakeholder database and will be kept informed throughout the EIA process.	06.02.2018
Fiona	Petersen	Private	I strongly object to you ruining our coast and harming sea life	05.02.2018	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
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.	05.02.2018	Thank you for your interest in the Project. During the Scoping Phase of the EIA process, public participation activities have been focused around Durban and Richards Bay as this is where the potential impacts may be felt, and where many of our stakeholders are based. While Block ER236 extends along a large portion of the KZN coastline, the onshore logistics base will be located in either Richards Bay or Durban. Should it be determined that the public participation programme needs to be expanded, based on the outcomes of the impact assessment, this will be considered by the EIA team.	06.02.2018
P	Govender	Private	Durban meeting keep me posted	06.02.2018	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	06.02.2018

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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.	06.02.2018	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
Jennifer	Olbers	Wildlife and Environment Society of South Africa (WESSA) KZN	Please find acknowledgement of receipt attached.	07.02.2018	The acknowledgement has been received, thank you very much.	22.02.2018
Rosemarie	Bindon	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.	07.02.2018	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	Beyl	Private	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.	08.02.2018	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 for 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. 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=c0bHP3yYVuk . Also attached is a copy of the draft Scoping Report (which is available on the project website: www.erm.com/eni-exploration-eia).	

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Mark	Beyl	Private	<p>1. We refer to the above matter, and more specifically to our telephonic conversation earlier today.</p> <p>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.</p> <p>BRIEF BACKGROUND OF SADSAA & RBSBC</p> <p>3. Our organization, the SOUTH AFRICAN DEEP ANGLING SEA ORGANISATION ("SADSAA") is the national governing body of all recreational deep sea anglers in South Africa, is made up of all the geographical provinces, and in the provinces in turn is made up of various clubs, which has approximately 8000 members countrywide. Amongst our members are highly regarded marine scientists and biologists, which assist us with credible scientific data. Writer is the national environmental officer of SADSAA, and a member of the RBSBC.</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 organization's such as IGFA, the Billfish Foundation and International Light Tackle Association, and is also recognized by SASCOO.</p> <p>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 60 km from the Richards Bay Port, which will probably be used as a basis for the drilling vessels.</p> <p>INTERESTED AND AFFECTED 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>	08.11.2017	<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 as 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>I will forward your letter on to Eni today so that they can review and understand the concerns of the SADSAA & RBSBC. I suggest as a first step, let's see if Eni can provide more clarity around the drilling schedule. From there we can see if a meeting between yourself, ERM and Eni is required. Please let me know if you have any further questions at this stage.</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 Gelmetti the MD for Eni South Africa and he has confirmed that the earliest the drilling is expected to start is late 2019 (November – December). I hope that this comes as good news to you.</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>	08.02.2018
			<p>9. Naturally both SADSAA & the RBSBC will forward more detailed comments after the public participation meetings early next year, but in the main our current concerns are briefly set out hereinafter.</p> <p>10. SADSAA & the RBSBC is hosting an international Game & Bill Fish Tournament in February 2019, and your client's intended drilling is scheduled for late 2018 and early 2019.</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 these 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 Marlin, Tuna and game fishing. We are concerned the intended drilling causes the migratory fish to avoid the area of interest, which could result in little or no fish being caught, and notwithstanding a well-run tournament hosted by SADSAA and the RBSBC, 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>	26.02.2018
Brenda	Grant	Dargle Conservancy	Please register the Dargle Conservancy as an interested and affected party in the above matter	09.02.2018	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.	22.02.2018

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Briege	Williams	SAHRA	<p>The South African Heritage Resources Agency would like to thank you for submitting the "Draft Scoping Report for Exploration Drilling within Offshore Block ER236, KZN, South Africa". With regard to the Draft Scoping Report it is noted that it contains no mention of maritime and underwater cultural heritage such as shipwrecks. In terms of the National Heritage Resources Act, No 25 of 1999 (NHRA), heritage resources, including any wreck being a vessel or aircraft or any part thereof older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority.</p> <p>The East coast of South Africa has historically been a very busy shipping channel and whilst there has been no shipwrecks positively identified directly in the exploration area there are three reports of ships being lost in the study area. Two of the reported wrecking's are those of the Nova Scotia (1942) and the Aelybryn (1943) which were both lost during the 2nd World War. Both vessels were torpedoed by German U-Boats with a great loss of life, especially the Nova Scotia who was transporting Italian internees when she was hit, resulting in the loss of 858 people. The Nova Scotia is known to have gone down in the northern part of the exploration area whilst the Aelybryn may lie to the east of the area, both would be considered war graves. Another well known vessel thought to have been wrecked in the area is that of the Waratah which went missing in July 1909, enroute from Durban to Cape Town, she disappeared with 211 passengers and crew aboard and no trace of her has ever been found.</p> <p>As the proposed exploration drilling is undergoing an Environmental Authorisation (EA) Application process and National Environmental Management Act, No 107 of 1998 (NEMA), it is incumbent on the developer to ensure that a Heritage Impact Assessment (HIA) is done as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). This must include a maritime archaeology component and any other applicable heritage components. The HIA must be conducted as part of the EA Application in terms of NEMA and the 2017 NEMA EIA Regulations.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p>	13.02.2018	<p>Thank you for your comment. ERM 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. 	This Report
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.	14.02.2018	<p>Thank you for your comment.</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. Further information on the management of oil spills will be included in the EIA and EMP Report.</p>	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	14.02.2018	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?	15.02.2018	<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>	15.02.2018
Naureen	Craig	Private	What about the whales? In your quest for wealth have you considered other creatures, including people????	19.02.2018	<p>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:</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 the ESIA.</p>	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Janet	Solomon	Vanishing Present Productions	<p>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:</p> <p>1. INCIDENT MANAGEMENT</p> <p>Transparency is needed with regards to Oil Spill Response, Planning and Capacity necessary for public health and welfare and the marine and coastal environment. An annex to the EIA should include the blowout management protocol for Eni South Africa BV (Eni), and Sasol Africa Limited (Sasol) for this project. Included in this annex should be highlighted any deficit of technological expertise or resources or difficulty of effective co-ordination with all government or conservation agencies that have a statutory responsibility for some aspect of offshore oil and gas activities regarding incident management. The delegated National Incident Commander, along with the intended lines of responsibility for interagency efforts, should be made public information in this annex. The public needs assurance that incident management is fully informed, and has capacity to deal with, the latest technology, practices and risks associated with, and due to, the different geological and ocean environments being explored, prior to commencement of drilling.</p>	20.02.2018	<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, 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.</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 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 or 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 regarding oil spill response will be included in the EIA and EMPr.</p>	20.02.2018
			<p>2. LIABILITIES AND FINANCIAL RESPONSIBILITY FOR OIL SPILL REMEDIATION</p> <p>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.</p>		<p>Further information on the financial provision for closure and potential environmental damage will be provided in the EIA.</p>	
			<p>3. CLIMATE CHANGE</p> <p>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>		<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 explorative phase will be confirmed and a decision will be taken to move to the development phase, including production of the discovered natural resources, a further EIA will be required.</p>	
			<p>4. OPERATIONAL WASTE</p> <p>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>		<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> <p>Eni's waste management principle is to do the following; in the order of priority: reduce, reuse, recycle, recover, treat, dispose. A project specific Waste Management Plan (covering all wastes generated offshore and onshore) would be developed in accordance with MARPOL requirements, South African regulations and Eni's waste management guidelines. All vessels would have equipment, systems and protocols in place for prevention of pollution by oil, sewage and garbage in accordance with MARPOL 73/78.</p> <p>Further inform around waste and waste management will be included in the EIA Report and EMPr.</p>	

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<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 (Hohn et al. 2006). The mitigation of Vertical Seismic Profiling cannot simply be an issue of 'short duration'. These airguns are capable of inducing significant acoustic trauma. The use of airguns producing high decibels and amplitudes of sound in a marine environment requires mitigation. Please fully address the adverse effects of subsurface man-made noise and vibration during these operations. Noise emissions from drilling operations often produce noise that includes strong tonal components at low frequencies, including infra-sonic frequencies in some cases, thereby leading to potential disturbance, damage or interference to a variety of marine species. Please assess the full scale of this acoustic footprint including impacts caused by vibration through drill string and casing, vibration into the seabed and vibration of the drill bit.</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 emissions quantity and concentration must be agreed upon. An annual and public report of flaring volumes by Eni and Sasol would be required. Flaring negates commitments made by South Africa under the United Nations Framework Convention on Climate Change (UNFCCC), Kyoto Protocol and the Paris Agreement.</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.	
			<p>8. PHYSICAL DAMAGE TO THE SEA FLOOR AND IMPORTANT HABITATS The disruption that drilling causes to the seafloor habitat and the benthic community was not adequately dealt with in the Scoping Report. Impacts of drilling on the seabed are not necessarily localised or short-term and must be assessed further. Cognisance must be taken of the hazards of drill cuttings disposal onto the seabed because they are often contaminated with drilling lubricants, synthetic-based drilling fluids (SBFs) and other non-aqueous drilling fluids (NAFs). The EIA must include mitigation against sediments contaminated with petroleum products, heavy metals and salts, which do not biodegrade and can accumulate in high concentrations affecting reproduction of marine life, and biomagnify toxic substances in the food chain.</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>9. INVASIVE SPECIES Ships, drilling equipment and rigs are used and relocated all around the world. Negative impacts on native biodiversity from invasive species colonising drilling infrastructure should be mitigated.</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>10. BASELINE STUDIES NEEDED The occurrence of deep-water corals in Block ER 236 and the areas of interest are unknown. Therefore potential gains and/or losses at the inter- and intra-species levels; changes in species abundances; loss of habitat; loss of physical connectivity between habitats, and ecosystems and the unknown impacts on seabed features as well as undiscovered species are unaccounted for. Consequently, there is a need for planned, coherent, and consistent ecological data to inform this EIA to develop robust physical and biological baselines. The effectiveness of implemented mitigation measures with well-designed and consistent environmental monitoring is a critical next step.</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.	

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<p>11. TIMING OF IMPACT The timing of this exploratory drilling is critical for least possible impact on seasonal breeding, feeding and migrations. Best practice is to mitigate negative impacts of oil exploration on endangered marine life is to separate them in time, space, or both. There should be no leeway given in the proposed temporal window of this survey, except to reduce the schedule duration, given the degree of threat due to the survey area overlapping Humpback whale, Southern Right whale, sardine and critically endangered Leatherback and endangered Loggerhead turtle migration routes.</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>10. WELL ABANDONMENT More information is required with regards to well abandonment and its mitigation. How will Eni and Sasol ensure monitoring will be carried out after production has ceased and throughout de-commissioning?</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. 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. 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>	
Elise	Templehoff	Private	To which website do I go? When will the scoping report be completed?	15.02.2018	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
Hoosen	Bobat	Private	ERM A printed version of your presentation was not available at your Durban presentation. Kindly forward a copy of that draft report. Please register me interested party and send all future correspondence to me Thank you	21.02.2018	<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. 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> <p><i>A copy of the presentation was forwarded along with the Durban meeting minutes.</i></p>	26.02.2018
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!	21.02.2018	<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 the ESIA.</p>	This Report
	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.	22.02.2018	<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>	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Nicky	Koekermoer	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.	22.02.2018	<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>	This Report
Jennifer	Olbiers	KZN Ezemvelo	<p>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 abovementioned application.</p> <p>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:</p> <p>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?</p> <p>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.</p> <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>	22.02.2018	<p>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.</p> <p>Further information will be provided in the EIA regarding impacts associated with unplanned events such as an oil spill.</p> <p>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 EMPr.</p> <p>Eni's waste management principle is to do the following; in the order of priority: reduce, reuse, recycle, recover, treat, dispose. A project specific Waste Management Plan (covering all wastes generated offshore and onshore) would be developed. Further information around wastes generated and waste management will be included in the EIA Report.</p> <p>Eni's waste management principle is to do the following; in the order of priority: reduce, reuse, recycle, recover, treat, dispose. A project specific Waste Management Plan (covering all wastes generated offshore and onshore) would be developed. Further information around waste and waste management will be included in the EIA Report.</p> <p>The potential impact associated with light pollution will be discussed in the EIA Report.</p> <p>Based on our current understanding of the potential impacts to biodiversity of normal operation, no biodiversity offsets are being considered at this time.</p>	23.02.2018

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			<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>Eni will produce a detailed Oil Spill Contingency and Response Plan, which will provide information on the management of spills should they occur. This plan will need to be approved by the Department of Transport, DEA and PASA prior to drilling activities commencing. Eni have confirmed that this plan can be disclosed as required.</p> <p>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.</p> <p>Further information on the management of oil spills will be included in the EIA and EMPr.</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/SASAOL propose to engage with authorities in terms of law enforcement and compliance in terms of their activities?</p>		<p>As part of the Exploration Right agreement (as well as requirements that will be incorporated into the EIA/EMPr) Eni/Sasol will be required to audit compliance with the requirements of the EMPr. Results of the audits will be submitted to PASA.</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>Further information on the three alternative drilling vessel types can be provided in the EIA report. An explanation of the motivation for the use of a drill ship is currently provided in Chapter 4 of the Scoping Report.</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>		<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>11. Precautionary principle: 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 a 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>		<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>	
			<p>12. Timing - Ecological processes: 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>		<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>13. Language, comprehension and access: 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>	

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<p>14. Environmental and benthic data: 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>		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>15. Proof of Insurance: 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: 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 (eg 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 (Pisces 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 8.1 Specialist Qualifications has been included in the Scoping report to provide details on the specialists.</p>	
			<p>17. Terms of Reference: A full terms of reference from ENI/SASOL to ERM is to be included in the EIA.</p>		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.	
			<p>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.</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. 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>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.</p>		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.	26.02.2018
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	<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>	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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 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 ESIA.	This Report
Jonathan	Caramanus	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 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
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	22.02.2018	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
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.	22.02.2018	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
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.	22.02.2018	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

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Melita	Steele	Greenpeace	<p>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.</p> <p>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.</p> <p>Any move to allow oil drilling in the area will put the biodiversity of the Kwa-Zulu Natal coastline and the tourism that relies so heavily on the area's rich marine life - at risk, while also creating the potential for oil spills off the coast of South Africa. Putting the interests of companies like Eni and Sasol first will only create the perception that the South African government does not have the best interests of South Africans at heart.</p> <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. 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>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>	22.02.2018	<p>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:</p> <ul style="list-style-type: none"> • 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. <p>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.</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 infrastructural economic 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>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>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>	This Report
Bruce	Blake	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>	23.02.2018	<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>	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Margaret	Stella	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.	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: <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
Megan	De Oliveira	Private	On account of the adverse effect that this project will have on the ocean, marine life, our environment and our living conditions, as well as to tourism in the areas, people don't want to sit on the beach looking at this off shore. I strongly object to ALL offshore exploration and/or drilling. Please find this email as my written objection to any offshore exploration and drilling, seismic activity included.	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: <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 ESIA.	This Report
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: <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
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: <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
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: <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 ESIA.	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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: <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
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: <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
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

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
Brigitte	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
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.	This Report
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.	This Report
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.	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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.	This Report
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.	This Report
Hein	van Hilten	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.	2018.02.26	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
Ione and Rob	Bowman	Private	We totally and completely object to offshore drilling. This will have devastating consequences to the marine life.	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.	This Report
Caroline	van Hilten	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.	26.02.2019	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

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Trish	du Preez	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.	This Report
Annie	Koulountis	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.	This Report
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.	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.	This Report
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.	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.	This Report
Imraan	Bux	Private	I am opposed to any sort of drilling on our coast. I am not convinced of your reasoning and your rational.	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.	This Report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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.	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 ESIA.	This Report
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.	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
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	Beyl	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	I 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
Marthina	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 the ESIA.	This Report
Dexter	Biyela	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 for 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 kind request. Please note that the Specialist Studies Team has been appointed for the project already. You have been added to our stakeholders database and will be kept informed throughout the EIA process.	28.02.2018

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
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.	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
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.	28.02.2018	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
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.	28.02.2018	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
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.	28.02.2018	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
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.	28.02.2018	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	Comment Received	Response	Response Sent
Vivienne	V	Private	<p>thank you for this opportunity to respond...basically any future developments regarding the exploration of coal, gas, oil etc definitely DOES NOT HAVE THE FUTURE OF THIS EARTH & US, THE PEOPLE, & OUR BEST INTERESTS in the right place!!!! we all are very aware in this 21st century the damage this has caused and we should all be saying NO!!!! the alternatives have more than proven themselves and that is what should be explored.....there is more than enough sun, wind, waves of the sea etc for sustainable living,...</p> <p>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>	28.02.2018	<p>Thank you for your email, your objection is acknowledged.</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>	28.02.2018
Marie	Roos	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>	28.02.2018	<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>	This Report
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>	01.03.2018	<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>	This Report
Kendyl	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>	01.03.2018	<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>	This report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			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.		The Terms of Reference for all specialist studies have been included in <i>Chapter 8</i> of the Scoping Report.	
			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.		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.	
			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".		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 guarantee by redundancy stability and positioning control equipment, including thrusters and GPS sensors. 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. 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.	
			5) Is there a clean-up plan in place should the blow out preventer fail?		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 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 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 (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 on management of oil spills will be provided in the EIA and EMPr.	
			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.	

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			<p>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.</p> <p>Furthermore, while it is noted that it is not under the control of the applicant, CoastWatch is concerned with Petroleum Agency South Africa's ability to act as both the promoters of the oil and gas industry as well as the adjudicators in these decisions. It is felt that this should be the role of the Department of Environmental Affairs, whose mandate it is to ensure that the environment is not harmful to the health and wellbeing of the citizens of South African and to protect the environment for the benefit of present and future generations.</p>		<p>Eni would investigate the options associated with hydrocarbon production, including application for a Production Right, which would require an associated EIA process if it is determine that extraction is viable.</p> <p>Your comment regarding PASA's role is noted.</p>	
Michelle	Macdonald	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>	01.03.2018	<p>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:</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 the ESIA.</p>	This Report
Hoosen	Bobat	Private	<p>ENI/ERM I am a private citizen, born and raised in Durban. I am doing this out of love of nature and our environment. Our coastline is the proverbial 'Goose that has laid the golden egg'... destroy it and East coast SA is doomed! I attach my presentation which I meant to present at the Austerville meeting. I will go through each slide and make comments. Slide 1 Your map of the area affected shows the KZN coast with three little dots ie. Richards Bay, Durban and Port Shepstone as being the only affected area. This map trivializes the whole project as if only 3 places affected. Actually the entire eastern seaboard from Kosi mouth to around East London is affected. You do not even show the Transkei coastline which is under threat with your area off Port Shepstone. Shockingly, your map does not even show all the major rivers, wetlands, little towns and villages along the east coast. What kind of an EIA process. Very shoddy. In case you ERM, is not aware, this is one of the most biodiverse marine environments in the world. Slide 2 shows South Africa mapthis is what you should have shown first and then move on to show area by affected area, taking area by area.</p>	04.03.2018	<p>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. .</p>	This report
			<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. Did you go and present to the Tonga people of Kosi who have done sustainable subsistence fishing here for over 700 years. Did you present to the custodians of Lake Sibaya, a Ramsar site. Did you present to KZN Wildlife who the custodians of the RAMSAR sites. Have you presented to the board of the iSimangaliso Wetland park?</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 Pulfrich of Pisces Environmental Services.</p>	
			<p>Slide 4..this is Sodwana Bay within iSimangaliso Wetland Park Did you present to the local community there, who rely on the marine environment for their livelihood? This stretch has 3 of South Africa's world renowned reefs. It is the most important area for turtle nesting. Turtles are already under threat of extinction, probably in 35/50 years time. The hatchlings swim out to join the Agulhas current 10/20 kms offshore, thereafter they are carried south by the Agulhas current. YOUR drilling area is smack in their paths. Sodwana is the home of the only known living Coelacanth, a truly pre-historic creature. Your drilling area off Richards Bay is far too close to the deepwater canyons that they inhabit. Sound travels greater distances underground than in the open air or underwater.</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 Pulfrich of Pisces Environmental Services.</p>	

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			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.		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.	
			Slide 6 : ERM Please read this slide carefully. This is a Marine protected area!!!! Operation Phakisa, which you and ENI so glibly quote has in fact extended the marine protected 54 km offshore at Kosi mouth and up to 93km off St Lucia lighthouse.		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. It should be noted that sections of the original ER236 which overlapped with the existing iSimangaliso and Aliwal Shoal MPAs were relinquished during the Exploration Right renewal process in 2016 to avoid direct impacts to key areas for biodiversity.	
			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 Mntentu, Msikaba, Port ST Johns etc. ?		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. The potential impact of the project on the marine environment will be explored in the EIA.	
			Slide 8 refers to an annual pelagic event that has played out over millions of years, the Sardine run. Acknowledged the world over as the "Greatest Shoal" on earth. Already under threat by pollution and global warming.... An oil spill would be a disaster of epic proportions....for the sardines, a multitude of marine species eg whales, dolphins, seals, dozens of fish species, birdlife and humans.		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 Pulfrich of Pices Environmental Services.	
			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 kmsand 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.		ERM is obliged to comply with the timeframes stipulated in the Environmental Impact Assessment Regulations (GNR 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.	

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			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.		<p>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.</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, 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.</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 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 or 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>	
Desmond	D'Sa	SDCEA	<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 Kwa Zulu Natal. There are numerous concerns that we have risen regarding the Oil and Gas Exploration activities proposed for our coast and find many discrepancies glaring throughout all the processes thus far concerning these activities.</p> <p>Kwa Zulu Natal is a hugely popular place and tourist destination because of the cities warm subtropical climate and extensive beautiful beaches. Healthy oceans are critically important to marine life and to coastal communities whose economies rely on tourism, fishing and recreational activities. Opening up new offshore areas to drilling, risks permanent damage to our oceans and beaches without reducing our dependence on oil.</p>	05.03.2018	This comment/background is noted.	This document
			<p><u>Appointment and the Role of Independent Consultants</u></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> <p>(a) be independent</p> <p>(b) have expertise in conducting environmental impact assessments or undertaking specialist work as required, including knowledge of the Act, these Regulations and any guidelines that have relevance to the proposed activity;</p> <p>(c) ensure compliance with these Regulations;</p> <p>(d) perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the application;</p> <p>(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</p> <p>(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> <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>	

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			<p><u>The Role of Experts</u></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>	
			<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 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; and • 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. 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 programme 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: <ul style="list-style-type: none"> o eThekweni Municipality libraries: Durban North; Durban Central Lending; Amanzimtoti; Warner Beach; Isipingo Beach; Umkomaas; and Tongaat Beach; o uMhlathuze 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. o An advert was published as follows: 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 o Notifications have been sent to all stakeholders on the database and the report was made available online and in the following libraries: Durban Public Library; Richards Bay Public Library; Port Shepstone Public Library • During the Scoping Phase public meetings have been held as follows: <ul style="list-style-type: none"> o 6 February 2018, Richards Bay; 7 February 2018, Durban; 8 February 2018, Port Shepstone 	

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			<p><u>Hosting of the Public Meeting:</u> 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>		<p>In response to concerns raised with regards to the meetings (and consistent with the response compiled in the SDCEA 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 in 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 meeting 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 translation, 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>Report Back Meeting:</u> The report back meeting was held on the 28th of February at the Austerville Civic Centre in Durban. At this meeting interested and affected communities were angry as the consultants failed to address the 20 page concerns raised at a previous meetings and the manner in which the entire participation was been conducted and the undermining nature from the majority shareholder of the ER236 oil and gas exploration activities which is Sasol who we requested previously to be in attendance at the public meeting. This complete disregard was unacceptable and therefore we as the community feel that the developers and consultants want to get away with a tick box exercise rather than engaging in meaning fully participation. A formal request was previously made by the SDCEA and other groups that the government departments responsible for this project which is the Department of Mineral Resources, department of Environmental Affairs and Petroleum Agency of South Africa should have also been present to present on how permission was granted on Seismic testing to Eni and Sasol to explore the shores of Kwa Zulu Natal.</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 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 request for authority attendance was communicated to the competent authority.</p>	
			<p><u>Background Information Document</u> The back-ground information document was requested at the TROPICANA hotel to be provided in English and ISIZULU however a few copies were made available in English, isiZulu. A further request that these documents including the scoping document must be given well in advance and in addition to ISIZULU, English, XHOSA must be included. It must be simple and easy for the community to understand and grasp the impact of the development. The developer must be prepared to answer questions and respond to the community. The identified impacts must come through the scoping or the background meetings that are identified and raised by the I&AP and communities. All issues raised by the affected communities must be tested and all expert opinions sought after. A review mechanism must be developed and review experts chosen and paid for by the developer.</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> 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>	

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			<p><u>International Conventions and Treaty Commitments South Africa</u> 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>	
			<p><u>Impacts of Offshore Oil and Gas Drilling</u> Impact on the communities, people and environment: When oil spills occur they can bring catastrophic harm to marine life and devastating losses for local businesses. Even routine exploration and drilling activities bring harm to many marine species. Expanded offshore drilling poses the risk of oil spills ruining our beaches, bringing harm to those who live, work and vacation along the coasts, as well as harming habitats critical to plants and animal species. Oil spills can quickly traverse vast distances. Exploration of oil and gas presents multiple forms of environmental degradation. Oil pollution also damages fishing equipment and pollutes drinking water in wells. Oil spills and waste dumping have also seriously damaged agricultural land. Long term effects include damage to soil fertility and agricultural productivity, which in some cases can last for decades. Economically, the costs of those products become exorbitant given the law of supply and demand. The negative impact of environmental consequences of the oil industry activities are mainly localized within the host communities. However, some of the effects have trans-boundary implications. Gas flaring is a contributing factor to global warming and these are risks no community is willing to take especially South Durban and the communities all along the KZN coastline from the north to the South given the fact that this area is already a marginalized and affected group of communities that experience these kind of environmental disasters more often than a residential area should or ever at all.</p>		<p>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. 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</p> <p>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.</p>	
			<p>Impact on fisherfolk: These developments and projects will not only cause catastrophic destruction with the above-mentioned impacts but will also destroy livelihoods to over 50 000 subsistence fisher folk who eke out a living daily. When seismic tests are conducted, they clearly have an impact on marine life. The fish are either killed or forced to leave the area. There will be no fish for the subsistence fishermen, who fish areas all along the coast. This impact will increase poverty and lead to more people joining unemployment line. Thereby increasing to the millions of people who are unemployed and this development will require specific skills which the majority of the population do not possess therefore there is no job creation in these projects. In the public participation process, this group of marginalised fisherfolk must be given notice and opportunity to comment and voice their concerns.</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. 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.</p>	
			<p>Emissions to air: The oil and gas industry is a significant source of greenhouse gas emissions as well as toxic volatile organic compounds (VOCs), VOC in combination with NOx contribute to the formation of ground-level ozone and is a known causal agent of acid rain. The atmospheric pollution will have measurable impacts on the surrounding ocean but also become potentially entrapped in air masses moving towards the coastline where it will be deposited as acid rain. The drilling of wells and production process require vast amounts of energy usually provided by the burning of gas and diesel. The impact of this activity needs to be accurately assessed in terms of tons of fuel burnt and hydrocarbons released. Assuming that oil or gas is discovered then this would no doubt need to be flared off until such time as it can be capped and processed. During this time vast quantities of particulate matter and volatile organic compounds will be released into the atmosphere, indeed continuing throughout the production process. In addition the associated fugitive emissions from retrieved product is an additional source of toxic pollutants as the venting from either onsite (barge/tanker) or onshore (storage tanks and pipeline valves) must be evaluated. The carbon generated from flaring will also add to the existing problem and create added negative consequences in terms of climate change.</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 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.</p>	

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			<p>Physical Effects of Offshore Oil Rigs:</p> <p>Any floating platform will attract pelagic fish and seabirds as well as certain marine mammal species. A consequence of this for seabirds is that bird mortality has been associated with physical collisions with the rigs especially at night, as well as incineration by the flare. Birds settling on the water surrounding the rig may come in contact with oil residues and leaks leading to their death following contact with such pollutants. Fish aggregating around the drilling rig may be exposed to high levels of pollutants which are then biomagnified up the food chain ending up in apex predators such as sharks and marine mammals such as dolphins and toothed whales. It has long been suspected that drilling activity around oil rigs in the Gulf of Mexico is associated with elevated levels of mercury in 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 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.</p>	
			<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>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 (Waratah) and in some cases had their bows sheared off by the force of these waves. How then will these rigs survive significant storms events without environmental mishap?</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. 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. 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 modelling study is being undertaken as part of the EIA to understand the fate and transport of a potential oil spill.</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>		<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 utilised 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>	

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			<p>Agulhas Current:</p> <p>The Agulhas current has many unique features. There are little understood but regular upwelling events are associated with either (a) the strength/velocity of the current (b) its unexplained meanderings (c) its collision with undersea topographic features - all of which lead to the potential that constituents of the offshore water column are pushed inshore to the beaches. Consequently, in the event of an offshore rig disaster there is a distinct possibility that the southward bound current will provide a mechanism to drive the toxic consequences of the oil and gas industry into our nearshore waters and indeed even onto our beaches. This is an invariable fact of the Agulhas Current that sweeps along our coast with regular gyres (reverse currents) spinning off inshore meaning toxic by-products can be expected to be deposited along our sensitive shoreline including Marine protected Areas, sensitive breeding colonies (penguins/seals) and primary fish recruitment areas (Agulhas banks). No area of our Eastern coastline would be spared.</p>		<p>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 meteorocena data, including Agulhas current, are included in the models.</p>	
			<p>Impacts of Drilling:</p> <p>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 inject 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.</p> <p>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.</p> <p>The prospect of a catastrophic spills and blowouts is a documented threat from offshore drilling operations and the near impossibility of introducing a successful capping of the blowout at the depths cited are of deep concern to us. We require significant detail to be presented on this aspect given the learnings of Deep Water Horizon disaster.</p>		<p>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.</p>	
			<p>The iSimangaliso Wetland Park</p> <p>The iSimangaliso Wetland Park is South Africa's very first World Heritage site since 1999 (Unesco), it is also the third largest protected area in South Africa. Nelson Mandela stated that "iSimangaliso must be the only place on the globe where the oldest land mammal (the rhinoceros) and the world's biggest terrestrial mammal (the elephant) share an ecosystem with the world's oldest fish (the coelacanth) and the world's biggest marine mammal (the whale)".</p> <p>The consultants are prone to making wild and unsubstantiated and absolutely unverifiable claims. Consider the following: <i>"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"</i>.</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 there all the way from Sodwana bay in Northern Zululand. Almost no exploration has taken place in the deep canyons and offshore waters of KZN largely on account of access as there simply are no deep water submersibles available with which to do so, nor is there any funding. The discovery of the coelacanth off northern KZN was purely due to the inshore proximity of the canyon that allowed scuba divers the opportunity of witnessing them. By no stretch of the imagination can it be concluded that they therefore do not occur elsewhere in deep waters off our continental shelf. This statement is therefore entirely false and unprovable and one can only wonder why such bias would present itself in such a report when the coelacanth is considered to be "the most endangered order of animals in the world"1 One shudders to think what the impact on the coelacanth population has been due to the intensive seismic testing that has taken place in these areas during the</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: Wiles, E., Green, A., Watkeys, M., Jokat, W. & Krockner, 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. Marine and Petroleum Geology 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 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 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>	

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			<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><u>The Marine Ecosystem</u></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>Seismic Survey Impacts:</p> <p>Seismic testing is still taking place and proved to be very negative toward marine life. The Oceana website reports that blasts from seismic air-guns, towed behind ships, are repeated every ten seconds, 24 hours a day, for days and weeks at a time. Sound travels more easily under water than through the air and the noise from a single seismic survey can travel tens of thousands of square kilometres. An article in the Canadian Journal of Zoology reports that seismic surveys increase noise levels to twice the normal level, and impact marine life. Such surveys disturb the communication, navigation and eating habits essential to the survival of marine wildlife. These sonic waves can also damage fish with air bladders, destroy marine wildlife eggs and larvae, and cause fish and other marine species to temporarily migrate away from the affected area. The effect of these blasts of sound on marine life is disturbing and can have catastrophic results: Seals have been found to display dramatic avoidance behaviour, a slower heart rate, ceasing feeding and hauling out of the ocean. Turtles have shown reduced hearing sensitivity at a distance of 1km from the blasts. There has been damage to fish ears at distances of 500m to several kilometres, a reduction of 40 – 80% of catch rates in the North Atlantic and increased embryonic mortality. Zooplankton, which are essential for the health and productivity of global marine ecosystems have suffered significant mortality and the impact has been observed at a range of 1,2km from the blasting sites. Impacts include temporary and permanent hearing loss, abandonment of habitat, disruption of mating and feeding, and even beach strandings and death. For whales and dolphins, which rely on their hearing to find food, communicate, and reproduce, being able to hear is a life or death matter. Whales simply stop "talking" to each other.</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>Impacts of Oil and Gas Drilling on Marine life:</p> <p>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.</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>	

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			<p><u>Alleged Commercial Advantage:</u> 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.</p> <p>SASOL currently sources' gas from Mozambique but does not pass this "saving" onto us as consumers. Rather their cost of production falls but prices are set by virtue of the ubiquitous pricing mechanism that has been in place since the apartheid era, one that prices the domestic prices of fuels by reference to (a) international crude oil prices, (b) international supply and demand balances for petroleum products and (c) the Rand/US Dollar exchange rate.² This means that there is absolutely no requirement for any producer of petroleum products to pass any such savings from home grown sources onto the consumer. Rather, given the fact that there is considerable secrecy regarding operating refiner input costs, there exists abundant opportunities to make windfall profits by processing locally extracted gas and oil whilst having a Government set international benchmark for refined product. The idea that the oil and gas industry would somehow pass these benefits on to the consumer is repugnant. Secondly, it is not clear what "increase in government revenues" they refer to? Again, there is enormous secrecy regarding any refiners input cost in terms of crude oil processing costs and how these are disclosed. It is however clear that the Government derives an enormous benefit from the fuel levy and pipeline transfer fees but these refers to the finished product and not the raw input. We therefore demand further clarity and exposition on these loosely cobbled statements as to economic benefit to South Africa besides that relating to reduced need for foreign exchange.</p>		<p>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.</p>	
			<p>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.</p>		<p>This comment is noted.</p>	
			<p>Alternatives: No alternatives were investigated such as investments in renewable energy which desperately require.</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 infrastructural economic 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>	

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			There is no social enhancement study presented in any of the documents we have come across so far and this is a crucial part of this type of activity and leaving it out simply gives us the clear indication that this is not taken seriously or properly considered. The social enhancement study must research into the jobs created by small businesses, fishing boats , tourism industry and all who use the Indian Ocean for major sporting and recreation events.		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>Demands</p> <p>We as representatives of the community demand that...</p> <ol style="list-style-type: none"> 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 upfront 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 fisherman 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. 		<ol style="list-style-type: none"> 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 additional 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 locals 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_IT/sustainability.page 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 publically 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. 	
			<ol style="list-style-type: none"> 14. The terms of reference of the consultant and any experts that has been appointed. 15. Proper risk assessments be done by appointed experts 16. All specific targets must be provided including drilling, testing and chemical information 17. They investigate what kind of noise, the noise volume and noise impacts due to the development 18. They investigate the canyons, estuaries, wetlands and nurseries which serve as breeding grounds for South Africa's rich biodiversity. 19. The independent study that Sasol has conducted must be provided for. 20. Surveys must be done over a longer period of time 21. That they consider the no go option as an alternative <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>		<ol style="list-style-type: none"> 14. ERM has been appointed to undertake an EIA for exploration drilling in terms of NEMA. The Terms of Reference for the specialist studies are provided in Chapter 8 of the Scoping Report. 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. 16. Detailed project description information is provided in Chapter 4 of the Scoping Report. Additional information will be included in the Project Description in the EIA. 17. An assessment of the noise associated with exploration drilling will be undertaken in the EIA. 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. 19. It is unclear what independent Sasol study is being referred to here. 20. No marine baseline surveys have been conducted for this project, baseline information presented has been gathered through a desktop study. 21. The no-go option will be considered as an alternative. 	

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			<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 spilt? The Gulf of Mexico oil spill can be made an example of how important it is to have a disaster emergency plan and of how offshore oil and gas drilling causes detrimental effects to the ecosystem. We are under the impression that all tiers of Government are promoting the idea of allowing these activities to go ahead without proper and meaningful consultation with the public communities. This type of reaction from Government is contradictory because whilst they are promoting tourism with the main focus on the Sardine shoals, whales and dolphin sighting points, beautiful marine nurseries, various bird life and small B&Bs which thrive on our beautiful beaches and ocean, they are destroying or allowing the destruction of this beautiful ocean we have. It seems that the offshore oil and gas project will only benefit the elite and rich people of society whereby once again the poor gets dealt a raw deal.</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>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 infrastructural economic 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>	
Phumla	Ngesi	Petroleum Agency South Africa (PASA)	<p>Timelines associated with drilling of a first well are clear. Considering the applicant proposes to drill up to 6 wells, how long would it take for the applicant to drill subsequent wells? Clarity is necessary to avoid possible assumptions that all wells will be drilled at the same time or immediately after the completion of a first well.</p> <p>Shore Base infrastructure: The assessment should not be limited to offshore drilling activities but should include activities associated with the proposed drilling operations. For instance the draft scoping report indicates that the shorebase will have storage facilities, a possible mud plant and bunkering services – however no identification and assessment of potential impacts associated with the shore base activities have been undertaken. Thresholds of the storage facilities should also be indicated.</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> <p>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.</p> <p>The Scoping Report only makes reference to municipalities in Richard's Bay (King Cetshwayo and City of Umhlatuze) and Durban (EThekweni Metro) and no reference is made to Ugu District Municipality. The socio-economic issues associated with Ugu and other affected municipalities (if any omitted) must be assessed.</p> <p>Finalisation of Scoping Report for submission to the Petroleum Agency SA instead of DEA.</p> <p>Newspaper coverage: concerned that there could be limited coverage in Port Shepstone. The EAP needs to consider local newspapers such as South Coast Herald. Erection of site notices: The erection of site notices were only limited to eThekweni Municipality, and Umhlatuze Local Municipality. Distribution of site notices should be extended to the South Coast part of the application e.g. Port Shepstone area.</p> <p>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.</p>	07.03.2018	<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> <p>Measures for the handling and transport of NADF's 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.</p> <p>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 Umhlatuze) and Durban (EThekweni 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.</p> <p>Error corrected.</p> <p>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.</p> <p>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.</p>	This report

Name	Surname	Organisation	Comment	Comment Received	Response	Response Sent
			<p>Are there any anticipated suspension activities? If so, the assessment shall make provision for the suspension of the well – in this regard the potential impacts associated with this must be assessed and appropriate mitigation measures provided.</p>		<p>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.</p> <p>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.</p> <p>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. 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 ROV shall be established.</p>	
			<p>Issues raised above concerning consultation must be catered for in the Plan of Study for EIA.</p>		<p>The Plan of Study included in Chapter 8 of the Scoping Report has been updated to include additional consultation activities.</p>	
			<p>The EIA Regulations require the assessment of impacts and risks identified to include the nature, significance and consequence of the risk; extent and duration; the probability of occurrence; <u>the degree to which the impact and risk can be reversed; the degree to which the impact and risk may cause irreplaceable loss of resources;</u> and the degree to which the impact and risk can be mitigated. The methodology prescribed in the plan of study does not make provision for the highlighted issues and must therefore be considered.</p>		<p>The EIA methodology in Chapter 8 of the Scoping Report has been updated to include the highlighted items.</p>	
			<p>Regulations for Financial Provisioning, 2015 requires the applicant to determine financial provision to undertake rehabilitation and remediation of the adverse environmental impacts of exploration operates through a detailed itemisation of all rehabilitation activities and costs, calculated based on the actual costs of implementation. The said determination must be carried out by a specialist(s). It is hence expected that the applicant appoints a specialist to determine financial provision for decommissioning and rehabilitation.</p>		<p>Additional text has been included on page 13 of the Scoping Report as follows:</p> <p><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 BOP will be then retrieved at surface and the drillship and support vessels will depart the area .</i></p> <p><i>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></p>	

Annex C2

ERM Response Letter to SDCEA

**Environmental
Resources
Management**

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

Postnet Suite 90
Private Bag X12
Tokai, 7966
Cape Town, South Africa

Tel: +27 21 681 5400
Fax: +27 21 686 0736
www.erm.com



27 February 2017
Att: Desmond D'SA
South Durban Community Environmental Alliance
PO Box 211150
Bluff 4036
Durban
Kwazulu-Natal

Sent via email: desmond@sdceango.co.za

Your ref: Eni ER236 Exploration Drilling EIA Stakeholder Engagement
Our ref: 0414229

Dear Mr D'Sa,

Re: Eni Exploration Drilling Additional Responses to Queries and Concerns Raised During the Scoping Public Meeting in Durban

This letter has been compiled in response to queries and concerns raised during the public meeting held in Durban on 7 February 2018. During the meeting it was communicated that Eni South Africa BV (Eni) and Environmental Resources Management (ERM) did not provide sufficient response to the queries and concerns raised due to time pressure. A follow up meeting has been scheduled for Wednesday 28 February 2018 to respond in more detail.

This letter has been prepared as an input to assist in preparation for the scheduled follow up meeting. It addresses issues related to:

- 1) The background to the proposed project;
- 2) The role of ERM and the independence of specialists;
- 3) An overview of the stakeholder engagement process for the EIA process;
- 4) Concerns raised about the exclusion in the Scoping exercise of certain issues from the EIA process;
- 5) Approaches to potential oil spills; and
- 6) Eni's environmental performance.

Important concerns of a general nature were raised at the public meeting in Durban relating to government policy, strategic concerns relating to potential future extraction of oil/gas and its impact on climate change, and impacts related to possible future operations should the process proceed that far. These fall outside the scope of this EIA process as they are of a general nature. We welcome these issues being raised and they

Registered Office Address
Environmental Resources Management
Southern Africa (Pty) Ltd
1st Floor, Building 32
The Woodlands Office Park
Woodlands Drive, Woodmead
2148, Johannesburg, South Africa

Company Registration Number
2003/001404/07

Directors
Claudio Bertora
Urmilla Bob (Non-Executive)
Linda Kumbemba
Tania Swanepoel
Marinda Rasmussen

**A member of the Environmental
Resources Management Group**

will be included in the comments and responses report to be submitted to the authorities, however we will not be addressing these in further detail.

We have prepared the following detailed responses which we will present at the meeting and which we hope address your comments and concerns.

1) PROPOSED PROJECT

Although it is likely you are aware of this information, a brief summary of the proposed project location and activities is provided here for information purposes.

Eni, and Sasol Africa Limited (Sasol) hold an Exploration Right off the East Coast of South Africa. Eni and Sasol are considering the possibility of conducting an exploration drilling programme in Block ER236 (12/3/236) to assess the commercial viability of the hydrocarbon reservoir for future development.

The proposed project includes the drilling of six wells in deep water in ER236:

- Four wells in the northern area (roughly in line with Richards Bay, but more than 60 kms offshore) in water depths ranging between 1,500 m and 2,100 m.
- Two wells within the southern area (roughly in line with Port Shepstone, but also more than 60 kms offshore), in water depth ranging between 2,600 m and 3,000 m.

The number of wells and where they will be drilled within the specified areas is still to be determined. The success (if valuable hydrocarbon is discovered) of the first well in each area will also determine whether or not subsequent wells are drilled.

The drilling of the first exploration well is planned for late 2019.

2) ERM AND SPECIALIST INDEPENDENCE

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.

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.

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).

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.

3) SUMMARY OF THE STAKEHOLDER ENGAGEMENT PROCESS

Introduction

Many of your comments reference the stakeholder engagement process and we would like to provide a summary of the actions that have been taken during the process thus far. It should be noted at this stage that we are currently in the Scoping phase of the EIA process and as such there will be an additional opportunity to comment (and attend public meetings) during the next (EIA) phase of the project.

Public participation is required for an Environmental Authorisation process in terms of the EIA Regulations ¹.

Public participation during EIA's in South Africa is required by the the National Environmental Management Act (NEMA) ². More detail is included in the Public Participation Guideline ³ from the Department of Environmental Affairs. This guideline requires that the scope of engagement be determined based on a number of factors, including the scope and scale of potential impacts, characteristics of potentially affected parties, sensitivity of environment and controversy of the project.

Our approach to engagement was based on these regulations and guidelines. It is important to note that adjustments can be made depending on the results of the specialist studies and responses during the initial stages of engagement.

(1) GN R.982 (December 2014, as amended)

(2) Act 107 of 1998, as amended

(3) GN 807: Guideline 7: Public Participation in the Environmental Impact Assessment Process (Department of Environmental Affairs, 10 October 2011)

Below is a summary of the engagement undertaken thus far, followed by responses to concerns raised and a proposal for future engagement.

Stakeholder Engagement

In order to engage stakeholders, the following actions were carried out:

- 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 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:
 - eThekweni Municipality libraries:
 - Durban North;
 - Durban Central Lending;
 - Amanzimtoti;
 - Warner Beach;
 - Isipingo Beach;
 - Umkomaas; and
 - Tongaat Beach.
 - uMhlathuze Local Municipality;
 - Richards Bay Municipality; and
 - Richards Bay Library.
 - 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:
 - 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:

- Durban Public Library
- Richards Bay Public Library
- Port Shepstone Public Library
- *It should be noted that an earlier version of the Draft Scoping Report was released for comment on 27 October 2017. Due to a change in project scope, a notification was sent out on 7 November 2017 to notify stakeholders that the report would be re-released for a full 30 day comment period in early 2018.
- During the Scoping Phase public meetings have been held as follows:
 - 6 February 2018, Richards Bay
 - 7 February 2018, Durban
 - 8 February 2018, Port Shepstone

Public Meetings

As identified above in addition to the written disclosures of the draft Scoping Report, a series of meetings were held to increase engagement with potentially interested and affected parties.

Numerous concerns have been raised with regards to the meetings:

- Advertising and notification – the meeting was advertised in the four newspapers indicated 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 in 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 meeting 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 translation, a professional isiZulu translator would be preferable and will be made available for subsequent meetings.

Way Forward

In order to address concerns raised with regards to the process we propose to modify the scope of the engagement process as follows:

Immediate steps:

- Translate the summary of the Draft Scoping Report into isiZulu and distribute to all Interested and Affected Parties on the stakeholder database.

- Extend the comment period for an additional week to Thursday 1 March 2018 in order to allow stakeholders to review the isiZulu version of the summary.
- Undertake a follow up meeting with yourselves (SDCEA) to respond to concerns raised where there was insufficient time to do so during the public meeting. This meeting is planned for the 28th February 2018. Note that a record of the meeting will be included in the Final Scoping Report which **must** be submitted to the authorities on or before 8 March 2018.

EIA Consultation:

- Additional advertising in local newspapers in communities along the coast. It is proposed that adverts will be placed in at least 10 additional local papers, including in the Eastern Cape.
- Radio notifications in English and Zulu are under consideration.
- isiZulu translation at meetings in KZN.
- EIA Phase meetings to be held in Richards Bay, Durban and Port Shepstone as before, with additional meetings depending on interest shown and stakeholder registration in other locations. Should there be an issue with access to meetings by registered I&APs this can be discussed on a case-by-case basis and alternative measures implemented. Furthermore, we would value discussion on appropriate venues for meetings to allow for greater participation.
- We will aim to make presentations accessible to meeting participants through the use of plain language and clear explanations of technical content.

4) CONCERNS RAISED ABOUT THE EXCLUSION IN THE SCOPING EXERCISE OF CERTAIN ISSUES FROM THE EIA PROCESS

As described in *Chapter 7* of the Draft Scoping Report, the assessment process included two steps:

- Screening to determine which activities (e.g., drilling the well; movement of vessel, disposal of waste) may interact with environmental and social resources and receptors (e.g., water quality, marine fauna, fisheries, local economy).
- Scoping to determine if the interaction has the potential for significant effects.

Based on this some impacts were identified for further assessment in the EIA.

Concerns were raised during the Durban public meeting and it was indicated that no impacts should be screened out.

The text below provides more detail on each of the interactions/possible impacts that were screened out during the Scoping Process (Screening and Scoping) and provides the motivation for not assessing them further:

- **Impact to Community Health, Safety and Security due to interactions with foreign/migrant workers** - although Scoping determined that the project will employ workers during all the phases of the project, due to the nature of the work, the majority of the employees onboard the drillship will be expatriate staff who may transit through Durban or Richards Bay for a short period of time. Shore base employees are likely to be mainly current employees of existing logistics companies based in these areas.
- **Positive impact to local employment and associated income generation during the drilling activities** - Eni has estimated that in the order of 10 jobs will be created for locals by this 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.
- **Positive impact to local economy due to trade with local suppliers (e.g., for food, water, hotels, waste disposal, etc.)** - scoping determined that the project will result in trade with local suppliers for food, fuel, water, hotel, waste treatment and other supplies. This may result in a limited, short-term positive impact.
- **Degradation of air quality** - a reduction in air quality from the vessel and helicopter activities, power generation and bunkering are not expected to be significant in a regional context, or to cause human health impacts due to the temporary nature of the project, the well mixed air-shed of the offshore environment and the distance of the project site to shore. The drilling rig's power generators will be equipped with emissions abatement system as prescribed by international standards. A summary of air emissions will be presented in the EIA report and control measures for reduction in air quality will be presented in the Environmental Management Programme.
- **Impact to Community Health, Safety & Security due to noise from helicopters** - the noise generated by helicopters for crew transfers will be over the Port of Richards Bay or Durban, helicopters will not fly over residential areas.
- **Increase in disposal of wastes generated by the project activities at onshore disposal sites** - the project will result in an increase in waste generated in the area. Wastes will be transported by vessels to the onshore supply base in Richards Bay or Durban for temporary storage prior to off-site disposal. Solid non-hazardous waste will be disposed of at a suitably licensed waste facility. Hazardous wastes

will be treated/ disposed of at a licensed waste treatment/ disposal facility

- **Impact due to fresh water supply on the vessels and at the shorebase** - water will be provided via a reverse osmosis plant onboard the project vessels, and where required bottled water may be provided. Therefore this impact was considered not significant and will not be assessed further. Water stored at the onshore base for water supplies for the limited number of onshore staff will be sourced from the local municipality and will not have a significant impact.
- **Marine pollution due to discharge during well clean-up and well testing**-- after drilling activities are complete, in case of well testing will be confirmed for appraisal wells, hydrocarbon and fluids will be flared. Possible concentrations of residual contaminant in seawater would be anticipated to return to background levels rapidly. Control measures related to the discharge during well clean-up and well-testing will be included in the Environmental Management Programme.
- **Pollution due to well logging (logging while drilling (LWD) and vertical seismic profiling (VSP))** - LWD and VSP activities will be conducted inside the well in a closed system composed by the well itself, riser, rig. Standard industry mitigation measures will be implemented, therefore there will be no interaction with the external marine environment. This impact was considered not significant and will not be assessed further.
- **Marine pollution due to disposal of excess cement** - the cementing of the casing (steel pipe) into the well is required to ensure the safety of the well and avoid a blowout and oil spill. The presence of excess cement slurry that has already been mixed is unavoidable during operation and it will be disposed of overboard to avoid damages to lines, cement unit and tanks. The amount of excess slurry will be minimised as far as possible. Seawater quality would be expected to return to background levels rapidly and therefore have limited impacts on marine fauna.
- **Physical disturbance of the seabed by drilling activity** - the impact of drilling on the seabed will be very localised and short-term. In particular the highest disturbance will be during the first drilled section (conductor pipe and surface drilling) in which return of drilling cuttings and cement will be directly to the seabed. In the next drilling phases, the only disturbance is the dispersion of drilling cuttings. The dispersion of cuttings will be simulated with a specific software and results will be included in the EIA report.
- **Visual impact of the drillship during drilling** - The drillship will be located more than 60 km offshore and therefore is unlikely to be seen from the shore.
- **Community and workforce health and safety due to well abandonment** - at the end of operations wells drilled will be plugged and abandoned. Given that the water is deep, it is therefore not

anticipated that the abandoned wells will have any impact on navigation or fishing.

- **Introduction of alien invasive species due to support and supply vessel ballasting** - 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.

Employment Opportunities

A recurring item of discussion during the meeting was that of employment opportunities. As discussed above and in *Chapter 7* of the Draft Scoping Report local job creation linked to the proposed exploration drilling activities is negligible due to the specialised nature of the work and the short duration of the activities. It is acknowledged that minimal job opportunities would be available for local people at this stage, but Eni has committed to ensuring local contractors are used wherever feasible. This EIA does not consider possible future employment opportunities associated with production activities.

Climate Change

Comments regarding the impact to climate change were made during the public meeting. 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 welltesting.

5) POTENTIAL OIL SPILL

One of the key issues raised and a key impact to be assessed is that of a potential oil spill.

The following response was provided by Eni regarding the management of oil spills:

'The potential for oil spill and blow out is something that is simulated and assessed by Eni from the start of projects, during the impact assessment analysis and the design phase of well. Eni adopts several and different prevention measures to avoid/prevent the occurrence of negative events, including: preparation of written programs and procedures, quality check and audit for contractors capabilities, services and tools, training and certification of staff and

contractors. In addition other activities are carried out to describe identified scenarios, roles, responsibilities and techniques to respond to and manage any occurring oil spill/blow out events and mitigate impacts; those include qualification and training of personnel, studies such as blowout study and modelling, Oil Spill Contingency Plan (OSCP).

This multiple system of preventing actions/mitigation tools has been also consolidated by Eni after years (decades) of commitment in excellence of operations and successful results in drilling activity, in particular for new wells. Eni demonstrates excellent HSE record, including zero blow-out and well accidents for a thirteenth consecutive year and limited operation-related spills. Eni applies best industry standard (eg API, ISO, Norsok) and industry working groups (eg. IMO, IOGP) best practice; Eni applies the most stringent safety standards to protect people, assets and the environment.

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, the 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 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.

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.

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.'

6) ENI ENVIRONMENTAL PERFORMANCE

Your comments about Eni and the company's environmental performance are noted. Most of the comments are with reference to issues that are beyond the scope of the EIA process.

Regarding your comments Eni provided the following in response:

'Eni, in its desire for a sustainable growth, strongly believe that in its business, attention shall be paid to the health and safety of its people and local communities, to the protection of the environment and of territory and to the continuous improvement of quality in processes, services and products. Therefore in all the activities and within all onshore and offshore areas where it operates, Eni always impose the highest environmental, health and safety standards. Eni responds to such evidence with management and control tools and measures to prevent and reduce the risk of impact on the environment and on the health of the community, adopting the best technologies and engaging people who are constantly trained and prepared.

Eni recognizes the scientific evidence presented in the IPCC Fifth Assessment Report and the urge to limit the rise of global temperature below 2 °C above pre-industrial levels. To this end Eni is carrying out an integrated climate strategy to mitigate its impact on the climate and reduce the risks associated with climate change that has already produced significant results. Eni has three pillars: reducing climate-altering emissions, promoting the use of natural gas for power generation and a commitment to renewable energy.

Eni as an organisation is committed to playing an active role in decarbonising the energy system by accompanying the transition toward greener energy solutions by promoting the substitution of coal and oil with natural gas that is the fossil fuel with the lowest carbon content. Reduction of CO₂ and fugitive methane emissions in operated assets are also main targets for Eni. The reduction of GHG emissions is sustained by a strategy focused on natural gas utilization. In 2016 the Carbon Disclosure Project (CDP) ranked ENI top of the major oil and gas companies in the Climate A List.

Eni has partnerships and collaborations with several universities, International NGOs and Institutions who are leaders in biodiversity conservation. Eni operates according to internationally recognized best practices, such as World Bank PS6, in order to protect biodiversity and ecosystem services from the first exploration stages.

Eni has also created the Energy Solutions Department to integrate renewable sources in the business model. Eni supports the need to introduce a carbon price for the GHG emissions at a global level to discourage higher emissions options and to stimulate investments in low carbon technologies. 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.'

With regards to questions about the Oil Spills in the Niger Delta, these impact on the production of all oil companies operating in the area, and they affect the environment as well as the safety, security, and health of people in the region. In order to prevent sabotage and bunkering activities, and in addition to measures already implemented to mitigate and prevent explosions / theft of hydrocarbons (caused by third parties) and losses due to operational spills, Eni has taken further measures: reinforced security and surveillance of the pipelines with greater involvement of the communities concerned; improved relations with

the communities; cutting edge devices have been installed such as Vibroacoustic Pipeline Monitoring System, and Computational Pipeline Monitoring that allow real-time detection of leaks; intensification of the preventive maintenance campaign for the lines (sectional replacement), the valves, and the points previously repaired after theft/sabotage events.

In the event of a spill, Eni/NAOC's in-house response team mobilizes for confirmation and verification of spill site. The spread of spill is contained by deploying containment measures. The leaking facility is either isolated/shut down or depressurized as applicable repairs are carried out. Following containment and repairs, the impacted site is cleaned up and a post clean up inspection is conducted with Government regulatory agencies where soil sampling and analysis of site are carried out.

Since March 2014 Eni/NAOC has set up a constantly updated web site that transparently disseminates oil spill event information as well as response and remediation measures.

7) OTHER COMMENTS

The company's position regarding the alleged corruption case in Nigeria and the ongoing proceedings remains that there was no inappropriate conduct by any Eni company or its staff. Eni is confident that the proceedings will confirm the correctness and integrity of its conduct in the acquisition of OPL 245.

CONCLUDING REMARKS

Thank you for your inputs during the public meetings during the week of 6 February 2018, effective engagement is an important part of the process and we will strive to ensure that stakeholders are engaged in a meaningful and appropriate way. As indicated previously we will hold a follow up meeting with SDCEA and related stakeholders to respond to the points as indicated above, namely the following:

- The role of ERM and the independence of specialists;
- An overview of the stakeholder engagement process for the EIA process;
- Concerns raised about the exclusion in the Scoping exercise of certain issues from the EIA process;
- Approaches to potential oil spills; and
- Eni's environmental performance.

Annex C3

Meeting Minutes

**Meeting
minutes**

**Environmental
Resources
Management**

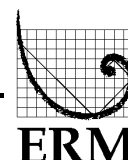
Subject/Ref 0414229: Scoping Phase Public Meeting - Eni South
Africa's Offshore Exploration Drilling: Scoping Phase
Public Meeting

Venue Premier Hotel, Richards Bay

Date of Meeting 06 February 2018

Present See below and attached attendance register

Building 32
1st Floor
The Woodlands Office Park
Woodlands Drive
Woodmead, 2148



A public meeting was held at the Premier Hotel, where the following agenda was followed:

1. Welcome and Introduction
2. Introduction to Eni and ERM
3. Project Overview
4. EIA Process Summary
5. Discussion
6. Way Forward

The following Eni and ERM team members were present at the meeting

Name	Role
David Shandler	Independent Facilitator
Alessandro Gelmetti	Eni South Africa Managing Director
Marilia Cioni	Regional Media Advisor/Press Officer, Eni
Fabrizio Pecoraro	Sustainability Department, Eni
Claire Alborough	Project Manager, ERM

Attached as annexures are copies of presentation material presented to the meeting in items 2, 3 and 4 of the agenda. Below is a record of the discussion as conducted in item 5 of the agenda.

Meeting
minutes

Record of Discussion held at Public Meeting

I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
Gavin Anderson	Gavin stated that the Scoping Report does not indicate that a marine archaeologist study will be undertaken for this project. It is his understanding that an HIA will be required for the project and he emphasised that if the project does not do one it will be a problem.	Claire	We have submitted the report to SAHRA and they have not as yet indicated that an HIA will be necessary, however we will follow up on this.
Freya van der Wid	Freya queried how the vessel manages extreme events.	Alessandro	Alessandro responded to say that accidents are very rare and largely avoidable, e.g., Macondo. He went on to say that the vessel is designed to manage strong currents, winds, waves, etc., however in the case of an extreme weather event, e.g., hurricane, the vessel is able to safely disconnect from the sea bed and move to a place of safety.
Vumani Ndlovu (TNPA)	Vumani noted that spills would be a concern and he would like to understand how consultation would be done along the coast where spills may occur. He indicated that he would like to understand upfront how oil spill management would be undertaken for the Project. He further indicated that it would be advisable for the Project to present to the disaster management advisory forum at the uMhlatuze Municipality. NGOs and stakeholders should also be given the opportunity to understand how oil spills will be managed.	Alessandro/Claire	Alessandro indicated that an Oil Spill Contingency Plan would be developed prior to drilling and that this plan would need to be approved by the authorities (PASA, SAMSA, Department of Transport). This plan would cover measures to manage small, medium and large spills. Claire stated that the EIA phase consultation would be extended to cover areas potentially affected by oil spills and that a meeting with the uMhlatuze municipality has been discussed and would be arranged to take place during the EIA phase consultation.
Sandy Camminga (Coastwatch)	Sandy indicated that the country (and City) has limited capacity to deal with disasters and has a slow reaction time, e.g., the large container ship that came aground and spilled plastic pellets which polluted a large part of the coastline. She wanted to know how they would manage with a large oil spill.	Alessandro	Alessandro indicated that Eni would manage oil spills themselves (in consultation with the authorities) and that spills are managed differently depending on their size (small spills are dealt with by the vessel; and medium spills by the vessel and equipment from the shorebase). Eni will have a contract with Oil Spill Response Limited (OSRL) and in the event of a large spill OSRL would mobilise with personnel and equipment to manage the spill. OSRL have a base in Saldanha Bay, with one of four available capping stacks in the world.
Sharin Govender	Sharin indicated that the uMhlatuze Municipality are interested in the project and feel it is important for them to	Claire	Claire indicated that a meeting with the municipality would be arranged during the EIA phase consultation period.

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I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
(uMhlatuze Municipality)	<p>understand the local level planning needs for a project such as this, including linkages to onshore and future developments that could occur. The municipality would like to be strategically prepared if needed. She also stated that she is aware that it is likely premature for this sort of planning.</p> <p>She indicated that this project has links to the gas to power project which should be co-ordinated, both from a spatial and timing perspective.</p>		
	Sharin requested clarity on whether the competent authority was just PASA.	Claire	Claire responded that the competent authority is the Department of Mineral Resources, but that they have delegated authority to PASA to deal with the EIA processes for oil and gas projects. The DMR still have ultimate sign off on the Environmental Authorisations.
	Sharin stated that she was concerned about possible impacts to tourism due to impacts on marine life, as well as impacts of sonar. The other concern she raised was that of coastal erosion which is a big concern along the coast in the area.	Claire	Claire responded to say that impact to marine fauna will be assessed in the EIA phase. She further indicated that the project does not involve the use of sonar and that coastal erosion or deposition will not occur based on the type of activity proposed and the distance from shore. Any cuttings to be disposed would disperse very rapidly.
	Sharin asked what would happen if after drilling the first well if nothing was found.	Alessandro	Alessandro indicated that given the two areas of interest (north and south) it is possible that if a dry well was drilled in one area Eni may still drill another well in the other area. However, it would be unlikely for them to drill additional wells in an area of interest if the first well in that area was dry. If the first well is however successful then an appraisal well would be drilled to identify the size and flow rate of the discovery. If additional wells to those covered in the EIA are needed then another EIA would need to be done.
	Sharin stated that given the gas-to-power situation there is an interest in things being done at a reasonable speed. The gas-to-power project is currently stalled due in part to the cost of gas contracts. An alternative source of gas is required.		Noted

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I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
Keith Harvey (RBIDZ)	<p>Keith stated that in the oil and gas industry the chances of success are not high, only 1 out of 8 wells are successful. A bet is being taken and he stated that this should be promoted. He used the example of drilling in Norway where numerous wells were drilled and were all dry. The majority of ships/companies left but one continued drilling and was eventually successful.</p> <p>He stated that he hoped the Blow out Preventer (BOP) was not the same as in Macondo and that Eni must be sure not to take any shortcuts with HSE related issues.</p> <p>Keith queried how many helicopter trips per day would be needed.</p>	Alessandro	Alessandro responded to state that the BOP (and many other safety aspects) has been improved since Macondo and that Eni are focussed on HSE and will not take any shortcuts.
Mike Patterson (Chamber of Commerce)	<p>Mike stated that in his view this would be good for Richards Bay and that Eni should do the project if they can as it would be a “win-win”. He provided some information on the gas-to-power project and the discussions around a potential pipeline from Mozambique. He did, however, state that the timing would be critical for a project like this.</p> <p>Mike went on to emphasise that it is critical that Eni take into consideration the sea conditions (Agulhas current) and stated that any spill would spread down the coast due to the nature of the current.</p>	Alessandro	<p>The statement regarding timing is understood and depending on how the process progresses Eni intend to move as quickly as they can.</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. An oil spill modelling study is being undertaken as part of the EIA.</p>
Dave Savides	Dave asked how extraction would be undertaken if oil/gas is found - would lots of wells then be drilled.	Alessandro	Alessandro responded to say that should oil and/or gas be found Eni would undertake careful planning to ensure that a minimum of wells would be drilled. The appraisal well is critical in this planning process. Eni do not want to drill too many wells, given that one well costs 60 – 70 million dollars to drill.
Sandy	Sandy indicated that Coastwatch are concerned about marine life and wanted to understand what would be a no-go? She also asked for the specialists to be present at the EIA meeting to present the results of the their specialist study.	Claire	A marine faunal specialist study will be undertaken to understand and assess the impact of the proposed project on marine life. Claire went on to state that generally a project would have been no-go’ed earlier in the process and not at the end,

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I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
			however a no-go decision can be made by the government during the decision making process. If feasible specialists will come to the EIA meetings to present their results.
Vumani	Vumani indicated that Transnet would like to understand expectations from the outset and asked that the project be presented early for alignment purposes. This would include aspects such as waste management. Vessel traffic is also something to consider.	Alessandro	Alessandro responded to indicate that a logistics study would be undertaken to understand the capacity at the Port and potential requirements. He further stated that Eni would engage early with TNPA to ensure alignment.
Sandy	<p>Sandy indicated that the marine faunal study needs to look at the impact of noise on humpback whales. She further queried whether the project had considered the MPAs and were the areas of interest not overlapping MPAs (or proposed MPAs)?</p> <p>She then queried what would happen after the well is drilled.</p>	Claire/ Alessandro	<p>Claire responded to state that the marine faunal study will consider noise impacts. A map of ER236 overlapping the current and proposed MPAs was shown and the fact that the areas of interest do not intersect with any current or proposed MPAs. Alessandro went on to indicate that Eni had as far as possible relinquished the parts of ER236 that overlapped with current or proposed MPAs.</p> <p>Alessandro indicated that after plugging and abandoning the well Eni would need to obtain a closure certificate (the same as mining) to prove that there is no further liability. Should the wells be successful Eni would need to apply for a production right before progressing.</p>

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**Environmental
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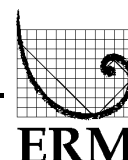
Subject/Ref 0414229: Scoping Phase Public Meeting - Eni South Africa's Offshore Exploration Drilling: Scoping Phase Public Meeting

Venue Gooderson Tropicana Hotel, Durban

Date of Meeting 07 February 2018

Present See below and attached attendance register

Building 32
1st Floor
The Woodlands Office Park
Woodlands Drive
Woodmead, 2148



A public meeting was held at the Gooderson Tropicana Hotel, where the following information was presented:

1. Welcome and Introduction
2. Introduction to Eni and ERM
3. Project Overview
4. EIA Process Summary
5. Discussion
6. Way Forward

The following Eni and ERM team members were present at the meeting

Name	Role
David Shandler	Independent Facilitator
Alessandro Gelmetti	Eni South Africa Managing Director
Marilia Cioni	Regional Media Advisor/Press Officer, Eni
Fabrizio Pecoraro	Sustainability Department, Eni
Claire Alborough	Project Manager, ERM
Ingeborg McNicoll	Project Partner, ERM
Khosi Dlamini	Project Consultant, ERM

Attached as annexures are copies of presentation material presented to the meeting in items 2, 3 and 4 of the agenda. Below is a record of the discussion as conducted in item 5 of the agenda.

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minutes

Record of Discussion held at Public Meeting

	I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
1	Desmond D'Sa (SDCEA)	Desmond D'Sa raised initial objections to the process, these included concerns regarding the following: <ul style="list-style-type: none"> • There was a lack of advertising of the meetings • Regarding notification of all I&APs (e.g. surf clubs, hostels etc) – who was notified and invited? • The presentation was too technical and confusing for the audience to understand. • The location and timing of the meeting was not appropriate • Holding three meetings in three days is too rushed • Zulu speakers were not catered for; there was no formal translation/translator or translation of the scoping report 	Claire Alborough	The meetings were advertised in four newspapers two weeks previously (the project was advertised previously in the same newspapers). Notifications were sent out to all those on the stakeholder database which is provided in the Scoping Report. The three locations were selected based on the location of the project and potential impacts associated with the project (e.g. possible location of shore base). Depending on the results of the impact assessment the engagement will be expanded as necessary.
2	Khalid Mather (Wildlands)	Khalid presented Jennifer Oblers presentation on seismic survey impacts to meeting attendees. The following concerns were raised: <ul style="list-style-type: none"> • The impacts of noise and vibrations on marine organisms • The impacts relating to seasonality such as whales migration route, turtles in current etc. • The disposal of 'sludge' produced by process • Drilling is close to sensitive areas (MPA's) 	Claire Alborough	It was clarified that this project is not a seismic survey. <ul style="list-style-type: none"> • Noise impacts will be considered during the EIA phase. • Seasonality will be taken into consideration when proposing mitigations. • Waste disposal will be further elaborated on in the EIA. • The proposed areas of interest do not overlap with current or proposed MPA's.
3	Vusi Zweli (UMH)	Vusi indicated that he did not feel stakeholders were notified of the process and that he is used to being listened to. He indicated that he was concerned regarding the language issue and that the translation was insufficient. He stated that they want black people, presenting the project in our own language. He further indicated that he is worried that Eni as a foreign company are going to take South Africa's		Responses to EIA process concerns included in line 12 and to questions regarding the strategic motivation for the project and benefits of the project in line 13.

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	I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
		resources. (Note that this comment was translated from Zulu during the meeting).		
4	Fred Kockott (Roving Reporters)	What do you hope to discover? What will you do about the request for translation into Zulu?	Alessandro Gelmetti	It is unknown at this stage. It could be either oil or gas or a combination. Translation of documentation will be discussed and we will provide feedback.
5	Njabulo Ndwandwe	<p>Njabulo indicated that in his view SA is somewhere that foreign people just take take take. This project will have limited employment and it will be risky employment. Eni has come from Italy to 'move the earth' and will leave SA with the negative effects. He queried if Eni had considered the people on the coast, including impacts on people and the environment. He then stated that people are tired of promises of employment that do not occur. 'Leave the land alone.' He indicated that a bottom up approach would be preferable and that Eni/ERM should listen to the people.</p> <p>The number of meetings was criticised, and he indicated that in his view meetings should also have been held in the following locations:</p> <ul style="list-style-type: none"> • Tugela Mouth • Cape Vidal • St Lucia • Kosi Mouth • Umkomaas • Transkei coast <p>It was noted that the impact on the sardine run needs to be discussed.</p> <p>A further comment was made regarding the use of inhouse ERM specialist people to do studies is a problem. Referee and decision maker.</p>		<p>*It should be noted that people were given the opportunity to speak, but due to the length of the comments and discussion time not all comments were immediately responded to. A consolidated response was provided by Alessandro Gelmetti of Eni and Claire Alborough of ERM. It was agreed that a further meeting would be convened to discuss certain of the issues raised which required further response.</p> <p>Responses to EIA process concerns included in line 12 and to questions regarding the strategic motivation for the project and benefits of the project in line 13.</p>

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	I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
6	Vusi Zweli	<p>Vusi stated that the news presented is devastating. He stated that Eni currently works in several countries in Africa and employs many people but queried how many of these jobs are for local people. He went on to state that there are no employment opportunities associated with the project. He indicated that although Eni may have worked in other areas in Africa, they are now in KZN and things are different here. He criticised the meeting and stated that the person doing the translation was not an interpreter.</p> <p>He also queried whether or not all stakeholders have been consulted (such as King Zwelintini).</p>		<p>Responses to EIA process concerns included in line 12 and to questions regarding the strategic motivation for the project and benefits of the project in line 13.</p>
7	Desmond D'Sa	<p>Desmond had the following queries:</p> <ul style="list-style-type: none"> • What are the advantages and disadvantages of the project. The disadvantages have not been presented. Would advantages just be jobs? • Where are you planning to discharge wastes and will this have an impact on the community or the environment? <p>He criticised the process, indicating the following:</p> <ul style="list-style-type: none"> • The hostels and people in Umlazi were not notified of the project. • The presentation was too technical. <p>He went on to state that this project will bring no jobs for the people but they will be the ones who are impacted negatively. There is nothing Eni can help us with.</p> <p>He went on to state that Libyans benefitted when Gadaffi was around. Anger about the proposed project was expressed.</p>		<p>Responses to EIA process concerns included in line 12 and to questions regarding the strategic motivation for the project and benefits of the project in line 13.</p>

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	I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
8	Mvuzo Ntombela	<p>Mvuzo indicated that in his view there is an issue with surveys (studies) that will not be done and that should the surveys not be done ERM would have failed in the EIA.</p> <p>He went on to state that given the 70 day operation and the skills needed no local people can be employed. He said that it is the same story as others who have come before, jobs are promised but none are realised.</p> <p>He indicated that there is an issue with the public participation and stated that everyone at the meeting was only there because of one person, and if it was not for him they would not have known about the process. He noted that many people do not know how to use the internet. Disagrees with the entire process.</p>		Responses to EIA process concerns included in line 12 and to questions regarding the strategic motivation for the project and benefits of the project in line 13.
9	Alice Thomson (Earthlife Africa)	<p>Alice made a presentation on behalf of Earthlife Africa, she started by stating that the droughts in South Africa caused by climate change should be a wake up call for all of us. Crops are failing, cattle are dying and people are going to have to start queueing for water. Climate change is happening because of projects and companies like this. This is a fight for our lives.</p> <p>There is a carbon bubble, an amount of carbon that cannot be used if we want to stay under the 2 degrees of warming committed to under the Paris agreement. We cannot afford to extract more than 20 percent of existing reserves. The remaining 80 percent must stay below the ground if we are to avoid catastrophic climate change, so why explore for more.</p> <p>By exploring you are betting that the government will not stick to the climate change agreement.</p>		Responses to EIA process concerns included in line 12 and to questions regarding the strategic motivation for the project and benefits of the project in line 13.

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	I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
		<p>She indicated to Eni that their presence in host countries should have improved conditions, but this has not been shown. In Nigeria Eni have had explosions, 193 oil spills in 2015, that is 4 every week. Eni explore and impact on fragile areas (eg Artic). It has been shown that people get sick, there is reduced fishing and therefore food. Although there has been a 50 year oil boom in Nigeria 80 percent of people still live on less than \$2 per day.</p> <p>Eni and Shell have also been implicated in a corruption deal in Nigeria and are still under trial in Italy. We don't want this company in South Africa.</p> <p>She ended off by indicating that language interpretation is key, and stated that the meeting was not good enough.</p>		
10	Sizwe Shiba	<p>Sizwe started out by stating that the people are expecting jobs from these sorts of projects, companies come here and promise jobs, but these are not realised.</p> <p>Sizwe stated that this project and Eni are here because of capitalism and that he hates capitalism because companies and people only think of themselves and they are willing to kill for profit. He went on to state 'you are capitalists'.</p> <p>He indicated that the people have paid a lot and have had enough. He accused the team of not presenting the disadvantages and indicated that he felt only the minority of people are being consulted on the project not the communities. He stated that the damages caused by the project will be paid by the people and that that is why we they fighting. He stated that their forefathers were robbed,</p>		Responses to EIA process concerns included in line 12 and to questions regarding the strategic motivation for the project and benefits of the project in line 13.

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	I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
		<p>uneducated black people were taken advantage of but that they are now aware of what is happening.</p> <p>He finished off by stating: 'I don't hate you as people, but this project will have a bad impact on the community.'</p>		
11	Desmond D'Sa	<p>Desmond repeated a number of his concerns related to the EIA process.</p> <ul style="list-style-type: none"> • The project was only advertised in some media and newspapers but not in all. • Only some people know about the project, but not all people and that ERM had failed to gather people, such as the surfers, tourism and fishing clubs and that based on that the meeting should be null and void. • The location of the meeting in a hotel is not appropriate as not all people can attend. • There is a lack of professional translation at the meeting. • Meetings have been rushed. • No colour copies were provided to the people. This is a violation of the regulations. There has been no access to the information, you have failed to provide it to us. <p>Based on the above Desmond stated that the meeting is not legal and that people have been undermined. He indicated that there is concern around the process and that it is unfair.</p> <p>He then went on to indicate that people in KZN already have jobs in tourism and you are going to destroy that with this project.</p> <p>He pointed out that Eni's growth and projects in Africa are shown but the damage to people, poverty,</p>		<p>Responses to EIA process concerns included in line 12 and to questions regarding the strategic motivation for the project and benefits of the project in line 13.</p>

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minutes

	I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
		<p>and lack of upliftment are not shown. Have African countries benefitted from Eni? Show us the benefits.</p> <p>Desmond asked Eni why they do not rather just invest in renewables and use their money for good and create jobs.</p> <p>He stated that the people have been bitten once too often and do not trust Eni. He asked: 'Sasol are your partner, why aren't they here? Sasol doesn't create jobs in SA. What have they invested?'</p> <p>He followed up by indicated to Eni that in Africa they have caused damage to the coastline, but they do not exploit the coastline of the EU. 'You have already exhausted your own coastline in Italy, so now you come here. If we show you evidence, will you back out?'</p> <p>Desmond indicated to ERM that in his view ERM experts cannot be used during the process, as ERM cannot be the referee and player. Equally PASA should also not be referee and player, however he acknowledged that that was something outside of the scope of the EIA.</p> <p>He went on to state that issues that have been excluded are important to him and other stakeholders and should be discussed further and not left out of the EIA. He stated that their coastline is beautiful and needs to be properly investigated and not destroyed.</p> <p>It was indicated that emergencies/disasters were presented as a small thing in the presentation, but no information on how the project would deal with emergencies. He then stated that Eni must already</p>		

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	I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
		<p>have the information and not want to share it with stakeholders. He stated that they will fight for information.</p> <p>Desmond indicated that the project has been presented as if it is only a small project, but it is a humungous problem. He stated that the people will only see what the impact is once all the marine life is gone. 'We need natural fish, not fake fish from a farm. We are free people, don't put us in cages and make the project look small.'</p> <p>He ended off stating that the process followed was flawed and that they will challenge it.</p>		
12			Claire Alborough	<p>Claire provided responses to concerns raised during the discussion period:</p> <p><i>Meeting Locations</i> As previously indicated during the presentation the locations for the meetings were chosen based on the geographical location of the areas of interest and where the potential impacts will likely be felt (eg shore base in either Richards Bay or Durban).</p> <p><i>Identification of Stakeholders</i> A stakeholder database was developed at the start and included stakeholders who were involved in previous processes, government departments, fishing organisations, NGO's, municipalities.</p> <p><i>Advertising</i> The availability of the Scoping Report and the details of the meetings were advertised in 4 newspapers in both Zulu and English. Notices were placed in libraries and municipal offices along the coast. Copies of the report are available in the Durban, Port Shepstone and Richards Bay libraries.</p>

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	I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
				<p>Modifications to the process will be considered based on the results of the specialist studies and responses received from stakeholders in other areas. We will certainly organise translation for future meetings.</p> <p><i>Scoping of Potential Issues/Impacts</i> With regards to issues screened out during the Scoping phase. The majority of these were screened out due to the very limited time and scale of the currently proposed project. There is further information on each aspect in Chapter 6 of the Scoping Report.</p> <p><i>Specialist Studies and Independence</i> Four specialist studies are proposed (marine fauna, fishing, oil spill modelling, cuttings dispersion modelling). The oil spill modelling will be undertaken by an ERM specialist team and will be peer reviewed. It should also be noted that ERM have been appointed in terms of the National Environmental Management Act as the Independent Environmental Assessment Practitioner and have had to sign a declaration of independence. The specialists will each have to do the same.</p>
13			Alessandro Gelmetti	<p>Alessandro provided the following response to concerns raised by meeting attendees:</p> <p><i>Strategic Project Motivation</i> As indicated in the presentation, the government of South Africa is promoting the exploration for oil and gas to potentially improve the country's security of supply and diversify the energy mix. Eni and Sasol took the decision to participate and has been granted an Exploration Right by the government.</p> <p><i>Benefits</i></p>

Meeting
minutes

	I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
				<p>The proposed exploration drilling project is limited in time and there will be no or limited benefit at this stage. This would of course change should a commercial discovery be made. The long-term benefits could be great and could include reduction in imports of hydrocarbons, employment opportunities.</p> <p>Eni is not here to take South Africa's resources; in any event it makes sense for any oil/gas found to be supplied in South Africa. South Africa needs energy and needs to reduce the use of coal for electricity.</p> <p>Alessandro then asked the stakeholders to assist with improving the presentation of information.</p>
14	Desmond D'Sa /Vusi Zweli	<p>It was suggested that the presentation should be in Zulu using a scholar who could make sure it is at the level people can understand. The presentation and documentation should be made simpler to understand.</p> <p>Certain aspects of the presentation should also be explained in more detail – eg why issues screened out.</p>		Thank you for your suggestions.
15	Desmond D'Sa	Desmond indicated that they insist on another meeting in their own community as the team failed to answer their questions due to time concerns. He stated that the meeting should be stopped in for the team to do further research and come to present.	David Shandler	David noted that certain participants were not happy with the responses and indicated that many questions and concerns were raised. He stated that another meeting would certainly be held during the EIA process and further discussions and responses to queries will be provided.

**Meeting
minutes**

**Environmental
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Subject/Ref 0414229: Scoping Phase Public Meeting - Eni South
Africa's Offshore Exploration Drilling

Venue Port Shepstone Country Club

Date of Meeting 08 February 2018

Present See below and attached attendance register

Building 32
1st Floor
The Woodlands Office Park
Woodlands Drive
Woodmead, 2148

0117988060
Facsimile
Email khosi.dlamini@erm.com



A public meeting was held at the Port Shepstone Country Club, where the following agenda was followed:

1. Welcome and Introduction
2. Introduction to Eni and ERM
3. Project Overview
4. EIA Process Summary
5. Discussion
6. Way Forward

The following Eni and ERM team members were present at the meeting

Name	Role
David Shandler	Independent Facilitator
Alessandro Gelmetti	Eni South Africa Managing Director
Marilia Cioni	Regional Media Advisor/Press Officer, Eni
Fabrizio Pecoraro	Sustainability Department, Eni
Claire Alborough	Project Manager, ERM
Khosi Dlamini	Project Consultant, ERM

Meeting
minutes

Record of Discussion held at Public Meeting

I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
Allan Carly	<p>What is the 500m exclusion zone?</p> <p>How thick is the steel casing?</p>	Alessandro	<p>The 500m exclusion is required by law and it is only around the drilling vessel during drilling activities.</p> <p>The largest casing at the top has a diameter of 36 inches (hole size 42"), whereas the smallest casing at the bottom has a diameter of 9.5 inches. Casing wall thickness varies depending on the casing size and range on average from 7 to 15 mm.</p>
John Irvin	<p>How is this project funded?</p> <p>Has the possibility of a freak wave over the East Coast of Africa been taken into account? Vessels have been snapped in half.</p>	Alessandro	<p>The project is being funded by both Eni and Sasol.</p> <p>Eni have looked at the hydrodynamics of the marine environment in the area already and prior to drilling would ensure the hydrodynamic information is available.</p>
Desmond D'Sa	<p>What is the source for the funding? Is it coming from the company itself or is it sourced from external financial institutions? What is the external source?</p>	Alessandro	<p>Financing of the drilling will be largely through the company's own sources with some borrowings. These resources include financial assets, credit lines and a variety of other types of financing, obtainable at competitive costs through the banking system and capital markets.. No funding is sourced from international or regional multilateral development financial institutions like World Bank, Africa Development Bank, etc</p>
Jennifer Olbers	<p>Will the drilling location be narrowed down in the EIA process?</p> <p>When the decision regarding the drilling is done, will I&APs be informed?</p> <p>Has seismic data already been acquired?</p> <p>What is the diameter of the well?</p>	Claire/ Alessandro	<p>No the whole area of interest will be assessed in the EIA.</p> <p>Yes, I&APs will be informed prior to the undertaking of drilling.</p> <p>In the northern area of interest the seismic has already been undertaken by a geophysical contractor under a Reconnaissance permit. In the southern area the seismic survey information is still to be acquired from another contractor.</p>

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I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
	<p>Will there be concurrent drilling in all 6 wells?</p> <p>Will there be benthic assessments done before and after drilling activities commence.</p>		<p>This varies and reduces in size as the well gets deeper. A detailed response was provided in the first line above.</p> <p>The wells will be drilled one at a time.</p> <p>A benthic assessment with marine sampling is not planned for during the EIA process. There will however be a Remote Operated Vehicle (ROV) survey done before and after the drilling. Eni have developed a new kind of Autonomous Underwater Vehicle which could potentially take water and sediment samples to look at the benthic environment.</p>
Phila Ntombela	<p>Phila indicated that the migration of people from other countries to South Africa is a big issue in the country. He expressed the view that Nigerians are running away from their country because of the mess made by companies like Eni.</p> <p>He further expressed concern regarding the representation of the public or communities in these meetings. He stated that the EAP will merely say that they have been here and the community says yes.</p>		The comment is noted
Desmond D'Sa	<p>Desmond stated that Eni is responsible for the malpractice as well as oil spills in various African countries including Nigeria and Mozambique.</p> <p>He indicated that no job opportunities are presented along the Durban coastline.</p> <p>The Public Participation Process is a flawed process as it is not reaching the masses. Many areas along the coast have not been considered in this process and many people are worried about this project.</p>	<p>Alessandro</p> <p>Claire</p>	<p>This comment is noted.</p> <p>It was confirmed during the presentation that only a limited number of local jobs will be created during this stage of the project.</p> <p>Claire indicated that the Public Participation process was developed based on the location of the proposed drilling areas - the northern area is broadly in line with Richards Bay and the southern area with Port Shepstone. The project proponent is also considering having their land base in Durban.</p>

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I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
	<p>Desmond went on to state that many people would be affected by the degradation of the coastline resulting from the project. Fisheries are also affected.</p> <p>It is requested that the Scoping Report be translated into isiZulu.</p> <p>ERM is both the facilitator of the project and doing the associated studies, which would imply a bias. He indicated that the peer review mentioned should be outside of ERM.</p> <p>Desmond asked why impacts have been excluded from the assessment and stated that ERM should be open and do the research and studies. For example regarding jobs and air quality.</p> <p>There is a potential of waste impacts on the coast.</p>		<p>Both and marine fauna and fisheries specialist study will be undertaken as part of the EIA process. During normal operations it is not anticipated that any impact would occur to the coastline.</p> <p>Claire responded to indicate that the Executive Summary of the Scoping Report is being translated into isiZulu and will be distributed.</p> <p>ERM has hired independent specialists to conduct specialist studies. ERM is only tasked with conducting modelling assessments. The oil spill modelling will be peer reviewed. The peer review will be conducted by a company outside of ERM but would be contracted by ERM.</p> <p>The issues scoped out in the scoping report were merely identified as issues that due to the short time scale and the limited scope of the project would not have a significant effect on the environment.</p> <p>Wastes and waste disposal will be dealt with in the EIA.</p>

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minutes

I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
Paddy Norman	<p>Paddy stated that although oil exploration is dangerous, it does not mean that it cannot be done. He had a number of questions for the project team.</p> <ol style="list-style-type: none"> 1. Has the project team made use of previous seismic data? 2. Is the data used in selecting the boreholes available in the EIA? 3. The Constitution makes mention of “informed consent” 4. Will there be deflections on the wells? 5. Would you list the chemicals you will use in the EIA? 6. The entire hole in its depth must be sealed after abandonment – will this be done? 7. Drilling activities weaken the area of impact, there is a potential of high pressure water seeping in after the well has been abandoned. There is a potential of other problems arising once the well has been abandoned. Will there be monitoring and follow ups done every few years after capping the well? 8. How much insurance does Eni have? 	Alessandro	<ol style="list-style-type: none"> 1. Alessandro indicated that Eni has acquired previous speculative seismic data undertaken over the exploration area. 2. No, this will not be in the EIA. Noted. In order to get access to data, an individual would need to pay a licence fee to the owner of the speculative seismic data 3. Informed consent is not required in terms of NEMA. NEMA requires ‘public participation’. 4. No, there are not anticipated to be deflections in the wells. 5. Yes, the chemicals used will be listed in the EIA, some of which are in fact included in the Scoping Report. 6. Yes, the length of the well will be sealed off with cement in segments, as per industry standard requirements. 7. Wells will be abandoned after plugging. Monitoring the wells is not standard practice. 8. Insurance is required in terms of NEMA for the closure of the well. There will also be insurance required by PASA. A large scale emergency cannot be fully insured, however this would be financed off Eni’s balance sheet.
Desmond D’Sa	<p>Desmond queried which insurers are used by Eni.</p> <p>He went on to state that the “no-go option” must be assessed and also indicate the impact it will have on tourism.</p>	Alessandro/Claire	<p>Alessandro indicated that this information would be provided once confirmed.</p> <p>Claire responded to state that the no-go option will be assessed as part of the EIA.</p>
Paddy Norman	<p>Paddy had the following additional questions:</p> <ol style="list-style-type: none"> 1. Will an emergency plan be made available to the public? 2. Will a different EIA from the one developed during Exploration be conducted for the Production phase? 3. Will the casing go all the way down? 	Alessandro/Claire	<ol style="list-style-type: none"> 1. An Oil Spill Contingency Plan is required to be approved by the government prior to drilling activities. The approval process does not require public engagement to our knowledge. 2. Yes, another EIA would need to be done should the exploration drilling be successful. 3. Alessandro provided a full description of how a well is drilled and cased/cemented.

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I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
	<p>4. Specialist studies: Will onsite surveys be done? Given the migratory path just one year of surveys wouldn't be enough. Please provide detail of what the studies will not cover. This is important as things change, e.g., the coastline hasn't recovered after a storm in 2007. There is a lack of detailed baseline information.</p> <p>5. Blow out Preventer (BOP): Has the BOP been designed to suit aggressive conditions? 'BOPs are wonderful things until they go wrong.'</p> <p>6. How are the borehole locations related to the marine protected and shipping areas?</p> <p>7. In your studies, have you considered noise volumes and frequencies?</p> <p>8. No-go option: In the EIA please detail the positive and negative impacts of the no-go option.</p> <p>9. As part of the Public Participation process, an advert was supposed to be released in a local newspaper</p> <p>10. Have the specialists considered the coelacanths in the canyons?</p> <p>11. Will drilling occur during migration periods?</p> <p>12. Where will the product be going once drilled?</p>		<p>4. Claire responded to indicate that primary data collection is not proposed for this project. The Terms of References for the specialist studies are included in the Scoping Report.</p> <p>5. Alessandro responded that often the disasters are in fact due to human error and not equipment failure. Eni does not have a history of spills during exploration and are also not wanting to destroy the environment. The BOP is tested before and during operations to ensure proper functioning. The Macondo tragedy helped the industry to design new methods and tools to manage large disasters, e.g., a capping stack becoming available at a base in Saldanha Bay.</p> <p>6. They are located outside of current and proposed MPAs. Some shipping areas could be affected, but given the short time frame and the notification requirements this is unlikely to be an impact.</p> <p>7. Noise impacts will be assessed in the EIA.</p> <p>8. More information will be provided on the no-go option in the EIA.</p> <p>9. Advertisements were placed in local and provincial newspapers, however as discussed a more suitable paper for this specific area has now been identified.</p> <p>10. The specialist has discussed the possibility of coelacanths in the canyons. No drilling will take place in the canyons.</p> <p>11. Mitigation measures will be provided in the EIA and one may include the exclusion of certain time periods. This will be confirmed in the EIA.</p> <p>12. Given the stage of the project Eni is not able to say where the product would go, however it would make sense for it to stay in South Africa and supply local power generation and industry.</p> <p>13. Local employment during the exploration phase will be very limited, however this would change should the project go to development.</p>

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I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
	<p>13. Will there be local employment? How many local employment opportunities are anticipated?</p> <p>14. Will there be training provided for the locals to equip them for job opportunities?</p> <p>15. Will Eni consider local procurement?</p> <p>16. The peer review should be undertaken by a distinctly independent party</p> <p>17. What is PASA's vested interest in this? PASA are not independent.</p> <p>18. How long is the transition from high carbon to green gas meant to last? 60 years?</p> <p>19. Will there be carbon footprint offsets for this project?</p>		<p>14. Yes, in case of successful exploration results and progress to development and production, training would be provided.</p> <p>15. Local procurement is seen as a priority by Eni.</p> <p>16. Peer review of oil spill modelling is to be undertaken by PRDW.</p> <p>17. Comment noted.</p> <p>18. Alessandro responded to indicate that there is a strong motivation from Eni to move toward that, but acknowledged that it could take time.</p> <p>19. No, there will not be any carbon footprint offsets for this project, namely the exploration drilling.</p>
Desmond D'Sa	<p>Desmond stated that it seems as if a low carbon economy is not a priority and that the Paris agreement has not even been considered. Projects like this should be part of that discussion. There should be a commitment to move to that as soon as possible. This sort of project will block the progress of this country. From a moral and ethical standpoint this should not be done. Eni should be committing to renewables, not extracting more fossil fuels.</p>	Alessandro	<p>Alessandro responded to say that Eni agrees the world needs to move to a greener economy but that changing a company takes time. Three years ago Eni started a new division to do research and development on energy solutions. Eni is already using solar energy to run compressors in Ghana for example and are committed to doing what they can to move toward a greener economy.</p>

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I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
Samuel Chademana	<p>Samuel had a number of questions for the project team:</p> <ol style="list-style-type: none"> 1. Is there a possibility of scoping beyond the areas specified in the scoping report? Are the impacts of all scoped areas included? 2. What are the time periods of the entire project? 3. What are the exclusion zones? 4. Will climate change be assessed as part of the specialist studies? 5. What is Eni's level of liability in this project should anything happen? <p>There is no justification for the proposed activities from an environmental perspective. In future, meetings should be held in a more appropriate venue for all stakeholders.</p>		<ol style="list-style-type: none"> 1. Impacts that will extend outside of the areas of interest and/or ER236 will be assessed. The Scoping Report does not exclude areas from assessment it merely limits where the drilling can take place. 2. The drilling of one well will take approximately 60 – 70 days. The entire time period in which drilling could take place over a period of a few years due to the nature of exploration drilling. 3. The 500m exclusion zone is a temporary exclusion around the drilling vessel during drilling activities only. 4. Climate change will be assessed during the EIA. This will be based on vessel emissions only. 5. Eni would be liable for clean up. <p>These comments are noted.</p>
Allan Carly	Advertising for the proposed project and the public meeting was very poor.	Claire	Thank you for the comment. This has been noted and advice regarding advertising for the next stage has been given.
Phila Ntombela	<p>Natural disasters have always been blamed on God, e.g., the tsunami in China. No responsibility is taken by the companies involved in causing the climate change. Governments just protect them and hide what they have done. How do we know you did not cause a tsunami from water rising in the borehole.</p> <p>There is a lack of awareness and knowledge about the company in question and their activities could cause a dramatic impact.</p>		This comment is noted.
Desmond D'Sa	Information regarding Eni and its history should be made available to the public.		This comment is noted.

Meeting
minutes

I&AP Name	I&AP Comment/Question	Project Team Name	Project Team Response
Paddy Norman	<p>The area in question has the highest potential for seismic activity in South Africa. Have the specialists picked this up?</p> <p>Will the project team be able to send through a hard copy of the EIA once done?</p>		<p>Seismic activity will be considered in the design of the well.</p> <p>Distribution of hard copies can be discussed. A copy will be available in the Port Shepstone Library.</p>
Mvuzo Ntombela	<p>Mvuzo firstly said that the venue selected for the public meeting is an issue and excludes certain people. He asked for a better venue to be considered next time. He said that his comments are not to be taken personally but that he wants to be the voice of the voiceless. He then went on to ask that the EIA be transparent and clear so that they can understand what is proposed and what the impacts are.</p>	Claire	This comment is noted and the venue for the EIA meeting will be reconsidered.
Jennifer Olbers	Will there be another public meeting held for the EIA phase?	Claire	Yes
John Irvin	John stated that in his opinion Eni sound like a responsible company but he is concerned that if exploration were successful that leaders and authorities won't know what to do with funds when they receive them. In his view they should be educated on how to manage the funds.	Alessandro	Alessandro responded that Eni always commit to dealing with the government, i.e., not with third parties. Income to the government will accrue from tax and royalties.
Desmond D'Sa	Desmond stated that companies such as Eni are only concerned with making profits, and the wealth is all taken to their home country. Nothing will benefit South Africa, they create a limited amount of job opportunities and take the oil. For example, Mozambique is worse off than before.		This comment is noted.

Meeting minutes**Environmental Resources Management**

Subject/Ref 0414229

Venue Austerville Community Hall: 6 Percy Johnston Rd, Wentworth, Durban, 4052

Date of Meeting 28 February 2018

Date 2 March 2018

Building 32
1st Floor
The Woodlands Office Park
Woodlands Drive
Woodmead, 2148
T: +27 11 798 4300
F: +27 11 804 2289
<http://www.erm.com>



A follow up meeting requested by the SDCEA was held at the Austerville Community Hall on 28 February 2018. The aim of this meeting was to provide clarity on some of the issues and concerns raised during the Public meeting held at the Tropicana Hotel in Durban on 7 February 2018.

The Agenda of this follow up meeting was as follows:

- Welcome and Introduction
- Project Background
- Response to Concerns Raised
- Way Forward

The attendees from the project team included:

Name	Role
David Shandler	Independent Facilitator
Bongi Shinga	Independent Translator
Alessandro Gelmetti	South Africa Managing Director, Eni
Marilia Cioni	Regional Media Advisor/Press Officer, Eni
Fabrizio Pecoraro	Sustainability Department, Eni
Ingeborg McNicoll	Project Partner, ERM
Claire Alborough	Project Manager, ERM
Khosi Dlamini	Project Consultant, ERM

Copies of the isiZulu Draft Scoping Report Executive Summary and the SDCEA response letter are attached as appendices.

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minutes

Record of Discussion held at Public Meeting

Stakeholder Name	Comments/Questions	Responses
Desmond D'Sa	<p>Desmond stated that there are many Zulu speakers in the room who have not received the isiZulu translated document. Similarly, Many English speakers did not receive a copy of the English written document.</p> <p>Desmond indicated that he/they need an explanation about Sasol's involvement in this project and why they were not present at the meeting.</p>	<p>David indicated that 50 copies of the isiZulu Scoping Report Executive Summary were distributed and some additional English copies were available (these were then distributed to those who needed them). 50 copies of the response letter in English were also available and more can be provided on request.</p> <p>David indicated that Alessandro would present further detail in terms of Eni and Sasol's involvement and explain their different roles.</p>
Vusi Zweli	Vusi stated that they would like to make a proposal to get together as a community to discuss the answers and asked if they could just listen to the answers and then present a joint response.	David indicated that this was up to them and they could propose the method for providing replies.
Desmond D'Sa	Desmond indicated that they would like to see the contract agreement between Eni and Sasol to get an idea of who would be liable in case of damages, as well as the agreement between Eni, Sasol and the government.	These requests were noted.
Stakeholder	A stakeholder asked: 'Are we expected to accept the agenda as it is, or can we be given room to change it? We would like to propose that Eni, the Facilitator and ERM leave the room to give the community an opportunity to discuss a way forward.'	David responded that the agenda could be amended as required.
Hoosen Bobat	<p>Will individuals be given an opportunity to comment on this project?</p> <p>Is this meeting meant to be a platform for ERM and Eni to present the decision already made, or is this a decision-making meeting?</p>	<p>David indicated that this is up to the attendees of the meeting. They could ask questions or make comment individually or collectively.</p> <p>David responded to say that the meeting is intended as part of the Scoping Phase of the EIA to merely present information and gather comments and respond to questions.</p>
Bobby Peek	Bobby stated that 60% of this project is owned by Sasol and wanted to know why they are not attending this meeting.	This request is noted. Sasol are not the operator of ER236 in terms of the agreement between Eni and Sasol and are therefore not responsible for obtaining permits, including applying for and being involved in the EIA.

Meeting
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Stakeholder Name	Comments/Questions	Responses
	<p>We would like to see the contractual agreement between Sasol and Eni. If the contract has expired, was there a renewal process? We would like to get detail and a record of that renewal process.</p> <p>There is a need for an independent facilitator in these meetings who will not be biased.</p>	<p>Alessandro responded during the presentation to provide detail on the renewal process undertaken.</p> <p>David indicated that a different facilitator can be used if required. This would need to be agreed by all.</p>
Desmond D'Sa	<p>Desmond indicated that they want Sasol here to answer to these questions. He questioned whether it was possible to proceed without Sasol being present. Eni, ERM, the facilitator and translator were asked to leave to give the community an opportunity to discuss a way forward.</p>	<p>ERM, Eni, the facilitator and translator left the room as requested and then returned when invited back.</p>
Vusi Zweli	<p>The participants reported that they wished to accord respect to the representatives of Eni and ERM so as to allow them to present the information they had come to present.</p> <p>* Thereafter presentations on Eni, the project and the EIA process were given. Subsequent discussion and contributions from participants did not allow for the responses to the issues and questions raised in the earlier meeting in Durban to be presented.</p>	
Bobby Peek	<p>Bobby relayed the following requests/demands:</p> <ul style="list-style-type: none"> • The participants required everything from the meeting to be said in writing; and they would put their responses in writing. • The participants requested that Sasol attend the next meeting. • The participants requested that the DEA and/or the DMR attend the next meeting. • The participants requested that the permit as well as the extension granted be made available to the public. 	<p>These requests were acknowledged and noted and it was reiterated that the response letter distributed included written responses to the issues raised during the previous Durban meeting. All comments and queries will be documented and included in the Final Scoping Report.</p>
Desmond D'Sa	<p>Desmond stated that the issue around Sasol's role in this project and their presence in these meeting was raised during the meeting in Durban, however, the response letter that had been provided makes no mention of Sasol.</p> <p>He therefore questioned the purpose of this meeting as the key partner in the project (Sasol) was not present.</p>	<p>Alessandro responded to indicated that originally Sasol was the holder of the exploration right. In December 2014, Eni created a joint venture with Sasol into the project. This venture was beneficial where funds are concerned and it also provided Sasol with the technical support needed to execute the project. Eni became the operator of the block and are therefore responsible for technical and permitting aspects of the project.</p>

Meeting
minutes

Stakeholder Name	Comments/Questions	Responses
Stakeholder	A stakeholder noted that consideration be given to having audio in the next meeting so that people can hear.	The suggestion was acknowledged.
Khalid Mather	<p>Khalid had the following queries:</p> <ul style="list-style-type: none"> • Where is PASA based? • Was the community included in the process undertaken when granting Eni a permit? • Where was the seismic information obtained? 	<ul style="list-style-type: none"> • Claire responded that PASA are based in Cape Town. • The Exploration Right process does not involve public engagement. • Alessandro responded to indicate that seismic data are required to understand where to drill but that this project is for the exploration drilling activities only. Seismic data is being obtained through geophysical contractors who operator in terms of separate reconnaissance permits.
Bobby	<p>Bobby stated that the consultants know that the EIA process is flawed. He went on to state that these consultants will go back to government and report that they followed the legislated procedure as required. What the community needs is a written document of all the meetings held, the issues raised, as well as responses.</p> <p>Eni needs to come back with Sasol to help answer to some of these questions as well. It is also requested that the government attend the next meeting.</p>	<p>David indicated that the meetings have and will all be documented and included with the Final Scoping Report. It was also noted that responses to comments and queries from the previous Durban meeting were documented in a letter sent to SDCEA prior to this meeting.</p> <p>These requests are noted and will be communicated to the relevant parties.</p>
Hoosen Bobat	Hoosen presented his questions and concerns regarding the proposed project. He stated that Block ER236 affects more places along the coast than those which it had been decided to have meetings at. Amongst those areas is the important Isimangaliso Marine Protected Area. ER236 is right in the middle of the Agulhas current. The coelacanths are also affected – what plan do you have to manage this? Have you considered the Turtles in Sodwana Bay?	<p>Due to the early closing of the meeting there was no opportunity to provide a verbal response to Hoosen.</p> <p>Note that responses to similar queries are included in the SDCEA response letter distributed to all meeting attendees and attached to these meeting minutes. This includes information on the consultation process followed and the motivation for the meeting locations chosen. A marine faunal study will be undertaken to determine potential impacts to sensitive species and areas.</p>
Stakeholder	It was stated that this meeting should end. Eni should come back with the DMR as well as Sasol.	The meeting was closed. Note that the detailed responses prepared were not able to be presented to the attendees.