

20 October, 2023

Our ref: 1570/GPK/lj

SAHRA CaseID: 21617

South African Heritage Resources Agency

Attention: Ms Nokukhanya Khumalo

Dear Madam:

RE: BLOCK 3B/4B EXPLORATION PROJECT: INTERIM COMMENT: IN TERMS OF SECTION 38(8) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)

The interim comment detailed in the letter dated 20 September 2023 regarding the above project, has reference. This letter serves to provide a response to the interim comments and to detail the proposed way forward in this regard.

1. Introduction

Africa Oil SA Corp, Ricocure (Pty) Ltd and Azinam Limited (a wholly owned subsidiary of Eco Atlantic) (the Joint Venture Partners of the Block 3B/4B Exploration Right - hereafter jointly referred to as the Applicants) have appointed Environmental Impact Management Services (Pty) Ltd (EIMS) as the Environmental Assessment Practitioner (EAP) to assist with undertaking the required authorisation processes (including the statutory public participation), and to compile and submit the required documentation in support of application for an Environmental Authorisation (EA) in accordance with the National Environmental Management Act (Act No. 107 of 1998 - NEMA).

The comment period for the draft version of the Scoping Report was from 19 July - 21 August 2023 and the final version of the Scoping Report, incorporating all comments received, was submitted to the Competent Authority on 1 September 2023. The Interim comment dated 20 September 2023, issued via the South African Heritage Resources Information System (SAHRIS) requested the following:

"A BID document and Scoping report was submitted to the case and it indicates that a impacts on social environment and intangible heritage impacts will be assessed as part of the Scoping and EIA process. However, the impacts to potential heritage resources on the coast and underwater cultural heritage have not been included in the study plan.

Interim Comment

The SAHRA APM Unit acknowledges receipt of the BID application and request that the following is undertaken in terms of section 38(3) of the National Heritage Resources Act (25 of 1999) as part of the EA application process. The proposed offshore drilling has the potential to impact negatively on heritage and/or cultural resources, therefore a maritime heritage impact assessment must be conducted. A field-based assessment of the impact to archaeological resources, ship wrecks, and other maritime cultural resources must be conducted by a qualified maritime archaeologist. The report must comply with section 38(3) of the NHRA and the SAHRA 2006 Minimum Standards: Archaeological and Palaeontological Component of Impact Assessments, and the 2012 Minimum Standards: Archaeological Component of Heritage Impact Assessments. The Minimum Standards provides allowance for a Letter of Recommendation for Exemption that can be submitted by a qualified archaeologist should they deem it appropriate.

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*In addition, a Desktop Palaeontological Study with a Fossil Chance Finds procedure must be drafted by a suitably qualified palaeontologist familiar with continental shelf that must be used in the event that some fossiliferous rocks and fossils are identified. **Other exploration blocks have identified underwater fossils.***

The report must comply with section 38(3) of the NHRA and the SAHRA 2006 Minimum Standards: Archaeological and Palaeontological Component of Impact Assessments, and the 2012 Minimum Standards: Palaeontological Component of Heritage Impact Assessments. The Minimum Standards provides allowance for a Letter of Recommendation for Exemption that can be submitted by a qualified palaeontologist should they deem it appropriate.

The assessment should include any other heritage resources that may be impacted such as built structures over years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed."

2. Response to Interim Comment

Block 3B/4B is located approximately 120 km west of St Helena Bay and approximately 145 km south-west of Hondeklip Bay off the West Coast of South Africa and in waters ranging from 200 m – 2000 m depth. As described in section 3.2.1 ("Pre-Drilling Surveys") of the Scoping Report:

"Pre-drilling surveys may be undertaken prior to drilling in order to confirm baseline conditions at the drill site and to identify and delineate any seabed and sub-seabed geo-hazards that may impact the proposed exploration drilling operations. Pre-drilling surveys may involve sonar surveys, sediment sampling, water sampling and ROV activities."

Should any heritage features (including archaeological or obvious palaeontological feature) be identified during these pre-drilling surveys, the operator will site the final borehole location to avoid these features – in an effort to avoid destruction of these features and also to avoid damage to the equipment.

It is considered that shipwrecks are among the only tangible heritage features or resources that may be discovered at the depths associated with the exploration well drilling and other associated activities. It should further be noted that the actual footprint of the drilling activities will be extremely limited (i.e. the size of a large borehole), which means that the likelihood of impacting on a potential heritage resource will be very low.

Kindly refer to Section 9.3 ("Description and Preliminary Assessment of Impacts") Table 40 of the Scoping Report, which details the preliminary assessment of impacts and whether these will be assessed further in the EIA Phase. Impact 38 (Disturbance of Potential Heritage Features) was identified, and it was stated that:

"The potential exists for the operations to discover previously unknown heritage features. Any object or site as defined in Section 3 of the NHRA is considered a heritage resource and if discovered as part of this project, must be reported to SAHRA. It is unlikely that any such features will be located within the proposed project area and the impact is therefore considered to have a low overall significance."

Additionally, the activities of the project, namely pre-drilling surveys as captured in the Final Scoping Report of the project, offer an opportunity to identify unknown shipwrecks and other palaeontological features. Therefore, it is proposed that any resulting information gathered related to unlikely discoveries following the pre-drilling surveys will be shared with SAHRA before any further activities can be undertaken, and should any fossils be discovered during the drilling activities.

It must be noted that additional considerations have been made regarding the impact of the project on Cultural Heritage. As part of the specialist studies done for the EIA of the proposed project, EIMS has appointed Professor MJR Boswell, an anthropologist based at Nelson Mandela University, to conduct a Cultural Heritage Impact Assessment (CHIA) of the affected communities and social systems. This decision was based on the understanding that the project has the potential to affect intangible heritage. The study conducted by Prof. Boswell spans across the West coast from Port Nolloth to False Bay, incorporating field research conducted from March 2022 to May 2023.

3. Environmental Management Programme (EMPR) Conditions

In order to formalise the above, it is recommended that the following conditions be included in the EMPr (in addition to a chance find protocol) should the Environmental Assessment Practitioner (EAP) recommend that the proposed activity be authorised:

- All pre-survey information and documentation should be made available to an archaeologist and palaeontologist for review and confirmation of heritage features prior to commencement of drilling operations.
- Training is to be provided to the on-board ECO and drilling operator regarding the identification of archaeological and palaeontological resources, and the implementation of the chance find procedure.
- Pre-drilling surveys offer an opportunity to identify unknown archaeological features (including shipwrecks) and palaeontological features. Should any archaeological features and /or palaeontological features encountered during the pre-drilling surveys, the location of the borehole(s) should be amended to avoid these sites, by implementing a 100 m no-go buffer around the features.
- Should discoveries be made, the chance find procedure must be followed and these discoveries must be shared with the SAHRA MUCH Unit for inclusion into the national database. The further process and instructions from the SAHRA MUCH Unit need to be complied with.

4. Conclusion

For the reasons above it is our opinion that the implementation of the above measures would be sufficient to provide protection for any Archaeological or Palaeontological features that may be located within the application area of interest, and further studies in this regard would not be required at this stage.

It is respectfully requested that SAHRA consider the contents of this letter and provide further guidance in this regard.



Yours Sincerely,

Lucien James

Environmental Consultant and Archaeologist