

INDIGENOUS GROUPS

From: Pepino Koeries <[REDACTED]>
Sent: Monday, 16 January 2023 19:45
To: TEEPSA EIA
Cc: ZA - GLD - Teepsa Esia
Subject: Fwd: Images
Attachments: 1673878717073.jpeg; 1673878686219.jpeg

Follow Up Flag: Follow up
Flag Status: Completed

See attached WSP

Kindly regards
CHAIRMAN /KAI KORANA TRIBE

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

From: Coetzee Jessica <[REDACTED]>
Date: Mon, Jan 16, 2023 at 3:19 PM
Subject: Images
To: <[REDACTED]>



Scoping and Environmental Impact Assessment (S&EIA) process for the proposed offshore Production Right and Environmental Authorisation Applications for Block 11B/12B by TotalEnergies EP South Africa B.V.

Registration, Comment and Public Meeting Reply Form

Draft Scoping Report: Thursday 01 December 2022 to Friday 03 February 2023

Note: This is an opportunity to register as an I&AP for the Scoping and Environmental Impact Assessment (S&EIA) process. By registering as an I&AP on the proposed project, you agree to receive information about the proposed project during the statutory S&EIA process. You also agree to receive information about the S&EIA, public participation process and opportunities to contribute comments.

Personal Information					
Title	First Name	Surname	Organisation / Department (If applicable)		
CHAIRMAN	PEPINO	KOERIES	KAI KORANA! GORIIAIS		
Contact Details					
Mobile Number	Land Line Contact Number		Email / Fax Number		
[REDACTED]	[REDACTED]		Office	[REDACTED]	
	[REDACTED]		Home	[REDACTED]	
Do you want to register as an Interested and Affected Party?					
Please register me as an interested and affected party (I&AP) for this project so that I may receive further information and notifications as the project develops				<input checked="" type="radio"/> YES	<input type="radio"/> NO
I will attend the following public meetings in 2023:					
16 January, Kwanonqaba Community Hall, Mayixhale St, Kwanonqaba, Mossel Bay	<input type="radio"/> YES	<input type="radio"/> NO	21 January, Seavista Hall, Geelbek Street, St Francis Bay	<input type="radio"/> YES	<input type="radio"/> NO
17 January, Mossel Bay Town Hall, 101 Marsh Street, Mossel Bay	<input checked="" type="radio"/> YES	<input type="radio"/> NO	23 January, Pellsrus Hall, 1 Harder Street, Jeffreys Bay	<input checked="" type="radio"/> YES	<input type="radio"/> NO
18 January Thembaletu Community Hall, 66 Olympic Road, George	<input type="radio"/> YES	<input type="radio"/> NO	24 January, Feather Market Hall, 86 Baakens Street Port Elizabeth Central, Gqeberha	<input type="radio"/> YES	<input type="radio"/> NO
19 January, Khayelethu Community Hall, Mbethana Street, Knysna	<input type="radio"/> YES	<input type="radio"/> NO	25 January, Jauka Community Hall, Runeli Drive, Port Alfred	<input type="radio"/> YES	<input type="radio"/> NO
20 January, Piesang Community Hall, 7 Greenpoint Ave, Plettenberg Bay	<input type="radio"/> YES	<input type="radio"/> NO	26 January, Scenery Park Community Hall, 30 7 th Rd, Scenery Park, East London	<input type="radio"/> YES	<input type="radio"/> NO
In terms of the EIA Regulations, 2014 (as amended), I disclose below any direct business, financial, personal, or other interest that I may have in the approval or refusal of the application:	Date		16.01.23		
	Signature				

By registering as a stakeholder permission is hereby given in terms of the Protection of Personal Information Act for your contact details to be held securely to keep you informed about this project. WSP Group Africa as a good corporate citizen complies to the POPIA and confirms that your details will be kept confidential and will not be shared with any third party without your prior consent, other than the lead authority should they request stakeholder details.

For internal use to confirm capture of stakeholder details into the stakeholder database	
Stakeholder database reference number	
	Signature of data capturer

COMMENT(S)

You are welcome to use additional pages.

I have the following comments regarding this proposed project and/or the public participation process:

RESPONSIBILITY: THE GOVERNMENT AUTHORITY RESPONSIBLE FOR THE MATTERS COVERED IN THIS CONVENTION SHALL ENSURE THAT AGENCIES OR OTHERS APPROPRIATE MECHANISMS EXIST TO ADMINISTER THE PROGRAMS AFFECTING THE PEOPLES CONCERNED, AND SHALL ENSURE THAT THEY HAVE THE MEANS NECESSARY FOR THE PROPER FULFILMENT OF THE FUNCTIONS ASSIGNED TO THEM. FUNDAMENTAL RIGHTS: INDIGENOUS AND TRIBAL PEOPLE SHALL ENJOY THE FULL MEASURES OF HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS WITHOUT HINDRANCE OR DISCRIMINATION. THE PROVISION OF THE CONVENTION SHALL BE APPLIED WITHOUT DISCRIMINATION TO MALE AND FEMALE MEMBERS OF THESE PEOPLES. NO FORM OF FORCE OR COERCION SHALL BE USED IN VIOLATION OF THE HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS OF THE PEOPLES CONCERNED, INCLUDING THE RIGHTS CONTAINED IN THIS CONVENTION. MINERAL OR OTHER RESOURCES: IN CASE IN WHICH THE STATE RETAINS THE OWNERSHIP OF MINERAL OR SUB-SURFACE RESOURCES OR RIGHTS TO OTHER RESOURCES PERTAINING TO LANDS, GOVERNMENTS SHALL ESTABLISH OR MAINTAIN PROCEDURES THROUGH WHICH THEY SHALL CONSULT THESE PEOPLES. THE PEOPLES CONCERNED SHALL WHEREVER POSSIBLE PARTICIPATE IN THE BENEFITS OF SUCH ACTIVITIES, AND SHALL RECEIVE FAIR COMPENSATION FOR ANY DAMAGE WHICH THEY MAY SUSTAIN AS A RESULT OF SUCH ACTIVITIES.

Please return the Registration, Comment and Reply form to:

WSP Group Africa (Pty) Ltd

PUBLIC PARTICIPATION OFFICE

P.O. Box 6001, Halfway House, 1685

Tel: (011) 254 4800

Fax: (086) 582 1561

WhatsApp: 076 694 3842

E-mail: teepsaEIA@WSP.com / gld.teepsaesia@wsp.com

THANK YOU!

From: ZA - GLD - PPOffice
Sent: Thursday, 19 January 2023 15:32
To: TEEPSA EIA
Subject: FW: MARINE QUERY SEAVIEW ,PORT ELIZABETH
Attachments: 1674120612413.jpg; 1674120612372.jpg; 1674120612399.jpg; 1674120612447.jpg;
1674120612345.jpg; 1674120612359.jpg; 1674120612385.jpg; 1674120612437.jpg;
1674120612426.jpg

Follow Up Flag: Follow up
Flag Status: Completed

From: Sisonke Admin <[REDACTED]>
Sent: Thursday, January 19, 2023 11:44 AM
To: ZA - GLD - PPOffice <gld.PP@wsp.com>
Cc: Nelisiwe VUNDLA <[REDACTED]>
Subject: RE: MARINE QUERY SEAVIEW ,PORT ELIZABETH

Dear Sir /Madam

I'm Earl Pillay from NATIONAL ABORIGINAL GOVERNANCE COUNCIL

I was advised to contact you by Neliswe Vundla Totalenergies, copied in this email.

There's a issue that's, causing huge concerns in the Aboriginal community pertaining to fish that washed out in SEAVIEW, GQHEBERHA/PORT ELIZABETH.

The incident transpired yesterday/ today early morning.

Kindly investigate, as TOTAENERGIES are fingered by the communities , and yet there's no offshore exploration in the said area, duly confirmed by Neliswe. We do want development from Totalenergies.

I as representative of NAGC want to lay this issue to bed, to inform the communities, what exactly transpired.

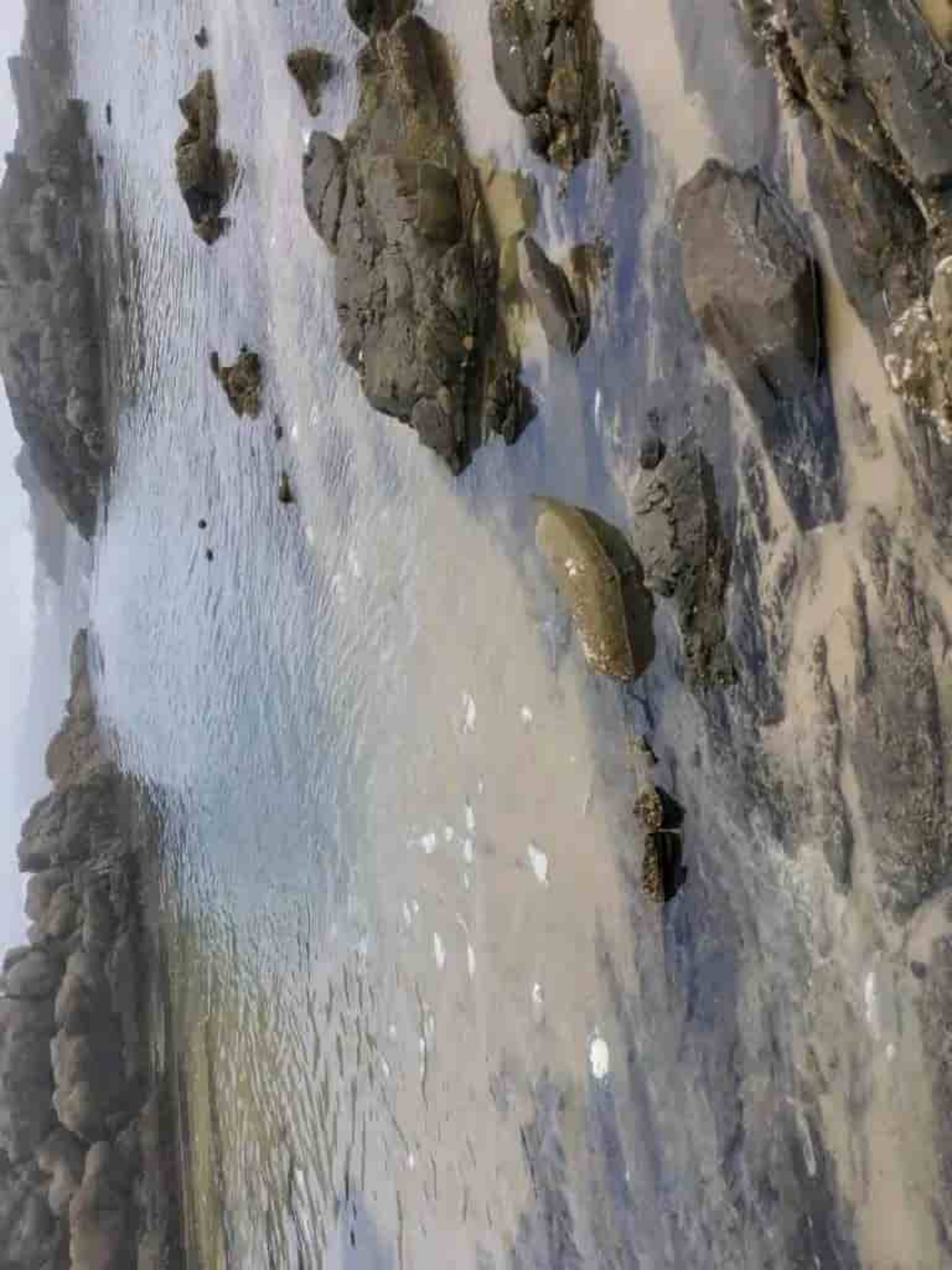
Be mindful we need Marine Expertise to address the issue with me, please forward in layman's terms and I will then disseminate the marine scientific feedback to them on the various Aboriginal Social Media platforms.

Please find attached pics from the SEAVIEW BEACH area.

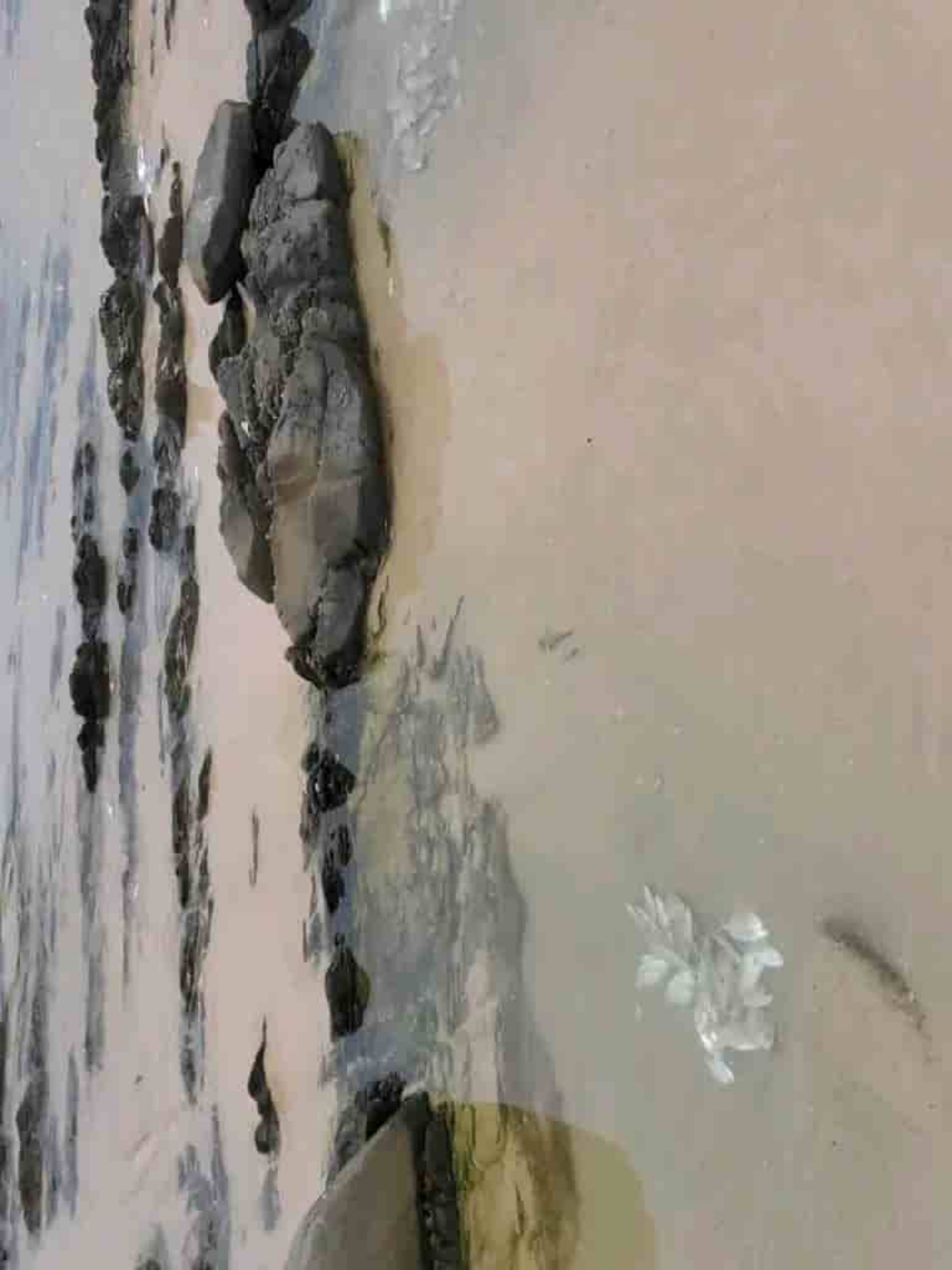
Trust you will revert soonest.

Regards
Earl Pillay
NAGC SPV



















From: Sisonke Admin <[REDACTED]>
Sent: Thursday, 02 February 2023 09:52
To: ZA - GLD - Teepsa Esia
Cc: TEEPSA EIA; [REDACTED]
Subject: Re: FW: MARINE QUERY SEAVIEW ,PORT ELIZABETH
Attachments: image001.jpg

Dear Stakeholders

Thanks for the response.

However we endeavour to send out a positive response to the Aboriginal communities residing in that area.

We always try to moralate these type of issues as we do want development by TOTALENERGIES.

Trust to receive more detailed Marine Scientific Evidence of the incident soonest.

Regards
Earl Pillay
MEMBER NAGC EXECUTIVE TEAM

On Thu, 2 Feb 2023, 09:26 ZA - GLD - Teepsa Esia, <gld.teepsaesia@wsp.com> wrote:

Dear Mr Pillay,

Your email regarding the fish kills at Seaview on or about 19 January 2022 refers.

We have made enquiries with the marine research network in Gqeberha and await a response. We have heard that the fish kill is known among the marine research community and have enquired if anybody responded to it and has further information as to the cause of the kill.

We will get back to you as soon as further information is available.

Kind regards,



Public Participation Office

T +27 11 254 4800

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Sent: Thursday, January 19, 2023 11:44 AM
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Trust you will revert soonest.

Regards

Earl Pillay

NAGC SPV



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-LAEmHhHzdJzBITWfa4Hgs7pbKl

From: Jonathan van der Westhuizen [REDACTED]
Sent: Friday, 03 February 2023 19:59
To: TFEPSA FIA
Cc: [REDACTED]
Subject: WCIC comments
Attachments: WCIC.docx

Good evening

Kindly find comments from WCIC.

Jonathan



West Coast Indigenous Council



Re: Comments from Indigenous Communities

WSP Public Participation / Block 11B/ 12B

The West Coast Indigenous Council was established to speak for and fight for the of the first nation people. All members of the council have deep ancestral roots in South Africa and particular the West Coast. Our vision is to guide and assist the indigenous people to win back their dignity.

Our objection is against the onslaught of our Marine heritage and natural resources, which are integral part off our cultural indigenous lifestyle. Fishing is the primary source of income and food security for our people along the entire coasts of South Africa, and any disturbance to our natural biodiversity will for surely have devastating impact on our diverse marine life as these proposed activities undertaking will warmer the oceans temperature with dire consequences, because everything in the sea as we have learned always works its way back to the ocean shore line, our people will be at the receiving end of all of that. As these meeting can't give us a clear guarantee that they have mitigation factors in place to foresee any damages cause by these kinds of actions. Our traditional fishing catches are also getting very limited and is moving away from its original habitat like the favorite Cape Brine and our indigenous fishers needs to move deeper in the ocean with lots of costs and danger attached to that because of these activities. The Critical Biodiversity zones (Marine protected area) are not taken into consideration within this application because your infrastructure will cut through these critical identified sensitive areas.

In public participation processes the right holder for these activities seismic testing is not clear about how we as first nation people will share of the benefits that they for all these years are reaping from our ocean, without any true remedy for those people who are still suffering from oppressor and domination, the process is just a tick box exercise and we are not really consider within these process as affected parties to these kinds of activities.

Oil and Gas is a super high risk for our environment and our traditional sectors along the coastline which is tourism and fishing will suffer soon as a result of these activities taking into consideration the great contribution to greenhouse gas emissions from these projects. The high levels of Algal blooms release can be toxic to the ocean and depleting levels in oxygen will kill marine life. Increased carbon dioxide in the atmosphere from the burning of fossil fuels is absorbing by seawater and makes it more acidic. Ocean acidification impacts key species, and the result is slower growth from these species and lower survival rates, smaller sizes and abnormal shapes seen in the oysters. The rising sea levels also affecting the land with increased coastal erosion which in turn affects the

indigenous coastal communities, damages to cultural sites and infrastructure and contribute to climate change in our oceans. Our ability to reconnect with our cultural and spiritual connection with the ocean, these issues are important to us, as we rely on the ocean as a source of food, a space for recreation and a place for identity formation and spiritual well-being.

If our marine environment is unhealthy traditional fishing/marine are put at risk.

Signed on behalf of the West Coast Indigenous Council

C ENGELBRECHT

03/02/2023

WCIC – West Coast Indigenous Council

Improved appreciation for diversity, sustainability and social responsibility.

Subject: FW: comments Ghariquiriqua Council
Attachments: block11b.12B.pdf

From: Jonathan van der Westhuizen <[REDACTED]>
Sent: 03 February 2023 20:04
To: TEEPSA EIA <teepsaEIA@wsp.com>
Cc: ChariGuriqua Xam <[REDACTED]>
Subject: comments Ghariquiriqua Council

Hi

Find attached comments

Jonathan

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-LAEmHhHzd.JzBITWfa4Hgs7pbKI

Chari-Guriqua / !!Xarixu//aes

San Tribe

To whom it may concern.

To be listed as affected party in connection to Environmental and Social Impact Assessment (ESIA)

For proposed offshore production rights and environmental authorisation applications for block 11B/12B

We are the above mentioned tribe.

We are concerned about the effects and impacts of drilling.

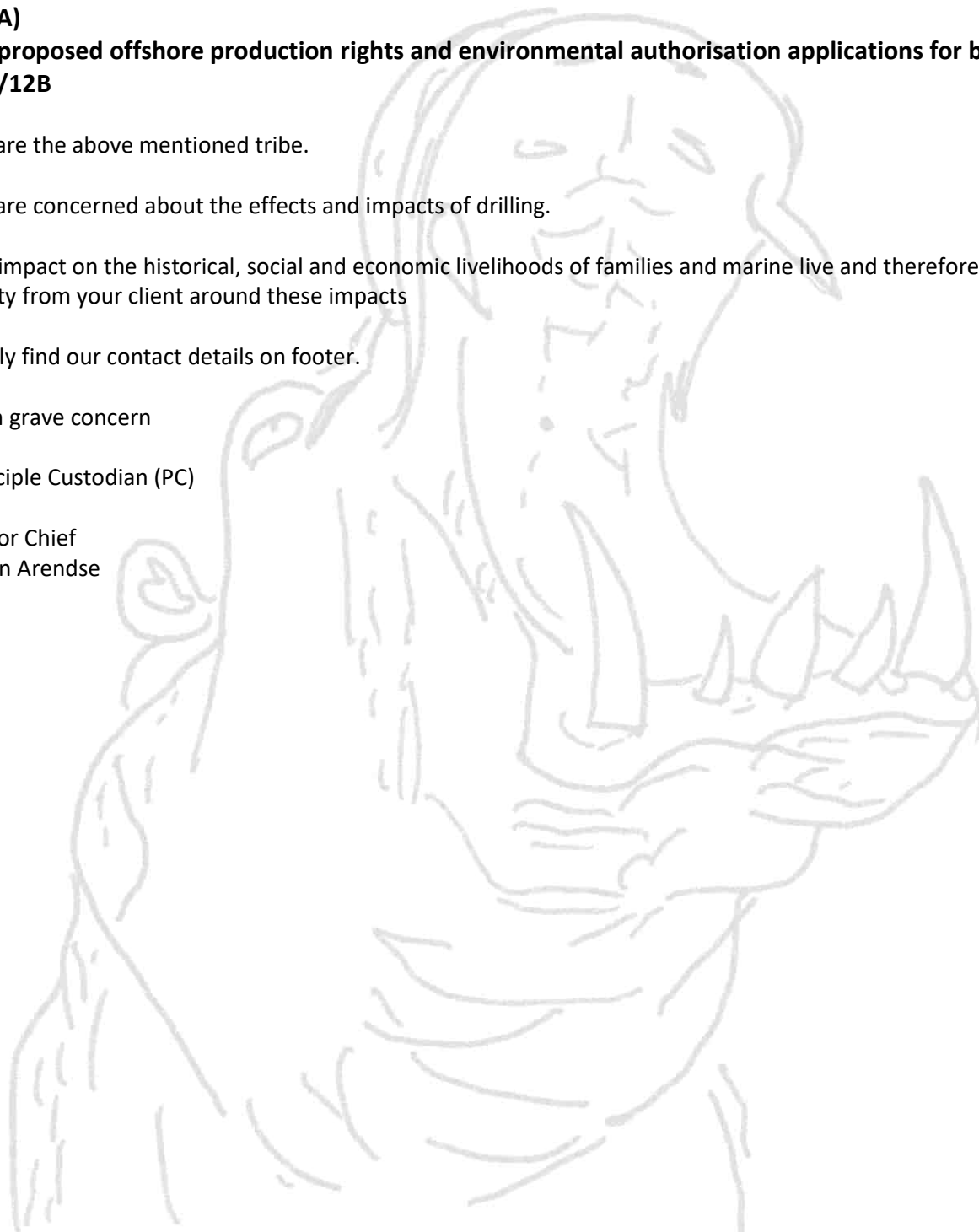
The impact on the historical, social and economic livelihoods of families and marine life and therefore want clarity from your client around these impacts

Kindly find our contact details on footer.

With grave concern

Principle Custodian (PC)

Senior Chief
Julian Arendse



Email: [REDACTED]
Principal leader Chief Julian Arendse

[REDACTED]
Head Secretary Quinton van Wyk

[REDACTED]



Date: 14 December 2022

FOR ATTENTION: TotalEnergy EP South Africa Stakeholders Engagement Team

REFERENCE: COMMENTS ON PROPOSED OFFSHORE EXPLORATION IN BLOCK 5/6/7 & BLOCK 11B/12B SOUTH-WEST COAST, SOUTH AFRICA

Customary Tribal Territories: West Coast area: Nama, Cochoqua, Guriqua, the Cape Peninsula is Goringhaicona, Goringhaiqua and Goraghouqua. South Coast area: Cochoqua, Ghainoqua, Hessequa and Gouriqua

We are grateful for the chance to comment on the abovementioned Request for Input from the TEEPSA and SLR, which correctly noted the urgent need for Environmental and Social Impact Assessment (ESIA) and climate admission.

We are writing to you regarding a particular set of voluntary disclosure that, in our opinion, are essential for addressing climate risk as well as broader ESIA risks and political, reputational, operational, and legal risks, but that your concern may be overlooked in your evaluation of the filings regarding the KhoiSan Customary Tribal Structure and Indigenous Fishing Communities. The problem is the violation of Indigenous and tribal peoples' land & sea rights and other rights by market capitalisation businesses.

As we explain in this letter, corporations directly associated with violations of land rights infrequently inform investors of the numerous legal, political, reputational, and operational risks associated with such violations, all of which have a material adverse effect on issuers' financial position.

However, banks, asset managers, and other financial institutions are increasingly acknowledging publicly the critical need of respect for Indigenous and tribal rights. Below is a discussion on free, prior, and informed consent (FPIC.) Since 2015, the World Bank has adhered to a stringent FPIC policy. The significance of such disclosures is becoming recognized by foreign securities regulators as well. For instance, the Non-Financial Reporting Directive of the European Commission encourages disclosure of human rights due diligence and actions taken to stop violations of human rights, especially those affecting the rights of Indigenous peoples.

These kinds of requirements are anticipated to become legally binding as the Directive is now being reviewed.

Finally, the problem of land rights for Khoi and San Indigenous and Tribal Peoples, which is crucial to protecting the ecology and the climate, affects on all three components of the ESIA landscape, on which investors themselves are increasingly admitting they base their investment choices.

As a result, the TEEPSA requires information of the dangers of present and future violations of Indigenous and tribal people's land rights and other rights brought on by the issuers' business strategies and particular projects. By doing this, TEEPSA would be able to further its goals to protect investors, provide fair, orderly, and efficient markets, and promote capital formation.

Indigenous & Tribal Peoples and the Environment

As explained by the UN Permanent Forum on Indigenous Issues, “while Indigenous peoples in all regions of the world live on lands and territories that contain a great wealth of natural resources, they remain some of the most vulnerable people on earth due to centuries of marginalization and discrimination. Indigenous peoples’ special relationship with their lands – a fundamental element of their spiritual, religious, cultural and physical survival – is often at odds with these interests.”

United Nations Permanent Forum on Indigenous Issues, “Indigenous Peoples And Industrial Corporations,”

Land is not just a possession and a source of income for many Indigenous and tribal peoples. Through memories, stories, and spiritual and cultural locations, their past and identity are connected to their territory. Impacts from the environment and climate have an impact on people's ability to sustain themselves, as well as their relationship with their land, ability to exist as Indigenous people, and ability to uphold their unique identity and customs. Numerous Indigenous and tribal domains have complicated networks of relationships, usage rights, and different decision-making procedures, and they are collectively owned and governed.

Therefore, even in a seemingly empty location remote from a settlement, activities or projects like mining, fishing, agribusiness, or oil drilling might make it harder for people to survive.

Per the UN Permanent Forum on Indigenous Issues, “the impact of such projects includes environmental damage to traditional lands in addition to loss of culture, traditional knowledge and livelihoods.” These differences are significant because they have given rise to a body of international legal standards.

United Nations Permanent Forum on Indigenous Issues, “Indigenous Peoples And Industrial Corporations,”

https://www.un.org/esa/socdev/unpfii/documents/PFII8_FS3.pdf.

Article 25 of the UN Declaration on the Rights of Indigenous Peoples states: Indigenous peoples have the right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, **waters and coastal seas and other resources** and to uphold their responsibilities to future generations in this regard.

United Nations, United Nations Declaration on the Rights of Indigenous

Peoples, <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html>.

UNDRIP, Article 25. Emphasis added.

And finally, while less widely adopted, 23 countries have ratified International Labour Organization Indigenous and Tribal Peoples Convention (No. 169) and have thus taken on binding treaty obligations. ILO Convention No. 169 spells out specific rights for Indigenous and Tribal Peoples. Among other rights outlined in the Convention, Article 7 states that Indigenous and Tribal Peoples have “the right to decide their own priorities for the process of development as it affects their lives, beliefs, institutions and spiritual well-being and the lands they occupy or otherwise use.”

International Labour Organization, Indigenous and Tribal Peoples Convention, 1989 (No. 169),

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:312314.

In summary, almost all nations have declared, some more than once, that Indigenous Peoples have certain inherent rights, such as the right to self-determination and the ability to administer, divide, and effectively control their territory in accordance with their traditional collective land tenure system and customary laws.

Indigenous Rights and Investor Risk

Conflict with impacted Khoi and San Indigenous and tribal peoples will unavoidably result from corporate disregard for these rights because of the close ties that many Indigenous and tribal peoples have to their territories and the nearly universal recognition that these peoples have rights to self-determination and control over their lands. Additionally, as we will discuss below, this corporate disregard for Indigenous rights has cost the involved companies money. This conflict will also unavoidably result in legal, political, reputational, and operational risks for the companies and their investors.

Legal Risks

Legal risks include the possibility of local courts overturning concessions on the basis of land rights violations, lawsuits resulting from human rights abuses committed in connection with projects and activities, and legal cases before international legal institutions.

The following are some examples of relevant, but nonetheless undisclosed, risks of this nature facing a variety of extractive industry companies around the world. In many of these cases, the companies were eventually forced to report, sometimes to the media—significant financial losses resulting from their lack of attention to Indigenous and tribal peoples' land rights.

Companies can also be indirectly affected by decisions in international courts against governments. In Suriname, for example, the Inter-American Court of Human Rights ordered a set of changes to law and practice in Suriname in response to a petition filed by the Saramaka people in the face of logging and mining concessions granted by the State in their ancestral territory without their consent. In its ruling, the Court affirmed Indigenous peoples' communal property rights, rights which require special measures to guarantee physical and cultural survival under international human rights law.

Ref -K review by Amazon Watch on May 28, 2021

Political Risks

Political risks may include referendums that outlaw extraction, such as the binding referendum in Cajamarca, Colombia in 2017 that rejected plans for a \$35 billion AngloGold Ashanti gold mine; a local government canceling the contract for an oil block concession after massive local protests; passage of legislation that reforms national laws in regards to customary land tenure rights such as Liberia's recent Land Rights Act; or change in government leading to increased regulatory and enforcement action to protect land rights.

Reuters, "Peru indigenous groups settle U.S. court claims with Occidental," 5 March 2015, <https://www.reuters.com/article/us-peruoccidental/peru-indigenous-groups-settle-u-s-court-claims-with-occidentalidUSKBNOM12BN20150305>.

In a different case involving reputational and other risks that is still unfolding, a Canadian oil company, ReconAfrica, is currently facing growing scrutiny for its exploratory drilling for oil and gas in the sensitive wilderness in Namibia and Botswana, home to the watershed of the UNESCO World Heritage site, the Okavango Delta, and six community-run wildlife reserves.

Local community members have voiced concerns that ReconAfrica's initial exploration activities have already violated Indigenous rights and human rights. Namibian law requires companies to ensure not just that Indigenous and tribal peoples are consulted, but also that members of the general public are aware of the proposed project, fully understand it, and have a chance to raise concerns. Any such concerns must be addressed in the assessment's final report in order to get government approval. ReconAfrica released the thousand-plus-page draft of the assessment on March 26, 2021, yet numerous people and advocacy organizations who participated, or sought to participate, in the consultation process, said the consultation was extremely limited, with translation unavailable, limits on attendance, ignored questions, and cancelled sessions. Legal action has also been threatened against journalists covering the project, and the head of a tribal-run conservation area says he fears for his life for speaking out. A local farmer has filed a lawsuit against ReconAfrica for failing to consult with local peoples.

Tuyakula Musheko and Shinovene Immanuel, The Namibian, "Canadian oil driller threatens to sue The Namibian," 16, February 2021, <https://www.namibian.com.na/208788/archive-read/Canadian-oil-driller-threatensto-sue-The-Namibian>.

Indigenous Peoples Sovereignty and Self-determination over resources

With time, the controversy grew, particularly during the 1970s call for a New International Economic Order. The Stockholm Declaration of the United Nations Conference on the Human Environment, the United Nations Convention on the Law of the Sea of 1982, the Declaration on the Right to Development, and the Rio Declaration on Environment and Development, the Johannesburg Declaration on Sustainable Development of 2002, among others, show that some of the sharp edges have been smoothed out and a spirit of compromise and cooperation has once again become possible.

Additionally, the work of the United Nations is replete with specific instances of the applicability of a people-centered strategy founded on the right to development. For instance, the Special Rapporteur on the Right to Food, Olivier De Schutter, emphasized the connection between sovereignty over natural resources and access to land in his report to the General Assembly in 2010 (A/65/281). He refers to indigenous peoples, small-scale farmers, herders, pastoralists, and fishermen in this context.

The following six principles, which encapsulate the essence of resource sovereignty, were developed over time as a consensus to balance rights and duties:

- (a) Natural resources should be employed for national development and the well-being of the people;
- (b) The rights of indigenous peoples to their habitat and its natural resources should be protected; (c) Natural resources should be properly and prudently managed, based upon the principle of sustainable use;
- (d) Nationalization and marine resource-related policies should be implemented "in accordance with international law";
- (e) Due care should be paid to the environment without compromising the rights of future generations; (f) States should cooperate for worldwide sustainable development.

Conclusion

Even in South Africa, businesses frequently cannot rely on the government, in which they conduct business to guarantee Indigenous rights. The prospective or actual violation of the rights of Khoi and San Indigenous and tribal peoples entails considerable legal, operational, reputational, and political concerns, as shown by the examples in this letter and others, which can have an effect on the financial stability of issuers. The TEEPSEA should require that all issuers publish the following details for their direct activities as well as their direct and indirect suppliers in order to ensure that investors are fully aware of these risks:

- a) How their supply chains, contractors, subcontractors, and other aspects of their business model might affect Khoi and San Customary Structure and/or tribal peoples' rights.
- b) the names of any and all KhoiSan tribal peoples whose territories (both those that have received legal recognition and those that are presently seeking it) overlap with operations in any way or would be adversely affected by them, such as by downstream pollution from oil drilling waste products;
- c) any and all land rights grievances or complaints lodged by nearby KhoiSan and fishing communities in the company's operating areas, the company's response, and complaints' evaluations of the company's answer;
- d) a description of any ongoing procedures whereby the issuer is attempting to speak with or secure the approval of KhoiSan tribal members who would be impacted by a proposed or ongoing operation by the issuer, a subsidiary, or a supplier;
- e) a record of all consultation procedures carried out over the previous reporting year, detailing who conducted them, if agreement was sought, and how the impacted KhoiSan peoples expressed it;
- f) a list of all legal proceedings in South Africa and/or other countries involving conflicts over land rights, procedures for seeking consent or consultation, or other issues involving Indigenous rights; and
- g) a list of all projects carried out by the issuer or its subsidiaries that call for the relocation of fishing in KhoiSan and/or tribal communities, along with any and all monetary or non-monetary compensation offered in exchange for fishing relocation.

Any issuer whose operations, or those of subsidiaries or suppliers, require the use of land, water, or the subsoil should be subject to these disclosure requirements. Agriculture, mining, oil and gas, energy infrastructure, logging, and biofuels are important industries, but they are not the only ones that are affected by these problems.

Sincerely,
HRH Charl Damon
Leader of the Cochoqua Tribe
KEDF Outreach Desk

Subject: FW: WCIC comments
Attachments: WCIC.docx

From: Jonathan van der Westhuizen [REDACTED]
Sent: 03 February 2023 19:59
To: TEEPSA EIA <teepsaEIA@wsp.com>
Cc: [REDACTED]
Subject: WCIC comments

Good evening

Kindly find comments from WCIC.

Jonathan

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-LAEmHhHzdJzBITWfa4Hgs7pbKI



West Coast Indigenous Council



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WSP Public Participation / Block 11B/ 12B

The West Coast Indigenous Council was established to speak for and fight for the of the first nation people. All members of the council have deep ancestral roots in South Africa and particular the West Coast. Our vision is to guide and assist the indigenous people to win back their dignity.

Our objection is against the onslaught of our Marine heritage and natural resources, which are integral part off our cultural indigenous lifestyle. Fishing is the primary source of income and food security for our people along the entire coasts of South Africa, and any disturbance to our natural biodiversity will for surely have devastating impact on our diverse marine life as these proposed activities undertaking will warmer the oceans temperature with dire consequences, because everything in the sea as we have learned always works its way back to the ocean shore line, our people will be at the receiving end of all of that. As these meeting can't give us a clear guarantee that they have mitigation factors in place to foresee any damages cause by these kinds of actions. Our traditional fishing catches are also getting very limited and is moving away from its original habitat like the favorite Cape Brine and our indigenous fishers needs to move deeper in the ocean with lots of costs and danger attached to that because of these activities. The Critical Biodiversity zones (Marine protected area) are not taken into consideration within this application because your infrastructure will cut through these critical identified sensitive areas.

In public participation processes the right holder for these activities seismic testing is not clear about how we as first nation people will share of the benefits that they for all these years are reaping from our ocean, without any true remedy for those people who are still suffering from oppressor and domination, the process is just a tick box exercise and we are not really consider within these process as affected parties to these kinds of activities.

Oil and Gas is a super high risk for our environment and our traditional sectors along the coastline which is tourism and fishing will suffer soon as a result of these activities taking into consideration the great contribution to greenhouse gas emissions from these projects. The high levels of Algal blooms release can be toxic to the ocean and depleting levels in oxygen will kill marine life. Increased carbon dioxide in the atmosphere from the burning of fossil fuels is absorbing by seawater and makes it more acidic. Ocean acidification impacts key species, and the result is slower growth from these species and lower survival rates, smaller sizes and abnormal shapes seen in the oysters. The rising sea levels also affecting the land with increased coastal erosion which in turn affects the

indigenous coastal communities, damages to cultural sites and infrastructure and contribute to climate change in our oceans. Our ability to reconnect with our cultural and spiritual connection with the ocean, these issues are important to us, as we rely on the ocean as a source of food, a space for recreation and a place for identity formation and spiritual well-being.

If our marine environment is unhealthy traditional fishing/marine are put at risk.

Signed on behalf of the West Coast Indigenous Council

C ENGELBRECHT

03/02/2023

WCIC – West Coast Indigenous Council

Improved appreciation for diversity, sustainability and social responsibility.

From: Barry Jacobs <[REDACTED]>
Sent: Thursday, 02 February 2023 11:45
To: ZA - GLD - Teepsa Esia
Subject: Re: URGENT NOTICE OF PUBLIC MEETING VENUE AND TIME CHANGE | PORT ALFRED FOR PROPOSED TEEPSA BLOCK 11B/12B ESIA PROJECT | 25 JANUARY 2023

Follow Up Flag: Follow up
Flag Status: Flagged

Mnr/Mev

Ons as die Gourikwa Khoisan versoek graag n meeting in Groot-brakrivier. Hier is heeltemal ontevredenheid omtrent dat daar net n meeting in Mosselbaai was vir die Gemeenskap.

Ons versoek u dus om in te gryp asseblief.

Hoor graag van u .

Groete

chief Barry Jacobs Gourikwa Khoisan stamhuis sel [REDACTED]

On Tue, 24 Jan 2023, 14:20 ZA - GLD - Teepsa Esia, <gld.teepsaesia@wsp.com> wrote:

Dear Stakeholder

Please note the changes to the public meetings in the Port Alfred area scheduled for **Wednesday 25 January 2023:**

Public meeting 1: **Kenton Community Hall, from 10h00 am to 12h00 pm.**

Public meeting 2: **Port Alfred Civic Hall, from 14h00 to 16h00 pm.**

More information on the project can be found on: WSP website: <https://www.wsp.com/en-za/services/public-documents> / Data-free website at: <https://wsp-engage.com/Total-11B12B/>

WSP Office: Tel: +27 (0) 11 254 4800 or WhatsApp: 076 694 3842 or Email: teepsaEIA@WSP.com / gld.teepsaesia@wsp.com

We look forward to your participation and hope to meet you at the public meetings.

Kind regards,

WSP Public Participation Office

From: GoriAis Tribe <[REDACTED]>
Sent: 23 January 2023 09:32
To: TEEPSA EIA <teepsaEIA@wsp.com>; ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com>
Subject: Comment on public meeting- Mossel Bay

Good day Sir/ Madam

Please see the attached letter for your attention, regarding the public meeting held on 17 January 2023 @ Mossel Bay Town Hall.

Kind regards

Angelique Stevens
Chief Secretary
!Gori||Ais Tribe
Koeries Family Council
!UriMā||Ais - Hoogekraal
Kai !Korana - Great Korana

NOTICE: This communication and any attachments ("this message") may contain information which is privileged, confidential, proprietary or otherwise subject to restricted disclosure under applicable law. This message is for the sole use of the intended recipient(s). Any unauthorized use, disclosure, viewing, copying, alteration, dissemination or distribution of, or reliance on, this message is strictly prohibited. If you have received this message in error, or you are not an authorized or intended recipient, please notify the sender immediately by replying to this message, delete this message and all copies from your e-mail system and destroy any printed copies.

-LAEmHhHzdJzBITWfa4Hgs7pbKl



ATTENTION: MANAGING DIRECTOR TOTALGAS

23 January 2023

Dear Sir/ Madam

It was with excitement that we, as the Aboriginal People heard about the proposed development in Mossel Bay.

We the abovementioned Aboriginal !Gori|Ais / Kai Korana House have been duly established and constituted in accordance with the ILO Convention and Indigenous and Tribal Peoples 1989 (No.169). Our Tribe are of authority and rightful land owners that stretches from Swellendam to Plettenberg Bay, according to proper and thorough historical and archeological research.

As seen in the mainstream media there is as an awakening of the Indigenous People in South Africa. It is with sadness that we have to admit that it seems as if the South African government is the only government that has not given due recognition yet to their first people, the real owners of the mineral rights, in this country.

With the above in mind, we need to focus your attention on the following:

1. We have a fully functional Tribal Council in place, elected and confirmed according to relevant legislation and tribal regulations.
2. We have a relevant constitution in place, in accordance with the ILO Convention regulations.
3. We have a duly constituted system of governance in place, which makes provision for the following (relevant to the Totalgas Development Plan):

3.1. Recruitment and Conditions of Employment (refer to Art. 20)

Governments shall, within the framework of national laws and regulations, and in co-operation with the peoples concerned, adopt special measures to ensure the effective protection with regard to recruitment and conditions of employment of workers belonging to these peoples, to the extent that they are not effectively protected by laws applicable to workers in general.

Governments shall do everything possible to prevent any discrimination between workers belonging to the peoples concerned and other workers, in particular as regards:

- (a) admission to employment, including skilled employment, as well as measures for promotion and advancement;
- (b) equal remuneration for work of equal value.

3.2. Vocational Training, handicrafts and rural industries (refer to Art. 22 & 23)

Measures shall be taken to promote the voluntary participation of members of the peoples concerned in vocational training programmes of general application.





Whenever existing programmes of vocational training of general application do not meet the special needs of the peoples concerned, governments shall, with the participation of these peoples, ensure the provision of special training programmes and facilities. This is where vocational training programmes can be extremely important. The aim of vocational training programmes is to train people, both men and women, in specific skills which can be used to earn a living.

3.3. Social Security and Health (refer to Art. 24 & 25)

Security:

24.1. Social security schemes shall be extended progressively to cover the peoples concerned, and applied without discrimination against them.

Health:

25.1. Governments shall ensure that adequate health services are made available to the peoples concerned, or shall provide them with resources to allow them to design and deliver such services under their own responsibility and control, so that they may enjoy the highest attainable standard of physical and mental health.

3.4. Education and means of communication. (Refer to Art. 26 to 31)

Education:

Measures shall be taken to ensure that members of the peoples concerned have the opportunity to acquire education at all levels on at least an equal footing with the rest of the national community.

With the above in mind, we want to state categorically that we are the legally established Tribal Aboriginal authority in this area and wish to point out that no industrial activities can take place without our consent.

As the oldest Tribal Family !Gori||Ais / Kai Korana Family, we do not recognise the authority of any other individuals or groupings to negotiate on our behalf. We also want to state clearly that there is no price on Indigenous Identity.

We wish to respectfully request a meeting with Totalgas Management to discuss the road ahead.

Yours in future development,

Allistair Koeries

Chief Tribal Leader

!Gori||Ais Tribe

Koeries Family Council

!UriMā||Ais - Hoogekraal

Kai !Korana - Great Korana



From: Coetzee Jessica <[REDACTED]>
Sent: Monday, 16 January 2023 21:54
To: TEEPSA EIA
Cc: ZA - GLD - Teepsa Esia
Subject: Images
Attachments: 1673898483325.jpeg; 1673898527473.jpeg; 1673898456152.jpeg; 1673898554099.jpeg

Follow Up Flag: Follow up
Flag Status: Completed

See attached Wsp
Kindly regards
KaiKorana!GORI| |AIS Tribe
KaiKangangs

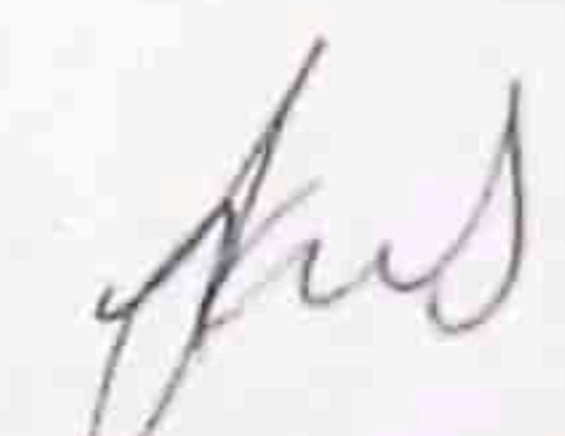
WSP

Scoping and Environmental Impact Assessment (S&EIA) process for the proposed offshore Production Right and Environmental Authorisation Applications for Block 11B/12B by TotalEnergies EP South Africa B.V.

Registration, Comment and Public Meeting Reply Form

Draft Scoping Report: Thursday 01 December 2022 to Friday 03 February 2023

Note: This is an opportunity to register as an I&AP for the Scoping and Environmental Impact Assessment (S&EIA) process. By registering as an I&AP on the proposed project, you agree to receive information about the proposed project during the statutory S&EIA process. You also agree to receive information about the S&EIA, public participation process and opportunities to contribute comments.

Personal Information					
Title	First Name	Surname	Organisation / Department (If applicable)		
Deputy Secretary	Jessica	Koeries	KAT KOBANA! GOBI/HAIS		
Contact Details					
Mobile Number	Land Line Contact Number		Email / Fax Number		
[REDACTED]	/		Office	[REDACTED]	
	/		Home	[REDACTED]	
Do you want to register as an Interested and Affected Party?					
Please register me as an interested and affected party (I&AP) for this project so that I may receive further information and notifications as the project develops				<input checked="" type="radio"/> YES	<input type="radio"/> NO
I will attend the following public meetings in 2023:					
16 January, Kwanonqaba Community Hall, Mayixhale St, Kwanonqaba, Mossel Bay	<input type="radio"/> YES	<input type="radio"/> NO	21 January, Seavista Hall, Geelbek Street, St Francis Bay	<input type="radio"/> YES	<input type="radio"/> NO
17 January, Mossel Bay Town Hall, 101 Marsh Street, Mossel Bay	<input checked="" type="radio"/> YES	<input type="radio"/> NO	23 January, Pellsrus Hall, 1 Harder Street, Jeffreys Bay	<input type="radio"/> YES	<input type="radio"/> NO
18 January Thembalethu Community Hall, 66 Olympic Road, George	<input type="radio"/> YES	<input type="radio"/> NO	24 January, Feather Market Hall, 86 Baakens Street Port Elizabeth Central, Gqeberha	<input type="radio"/> YES	<input type="radio"/> NO
19 January, Khayeletu Community Hall, Mbethana Street, Knysna	<input type="radio"/> YES	<input type="radio"/> NO	25 January, Jauka Community Hall, Runeli Drive, Port Alfred	<input type="radio"/> YES	<input type="radio"/> NO
20 January, Piesang Community Hall, 7 Greenpoint Ave, Plettenberg Bay	<input type="radio"/> YES	<input type="radio"/> NO	26 January, Scenery Park Community Hall, 30 7 th Rd, Scenery Park, East London	<input type="radio"/> YES	<input type="radio"/> NO
In terms of the EIA Regulations, 2014 (as amended), I disclose below any direct business, financial, personal, or other interest that I may have in the approval or refusal of the application:	Date		16:01 - 2023.		
	Signature				

By registering as a stakeholder permission is hereby given in terms of the Protection of Personal Information Act for your contact details to be held securely to keep you informed about this project. WSP Group Africa as a good corporate citizen complies to the POPIA and confirms that your details will be kept confidential and will not be shared with any third party without your prior consent, other than the lead authority should they request stakeholder details.

For internal use to confirm capture of stakeholder details into the stakeholder database	
Stakeholder database reference number	
	Signature of data capturer

COMMENT(S)

You are welcome to use additional pages.

I have the following comments regarding this proposed project and/or the public participation process:

Natural Resources : The rights of the peoples concerned to the natural resources pertaining to their lands shall be specially safeguarded. These rights include the right of these peoples to participate in the use, management and conservation of these resources.

Mineral or other Resources : In cases in which the State retains the ownership of mineral or sub surface resources or right to other resources pertaining to lands, government shall establish or maintain procedures through which they shall consult these peoples, with a view to ascertaining whether and to what degree their interests would be prejudiced, before undertaking or permitting any programmes for the exploration or exploitation of such resources pertaining to their lands. The peoples concerned shall wherever possible participate in the benefits of such activities, and shall receive fair compensation for any damages which they may sustain as a result of such activities.

You are welcome to distribute this form to friends/colleagues who may be interested in the proposed project so that they also can register as an Interested and Affected Party.

Please return the Registration, Comment and Reply form to:

WSP Group Africa (Pty) Ltd

PUBLIC PARTICIPATION OFFICE

P.O. Box 6001, Halfway House, 1685

Tel: (011) 254 4800

Fax: (086) 582 1561

WhatsApp: 076 694 3842

E-mail: teepsaEIA@WSP.com / gld.teepsaesia@wsp.com

THANK YOU!

WSP

Scoping and Environmental Impact Assessment (S&EIA) process for the proposed offshore Production Right and Environmental Authorisation Applications for Block 11B/12B by TotalEnergies EP South Africa B.V.

Registration, Comment and Public Meeting Reply Form

Draft Scoping Report: Thursday 01 December 2022 to Friday 03 February 2023

Note: This is an opportunity to register as an I&AP for the Scoping and Environmental Impact Assessment (S&EIA) process. By registering as an I&AP on the proposed project, you agree to receive information about the proposed project during the statutory S&EIA process. You also agree to receive information about the S&EIA, public participation process and opportunities to contribute comments.

Personal Information					
Title	First Name	Surname	Organisation / Department (if applicable)		
Councillor	Rose	Koeries	KAI KORANA! GORIHUIS		
Contact Details					
Mobile Number	Land Line Contact Number		Email / Fax Number		
[REDACTED]	-		Office	[REDACTED]	
	-		Home	[REDACTED]	
Do you want to register as an Interested and Affected Party?					
Please register me as an interested and affected party (I&AP) for this project so that I may receive further information and notifications as the project develops				<input checked="" type="radio"/> YES	<input type="radio"/> NO
I will attend the following public meetings in 2023:					
16 January, Kwanonqaba Community Hall, Mayixhale St, Kwanonqaba, Mossel Bay	<input type="radio"/> YES	<input type="radio"/> NO	21 January, Seavista Hall, Geelbek Street, St Francis Bay	<input type="radio"/> YES	<input type="radio"/> NO
17 January, Mossel Bay Town Hall, 101 Marsh Street, Mossel Bay	<input checked="" type="radio"/> YES	<input type="radio"/> NO	23 January, Pellsrus Hall, 1 Harder Street, Jeffreys Bay	<input type="radio"/> YES	<input type="radio"/> NO
18 January Thembalethu Community Hall, 66 Olympic Road, George	<input type="radio"/> YES	<input type="radio"/> NO	24 January, Feather Market Hall, 86 Baakens Street Port Elizabeth Central, Gqeberha	<input type="radio"/> YES	<input type="radio"/> NO
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20 January, Piesang Community Hall, 7 Greenpoint Ave, Plettenberg Bay	<input type="radio"/> YES	<input type="radio"/> NO	26 January, Scenery Park Community Hall, 30 7 th Rd, Scenery Park, East London	<input type="radio"/> YES	<input type="radio"/> NO
In terms of the EIA Regulations, 2014 (as amended), I disclose below any direct business, financial, personal, or other interest that I may have in the approval or refusal of the application:	Date		16.01.23		
	Signature		[Signature]		

By registering as a stakeholder permission is hereby given in terms of the Protection of Personal Information Act for your contact details to be held securely to keep you informed about this project. WSP Group Africa as a good corporate citizen complies to the POPIA and confirms that your details will be kept confidential and will not be shared with any third party without your prior consent, other than the lead authority should they request stakeholder details.

For internal use to confirm capture of stakeholder details into the stakeholder database	
Stakeholder database reference number	
	Signature of data capturer

COMMENT(S)

You are welcome to use additional pages.

I have the following comments regarding this proposed project and/or the public participation process:

Development; Government action to apply to Convention shall include:
assisting the members of the peoples concerned to eliminate socio-
economic gaps that may exist between indigenous peoples and
other members of the national community, in a manner compatible
with their aspirations and ways of life.

The improvement of the conditions of life and work and
levels of health and education of the peoples concerned,
with their participation and co-operation, shall be a matter of
priority in plans for the overall economic development of
areas they inhabit. Special projects for development of the
areas in question shall also be so designed as to
promote such improvement.

You are welcome to distribute this form to friends/colleagues who may be interested in the proposed project so that they also can register as an Interested and Affected Party.

Please return the Registration, Comment and Reply form to:

WSP Group Africa (Pty) Ltd

PUBLIC PARTICIPATION OFFICE

P.O. Box 6001, Halfway House, 1685

Tel: (011) 254 4800

Fax: (086) 582 1561

WhatsApp: 076 694 3842

E-mail: teepsaEIA@WSP.com / gid.teepsaesia@wsp.com

THANK YOU!

AUTHORITIES COMMENTS

From: Thea Jordan <[REDACTED]>
Sent: 03 February 2023 13:19
To: ZA - GLD - Teepa Esia <teepesaesia@golder.com>; TEEPSA EIA <teepsaEIA@wsp.com>
Cc: Adri La Meyer <[REDACTED]>
Subject: COMMENTS ON THE DSR FOR THE PROPOSED PRODUCTION AND EXPLORATION RIGHT IN BLOCK 11B/12B (12/4/13 PR)

Dear EAP,

Your request for comment dated 1 December 2022 refers.

Please find attached this Department's comment in the above regard.

Yours faithfully

Thea Jordan
Pr. Pl. [REDACTED]
Director: Development Facilitation
Department of Environmental Affairs and Development Planning
Western Cape Government

[REDACTED]

Tel: [REDACTED]
Email: [REDACTED]
Website: www.westerncape.gov.za/eadp



Be 110% Green. Read from the screen.

Due to COVID-19 restrictions, we are still operating on a "work-from-home" basis.

Should you not be able to contact the numbers above, please call +[REDACTED] between 07:30-16:00.

From: ZA - GLD - Teepa Esia <teepesaesia@golder.com>
Sent: Thursday, December 1, 2022 19:01
Subject: NOTIFICATION: ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) FOR THE PROPOSED OFFSHORE PRODUCTION RIGHT AND ENVIRONMENTAL AUTHORISATION APPLICATIONS FOR BLOCK 11B/12B - REF NO: 12/4/13 PR

References:

16/3/3/6/4/2/2/D6/28/0295/22 (Development Management)
17/1/8 (CMU 003/2023) (Biodiversity and Coastal Management)
18/2/3/2022-2023 (Development Facilitation)

Attention: Mr Kavilan Naidoo

WSP Group Africa (Pty) Ltd
P.O. Box 6001
HALFWAY HOUSE
1685

teepsaEIA@wsp.com

Dear Sir

COMMENTS ON THE DRAFT SCOPING REPORT AND PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED OFFSHORE PRODUCTION RIGHT AND EXPLORATION RIGHT IN BLOCK 11B/12B, LOCATED OFFSHORE OF THE SOUTHERN CAPE COAST BETWEEN MOSSEL BAY AND CAPE ST. FRANCIS (PASA REF: 12/4/13 PR)

1. The email notifications of 01 and 02 December 2022 notifying potential interested and affected parties ("I&APs") of the availability of the Draft Scoping Report ("DSR") and Plan of Study for Environmental Impact Assessment ("EIA"), the email of 13 January 2023 reminding I&APs of the upcoming public meetings for the project, and the email of 17 January 2023 regarding an additional public meeting to be held in Jeffreys Bay, refer.
2. Please find consolidated comment from various directorates within the Department on the DSR and Plan of Study for EIA dated December 2022 that was downloaded from the website of the environmental assessment practitioner ("EAP").
3. Directorate: Development Management (Region 3) – Ms Shireen Pullen (Email: Shireen.Pullen@wester; Tel.: (044) 814 2021):
 - 3.1. According to Figure 7-14 of the DSR, the proposed exploration right area falls almost entirely within the Kingklip Corals Ecologically or Biologically Significant Area ("EBSA") and what appears to be a Marine Protected Area ("MPA"). (Please note, the MPA is difficult to ascertain due to the colour scheme being

used for the legend). Whilst it is acknowledged that no specific management actions have been formulated for EBSAs, cognisance must be taken that the objective an EBSA is to identify features of higher ecological value that may require enhanced conservation and management measures. As such, a precautionary approach should be taken to avoid negative environmental impacts on an EBSA. The location of the proposed exploration and appraisal drilling and related activities in relation to the EBSA should be identified during the environmental impact reporting stage.

- 3.2. According to the DSR, the proposed pipeline routing passes through a Critical Biodiversity Area ("CBA") Natural Area. The development of subsea pipelines associated with oil and gas processes are considered non-compatible within a CBA Natural area. As a rule, this Directorate does not support development that is not compatible with the management objectives of a CBA. Whilst the DSR has indicated that the environmentally preferred option of rerouting the pipeline to avoid the CBA may not be feasible, it has not provided reasons for the statement. Please provide reasons why the impact management hierarchy of avoidance cannot be implemented for the proposed pipeline routing. (In this regard, please also refer to paragraph 4.3. below.)
4. Directorate: Biodiversity and Coastal Management – Mr Ryan Apolles (Email: Ryan.Apolles@westerncape.gov.za; Tel.: (021) 483 2817):
 - 4.1. This Directorate notes and supports the assessment of noise impacts on mammals from the proposed seismic survey activities and ancillary support activities (i.e., support vessel noise). The applicant is further encouraged to assess the potential cumulative impacts (from other noise-generating activities in the licence block).
 - 4.2. Please be advised that in accordance with the requirements of the Protocol for Specialist Assessment and Minimum Report Content Requirements for Noise Impacts published in Government Notice No. 320 of 20 March 2020, the details and relevant expertise, including a curriculum vitae, of the appointed specialist for the Marine Acoustic Assessment must be included in the Draft EIA Report
 - 4.3. The applicant highlighted that the development of subsea pipelines associated with oil and gas processes are considered non-compatible within CBAs and that the environmentally preferred option is to reroute the pipeline to avoid CBAs. However, the applicant intends to not implement the environmentally preferable option as avoidance may not be feasible. Please be advised that the integrity of CBAs should not be compromised. As such, the applicant is advised to ensure that the proposed subsea pipeline avoid these sensitive environments or provide adequate reasons why avoidance is not possible.
 - 4.4. This Directorate notes that Offshore MPAs near Block 11B/12B include the Indian Seamounts MPA to the southwest of the block, and the Port Elizabeth Corals MPA to the northeast. Section 48 of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEM: PAA") states that no person may conduct commercial prospecting or mining activities in a protected environment without the written permission of the Minister and the Cabinet member responsible for minerals and energy affairs. According to page 89 of the DSR, several I&APs have been identified, including CapeNature, the fishing industry, South African Maritime Safety Authority, relevant offshore regulatory authorities (i.e., Department of Forestry, Fisheries and the Environment's Branches for

Fisheries, and Oceans and Coasts), South African Hydrographic Office, Port Authorities, and Marine Research Institutions. Please note that the Minister responsible for environmental affairs must also be consulted, per section 48 of the NEM: PAA, 2003.

- 4.5. This Directorate acknowledges the recommendation that where the seabed survey results indicate special environmental features such as corals at the planned location, alternative locations would need to be considered before proceeding with drilling. Please note that the presence of such sensitive features must be identified and the impact of the proposed activities on such sensitive features must be assessed during the EIA process, as this information must be considered by the competent authority to ensure informed decision-making.
- 4.6. As a state department that administers a law relating to a matter affecting the environment, this Department has a constitutional mandate to ensure that the environment is protected and to secure ecologically sustainable development. The National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") requires the consideration of all relevant factors for sustainable development, including that a risk-averse and cautious approach be applied that considers the limits of current knowledge about the consequences of decisions and actions. This Directorate advises that the competent authority should adopt a risk-averse and cautious approach in its decision-making, based on the limited knowledge available to determine cumulative impacts on the marine environment.
- 4.7. Whilst the applicant has indicated that an assessment of underwater noise impacts from the project will be carried out for several project activities, it should be noted that the conclusiveness of scientific knowledge is currently being contested, as considered in the Western Cape High Court Judgement in the case of Christian John Adams & Others v Minister of Mineral Resources and Energy & Others (case number: 1306/22) where applicants in this matter presented the argument that cumulative impacts of seismic surveys have not been studied in South Africa, and that the impact on fish assemblages was difficult to interpret.
- 4.8. The cumulative impacts of seismic surveying are purely speculative at this stage. It is therefore essential that a Strategic Environmental Assessment ("SEA") be conducted from an environmental, social and economic perspective, and this should be instituted at the earliest possible opportunity. It is recommended that a SEA, based on spatial planning principles, be undertaken to assess and manage potential cumulative impacts in a holistic manner and to identify and implement regional level mitigation measures. The competent authority must take cognisance of this recommendation to undertake a SEA to assist specialists and EAPs to accurately assess cumulative impacts.
- 4.9. This Directorate therefore does not support further offshore petroleum reconnaissance, exploration, prospecting, or production activities until such time that sufficient and strategic level information is available on the cumulative impacts of these activities for this Directorate to apply its mind and provide informed comments on such applications, and not consider each application for seismic surveying in isolation of each other.

5. Directorate: Development Facilitation – Mr Ralph van Delin (Email: [REDACTED]):

- 5.1. It is noted that the application also includes exploration and appraisal drilling and related activities, which will entail additional drilling of up to four exploration wells in the application area, bathymetry and sonar surveys, sampling surveys of the sea floor, and metocean surveys. This Directorate requires clarity why Activity 21C of Listing Notice ("LN") 1 and/or Activity 18 of LN 2 of the NEMA EIA Regulations, 2014 (as amended) have not been applied for. This Directorate respectfully submits that the proposed exploration and appraisal drilling cannot be authorised under Activity 20 of LN 2 of the NEMA EIA Regulations, 2014 (as amended) as said activity only includes "*any other activity as contained in this Listing Notice, in Listing Notice 1 of 2014 or Listing Notice 3 of 2014, required to exercise the production right*" (own emphasis).
- 5.2. It is noted that Activity 4 of LN 2 of the NEMA EIA Regulations, 2014 (as amended) is being applied for. Please confirm that the handling and storage of oil, gas and/or fuel (diesel) will occur in containers to ensure applicability of the listed activity. Please further indicate the location of the containers for the storage and/or handling of dangerous goods (i.e., on the drilling unit, support vessels, or onshore logistics base).
- 5.3. The Draft EIA Report should indicate the names of the oceanic basins in Block 11B/12B that will be subjected to production and exploration activities (e.g., Bredasdorp Basin for the proposed production pipeline).
- 5.4. The Draft EIA Report should provide the coordinates of the corridor for the proposed linear activity (production pipeline).

The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely

pp **HEAD OF DEPARTMENT**
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Letter signed by:

Thea Jordan

Director: Development Facilitation

Date: 3 February 2023



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Tel: + [REDACTED], Fax: + [REDACTED]

Reference: TEEPSA OFFSHORE PRODUCTION

Enquiries: Ms M Rabothata / Mr K Mathetja

Telephone: [REDACTED] **E-mail:** [REDACTED]

Mr. Kavilan Naidoo
WSP Group Africa (Pty) Ltd
PO Box 6001
Halfway House
1685

Telephone Number: (+ 27) 11 254 4800
Email Address: teepsaEIA@wsp.com

PER E-MAIL

Dear Mr. Naidoo

COMMENTS ON THE DRAFT SCOPING REPORT FOR ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) FOR THE PROPOSED OFFSHORE PRODUCTION RIGHT AND ENVIRONMENTAL AUTHORISATION APPLICATIONS FOR BLOCK 11B/12B

The Directorate: Biodiversity Conservation reviewed and evaluated the report.

Based on the information provided in the report, Block 11B/12B falls within the warm temperate south coast which is a region of high endemism and diversity. The habitat threat status of all the ecosystem types within the Production Right Area and proposed pipeline routing is "Least Concern", while the Agulhas Blues is considered "Near Threatened". The substrate in the area is classified as "Southwest Indian Unclassified Slopes".

Offshore Marine Protected Area (MPA) near Block 11B/12B include the Southwest Indian Seamounts MPA to the southwest of the block, and the Port Elizabeth Corals MPA to the northeast. The northern border of Block 11B/12B falls alongside the full extent of the 'Kingklip Corals' Ecologically or Biologically Significant Areas (EBSA) and lies just to the northeast of the Shackleton Seamount Complex Ecologically or Biologically Significant Areas (EBSA).

The proposed pipeline routing passes through the southwestern corner of the Kingklip Corals Ecologically or Biologically Significant Areas (EBSA). The proposed pipeline routing passes through a Critical Biodiversity Area (CBA) Natural Area. The northwestern corner of Block 11B/12B intersects the Southern Coastal and Shelf Waters Important Marine Mammal Areas (IMMA). Kindly note that any development within a very highly sensitive area that will result with significant negative residual impacts after mitigation is prohibited, therefore the project should avoid all highly sensitive areas.



COMMENTS ON THE DRAFT SCOPING REPORT FOR ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) FOR THE PROPOSED OFFSHORE PRODUCTION RIGHT AND ENVIRONMENTAL AUTHORISATION APPLICATIONS FOR BLOCK 11B/12B

Considering the above and the stage of the EIA process for the proposed development, the Directorate Biodiversity Conservation does not have any objection with the proposed DSR & Plan of Study.

All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email:

[REDACTED] for attention of **Mr Seoka Lekota**.

Yours faithfully



Mr. Seoka Lekota
Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Forestry, Fisheries & the Environment
Letter signed by: MP Makitla
Designation: Control Biodiversity Officer Grade A
Date: 24/01/2023

From: Johann Schoeman (Dr) [REDACTED]
Sent: Wednesday, 11 January 2023 11:28
To: TEEPSA EIA; ZA - GLD - Teepsa Esia
Cc: Angus Andries; Admin (Rekords); Joy Leaner
Subject: COMMENTS ON ESIA
Attachments: TEEPSA Comments On ESIA 11 Jan 23.pdf

Good day

Please find attached comments for you attention.

Regards

Johann Schoeman



Dr Johann Schoeman

Manager: District Air Quality Control

Tel: + [REDACTED] | + [REDACTED]

[REDACTED]

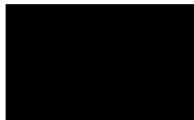
Emergency Communications: [REDACTED]

Ethics and Fraud Hotline: [REDACTED]

www.gardenroute.gov.za



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OFFICE OF THE MUNICIPAL MANAGER

Enquiries: JP Schoeman
Reference: 18/3/5/3
Date: 11 January 2023

Total Energies EP South Africa B.V. (TEEPSA)
WSP Group Africa (Pty) Ltd
PUBLIC PARTICIPATION OFFICE
P.O. Box 6001
Halfway House
1685

By Email: teepsaEIA@WSP.com, teepsaesia@golder.com

Dear Sir/ Madame

COMMENTS ON DRAFT SCOPING REPORT (PROJECT NO. 41105306) FOR THE PROPOSED OFFSHORE PRODUCTION RIGHT, ADDITIONAL EXPLORATION ACTIVITIES AND ENVIRONMENTAL AUTHORISATION APPLICATION FOR BLOCK11B/12B - REF No: 12/4/13 PRDNG (PTY) LTD GAS-TO-POWER FACILITY AND ASSOCIATED INFRASTRUCTURE IN MOSSEL BAY

Thank you very much for registering the Garden Route District municipality as an Interested and Affected Party for the proposed project.

Our comments on the draft scoping report as follows:

1. In terms of section 36 (5)(e) of the National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004) (the Act), the Minister responsible for mineral resources is the Licencing Authority for any section 21 listed activities which may be triggered by the proposed project as the proposed activity relates to a

prospecting, mining, exploration or production activity as contemplated in the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002).

2. It should be noted that if any small boilers as contemplated in GN No. 831 of November 2013, will be operated Garden Route District municipality will be the authority responsible for issuing small boiler registration certificates.
3. Further comments will be made in terms of Air Quality management as the environmental and social impact assessment progresses and the possible listed activities confirmed with the appropriate Licencing Authority.

Once again, thank you for your cooperation.

For any further information or points of clarity please feel free to contact Johann Schoeman at [REDACTED] or email to [REDACTED].

Regards

Yours faithfully

[REDACTED]


[REDACTED] TU
MUNICIPAL MANAGER

Read: REMINDER: INVITATION TO PUBLIC MEETINGS: Block 11B/12B by TotalEnergies EP South Africa B.V. Ref. No. 12/4/013

Monde Stratu <[REDACTED]>

Mon 1/16/2023 9:32 AM

To: ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com>

 1 attachments (10 KB)

Read: REMINDER: INVITATION TO PUBLIC MEETINGS: Block 11B/12B by TotalEnergies EP South Africa B.V. Ref. No. 12/4/013;

[<http://www.gardenroute.gov.za/grdm-footer.jpg>] Monde Stratu

Municipal Manager

[REDACTED]

Tel: + [REDACTED] | + [REDACTED]

54 York Street, George, 6530, Western Cape, ZA

Emergency Communications: [REDACTED]

Ethics and Fraud Hotline: [REDACTED]

www.gardenroute.gov.za

[facebook icon] <<https://www.facebook.com/gardenroutedm>> [twitter icon]

<https://twitter.com/gardenroute_dm> [youtube icon]

<https://www.youtube.com/channel/UC66RBZT0_U2_L4-zSn7yXJQ>

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E-mail: [REDACTED]
www.gardenroute.gov.za

OFFICE OF THE MUNICIPAL MANAGER

Enquiries: JP Schoeman
Reference: 18/3/5/3
Date: 11 January 2023

Total Energies EP South Africa B.V. (TEEPSA)
WSP Group Africa (Pty) Ltd
PUBLIC PARTICIPATION OFFICE
P.O. Box 6001
Halfway House
1685

By Email: teepsaEIA@WSP.com, teepsaesia@golder.com

Dear Sir/ Madame

COMMENTS ON DRAFT SCOPING REPORT (PROJECT NO. 41105306) FOR THE PROPOSED OFFSHORE PRODUCTION RIGHT, ADDITIONAL EXPLORATION ACTIVITIES AND ENVIRONMENTAL AUTHORISATION APPLICATION FOR BLOCK11B/12B - REF No: 12/4/13 PRDNG (PTY) LTD GAS-TO-POWER FACILITY AND ASSOCIATED INFRASTRUCTURE IN MOSSEL BAY

Thank you very much for registering the Garden Route District municipality as an Interested and Affected Party for the proposed project.

Our comments on the draft scoping report as follows:

1. In terms of section 36 (5)(e) of the National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004) (the Act), the Minister responsible for mineral resources is the Licencing Authority for any section 21 listed activities which may be triggered by the proposed project as the proposed activity relates to a

prospecting, mining, exploration or production activity as contemplated in the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002).

2. It should be noted that if any small boilers as contemplated in GN No. 831 of November 2013, will be operated Garden Route District municipality will be the authority responsible for issuing small boiler registration certificates.
3. Further comments will be made in terms of Air Quality management as the environmental and social impact assessment progresses and the possible listed activities confirmed with the appropriate Licencing Authority.

Once again, thank you for your cooperation.

For any further information or points of clarity please feel free to contact Johann Schoeman at [REDACTED] or email to [REDACTED].

[REDACTED]

Yours faithfully

[REDACTED]

**MONDE STRATU
MUNICIPAL MANAGER**

From: Westerberg, Erlene <[REDACTED]>
Sent: Wednesday, 25 January 2023 14:16
To: TEEPSA EIA
Cc: Steyn, Douw; Prins, Niel; Municipal Manager
Subject: COMMENTS ON DRAFT SCOPING REPORT FOR THE PROPOSED OFFSHORE PRODUCTION RIGHT AND ENVIRONMENTAL AUTHORISATION APPLICATION FOR BLOCK 11B/12B BY TOTAK ENERGIES EP SOUTH AFRICA AND ASSOCIATED INFRASTRUCTURE IN MOSSEL BAY
Attachments: YOUR REFERENCE NUMBER 12 4 013 COMMENTS ON DRAFT SCOPING REPORT FOR THE PROPOSED OFFSHORE PRODUCTION.pdf

Good afternoon

Please find attached correspondence from the Municipal Manager, Mr C. Puren, for your attention.

Kind regards



Erlene Westerberg
Personal Assistant (Municipal Manager)
[REDACTED]
Email: ewesterberg@mosselbay.gov.za
Web: <https://www.mosselbay.gov.za>
Tel: [REDACTED]



MOSSEL BAY | HARTENBOS | GREAT BRAK RIVER | HERBERTSDALE
Anti-Fraud Hotline: 0800 333 466

Mossel Bay Municipality email disclaimer:
http://www.mosselbay.gov.za/mbm_disclaimer.pdf

Mossel Bay Municipality,
101 Marsh Street,
Mossel Bay,
6506,
South Africa

Tel: [REDACTED]

www.mosselbay.gov.za



MOSEL BAY MUNICIPALITY
MOSELBAAI MUNISIPALITEIT
UMASIPALA MOSEL BAYI

In antwoord verwys na nommer
In reply quote number
Xa Uphendula chaza Le Nombolo

Tel, Imfonomfono: + [REDACTED]
Fax, ifeksi: + [REDACTED]
e-mail: [REDACTED]
web: www.mosselbay.gov.za

[REDACTED] Performer Good Governance Africa
2020 Best Municipality Western Cape Ratings Africa

23 January 2023

WSP Group Africa (Pty) Ltd
Public Participation Office
P.O Box 6001
Halfway House
1685

By email: teepsaEIA@WSP.com

Dear Sir/Madam

YOUR REFERENCE NUMBER: 12/4/013
COMMENTS ON DRAFT SCOPING REPORT FOR THE PROPOSED OFFSHORE PRODUCTION RIGHT AND ENVIRONMENTAL AUTHORISATION APPLICATION FOR BLOCK 11B/12B BY TOTAK ENERGIES EP SOUTH AFRICA AND ASSOCIATED INFRASTRUCTURE IN MOSEL BAY

The Municipality, as interested and affected party, supports the project in principle as the sustainable provision of gas and associated condensates will promote possible significant investments in the local economy. However, residents of Mossel Bay and the surrounding environment should not be negatively affected by the proposed activities and development as this could again lead to disinvestment and negative economic growth. In addition to the public participation meeting that took place on 17 January 2023, the following are the Municipality's comments to the Scoping Report:

- 1) The Municipality notes that a comprehensive Environmental Impact Assessment (EIA) will follow this Scoping Report and requests that the Municipality be properly informed and consulted throughout future authorisation processes. All specialist reports must adhere to the standards of the EIA Regulations, and the Mossel Bay Municipality reserves its rights on the outcome of and recommendations contained in the reports.

It is required that the following specialist reports also be considered and added:
-the Sea Level Rise and Flood Risk Assessment for a Select Disaster Prone Area Along the Western Cape Coast commissioned by DEADP in 2011; and
-the Sediment Supply study commissioned by Mossel Bay Municipality and DEADP in 2015.

- 2) Due to the potential impact of the project your public participation process must fit and address the local context of Mossel Bay and its residents.

The following local forums must be included: S.M.A.R.T which can be contacted at [REDACTED], the Great Brak, Klein Brak and Hartenbos Estuary Advisory Forums which can be contacted at [REDACTED] /

██████████ and the Mossel Bay Coastal Waters Discharge Forum which can be contacted at ██████████

The local media, (newspapers, social media, radio stations etc.) must also be used to inform our local community accordingly of the envisaged activities. It should be noted that Mossel Bay Municipality represents its communities and consultation with regard to the EIA must include Mossel Bay Municipality.

- 3) The alignment and routes of the pipelines might cross privately owned properties. It is not clear to what extent this will affect the development potential of the properties and if the owners have been informed accordingly.
- 4) The routes of the pipelines could affect the bulk water pipelines and bulk electricity network infrastructure of the Municipality as the routes might cross these services. The report is not clear to what extent and how this will be dealt with.
- 5) The Voorbaai area already has a significant number of underground services, municipal as well as PetroSA. This must be considered in determining the final pipeline route/alignment.
- 6) The Municipality is concerned about the safety during the construction, the commencement of the project and its operational phase. This should be adequately addressed in the EIA.
- 7) The Municipality is concerned regarding the level of flammability of the gas to be transported in the pipeline(s). It is uncertain what effect a possible incident will have on the surrounding residential areas and whether our disaster and fire services personnel will have the capacity to deal with such incidents. A proper prevention and disaster management plan needs to be developed in conjunction with the Municipality before commencing with construction and commissioning of the pipeline(s).
- 8) The proposed ocean activities will have a visual impact and possibly negatively affect the ocean views of our residents. From past similar experiences, this could lead to negative public perceptions and if not dealt with from the onset, can result in an uncontrollable situation that could halt the project.
- 9) These issues must be dealt with in a very sensitive and serious manner during the EIA process.
- 10) It is not clear to what extent the proposed ocean activities will affect the surrounding beaches, Robbe Island, recreational and commercial fishing, the marine life etc, which are all contributing significantly to the tourist industry and economy of Mossel Bay. The local research organisation called Ocean Research must be extensively consulted regarding the potential impacts to marine life. The contact person is dr Enrico Gennari (email: ██████████
██████████).

- 11) The Municipality requests an urgent meeting with yourselves and representatives of Total Energies before 3 February 2023 to discuss the above and any other inputs to be considered during the processes to follow.

Any further enquiries can be addressed to Mushfiqah Abrahams at [REDACTED]
[REDACTED] or email: [REDACTED]

Yours faithfully


C PUREN
MUNICIPAL MANAGER

RE: Registration

ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com>

Tue 1/10/2023 8:18 AM

To: Stephen Muller <[REDACTED]>

Dear Stephen

Thank you for registering as an I&AP, your contact details have been added to the stakeholder database.

Kind regards,

Public Participation Office

T+ 27 11 254 4800

WSP in Africa
Building 1, Maxwell Office Park
Magwa Crescent West
Waterfall City
Midrand, 1685
P.O. Box 6001
Halfway House
1685

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From: Stephen Muller <[REDACTED]>

Sent: Thursday, January 5, 2023 1:35 PM

To: TEEPSA EIA <teepsaEIA@wsp.com>

Subject: Registration

Please register mee as an I&A party.

Regards,

Stephen Müller

Director: Infrastructure and Planning

Overstrand Municipality
[REDACTED]

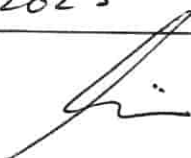
WSP

Scoping and Environmental Impact Assessment (S&EIA) process for the proposed offshore Production Right and Environmental Authorisation Application for Block 11B/12B by TotalEnergies EP South Africa B.V.

Registration, Comment and Reply Form

Draft Scoping Report: Thursday 01 December 2022 to Friday 03 February 2023

Note: This is an opportunity to register as an I&AP for the Scoping and Environmental Impact Assessment (S&EIA) process. By registering as an I&AP on the proposed project, you agree to receive information about the proposed project during the regulatory S&EIA process. You also agree to receive information about the S&EIA, public participation process and opportunities to contribute comments.

Personal Information			
Title	First Name	Surname	Organisation / Department (if applicable)
Mr	Stephen	Müller	Overstrand Municipality.
Contact Details			
Mobile Number	Land Line Contact Number		Email / Fax Number
[REDACTED]	[REDACTED]	Office	[REDACTED]
		Home	
Do you want to register as an Interested and Affected Party?			
Please register me as an interested and affected party (I&AP) for this project so that I may receive further information and notifications as the project develops		YES <input checked="" type="checkbox"/>	NO <input checked="" type="checkbox"/>
Please include my details on WSP's database to contact me about future projects in my area		YES <input checked="" type="checkbox"/>	NO <input checked="" type="checkbox"/>
In terms of the EIA Regulations, 2014 (as amended), I disclose below any direct business, financial, personal, or other interest that I may have in the approval or refusal of the application:	Date	5/1/2023	
	Signature		

For internal use to confirm capture of stakeholder details into the stakeholder database	
Stakeholder database reference number	
	Signature of data capturer

By registering as a stakeholder permission is hereby given in terms of the Protection of Personal Information Act for your contact details to be held securely to keep you informed about this project. WSP Group Africa as a good corporate citizen complies to the POPIA and confirms that your details will be kept confidential and will not be shared with any third party without your prior consent, other than the lead authority should they request stakeholder details.

COMMENT(S)

You are welcome to use additional pages should you so wish.

I have the following comments to make regarding this proposed project and/or the public participation process:

None at this stage.

You are welcome to distribute this form to friends/colleagues who may be interested in the proposed project so that they also can register as interested and affected parties.

Please return the Registration, Comment and Reply form to:

WSP Group Africa (Pty) Ltd

PUBLIC PARTICIPATION OFFICE

P.O. Box 6001, Halfway House, 1685

Tel: (011) 254 4800

Fax: (086) 582 1561

WhatsApp: 076 694 3842

E-mail: teepsaEIA@WSP.com

THANK YOU!

Our Ref:



an agency of the
Department of Arts and Culture

T: + [REDACTED]
South African Heritage Resources Agency | [REDACTED]

www.sahra.org.za

Enquiries: Ruan Brand

Tel: [REDACTED]

Email: [REDACTED]

CaseID: 20323

Date: Friday February 03, 2023

Page No: 1

Interim Comment

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: TotalEnergies EP South Africa B.V.

TotalEnergies EP South Africa B.V. (TEEPSA), together with its joint venture partners, QatarEnergy, Canadian Natural Resources International South Africa Limited, and a South African consortium, MainStreet 1549 held an Exploration Right (Exploration Right Ref. No.: 12/3/067) over Block 11B/12B, located offshore from the Southern Cape coast, South Africa. To date the exploration programme for Block 11B/12B has been focused on the south-western part of the block and has resulted in d gas and associated condensates discoveries in the Paddavissie fairway including the Brulpadda and Luiperd discoveries (hereafter referred to as project development area).

The Maritime and Underwater Cultural Heritage (MUCH) unit at the South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Scoping Report (DSR) for an Environmental and Social Impact Assessment (ESIA) for the proposed offshore production right and Environmental Authorisation (EA) applications for block 11B/12B off the Southern Cape coast, South Africa under section 38(8) of the National Heritage Resources Act, No. 25 of 1999 (NHRA).

The proposed activities include exploration, in the form of marine surveys and well drilling; preparation for production consisting of drilling development and appraisal wells, the installation of subsea infrastructure, and modifications to existing infrastructure; and production which will involve the use of this infrastructure to flow gas to a platform for further treatment with lastly, the exporting of gas and condensate to the shore not forming part of this ESIA.

SAHRA has reviewed the document and has noted the following:

On Page 82 of the DSR, under section 8.1.7, a summary of NHRA is provided. This section is easily misinterpreted as it states that all ship wrecks are administered by SAHRA and that the only applicable heritage resource in the marine environment that the NHRA makes provisions for are ship wrecks. This section must be updated to reflect that:

- Wrecks, meaning any vessel or aircraft, or any part thereof, which are older than 60 years, or which SAHRA considers to be worthy of conservation, are treated as archaeological in the NHRA under



an agency of the
Department of Arts and Culture

T: + [REDACTED]
South African Heritage Resources Agency | [REDACTED]

www.sahra.org.za

- section 2(ii)(c) and as such, are administered by SAHRA; and
- The scope of heritage resources that are in the marine environment consist of more than just wrecks. The National Estate, which is administered by SAHRA, according to section 3 of the NHRA, includes definitions which are applicable in the marine space, such as, but not limited to, places to which oral traditions are attached or which are associated with living heritage, submerged landscapes and features of cultural significance, archaeological and palaeontological objects and sites, graves and burial grounds, etc.

On page 77 of the DSR, under section 7.3.2, a brief overview of marine archaeology is provided. This section is poorly phrased implying that Mossel Bay's history only started in 1487 when the Portuguese landed there, yet it also mentions that there are coastal caves nearby that were occupied up to 40,000 years ago. This section should reflect the rich history of the Southern Cape coast's archaeology which in some instances spans as far back as the Early Stone Age (ESA). Moreover, as this section speaks to marine archaeology, inclusions must be made reflecting the recent studies on the Palaeo-Agulhas-Plan (PAP). As there is no part of the DSR that speaks to palaeontology, this section can also be updated to include information relating to some of the fossils that have been discovered in the targeted area, such as those by the 1993 Africana Voyager III demersal cruise, as well as during the recent environmental baseline studies. There is also a paragraph dedicated to the wreck of the Kiani Satu which wrecked in 2013, and as this wreck is under 60 years of age it currently falls outside the remit of the NHRA and is therefore not considered a heritage resource.

There are further minor changes that must be made in in Appendix B (other applicable national legislation) and Appendix C (other applicable international legislation):

- The National Policy on South African Living Heritage was adopted by cabinet in 2019, not 2009, as is listed;
- The Protection, Promotion, Development and Management of Indigenous Knowledge Act, No. 6 of 2019 (IKS Act) should also be listed in the table as there are indigenous knowledge systems related to the marine environment on the Southern Cape coast that might be impacted by some of the proposed activities;
- The 2001 Convention on the Protection of the Underwater Cultural Heritage is mentioned twice in the table;
- The 2003 Convention for the Safeguarding of the Intangible Cultural Heritage is omitted from the table. South Africa is not a state party to this convention, but has been observing for the past two years and

Our Ref:



an agency of the
Department of Arts and Culture

T: [REDACTED]
South African Heritage Resources Agency | [REDACTED]
www.sahra.org.za

Enquiries: Ruan Brand

Date: Friday February 03, 2023

Tel: [REDACTED]

Page No: 3

Email: [REDACTED]

CaseID: 20323

there is a process underway to become signatories. As the 2019 National Policy on South African Living Heritage speaks strongly to this convention it should be included in this list.

SAHRA is pleased to note that a Cultural Heritage Impact Assessment (CHIA) will be submitted as part of this application, which will assess impacts to intangible cultural heritage. However, as the proposed exploration activities, including the installation of subsea infrastructure, may result in the disturbance of the seabed SAHRA insists that a Heritage Impact Assessment (HIA) be conducted by a suitably qualified maritime archaeologist. Disturbance of the seabed has the potential to identify previously unrecorded tangible heritage resources, such as fossil localities and archaeological ship wrecks. The impact assessments must suggest mitigation measures for both tangible and intangible heritage resources which must be included in the ESIA.

Please note that all updates and/or changes to the project, supporting documentation, correspondence, reports, or any other work relating to the project must be uploaded to the case on SAHRIS to provide SAHRA with the opportunity to comment. SAHRA does not accept emailed documents or hard-copy documents received via post.

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

Yours faithfully

Ruan Brand
Heritage Officer
South African Heritage Resources Agency

Our Ref:



an agency of the
Department of Arts and Culture

T: + [REDACTED]
South African Heritage Resources Agency | [REDACTED]
www.sahra.org.za

Enquiries: Ruan Brand

Tel: [REDACTED]

Email: [REDACTED]

CaseID: 20323

Date: Friday February 03, 2023

Page No: 4

Briege Williams
Acting manager
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/610709>
(DMR, Ref:)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.

CBOs COMMENTS

Subject: FW: Registration as IAP : Total Energies, Brulpadda Project, Block 11B/12B

From: camoller <[REDACTED]>

Sent: 17 January 2023 10:16

To: TEEPSA EIA <teepsaEIA@wsp.com>

Subject: Registration as IAP : Total Energies, Brulpadda Project, Block 11B/12B

WSP

Please register AfriForum Mossel Bay Branch as an Interested & Affected Party

Please confirm receipt and registration as IAP

Thank you

Regards

Charl Möller
Member responsible for Environmental Affairs
AfriForum Mossel Bay Branch

[REDACTED]
[REDACTED]

Sent from my Galaxy

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-LAEmHhHzdJzBITWfa4Hgs7pbKI

From: Rex the Rhino <[REDACTED]>
Sent: Friday, 03 February 2023 14:12
To: ZA - GLD - Teepsa Esia; Bhaktawar, Natasha
Cc: Rudi Martin; Oliver Rissik; Paul Falla; Basil van Rooyen
Subject: COMMENT ON DRAFT SCOPING REPORT | BLOCK 11B/12B BY TOTALENERGIES EP SOUTH AFRICA B.V. REF. NO. 12/4/013
Attachments: Total Energy Gas Drilling Draft Scoping Comment Plett Enviro Forum Feb 2023.pdf; PastedGraphic-1.tiff

Many thanks for the opportunity to comment on the application for the proposed project: Offshore Block 11B/12B.

Please find attached the comments and queries from the Plettenberg Bay Community Environment Forum.

Kind regards
Julie

Julie Carlisle
OBO Plettenberg Bay Community Environment Forum
[REDACTED]

On 03 Feb 2023, at 11:45, ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com> wrote:

Dear Stakeholder

*This is a reminder that the public comment period on the Draft Scoping Report for the TEEPSEA Block 11B/12B ESIA closes **today**, 03 February 2023.*

Please register as an I&AP and submit your comments if you have not done so already.

Kind Regards,

WSP Public Participation Office

EmHhHzdJzBITWfa4Hgs7pbKI



WSP Group Africa (Pty) Ltd

PO Box 6001

Halfway House

1685

Via e-mail: teepsaeia@wsp.com

2nd February 2023

To whom It May Concern

Re: Proposed Offshore Block 11B/12B Development Project - TEEPSA

Many thanks for the presentations on the 7th December 2022 (online) and the public meeting held in Plettenberg Bay on the 17th January 2023.

While we appreciate the efforts, we would like it noted that the online meeting, due to load shedding, cannot be deemed as a satisfactory engagement. During this online meeting, I submitted several queries via the chat prior to load shedding and none of these were addressed. Load shedding happened 30 minutes into the presentation.

The meeting held on the 17th January 2023 was exceptionally badly advertised, with times changing and then changing back and people only becoming aware of the meeting on the day of the meeting. The time allowed for questions was inadequate with only 10 questions being allowed. Again, this should not be considered a comprehensive participation.

1. The questions posed at the meeting in December which still require answers are as follows:

- How does TEEPSA intend to address the lack of research and understanding of cetaceans and other species that occur offshore and in the deeper waters?
- Will marine mammal observers be included? If so, who will these be and what will their reporting lines and response times be?
- Will the timing of the louder activities consider migration timelines of marine mammals, the squid season, etc?

- Will ongoing monitoring within the MPA's be conducted and, if so, if impacts are noted, what will the process be to prevent further impacts or to implement mitigations?
- Will ongoing monitoring of the local community fisheries be conducted?
- Will hydrophones be used prior to activity as well as during activity?

2. Questions and concerns arising from the 17th January 23 presentation:

- The application refers to international agreements regarding energy sources. Please can you advise why drilling for gas in such an area recognised for its environmental sensitivities and biodiversity makes sense? Why is hydro-, solar, or wind not preferable? How do the costs and impacts of off-sea drilling and alternative sources compare?
- Regarding the biodiversity action plans that are mentioned, who will monitor and implement these plans and who will be responsible for policing these?
- Regarding the additional exploration that is to take place east of the block, are there existing rights for this? Or is this part of this application?
- At the meeting, the timeframes that were given suggested that by June all the required research and specialist studies will have been completed. This is an exceptionally narrow timeframe and we are concerned that these studies will rely on desktop information where research is lacking. What detailed studies are to be done and in what timeframes?
- Can you confirm that work will only commence once negotiations with buyers of this gas have been completed?
- Reference was made to the "peak level of production". Is this predetermined? Are quantities capped?
- Is the closure plan updated prior to decommissioning? Is there a process attached to this?
- What is the risk percentage for accidental spills or other risk factors?
- What is the carbon impact of the project?
- What is the actual total impact of the gas, over the predicted 20 year lifespan, on the total environment?
- Who is going to benefit from the implementation of this and how? Many development applications cite job creation as a rationale. The document states that "The project is required to contribute to local development ... through IDPs, SDFs and EMS." How will the project contribute?
- Honest information during the process for the Social and Labour Plan needs to be available in clear, understandable terms. It would appear from the presentation and documentation that only communities in Mossel Bay will benefit from this project, in which case other communities along the Southern Cape coastline need to be made aware.

3. Draft Scoping Report Concerns & Queries

- The report states that *“In this case, as of April 22, according to Harris et al, the development of the subsea pipelines associated with oil and gas processes are considered non-compatible within the CBA natural area. The environmentally preferable option is to reroute the pipeline to avoid CBA area ... but this may not be feasible.”* While the rationale for drilling in this area is clearly dictated by the presence of gas, the associated environmental impacts in areas listed as MPAs, EBSA, CBAs and Important Mammal Areas seems entirely counter-intuitive. The consequences are particularly concerning considering the comparative life-spans of the two factors (gas availability for 20 years vs environmental integrity into the far distant future). Why is this site to be sacrificed when there is enough sun, hydro and wind available for alternative energy sources?
- The project assumes that there will be no further production from this field. Is this a confirmed assumption and, if not, what are the implications?
- Please confirm whether pipeline routings will be subject to public scrutiny during the ongoing processes.
- Why are platform modifications not part of the scope of the EISA? This is directly linked to this project and any modifications will surely be required to follow due process?
- Has an environmental integrity baseline been established that will enable ongoing environmental monitoring and evaluation?
- What is the impact on marine life of the air gun discharges of the state 8 to 12 hours and what is the circular radius of impact?
- Is it guaranteed that cement plugs will seal the drilling points that are not to be used? Will the seals remain into perpetuity or is there a monitoring system proposed?
- What explosives are to be used and what is the impact of these?
- What is the potential impact to sea life from the corrosion of the flowlines?
- Why is it necessary to bury pipe components in trenches in shallow water to decommission them? Why can they not be removed? Why is any removeable infrastructure or equipment left?
- Considering that the Agulhas current is the strongest surface current in the world, what are the risks to equipment and marine life should equipment get damaged?
- The table of the hearing ranges of cetaceans in the report does not link this information to the actual activities that are proposed. What will the impact be on cetaceans (and other sea life) and will research be conducted to establish the number of cetaceans (and sea life) that may be impacted?

4. Draft Scoping Report Non Technical Summary

The identified and listed potential impacts described the document include, but are not limited to:

- *Impacts on air quality due to air emissions from vessel engines and from well testing;*

- *Impacts on sea water quality at drilling sites due to drilling muds and cuttings and cement which will be discharged into the sea during well drilling;*
- *Impacts on sediment quality (bottom contours, grain sized and some chemical parameters) from discharge of drilling muds and cuttings and cement and from seafloor sampling;*
- *Impacts on plant and animal life on the sea bottom in areas where wells are drilled, or project infrastructure is installed;*
- *Incineration of individual birds from well stem test flaring at the drillship;*
- *Noise effects on marine life due to sound from construction related activities, and associated physical and behaviour disturbance;*
- *The potential for collision between project vessels and marine mammals and sea turtles or due to well drilling, VSP and/or sonar survey activities, resulting in injury or mortality;*
- *Impact on bird life / nesting due to disturbances caused by marine vessels and helicopter traffic;*
- *Protection from fish pressure of some fishes and invertebrates species attracted to the project infrastructures where the exclusion zone will be applied;*
- *Local disruption to marine traffic to avoid project activities at sea and their exclusion safety zones;*
- *Loss of fishing gears due to project vessel movements in fishing areas;*
- *Loss of small-scale/artisanal fishing grounds due to project infrastructures and their exclusion safety zones;*
- *Risk of collision between project vessels and small-scale fishing boats due to project vessels movements;*
- *Social unrest in coastal communities due to the perception of project negative impacts on fisheries combined with very limited local benefits;*
- *Potential impacts on human cultural heritage and spiritual connections to the ocean and coastline, which is of sacred value to communities.*

How are all of these to be mitigated and what risk percentage is deemed as “acceptable”?

The Plettenberg Bay Community Environment Forum thanks you for the opportunity to comment and we look forward to your response to our concerns and queries raised. We reserve the right to comment on this proposed project in the future.

Yours sincerely



OBO Plettenberg Bay Community Environment Forum

From: peter fillies <[REDACTED]>
Sent: Tuesday, 17 January 2023 07:49
To: TEEPSA EIA
Subject: Registration ,Comment abd Reply form
Attachments: 20230117_074352.jpg; 20230117_074400.jpg

Follow Up Flag: Follow up
Flag Status: Completed

Good morning

Please find attached the Registration form as requested.

Regards
Peter Fillies (Chair: Eden Labour Forum)

Scoping and Environmental Impact Assessment (S&EIA) process for the proposed offshore Production Right and Environmental Authorisation Applications for Block 11B/12B by TotalEnergies EP South Africa B.V.

Registration, Comment and Public Meeting Reply Form

Draft Scoping Report: Thursday 01 December 2022 to Friday 03 February 2023

Note: This is an opportunity to register as an I&AP for the Scoping and Environmental Impact Assessment (S&EIA) process. By registering as an I&AP on the proposed project, you agree to receive information about the proposed project during the statutory S&EIA process. You also agree to receive information about the S&EIA, public participation process and opportunities to contribute comments.

Personal Information						
Title	First Name	Surname	Organisation / Department (If applicable)			
MR	PETER. H.	FILLIES	ELF/EDEN LABOUR FORUM			
Contact Details						
Mobile Number	Land Line Contact Number		Email / Fax Number			
		Office				
		Home				
Do you want to register as an Interested and Affected Party?						
Please register me as an interested and affected party (I&AP) for this project so that I may receive further information and notifications as the project develops					<input checked="" type="radio"/> YES	<input type="radio"/> NO
I will attend the following public meetings in 2023:						
16 January, Kwanonqaba Community Hall, Mayixhale St, Kwanonqaba, Mossel Bay	<input type="radio"/> YES	<input type="radio"/> NO	21 January, Seavista Hall, Geelbek Street, St Francis Bay	<input type="radio"/> YES	<input type="radio"/> NO	
17 January, Mossel Bay Town Hall, 101 Marsh Street, Mossel Bay	<input checked="" type="radio"/> YES	<input type="radio"/> NO	23 January, Pelisrus Hall, 1 Harder Street, Jeffreys Bay	<input type="radio"/> YES	<input type="radio"/> NO	
18 January Thembalethu Community Hall, 66 Olympic Road, George	<input type="radio"/> YES	<input type="radio"/> NO	24 January, Feather Market Hall, 86 Baakens Street Port Elizabeth Central, Gqeberha	<input type="radio"/> YES	<input type="radio"/> NO	
19 January, Khayeletu Community Hall, Mbethana Street, Knysna	<input type="radio"/> YES	<input type="radio"/> NO	25 January, Jauka Community Hall, Runeli Drive, Port Alfred	<input type="radio"/> YES	<input type="radio"/> NO	
20 January, Plesang Community Hall, 7 Greenpoint Ave, Plettenberg Bay	<input type="radio"/> YES	<input type="radio"/> NO	26 January, Scenery Park Community Hall, 30 7 th Rd, Scenery Park, East London	<input type="radio"/> YES	<input type="radio"/> NO	
In terms of the EIA Regulations, 2014 (as amended), I disclose below any direct business, financial, personal, or other interest that I may have in the approval or refusal of the application:	Date		2023/01/16			
	Signature					

By registering as a stakeholder permission is hereby given in terms of the Protection of Personal Information Act for your contact details to be held securely to keep you informed about this project. WSP Group Africa as a good corporate citizen complies to the POPIA and confirms that your details will be kept confidential and will not be shared with any third party without your prior consent, other than the lead authority should they request stakeholder details.

For internal use to confirm capture of stakeholder details into the stakeholder database	
Stakeholder database reference number	
	Signature of data capturer

COMMENT(S)

You are welcome to use additional pages.

I have the following comments regarding this proposed project and/or the public participation process:

EDEN LABOUR FORUM WELCOMES THE PROPOSED PROJECT OF WHICH THE COMMUNITY WILL BENEFIT. WE AS THE COMMUNITY WILL GIVE OUR FULL SUPPORT IN ALL ASPECTS TO SEE THE PROJECT TO BE A SUCCESS.

WE WELCOME THE TRAINING AND DEVELOPMENT OF SKILLS TO OUR COMMUNITY AND THE YOUTH WITHIN THE EDEN DISTRICT. ALL AGREEMENTS MUST BE IN WRITING. TO SHOW YOUR GOOD FAITH.

You are welcome to distribute this form to friends/colleagues who may be interested in the proposed project so that they also can register as an Interested and Affected Party.

Please return the Registration, Comment and Reply form to:

WSP Group Africa (Pty) Ltd

PUBLIC PARTICIPATION OFFICE

P.O. Box 6001, Halfway House, 1685

Tel: (011) 254 4800

Fax: (086) 582 1561

WhatsApp: 076 694 3842

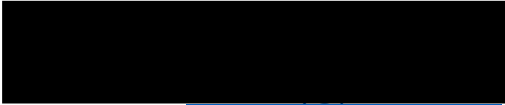
E-mail: teepsaEIA@WSP.com / gld.teepsaesia@wsp.com

THANK YOU!

From: [REDACTED]
Sent: Friday, 03 February 2023 15:38
To: TEEPSA EIA; gld.teepsaesi@wsp.com; [REDACTED]
Cc: [REDACTED]
Subject: STATEMENT AND COMMENTS - 0619214879
Attachments: 22.pdf

Good day please find attached document.

Shaedah Kiewiet
Postlink Mosselbay



STATEMENT AND COMMENTS TO Total Energies EP South Africa B.V. (TeepSA)

Subject: Environmental and Social Impact Assessment (EISA) for the proposed offshore production right, additional exploration activities and environmental authorisation application for Block 11B/12B – Ref. No. 12/4/13 PR

Joint statement and comments by Interested and Affected Parties, as listed for the purpose of this document, on the above subject.

1. PREAMBLE

- 1.1. The organizations and institutions listed at the end of this document, came together, consolidating and constituting the MOSSEL BAY SOCIO-ECONOMIC COLLECTIVE (MSEC), echoing in unison the importance of drafting comments to WSP and TeepSa (Total Energies) on the above subject matter. Though the EISA is directed and governed by law, engaging communities are not always producing the best of results, bringing about high hopes and expectations for the ordinary person and unleashing bizarre and unexpected objectives and modus operandi for many.
- 1.2. The above organizations have a proven track record of living, working, suffering with and leading many in the communities of Mossel Bay, in particular in D'Almeida, Extension 13, Tarka, New Sunny Side, Highway Park, Protea Park, Civic Park, Valley, Sonskynvallei, Brandwag, Powertown, Ruitersbos, Friemersheim, Great Brak River, Herbertsdale, Buisplaas, Vleesbaai and Bartelsfontein, perfectly understanding the needs, expectations, short comings and other humanitarian challenges of our day-to-day livelihood.
- 1.3. Most, if not all these organizations stood the test of time, experienced numerous investment opportunities, developmental endeavours and to say the least, exploitation and hardship at the hands of governments and private sector, since we have been identical in living with our natural and human resources over the ages.
- 1.4. For the bigger part of most of our livelihoods, we are still today people of the sea, a coastal generation that became synonymic with the ocean and it's economy. We may not all have directly experienced the benefits thereof, but by virtue of our association, we became augmented.
2. We have learned through participating in development projects in human and natural resource development to become active players, not to be used for other people's gains, but to cement concrete deals and opportunities that not only grant people work but to become shareholders, decision makers and give credible directions to development causes. Thus, shareholding in project operations has to be discussed with TeepSa and related enterprises.
3. Our communities came through ages of battles for survival and developed periodically into became self-reliant, though not as sustainable as it should be, but to an extend that people grew closer to on another. As with the economy of our country and that of the town, to many people are still left behind making the gap between rich and poor bigger than before. Government and private sector need to take responsibility for this ever-increasing gap and redirect their focus to where it really matters. People's needs are growing; hence the focus should not be shifted from (i) housing, (ii) employment, (iii) safety and (iv) basic needs.

3.1. HOUSING

Although it's the responsibility of government, Mossel Bay has seen housing developments based on racial lines for years. Poor black communities get low class (income) housing developments whilst white suburbs are developed for the rich and wealthy. The TeepSa project should bring about a shift in the mindset of those in government and make remarkable investments in infrastructure and housing developments that will benefit all racial communities.

A housing project should be embarked upon jointly by TeepSa and a Collective structure in Mossel Bay.

3.2. EMPLOYMENT OPPORTUNITIES

Since the dawn of petro-chemical projects in Mossel Bay, this has always been a cause of disagreement. This industry may require from time-to-time particular skills, knowledge and tradesmanship. It has been found that certain companies in the industry make use of importing certain skill that are existing in Mossel Bay of which is a disgrace and an insult to the residence of this town. Some even went as far as training locals in certain field, but still employment is not offered.

This caused many skilled, qualified and highly sophisticated tradesman to leave the country in search for employment. A joint initiative by both TeepSa and community should embark on the creation of a skills data base, however it should not happen that labour brokers and forums, any sphere of government or any private entity that stand to gain from the construction face, should be eligible to produce such a skills data base.

Secondly, the need to train more eligible people in certain fields can never be over emphasized, thus TeepSa should invest in a proper accredited training facility of world class standards, providing sustainable training opportunities. Proper certification in this regard is of utmost importance since universal standards are to be considered. There should not be a need to create new infrastructure, as it already exists in the **form of a TVET (South Cape College) and the Centre of Excellence (PetroSA).**

Development of acquired (sustainable)skills should be ongoing as it **(i) needs to prioritize upskilling opportunities; (ii) it should be investor/employer-led; (iii) should find a mentor to support the development of such skills and (iv) must sign up for external skills training.**

If and when the project has been commissioned to proceed with the production face, after obtaining the necessary permits and/or licensing, we believe that construction will be outsourced to the relevant companies, partners and/or stakeholder. The latter service providers need to be engaged by both TeepSa and the Collective to ensure

that labour is properly recruited from the Mossel Bay component of labour, hence the need of a **well-researched skills data base**.

Creation of a social labour plan that benefits the indigenous people of the area and the majority amongst the originals.

4. SAFETY

Community life is the place where opportunities for people are existing, but at the same time it's the place where crime and violence concentrates. It usually came because of unemployment, inadequate services and health provisions, social exclusion and over population. Safety is a key component for realising liveable, productive, inclusive and sustainable communities, hence it needs to be high priority.

TeepSa and community should partner in driving social and economic programmes to deal decisively with crime and violence. Crime and violence manifest in various forms and are primarily driven by socio-economic factors. It has a severe negative effect on society to the extent that productivity and sustainability is disturbed in the private sector and small business environment.

Resource allocation is essential to the success of such an approach, to secure the communities meet their developmental potential. Safety goes beyond the safety of persons, the integrity of investments and the sustainability of community development, it invokes freedom of movement and access to public spaces and unfettered participation in school, public life and income-generating activities.

As a start TeepSa and communities should embark on

- (i) **safety audits within communities to establish safety needs and strategies.**
- (ii) **create environmental designs aimed at addressing the safety of women, children and other vulnerable groups.**
- (iii) **safety plans that have corresponding budgets.**

5. BASIC NEEDS

People in communities thrive on various kinds of basic needs as it is important for people to become aware their basic needs in order to develop themselves. Before we thrive, we need to satisfy our basic material needs, i.e. **food, clean air, shelter, clothing, health care, etc.**

TeepSa can play a pivotal role as an engine of economic growth and job creation. It can provide goods and services to local communities, generate tax revenues to finance essential social and economic infrastructure, develop new innovative solutions that help tackle development challenges and it is central in addressing climate change.

As communities we are looking forward to the developmental approach of TeepSa, expecting to see that it broadens from the conventional approach of supporting the economic development to a more inclusive and elaborated public private partnerships. Through this, TeepSa will become an important strategic partner in achieving the goal of eradicating poverty and reduce inequalities and exclusion within the broader sustainable development agenda.

In order for this project to be a people-centred development project, TeepSa should not limit itself to financing and investment, rather strongly focus on innovative capacities, human resources, know-how and technological inputs from within the communities they operate.

By these actions basic needs will be addressed.

6. THE OCEANS ECONOMY

The oceans economy will always be a means to sustain livelihoods, both coastal and inland, in ways particularly friendly and familiar to the Southern Cape Coastline, by means of (i) sustainable maritime repair and maintenance; (ii) support for gas and oil explorations, (iii) commercial and small-scale fishing; (iv) sustainable aquaculture; (v) marine tourism and a (vi) self sustainable maritime school.

The block identified by Total for production and future exploration rights has a reach coastline and a very deep-rooted tradition fishing heritage.

6.1. MARITIME REPAIRS AND MAINTENANCE

Centuries before oil and gas and marine tourism were discovered in our rich oceans, subsistence, small scale and commercial fishing were the main activities of the indigenous and modern people of Mossel Bay.

It is disappointing that government today does not regard the Mossel Bay harbour as a fishing harbour, focussing mainly on petro-chemical activities, hence fishing has become secondary to almost zero importance. Even though, the fishing industry provides numerous job and business opportunities for our people, it is considered of lesser importance. Furthermore, ports authorities in Mossel Bay made access to the harbour virtually impossible for small scale fishing by not creating sufficient infrastructure (launching, loading and offloading of boats and cargo) and the high unaffordable cost of using the existing poor infrastructure.

The industry creates food for more people in our communities than that of the petro-chemical industry, the latter does not provide food directly to the table. Neither does it provide sufficient jobs and small business opportunities. We do consider the many positive impacts of the petro-chemical industry, but it should not contribute to the eradication of the fishing industry.

Therefore, TeepSa should assist the fishing community of Mossel Bay, to engage authorities to provide proper infrastructure and intervene on the cost of using such. Small scale fishing use different vessels and equipment than the commercial operators, and due to the low-income margin of small scale, it remains a serious challenge to meet budgetary demands, thus the maintenance of equipment brings

many constrains. A joint capital investment strategy needs to be developed by all parties concerned.

Ship building, maintenance and repair industry is at a critical stage in its development, the industry continues to be stifled by obsolete port infrastructure, protectionist government policy and monopoly pricing. This cause many in the shipping industry to use ports in other areas, even countries. Mossel Bay port has land potential to further boat and ship repairs, since Transnet do own land on the harbour and the current slipway needs to be improved to proper dry dock standards. Potential does exist, but the economic, social and political will fall short.

6.2. SUPPORT FOR GAS AND OIL

As did the consultant, WSP indicate that the project reached the phase where consultation with I&AP's must take place, it is however questionable why TeepSa only at this stage start talking to communities and I&AP's, whereas the former and latter were not informed, consulted or even brought on board during the exploration phase. However technical or scientific the exploration phase might have been, ordinary people within our communities could have been better informed, and best understood the situation the TeepSa is facing at present.

With the consultation process, first round of meetings held in Mossel Bay, we need to express our utter disappointment with the manner in which and where meetings were held. It is uncalled for to make racial divides so obvious by having two meetings in a Xhosa speaking African community and two meetings in a white Afrikaans speaking community. No meetings were held in the black Afrikaans speaking areas. TeepSa and WSP need to correct that, since the first nation people has to be recognised. Second to that, no regard has been given to rural communities around Mossel Bay, a clear indication that our rural people are not considered intellectually enough for such technical data and information and/or that they can only be farmers. We need thorough explanations on this matter.

Our organizations and affiliates to this document in Mossel Bay, take note of public objections and campaigns against TeepSa projects offshore productions intentions, in particular that from the Green Connection (South Africa) and BLOOM (France). Therefore, we are of the opinion that (i) organizations that does not live in poverty, need not to stop initiatives that will fight this evil, poverty; (ii) small scale fishers should not be used as an excuse to further foreign courses, rather be partnered with fishing communities to bring permanent relief.

Mossel Bay Small scale fishing communities do have genuine concerns, challenges and needs, which need to be addressed by civil society, business and government, with the latter failing to deliver since legislation and pressures from organised commercial industries in fishing cause to much red tape and serious constrains. In lobbying for support for the production of oil and gas, as a collective for furthering socio-economic prosperity for the greater Mossel Bay we will have to engage TeepSa and related institution to provide not only employment, but a capital share that will ease up on poverty and disempowerment.

6.3. COMMERCIAL AND SMALL-SCALE FISHING

From experience and exposure to this industry for many years, we came to learn and succumbed to defeat in all Fishing Rights Allocation Processes (FRAP) to this day. The process has never been community or small business friendly as it requires massive sums of money, huge financial backing and/or investments, highly technical advisories, legal expertise, all which comes with the monopoly of capital. As FRAP works on a quota system only a few wealthy, politically connected, friends in high places and dubious racketeering tendencies are becoming evident at the time of applying for fishing rights.

Rural communities hardly get any portion from this method of allocating fishing rights to the extent that one (1) in three (3) successful black applicants (small enterprises) for the FRAP 21/22 in Mossel Bay develop into competitive business. The rest always fails.

Various factors could be ascribed to it of which we will not dwell much on the scientific data available, rather on the unfairness; racial prejudices; lack of commercial fishing vessels and the monopoly of those who currently own these vessels (white vessel owners) in the business sector. Let us give an example how the industry operates: A black company in the community has a fishing right (quota holder). An agreement has to be reached with a vessel owner (catch or charter agreement). In the event of a catch agreement, the deals are always 45;40;10 and 5, which means that the boat owner gets 45%, the crew 40%; 5% reserve fund and 10% to the quota holder. One can make your calculation should this quota be 5million ZAR. Our question that comes to mind immediately, is whether it is worthwhile clinging to commercial fishing as the odds are against the poor, marginalized and coloured and black component of the fishing community. We became spectators in the commercial industry, whilst big business, controlled by white monopoly and capital reap the best fruits and harvest from the ocean.

TeepSa appears to come with an alternative, provided we are not made to be spectators in the process. There are alternatives to the disappearing fish stocks, disturbances in the seabed for sea life, disruption of the entire ecosystem. Research and implement such alternatives.

Small business in the commercial fishing industry, especially black business will never succeed until the balance of monopoly capital and investments are not addressed in favour of small business in the commercial fishing industry. Once again, the scale of these inequalities needs to be addressed in Mossel Bay and over a broader spectrum in the industry. Rural communities close to the ocean should get preference over big business in fishing, mainly operating from the metros.

Scientists wrote many reports and lengthy documents on the impact and effects that projects such as oil and gas exploration and production have on marine life, some of which many in our community can bear witness to. For years we experienced that the ocean "does not go to the doctor to be healed", she heals herself and fishers adapt to the changing tides. This may work for the commercial industry, but definitely not for the small-scale industry.

6.4. AQUACULTURE

Aquaculture is considered the fastest growing farming sector around the world, whilst South Africa is “feet-dragging” the process. The sector is facing severe challenges that can be addressed, inter alia, water, infrastructure, finances, markets, crime, etc. Hindrances such as lack of human capacity and aquaculture skills and complex government legislation scare investor quite easily. Aquaculture is a means of addressing poverty, food security and nutrition in rural communities. Most of our current fish stocks are harvested and exported to wealthy countries, but our own people are starving, since the price of fish is ever rising. Poverty has to compete with export.

Our coastline has suitable environmental conditions for aquaculture development and opportunities for commercial production of various cultured species. Our waters are common feeding and breeding grounds for hake, cob and tradition line fish. Fish stocks that can both be marketed abroad and in our impoverished communities. Studies proved that aquaculture could contribute to:

- Creation of sustainable job opportunities
- Foster economic developments
- Capitalize on export opportunities
- Stimulate rural development and livelihoods
- Attract foreign investments
- Safeguard sustainable environmental integrity
- Create small, medium and micro enterprises.

In order to bring about the abovementioned the hindrances and challenges that might cause negative impacts, TeepSa and the fishing community should partner in “tackling the bull by its horns”.

6.5. MARINE TOURISM

The seas also provide delicious seafood which is enjoyed by tourists and locals alike. While marine adventures excite and inspire, they also provide important benefits for local communities. Marine tourism **supports local jobs, such as surf instructors and dive guides**. In the Southern Cape, particularly Mossel Bay, we do have ample opportunity to enter this industry which is currently an exclusive for a minority racial group.

This industry with all its extensions such as hotels, restaurants, commercial centres, and travel agencies, along with all entities related to leisure activities and traveling make a great contribution to the world’s economy annually. That is the reason that has intrigued other oil producing countries like Qatar, the UAE, and even Saudi Arabia, which earn billions of dollars every year from oil sale, to shift their gaze towards the tourism industry for even more income.

In Mossel Bay opportunities such as Shark Cage diving, whale watching, marine bird and mammals watching, and travel and recreational fishing trips are but a few of the activities at our disposal. It does come with challenges, i.e. infrastructure and resources, of which proper engagement and planning can be deployed.

6.6. MARITIME TRAINING SCHOOL

The Southern Cape has training institutions available, TVET colleges and Nelson Mandela University, which can be approached to establish a proper maritime training facility. At present this kind of training can only take place the metros, leaving a huge vacancy among young people. Maritime training skills are mostly used in the fishing industry, since many are not made aware that the oceans economy is much more than fishing.

7. SMALL AND MEDIUM ENTERPRISE DEVELOPMENT

Small and Medium Enterprises (SME's) have been identified as productive drivers of inclusive economic growth and development in South Africa and around the world. Some researchers have estimated that, in South Africa, small and medium-sized enterprises make up 91% of formalised businesses, provide employment to about 60% of the labour force and total economic output accounts for roughly 34% of GDP.

While contributing significantly to the economy, SMEs foster diversification through their development of new and unsaturated sectors of the economy. In addition, innovative and technology-based small and medium enterprises can provide a platform for local, regional, and international growth, especially in Brazil, Russia, India, China, and South Africa (BRICS) economies.

SME's are considered an important contributor to the economy as drivers for reducing unemployment, especially since the formal sector continues to shed jobs.

7.1. CHALLENGES FACED BY SME's.

- Crime and corruption
- Appropriate technology and low production capacity (includes access to electricity)
- A lack of management skills and in adequate skilled labour
- Finance and obtaining credit.
- Access to markets and developing relationships with customers.
- Recognition by large companies and government bureaucracy
- Knowledge and support for the role that they play in economic development.
- Regulatory compliance.

The coming of oil and gas production brings about vast business activities which big companies are geared for; thus Total Energies should see to it that small to medium enterprises are given ample opportunities to be part of the construction of the production process. We all know that most SME's are unable to compete with giants companies, there it needs to be clear that big businesses should all partner with a SME.

8. SOCIAL RESPONSIBILITY

Corporate Social Responsibility, CSR is a broad term which describes a business' efforts to uplift or improve society. As a philosophy, CSR maintains that businesses are members of the society they operate in, to become known as corporate citizens and are therefore accountable to society for their actions. Total Energies are well aware and became known to live up to their CRS, hence we would be obliged as a collective to become central to it.

This means that you need to consider the impact of your business operations on society, including things like:

- Your company's carbon footprint and environmental impact
- Your company's impact on the South African economy
- Human rights and the promotion of positive change (e.g. addressing cultural and social issues)

As a collective we can secure ethical business practices through corporate governance and ethical leadership on all projects in Mossel Bay and ensure that both profit and non-profit organisations operate with honesty and transparency to avoid corruption.

Both TeepSa and Mossel Bay Socio-Economic Collective should strive towards the establishment of a vehicle that will carry funds (Social Fund) for achieving aforesaid programmes and projects.

TeepSa should allow towns in the region to present proposals on profit sharing and /or acquiring a capital share in the entire project. Giving communities (i) opportunities to work, (ii) sponsoring of projects and (iii) rendering assistance to any or all of the abovementioned ventures throughout the lifespan of the oil and gas exploration is hardly enough. Through this we will remain onlookers and spectators and will never become co-owners of our natural resources.

9. SUMMARY

Matrix of Content i.t.o.	
Challenges	Possible responses (solutions)
Our situation looks very bleak in terms of sustainable development.	<p>TeepSa can play a pivotal role as an engine of economic growth and job creation.</p> <p>It can provide goods and services to local communities, generate tax revenues to finance essential social and economic infrastructure. Develop new innovative solutions that help tackle development challenges.</p> <p>It is central in addressing climate change.</p> <p>SUSTAINABILITY</p>





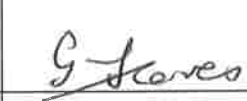


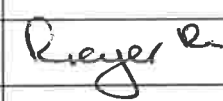

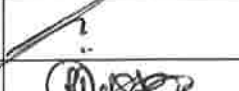






Disempowered communities in the greater Mossel Bay	<p>Identify beneficiaries and stakeholders to the TeepSa. Becoming partners of the TeepSa oil and gas exploration through production phase.</p> <p>SUSTAINABILITY</p>
Lack of descent housing	<p>Purchase land from the municipality to develop a middle-income housing project.</p>
Ensure that development of acquired skills should be ongoing	<p>Needs to prioritize upskilling opportunities; Skills should be employer-led.</p> <p>Should find a mentor to support the development of such skill. Must sign up for external skills training.</p> <p>SUSTAINABILITY</p>
Employment opportunities	<p>Essential skill be sourced locally, where it does not exist, then regionally and/or nationally and or internationally.</p> <p>All semi-skilled and unqualified labour be sourced local and regional.</p> <p>For each skill not found locally and regionally a candidate for training be sought locally and/or regionally to be empowered. Need of a well-researched skills data base.</p> <p>Design a social labour plan.</p> <p>SUSTAINABILITY</p>
Security and safety vs Criminality	<p>Safety audits within communities to establish safety needs and strategies.</p> <p>Create environmental designs aimed at addressing the safety of women; children and other vulnerable groups.</p> <p>Safety plans that have corresponding budgets.</p> <p>Empowering neighbourhood watch groups and proper training for Community Police Forums.</p> <p>SUSTAINABILITY</p>

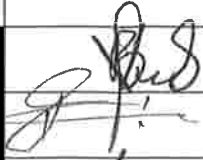



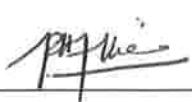




<p>People-centred broad base economic development</p>	<p>TeepSa should not limit itself to financing and investment, rather strongly focus on:</p> <ul style="list-style-type: none"> ➤ innovative capacities ➤ human resources ➤ know-how and ➤ technological inputs from within the communities they operate. <p>SUSTAINABILITY</p>
<p>SMALL & MEDIUM ENTERPRISES</p> <p>Appropriate technology and low production capacity (includes access to electricity).</p> <p>A lack of management skills and in adequate skilled labour.</p> <p>Finance and obtaining credit.</p> <p>Access to markets and developing relationships with customers.</p>	<p>Developing alternative and/or supplementary means to get electricity.</p> <p>Adopt a system to mentor, train and support struggling enterprises.</p> <p>Asist groups in similar industries to create consortiums.</p> <p>TEEPSA to start a guardianship programme to give exposure to SME's and partner them with suitable clients.</p>
<p>Maintenance and repairs to fishing infrastructure.</p> <p>Ship building, maintenance and repair industry is at a critical stage in its development, the industry continues to be stifled by obsolete port infrastructure, protectionist government policy and monopoly pricing.</p> <p>Small scale fishing use different vessels and equipment than the commercial operators, and due to the low-income margin of small scale, it remains a serious challenge to meet budgetary demands, thus the maintenance of equipment brings many constrains.</p> <p>Consultation meetings were held on a racial divide.</p> <p>Rural communities were totally excluded.</p>	<p>A joint capital investment strategy needs to be developed by all parties concerned.</p> <p>TeepSa should assist the fishing community of Mossel Bay, to engage authorities to provide proper infrastructure and intervene on the cost of using such.</p> <p>Further consultations should be done more thoroughly inclusive of, but not limited to all racial groups and areas and full participation of all rural communities.</p> <p>Future consultations should be mutually agreed upon by all parties and be held in all areas interested and affected.</p> <p>SUSTAINABILITY</p>

Disturbances on the seabed and dwindling fish stocks	Aquaculture SUSTAINABILITY
Inequalities in the fishing industry	Empowering small scale fishers by taking care of their overall running cost Subsidizing fuel bills Assistance with acquiring fibre glass deck boats Contribute to maritime training
Oceans economy: Creation of sustainable job opportunities. Foster economic developments. Capitalize on export opportunities. Stimulate rural development and livelihoods. Attract foreign investments. Safeguard sustainable environmental integrity. Create small, medium and micro enterprises.	The need for aquaculture has become inevitable SUSTAINABILITY
Community absence in marine tourism	Assisting communities to obtain permits, equipment and expertise in marine tourism. Engage current blue economy road users; i.e. big tourist vessels (cruise ships & yachts) and companies to partner with SME's in this industry. Provide management and planning skills to SME's in the industry. SUSTAINABILITY
Maritime training schools currently in the eastern cape, Cape Town and Saldanha Bay.	Engage the services of TVET colleges and Nelson Mandela University in the region. Prepare and compile a proper data base of all maritime skills needed in the maritime industry. SUSTAINABILITY
Capital share	To be negotiated with TeepSa by the Collective SUSTAINABILITY

10. Declaration of Intent by stakeholders

The content of this document has been designed, worked, issued, and constructed by Mossel Bay Socio-Economic Collective and officially signed on the 1 day of FEBRUARY 2023. Signatories to the document are properly vetted by the Collective and authorized by their respective boards, committees and/or executives.

No	Organization	Representative	Cell. No	Signature
	Green Worx Empowerment Centre	Jerohme Kannemeyer		
	Mossel Bay Child Welfare	Micheal Carelse		
	Siyanitanda Disabled School	Liyanda Maki		
	Mkhonto We Sizwe Liberation War Veterans	Lulamile Busakwe		
	Mossel Bay Community Care Centre	Ms.Glynnis Flores		
	SACC Forum	Willem Essau		
	SACC Veterans Association	Hilton De Kok		
	Anker Hope of New Life Relief	Ms. Nolene Cupido		
	Mossel Bay Minister's Fraternal			
	Mossel Pastoral Fraternal	Past. Peter Kees		
	Buisplaas Bewoners Vereniging	Pedro Meyer		
	Benevolent Park Old Age Home	Katriena Thiele		
	Mossel Bay Poverty Aliviation	Jerome Meyer		
	Buisplaas Kleinboere Vereniging	Gillian Thompson		
	Piet Julie's Aids Action Group	Rita Kayster		
	Mossel Bay Fishing Forum	Avril Baker		
	Ray of Hope Foundation	Larry Duncan		
	D'Almeida Activists Foundation	Linden Baker		
	SANTA Great Brak	Lindie Spandiel		
	Sao Bras Secondary School	Dawid Groenewald		

Hill Crest Secondary School			
Gourikwa Khoisan Stadhuis	Khoi Barry		
Gouriqua Khorana Kraal	Khoi Tiekie		
Great Brak Multi-Purpose Centre	Past. Leon Prinsloo		
Trawl and Linefish Union	Mervyn Barnard		
Imakhaya Health & Welfare Academy	Karel September		 K. September
Eden Labour Forum	Peter Fillies		
JOUNQU ARTS FOUNDAT.	N. PHILANDER		
GRUOT-BRAKRIVIER SEK. SKOOL	I. A. SPEELMAN		
FRIEMERSHEIM PRIMARY	J. SPEELMAN		

MEMORANDUM OF AGREEMENT BETWEEN LISTED PARTIES

1. **Parties.** This Memorandum of Agreement (hereinafter referred to as “MOA”) is made and entered into by and between the

2. **Purpose.** The purpose of this MOA is to establish the terms and conditions under which the above institutions intend to submit comments, proposals and directives to Total Energies (TeepSa). This MOA includes non-governmental organizations (NGO), faith based organizations (FBO), Community based organizations (CBO); small famers associations (SFA); Small scale fishers; War Veterans and institutions of learning and care. These partners are representatives from the greater Mossel Bay, inclusive of the rural areas around Mossel Bay

3. **Term of MOU.** This MOA is effective upon the day and date last signed and executed by the duly authorized representatives of the parties to this MOU and shall remain in full force and effect for not longer than _____ This MOA may be terminated, without cause, by either party upon 30 (thirty) days written notice, which notice shall be delivered by hand or by email to the given address listed above.

4. **Responsibilities of [other agencies].**

Other agencies refer to as Total Energies (TeepSa) and related contractors and service providers:

- Other agencies will be entered into agreements for furthering the aims and objectives of all parties to this agreement.
- All obligations from other agencies, including, but not limited to material, physical and monitory obligations will be negotiated and honored.

5. **Responsibilities of [agencies].**

- * All parties to this MOA will adhere to, follow and defend decisions made as the collective.
- * All documentation submitted by parties will be treated confidential until parties collectively agree to put it in the public domain.

- * The collective will be responsible to raise funds in the initial period to cover any cost that may be incurred by any party in the event of services and goods supplied for its cause.
- * No party will be allowed to engage other parties on similar matters, with whom the parties to this MOA are intending to make engagements, negotiated deals and settlements
- * Each party to this MOA will keep and maintain its identity, sovereignty, character, programs and operations and will be respected and honored by associated parties to this MOA.

7. **General Provisions**

A. Amendments. Either party may request changes to this MOA. Any changes, modifications, revisions or amendments to this MOU which are mutually agreed upon by and between the parties to this MOA shall be incorporated by written instrument, and effective when executed and signed by all parties to this MOA.

B. Applicable Law. The construction, interpretation and enforcement of this MOA shall be governed by the laws of the Republic of South Africa. The courts of the State of the Republic of South Africa shall have jurisdiction over any action arising out of this MOA and over the parties, and the venue shall be the judiciary of the Western Cape.

D. Entirety of Agreement. This MOA, consisting of 5 (five), pages, represents the entire and integrated agreement between the parties and supersedes all prior negotiations, representations and agreements, whether written or oral.

E. Severability. Should any portion of this MOA be judicially determined to be illegal or unenforceable, the remainder of the MOA shall continue in full force and effect, and either party may renegotiate the terms affected by the severance.

F. Sovereign Immunity. The agencies and their respective governing bodies do not waive their sovereign immunity by entering into this MOA and each fully retains all immunities and defenses provided by law with respect to any action based on or occurring as a result of this MOA.

G. Third Party Beneficiary Rights.

- The parties do not intend to create in any other individual or entity the status of a third-party beneficiary and this MOA shall not be construed so as to create such status.
- The rights, duties and obligations contained in this MOA shall operate only between the parties to this MOA and shall inure solely to the benefit of the parties to this MOA.
- The provisions of this MOA are intended only to assist the parties in determining and performing their obligations under this MOA.
- The parties to this MOA intend and expressly agree that only parties signatory to this MOA shall have any legal or equitable right to seek to enforce this MOA, to seek any remedy arising out of a party's performance or failure to perform any term or condition of this MOA, or to bring an action for the breach of this MOA.

8. Signatures.

In witness whereof, the parties to this MOU through their duly authorized representatives have executed this MOU on the days and dates set out below, and certify that they have read, understood, and agreed to the terms and conditions of this MOU as set forth herein.

The effective date of this MOA is the _____ day of _____ 2023.

No	Organization	Representative	Cell. No	Signature
1.	Green Worx Empowerment Centre	Jerohme Kannemeyer		
2.	Mossel Bay Child Welfare	Micheal Carelse		
3.	Siyanitanda Disabled School	Liyanda Maki		
4.	Mkhonto we Sizwe Liberation War Veterans	Israel Syfers		
5.	Mossel Bay Community Care Centre	Ms. Glynnis Flores		
6.	SACC Forum	Willem Essau		
7.	SACC Veterans Association	Hilton De Kok		
8.	Anker Hope of New Life Relief	Ms. Nolene Cupido		
9.	Mossel Bay Minister's Fraternal			
10.	Mossel Pastoral Fraternal	Past. Peter Kees		
11.	Buisplaas Bewoners Vereniging	Pedro Meyer		
12.	Benevolent Park Old Age Home			
13.	Mossel Bay Poverty Aliviation	Jerome Meyer		
14.	Friemersheim Kleinboere Vereniging	Koos Gelderbloem		
15.	Buisplaas Kleinboere Vereniging	Gillian Thompson		
16.	Piet Julies Aids Action Group	Rita Kayster		
17.	Bathesda Worship Ministries	Charlie Muller		
18.	Mossel Bay Fishing Forum	Avril Baker		
19.	Ray of Hope	Larry Duncan		

20.	@ Peace			
21.	D'Almeida Activists Foundation	Linden Baker		
22.	SANTA Great Brak	Lindie Spandiel		
23.	Sao Bras Secondary School	Dawid Groenewald		
24.	Hill Crest Secondary School			
25.	Gourikwa Khoisan Stamhuis	Khoi Barry		
26.	Korana Khoisan Stamhuis	Khoi Tiekie		
27.	Ridgeview Primary School			
28.	Diaz Primary School			
29.	All Saints Primary			
30.	Erika Primary			
31.	St. Blaize Primary			
32.	Babarian Rugby Club			
33.	Sussex			
34.	Great Brak Rugby Club			
35.	TM Ndanda Primary School			
36.	Mossel Bay Guiding Stars			
37.	Brandwag Communal Property Assoc.	Johnny Beukes		
38.	Imakhaya Health & Welfare Academy	Karel September		

Witnesses :

1. Name and Surname

Signature

2. Name and Surname

Signature

3. Name and Surname

Signature

From: fos <[REDACTED]>
Sent: Tuesday, 31 January 2023 17:20
To: ZA - GLD - Teepsa Esia
Cc: Mareo Bekker; Frits Nortje; Martin Pauw; Talitha Venter
Subject: Comments on Scoping Report for the ESIA for the Proposed offshore PR and EA Application for Block 11B/12B by TotalEnergies EP South Africa
Attachments: ESIA TEEPSA 11B12B response 2023013.pdf
Importance: High

Dear Sir

Attached please find REVAG's (Rescue Vleesbaai Action Group) comments regarding the Scoping report for the Proposed offshore PR and EA Application for Block 11B/12B by TotalEnergies EP South Africa.

REVAG represents the interest of the communities of the Vleesbaai Area. **As such we are compelled to stress the catastrophic impact of a potential well blow-out on the Southern Cape coast.** Our attached submission clearly sets this out.

It would be **inconceivable that such a risk can be worth taking for a relatively short term benefit. The inhabitants of the area would agree if they were aware of this danger.**

Please acknowledge receipt and confirm that our submission will be included in the ESIA.

Sincerely

Dr Fritz Snyckers
Chairman Rescue Vleesbaai Action Group



Comments on Scoping Report for the Environmental and Social Impact Assessment (“ESIA”) for the Proposed offshore PR and EA Application for Block 11B/12B by TotalEnergies EP South Africa (“TEEPSA”)

We refer to the information about the Environmental and Social Impact Assessment (ESIA) and public participation process that form part of the proposed Production Right and EA project for Block 11B/12B.

Although the scoping report mentions that some attention will be given to the **potential impact of a well blow-out, we would like to highlight the crucial need to fully investigate this** consideration as part of the ESIA.

The real danger of a deep-sea well blow-out and the devastating consequences thereof, were illustrated by the “Deepwater Horizon” catastrophe in the Gulf of Mexico. Such an event would be utterly disastrous to the whole Southern Cape coast. Due to the depth of the drilling, the sea conditions and the very strong and unpredictable deep currents, this is not such a remote possibility at all.

The item is briefly covered in the scoping report under “Specialist Studies – Oil Spill Modelling (Executive Summary §2.2 & Chapter 9, in §9.2.3)”. Missing here is the description of the extent of the modelling of the environmental consequences of such spills. Also the limitation of 20 days may be optimistic. The Deepwater Horizon spill lasted 5 months, i.e. 150 days, in seabed conditions which were probably less severe than in this case.

The draft ESIA for TEEPSA 5/6/7 in respect of drilling along the south-western coast of South Africa, compiled by SLR, provides a full and frightening picture of the extent and consequences of a blow-out in that exploration area (https://cdn.slrconsulting.com/uploads/2022-10/010_TEEPSA_567_ESIA_DEIR_Chap_10_Impact_Assessment_Unplanned_Events.pdf, §10.4). Extensive modelling has been applied and shows an apocalyptic disaster scenario for the Cape coast – with a risk probability of “unlikely”.

According to your own definitions, “unlikely” indicates a 5% or lower probability. **The sea conditions and the very strong and unpredictable deep currents in the 11B/12B area significantly enhance that risk** in this case and place the probability near the top of this range.

As supportive as one may be to the need for a gas supply to Gourikwa and PetroSA, especially in the current conditions, it still seems completely irresponsible to expose the whole economy of the Southern Cape to such a catastrophic risk.

We therefore request that the **ESIA MUST INCLUDE DETAILED AND RELIABLE SCIENTIFIC DATA WHICH SHOWS WHAT THE CONSEQUENCES OF A WELL BLOW-OUT AND THE RESULTANT IMPACT ON THE OCEAN ENVIRONMENT, FISHING, TOURISM INDUSTRY ETC.** Simply relegating this to an “unlikely” risk will not do.

It would be **inconceivable that such a risk can be worth taking for a relatively short term benefit. The inhabitants of the area would agree if they were aware of this danger.**

Please acknowledge receipt and confirm that our request will be included in the ESIA.

Sincerely

Dr Fritz Snyckers
Chairman, RESCUE VLEESBAAI ACTION GROUP

Subject: FW: Comments on TEEPSA Scoping Report
Attachments: CMP TEEPSA Comments 20230203.docx

From: Pauw, Martin [REDACTED] <[REDACTED]>
Sent: 03 February 2023 23:20
To: ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com>
Cc: TEEPSA EIA <teepsaEIA@wsp.com>
Subject: Comments on TEEPSA Scoping Report

Attached please find my comments.

Dr CM Pauw
Vleesbaai
[REDACTED]

The integrity and confidentiality of this email are governed by these terms. [Disclaimer](#)
Die integriteit en vertroulikheid van hierdie e-pos word deur die volgende bepalinge bereël. [Vrywaringsklousule](#)

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-LAEmHhH2dJzBITWfa4Hgs7pbKI

Residential address (non postal):



3 Feb 2023

Comments on Scoping Report for the Environmental and Social Impact Assessment (“ESIA”) for the Proposed offshore PR and EA Application for Block 11B/12B by TotalEnergies EP South Africa (“TEEPSA”

The WSP Public Participation Office,

gld.teepsaesia@wsp.com

cc: teepsaEIA@WSP.com

I refer to the submission by the Chairman of REVAG (Rescue Vleesbaai Action Group) Dr Fritz Snyckers, as sent to you per email on 31 January 2023.

As a member of REVAG I fully concur with Dr Snyckers’ comments and wish to endorse them in their entirety.

I also refer to a submission by Mr Ben Burke, (also a member of REVAG) more particularly pertaining to your presentation on 17 Jan 2023 at Mossel Bay. In this respect I particularly refer to your proposal to make use of the facilities of PetroSA, including the F-A platform and the pipeline through the bay of Vleesbaai which was installed to bring LNG from the platform to the PetroSA GTL refinery.

To the best of my knowledge there is only one pipeline from the platform to the refinery and not two as your report seems to suggest.

It is common knowledge that PetroSA has lately been floundering both financially and in terms of being able to meet its commitments.

It is also a fact that the PetroSA refinery and its infrastructure, including the F-A platform and pipeline which was commissioned more than 30 years ago and was designed for a life cycle of 20 years is by now aged and well beyond its ‘Best Before’ date.

This is illustrated by the fact that the pipeline has been giving more and more problems and regularly needs to be repaired. Recent media reports have reiterated this.

Your presentation on 17 January gave the impression that negotiations are taking place in order for PetroSA to take responsibility for the operation of the field, once commissioned, through the existing infrastructure. This is expected to continue for the next 20 years.

Added to the already aging infrastructure, another 20 years can hardly be contemplated without realising that major problems will become unavoidable.

Such problems could conceivably include major ecological disasters, both inshore and offshore, as well as threats to life and property.

Despite these facts, your presentation and the documents you subsequently sent to I&APs do not indicate clearly whether these matters have been adequately addressed with PetroSA and whether PetroSA will indeed be able to fully address them and ensure that problems do not arise.

Mr Burke's submission refers to the fact that your report indicates that PetroSA will cease production from its other fields in order for TEEPSA to fully and exclusively use the existing offshore installation and infrastructure. This implies that the existing wells will need to be decommissioned by PetroSA.

I reiterate mr Burke's questions in this respect:

Question :- Will PetroSA rehabilitate the sea beds, by removing or rendering the wells 'safe' similarly as per in para 5.4.1.3 Decommissioning Activities.

Question :- Does PetroSA have sufficient reserved funds for this process of "Decommissioning" to be undertaken.

Question :- Who will monitor the decommissioned wells for the next 20 years as required and stated in this report.

As to these questions, I refer the Mineral and Petroleum Resources Development Act, No. 28 of 2002 as amended and in particular to the making of financial provision as contemplated in the Act for the costs associated with the undertaking of management, rehabilitation and remediation of environmental impacts from prospecting, exploration, mining or production operations through the lifespan of such operations and latent or residual environmental impacts that may become known in the future.

See also Ch 10 of the Act, S130, S131 and S132.

All said and done, it is not clear at all whether these issues have been adequately addressed and conclusively and satisfactorily agreed upon with PetroSA.

Dr CM Pauw

Cell: [REDACTED]

Email: [REDACTED]

From: Karel September <[REDACTED]>
Sent: Monday, 30 January 2023 10:33
To: TEEPSA EIA
Subject: Submission on ESIA public participation
Attachments: Submission of Imekaya Health and Welfare Academy to TEEPSA.docx

Follow Up Flag: Follow up
Flag Status: Flagged

The above mentioned refers:
Attached pls find our submission.

Kalla September
[REDACTED]

THIS IS SUBMISSION OF IMAKAYA HEALTH AND WELFARE ACADEMY

234-756 NPO

SUBJECT: TOTAL ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) FOR THE PROPOSED OFFSHORE PRODUCTION RIGHTS AND ENVIRONMENTAL AUTHORISATION APPLICATION FOR BLOCK 11B/ 12B DRAFT SCOPING REPORT

TOTAL ENERGIES PUBLIC PARTICIPATION PROCESS (WSP)

The above mentioned NPO of Mosel bay would like Total Energies to develop and implement comprehensive human resource development programmed, Mine Community Development Plan Promoting employment, advance of social and economic welfare, Socio Economic Development, Social Fund, Safety and security, Social Fund Sustainable Development and to utilize and expand the existing skill base for Empowerment of H.D.S.A. and serve the and to serve the community

As a stakeholder and I/AP I further request that the Mine Community be part of the Production Rights and further exploration rights, and therefore must benefit in the construction and all phases of the project of Total.

We must be an active participant in the development of the project.

Our NPO support the Exploration and Production rights and further exploration rights of Total Energies.

We as **Imakaya Health and Welfare Academy recommend** the following for consideration:

To advance youth and women empowerment

To advance Socio Economic Welfare in our Area.

To advance Socio Economic Development in our Area.

To expand the existing skills development

To have direct employment from TEEPSA and not make use of Labor Brokers

To ensure the development of required skills in respect of core and critical skills, artisans ext.

To identified f significant business opportunities.

To trained the locals in ocean economy.

To give training in marine equipment

To forester an entrepreneurial culture

To give back up support to new and existing entrepreneurs towards he project the development and facilitation of business skills and courses

To Facilitate of access to business premises (Spatial Development)

To get Alignment with the IDP with locals prioritize there needs

To give support to environmental programmed/kloof project, beach cleaning ext.

To establish a Social Fund or Trust Fund made available by the company TEEPSA for the needs of the poor (infrastructure development) ext

Safety and Security: to give priority to our hot spots per area with support of camera project and support to neighborhood watches

Sustainable development: the social, economic and environmental functions must be bringing into planning, implementation and decision making by all stakeholders affected.

From: KALLA SEPTEMBER

IMAKAYA HEALTH AND WELFARE ACADEMY

