

INDIVIDUALS

Subject: FW: Offshore production for Blocks 11B/12B by Total Enterprises.
Attachments: SKM_550i23020310000.pdf

From: Jiv <>
Sent: 03 February 2023 10:30
To: TEEPSA EIA <teepsaEIA@wsp.com>
Subject: Offshore production for Blocks 11B/12B by Total Enterprises.

Dear Sir/Madam

Please see attached.

Kind regards,
John Wills.
Chairman
Jongensfontein Ratepayers Association.

Sent from [Mail](#) for Windows

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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	JOHN	WILLS	TONGENSPONTEIN RATEPAYERS ASSOCIATION.
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			YES <input checked="" type="checkbox"/> NO <input 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 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	1 FEB 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:

ON BEHALF OF THE JONGENSFONTEIN
RATEPAYERS ASSOCIATION WE ARE STRONGLY
OPPOSED TO THE PROPOSED OFFSHORE
PRODUCTION FOR BLOCKS 11B/12B BY
TOTAL ENERGIES.

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!

From: Andrew Witte <>
Sent: Tuesday, 31 January 2023 09:59
To: TEEPSA EIA
Subject: Comments on Draft Scoping Report PROJECT NO. 41105306
Attachments: TotalEnergies EP Comments.pdf

Good Morning,

Please find attached my comments/questions on the Draft Scoping Report for the Environmental and Social Impact Assessment (ESIA) For the Proposed Offshore Production Right and Environmental Authorisation Applications for Block 11B/12B.

Thank you,
Andrew Witte

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January 23

TotalEnergies EP South Africa B.V.

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

PROJECT NO. 41105306

Draft Scoping Report Comments

Andrew Witte
SubMarine Consultancy
Port Alfred

Page/Section	Comment/Questions
Section 2	None of the EAP's listed here were at the Port Alfred public meeting!
Section 4/7	My concern is that the need and desirability is disingenuous. Let's take the case of Mozambique where in 2021 Total withdrew from the liquefied natural gas (LNG) project near Palma on the Afungi peninsula. Mozambique has been riddled with conflict and corruption, and the LNG industry has resulted in economic distortion through promised economic benefits, which have not materialised. Its easy to sell the idea that NG can contribute to the energy crisis in a country where there is a huge deficit of power, and high unemployment but I am doubtful that the need is actually that great in the light that SA does not have the infrastructure, and the whole project is very localized to Mossel Bay. It is a concern that this is an economic distortion by TotalEnergies EP, together with its joint venture partners.
Pg 5 Sec 5 line 2	Full stop duplicated
Section 7	<p>One of the greatest issues noted, is the clear absence of sufficient baseline data in deep-sea ecosystems that TotalEnergies is exploring. There are many direct impacts from these activities including the infrastructure installation, which can result in sediment resuspension and burial by seafloor anchors and pipelines, typically a radius of ~100 m on from the installation on the seafloor, discharge of water-based and low-toxicity oil-based drilling muds which can extend over 2 kms, and ecological impacts at the population and community levels on the seafloor which can be in the order of 200–300 m from their source (Cordes et al. 2016). These impacts may persist in the deep sea for many years and likely longer for its more fragile ecosystems, such as cold-water corals (Cordes et al. 2016). I think this draft report needs to emphases this more as it is really only noted section 10.</p> <p>Concern also needs to be expressed towards the difficult conditions of this venture which increases the potential risk of accidents that may result in serious marine pollution. Sutton (2014) quotes a string of incidents—all suggesting an unfavourable trend in offshore oil and gas extraction, naming major companies such as Enbridge, Chevron, ExxonMobil, and Shell and the lists of incidents that have occurred. Again, I don't think enough emphases is made around this.</p> <p>A question, what is the noise generation during the drilling of wells and how far can this noise potentially travel? Could this potentially impact things like</p>

	<p>Also, there is a large body of research that shows that the drilling and extraction of natural gas from wells and its transportation in pipelines results in the leakage of methane, primary component of natural gas that is 34 times stronger than CO₂ at trapping heat over a 100-year period and 86 times stronger over 20 years (Myhre et al. 2013). How does TotalEnergies plan to mitigate these problems?</p> <p>References</p> <p>Cordes, E. E., D. O. B. Jones, T. A. Schlacher, D. J. Amon, A. F. Bernardino, S. Brooke, R. Carney, D. M. DeLeo, K. M. Dunlop, E. G. Escobar-Briones, A. R. Gates, L. Génio, J. Gobin, L. A. Henry, S. Herrera, S. Hoyt, M. Joye, S. Kark, N. C. Mestre, A. Metaxas, S. Pfeifer, K. Sink, A. K. Sweetman, and U. Witte. 2016. Environmental impacts of the deep-water oil and gas industry: A review to guide management strategies. <i>Frontiers in Environmental Science</i> DOI: .</p> <p>Myhre, G., D. Shindell, F.-M. Bréon, W. Collins, J. Fuglestedt, J. Huang, D. Koch, J.-F. Lamarque, D. Lee, B. Mendoza, T. Nakajima, A. Robock, G. Stephens, T. Takemura, and H. Zhang. 2013. Anthropogenic and natural radiative forcing. In <i>Climate change 2013: The physical science basis: Contribution of Working Group I to the fifth assessment report of the Intergovernmental Panel on Climate Change</i>, edited by T.F. Stocker, D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex, and P.M. Midgley. Cambridge, England: Cambridge University Press, 659–740. Online at www.climatechange2013.org/images/report/WG1AR5_Chapter08_FINAL.pdf.</p> <p>Sutton, I. 2014. <i>Offshore Safety Management</i> Second. Elsevier. DOI: 10.1016/C2013-0-13063-2</p>
References	<p>I haven't checked all references but noted that Harris et al 2022 not in reference list but is used in text pg65. I suspect other references are missing so a check needs to be done on all references.</p>
General Editing	<p>I have noticed some general editing inconsistency eg some lists use full stops and others use semi-colons and others are a mix of colons, semi-colons, commas and full stops. There</p>
General Comment	<p>I recognise this is a scope report and is trying to review and identify the gaps in knowledge. I think more emphasis is needed on ecological aspects and spatial impacts of activities from drilling. But overall, I think that WSP has done a good job on this draft and commend the professional manner in which they have conducted themselves.</p> <p>I think importantly natural gas production will not solve the climate crisis, nor energy crisis in South Africa, but I guess its the "lesser evil" option compared to other fossil fuels. I just question the promises of prosperity that this is selling and the true impact that it will have on the ocean environment. The cost is definitely greater than this report suggests.</p>

From: Kayla <>
Sent: Saturday, 04 February 2023 10:56
To: TEEPSA EIA
Subject: Gas pipelines in the Outeniqua Basin

I hereby object to the testing for potential oil and gas sites within the Outeniqua Basin.

My grounds for objection are:

Seismic testing is harmful to tge whales & dolphins that reside in these waters. These creatures are a huge tourism draw card & harming them will almost certainly have a negative impact on the tourism industry which is a major income & employment generator along this coastline.

The inevitable leaks & spills should oil be discovered will be detrimental to the natural environment which would lead to a decline in fish stocks. This will affect the local population, many of whom rely on their fresh catch to sustain their families.

One should bear in mind that the profits from harvesting oil and gas go into the pockets of an elite few and do not benefit the local population in any meaningful way.

The environmental degradation has a long term effect that profit seeking corporations do not care about - as long as it's not on their doorsteps.

Sincerely

Kayla Wolfaardt

Plettenberg Bay

The Whale Shop

From: Nicky van Eck Zolezzi <>
Sent: Friday, 03 February 2023 09:44
To: TEEPSA EIA
Cc: Nicky van Eck Zolezzi
Subject: TotalEnergies EP South Africa B.V. - Application for Block 11B/12B

Please receive my comment on Total's plan to drill and build new gas pipelines off Mossel Bay in the Outeniqua Basin.

It concerns me for the below reasons. And therefore I object to thebTotalEnergies's application for Block 11B/12B

1. This area lies in the middle of the Agulhus Current which is a major highway for Whale and Sardine migration. It will effect their livelihood, and as a consequence effect out oxygen levels.
2. Borders on a Marine Protected area.
3. Karpowership are dangerous to ocean health.
4. Gas and Oil is a super high risk to the environment, tourism and other economic endeavours along coastline.
5. Contribute to green-house gases and release of carbon stores of seabed sediment.
etc etc
6. Tremendous sounds and air pollution caused.

Please confirm receipt of my objection.

Warm regards

Nicky Zolezzi

id-

Mobile-

Email-

From: Sinegugu Zukulu <>
Sent: Friday, 03 February 2023 18:26
To: ; TEEPSA EIA
Subject: Re: Public comment about the proposed production

Dear Teepsa

I would like to voice my objection to the drilling or start of an operation to drill for oil and gas in our east coast for Total energies or for any body for that matter for the following reasons:

- 1) Our Indian ocean is home so some of the biggest migration of fish in the subcontinent such as whales.
- 2) The biggest shoal on earth which is composed of sardine run, sharks, birds, dolphins etc that all join a unique journey of sardine run. This journey creates sustainable revenue for our country.
- 3) Allowing this operation puts us on a path for a risk of oil spill. If an oil spill happens these following will be impacted; NWe as coastal communities are dependent on the ocean for many spiritual reasons such as Amatola (Traditional healers who use the ocean). Many African independent churches that use the ocean for baptismal ceremonies. Traditional healers Amagqirha use the ocean as part of training in coastal communities. Our ancient ancestors reside in the ocean. PROTECTION OF OCEANS FOR SUSTAINABLE CONSUMPTION THROUGH TOURISM WOULD BE THE WAY TO BENEFIT ALL.
- 4) The time for reliance on fossil fuels is over and our country should move away. Coastal communities are the most vulnerable to climate change. We have seen how the recent floods killed mainly the poor. We need to move away from fossil fuels. This scheme will of cause enrich the few shareholders of total energy while impacting the lives of many who rely on the ocean.

Our Indian Ocean has got some of the highest number of endemic fish species that deserve to be protected for sustainable eco-tourism development.

NB: If I'm not registred as IAP please register me.

Regards

Regards

Sinegugu Zukulu (Mr)
Sinegugu Zukulu (Mr)

Mobile: +
Fax:
Skype name:
e-mail:

From: Matt Zylstra <>
Sent: Thursday, 02 February 2023 16:35
To: TEEPSA EIA; ZA - GLD - Teepsa Esia
Subject: I&AP Comment on Draft Scoping Report

TO WHOM It MAY CONCERN

Dear Sir / Madam,

As coastal and marine scientists / oceanographers previously and currently active on the Southern Cape, my wife and I would like to register as I & APs.

Notwithstanding the purported motivations, the need to secure energy generation and augment national energy supply etc, we nonetheless hold major concerns with this proposed Phase 3 operation. Such concerns are primarily related to the potential environmental impacts, especially given the sensitive location along the continental shelf and within the all important Agulhas current, the lifeblood of this sensitive ecosystem and utilised by many oceanic species, numerous of which are vulnerable or endangered. Additionally there are numerous social-economic and cultural concerns.

To their credit, TEEPSA acknowledges much in their Draft Scoping Report Non-Technical Summary and we reiterate these valid risks with particular concerns about:

- Ability of this sensitive coastline (about which much is still unknown) to absorb the impacts of operations, especially if any accidents occurred.
- Impacts on sea water and sediment quality at drilling sites and current drift of those.
- Impacts on plant and animal life on the sea bottom in areas where wells are drilled, or project infrastructure is installed;
- Attraction & incineration of individual birds (esp rare & vulnerable pelagic species) from well stem test flaring at the drillship, effluent impacts etc;
- Noise effects on marine life (especially cetaceans, but all marine life, given how far noise travels underwater) due to sound from construction related activities, and associated physical and behaviour disturbance;
- Sonar effects from continued survey activities, resulting in injury or mortality;
- Loss of small-scale/artisanal fishing grounds due to project infrastructures and their exclusion zones;
- Social unrest in coastal communities due to the perception of project negative impacts on fisheries combined with very limited local benefits; and
- Potential impacts on human cultural heritage and spiritual connections to the ocean and coastline, which is of sacred value to communities, especially along this coastline, with a long history of connection to the sea.
- The legacy of the operation site at the end of their lifespan. Rehabilitation of the site(s) (where possible) and retrieval of demersal (sea-floor) infrastructure is absolutely essential.

Perhaps I have missed it in all the documentation, but I would like to see a(n) (second) independent risk analysis plan of the above, with a matrix of the likelihood of the risks occurring, a severity rating if they did occur and the proposed mitigation measures in place. I would expect that the liability /responsibility of accidents rests with the TEEPSA consortium and does not get transferred to national/public liability.

We also note that if this is being partially motivated as a climate/future-proofing project, then all measures need to be put into place to minimise harmful emissions . The environmental impact of fossil fuels is widely acknowledged and, in 2023, we would expect that the strictest and most progressive measures are being implemented (including renewable energies) to mitigate or offset the pollution/emissions caused by all operations (from drill site to terrestrial site)

Unfortunately the track record of oil and gas operations - with destructive social-ecological legacies that I have witnessed first hand - does not lend me to easily endorse such projects, even with thorough the EIAs that otherwise read well. Too often, as we see public interest in the matter wane, extraordinary profits transferred to the (foreign) consortiums, environmental impacts 'swept under the rug' (especially in the relative 'invisibility' of the deep sea) and the legacy of social and ecological cleanup left with the impoverished coastal communities (and incapacitated governments), who have gained little benefit from the operations. Nor do we have much faith in the political representatives to hold operations to account.

My preferred outcome , given the number and magnitude of risks, is that this venture does not proceed off what is an incredibly important, sensitive and biodiverse coastline, and recognised internationally as such. I remain unconvinced of the risk-benefit - and whether the purported benefits to the local economy or even to a national energy supply that is need of huge reform, will actually accrue, especially when it is mismanaged to the extent that it is.

If it were to still proceed and given this exploration is clearly going to be a lucrative undertaking, we would expect that strict

mitigation measures are enforced, that there is regular independent on-going monitoring of all operations or and that any clean-up is legally binding during and at conclusion of the projects lifespan.

Thank you for taking these matters onboard for future discussions.

Matthew Zylstra, PhD
SACNASP, Professional Natural Scientist (Reg.)

From: Rami Abiad <>
Sent: Monday, 19 December 2022 11:24
To: TEEPSA EIA
Subject: Environmental and Social Impact Assessment (ESIA) for the Proposed Offshore Production Right and Environmental Authorisation Applications for Block 11B/12B

Hell,

I have read the Environmental and Social Impact Assessment (ESIA) for the Proposed Offshore Production Right and Environmental Authorisation Applications for Block 11B/12B.

Furthermore the Block 11B/12B joint venture is currently negotiating the gas offtake with potential customers in Mossel Bay. As I understood Total is working on the gas offtake agreement with PetroSA and/or Eskom with a State guarantee to reduce payment risk

Will this gas offtake agreement affect this application when it is signed, and will this happen (the signing) before the Public perusal period that ends 3rd of February 2023?

Sincerely
Rami

From: Caroline Ablitt <> **Sent:** 03 February
2023 16:03
To: TEEPSA EIA <teepsaEIA@wsp.com>
Subject: S&EIA for block 11B/12B

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Registration, Comment and Public Meeting Reply Form

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Personal Information					
Title	First Name	Surname	Organisation / Department (If applicable)		
Mrs	Caroline	Ab. H			
Contact Details					
Mobile Number	Land Line Contact Number		Email / Fax Number		
[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				<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
I will attend the following public meetings in 2023:					
16 January, Kwanonqaba Community Hall, Mayixhale St, Kwanonqaba, Mossel Bay	YES	<input checked="" type="checkbox"/> NO	21 January, Seavista Hall, Geelbek Street, St Francis Bay	YES	<input type="checkbox"/> NO
17 January, Mossel Bay Town Hall, 101 Marsh Street, Mossel Bay	YES	<input checked="" type="checkbox"/> NO	23 January, Pellsrus Hall, 1 Harder Street, Jeffreys Bay	YES	<input type="checkbox"/> NO
18 January Themba lethu Community Hall, 66 Olympic Road, George	YES	<input checked="" type="checkbox"/> NO	24 January, Feather Market Hall, 86 Baakens Street Port Elizabeth Central, Gqeberha	YES	<input type="checkbox"/> NO
19 January, Khaye lethu Community Hall, Mbethana Street, Knysna	YES	<input checked="" type="checkbox"/> NO	25 January, Jauka Community Hall, Runeli Drive, Port Alfred	YES	<input type="checkbox"/> NO
20 January, Piesang Community Hall, 7 Greenpoint Ave, Plettenberg Bay	YES	<input checked="" type="checkbox"/> NO	26 January, Scenery Park Community Hall, 30 7 th Rd, Scenery Park, East London	YES	<input type="checkbox"/> 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		1 February 2023		
	Signature		[REDACTED]		

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:

We should all be seeking to find

alternative energies. Our Planet

can no longer survive with so much

use and damage of fossil fuels.

Invest in our future not our

demise.

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!

Subject: FW: S & EIA Total Energies for Block 11B/12B
Attachments: Total Energy Wild Coast Feb 23.pdf

From: <>
Sent: 02 February 2023 21:15
To: TEEPSA EIA <teepsaEIA@wsp.com>; ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com>
Subject: S & EIA Total Energies for Block 11B/12B

Dear Sir or Madam,

Please find attached comment form for the above.

Cheers,
Pete Ablitt

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Personal Information					
Title	First Name	Surname	Organisation / Department (If applicable)		
Mr.	Peter	Abilit			
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				YES	NO
I will attend the following public meetings in 2023:					
16 January, Kwanonqaba Community Hall, Mayixhale St, Kwanonqaba, Mossel Bay	YES	NO	21 January, Seavista Hall, Geelbek Street, St Francis Bay	YES	NO
17 January, Mossel Bay Town Hall, 101 Marsh Street, Mossel Bay	YES	NO	23 January, Pellsrus Hall, 1 Harder Street, Jeffreys Bay	YES	NO
18 January Thembalethu Community Hall, 66 Olympic Road, George	YES	NO	24 January, Feather Market Hall, 86 Baakens Street Port Elizabeth Central, Gqeberha	YES	NO
19 January, Khayeletu Community Hall, Mbethana Street, Knysna	YES	NO	25 January, Jauka Community Hall, Runell Drive, Port Alfred	YES	NO
20 January, Piesang Community Hall, 7 Greenpoint Ave, Plettenberg Bay	YES	NO	26 January, Scenery Park Community Hall, 30 7 th Rd, Scenery Park, East London	YES	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		2 - FEB - 2023		
	Signature				

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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:

Please spend this money to invest in Alternative Energy Research. Fossil fuels have a limited future. What gives us the right to use it all up.
Please consider the planet not your pocket.

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 / qld.teepsaesia@wsp.com

THANK YOU!

From: Sabrina Adams <>
Sent: Friday, 03 February 2023 14:47
To: TEEPSA EIA
Subject: Objection to oil and gas exploration

To whom it may concern,

I would like to raise my objection to Total's plan to drill and build new gas pipelines off Mossel Bay for the following reasons:

1. The planned area is an environmentally sensitive area which lies in the middle of the Agulhus Current that is a major highway for Whale and Sardine migration.
2. The planned area borders on a Marine Protected area.
3. Government officials stand to gain massively from the proposed x R8 billion annual income
4. Gas and Oil is a super high risk to the environment, tourism and other economic endeavors along coastline.
5. This plan will contribute to green-house gases and release of carbon stores of seabed sediment
6. The ESIA being done by WSP (A consulting firm that consults both on environmental and oil and gas drilling industry) - which is a huge conflict of interest.
7. There as been evidence of misconduct by the consulting firm: for the public participation meeting in George the consultants misadvertised the meeting the day before with a loud hailer telling the community of Thembaletu that they could come and sign up for jobs at the meeting. 400 people came with their ID books expecting to get a job.

Please stop this!

Best,
Sabrina

From: Melissa Adey <>
Sent: Wednesday, 01 February 2023 07:58
To: TEEPSA EIA
Subject: Objection to Gas and oil Pipeline off Mosselbay

To whom it may concern

I hope this finds you and your family well.

My plea and objection to this project moving forward is to consider future generations and our fragile marine life.

Please, I wholeheartedly object to this going ahead.

Thank you may my voice be added and heard today.

Melissa

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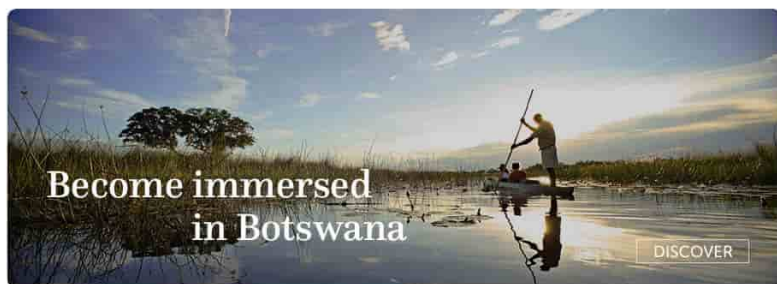
Melissa Adey

Travel Specialist

D
C
Emergency After-Hour Support

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From: Louis, Aldrich AC <>

Sent: 11 January 2023 08:25

To: TEEPSA EIA <teepsaEIA@wsp.com>; Adam, Mohamed M <>; Hattingh, Johan CJ <>; Stephens, Dylan DE <>; Siebritz, Shoenay SA <>; Griffiths, Gavin GA <>; Lourens, Erwee E <>

Subject: Total Energies Block 11B/12B Public Comment

Hello TEEPSA/WSP

Regarding the **TOTALENERGIES EP SOUTH AFRICA B.V. | 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**

See attached comment.

Kind Regards

Aldrich Louis | Senior Manager
ArcelorMittal South Africa

Saldanha Works
Private Bag X11, Saldanha, 7395

T + | F + | M

FRAUD AWARENESS

Do you have any concerns related to possible fraudulent activity within ArcelorMittal?

Let us know! We're waiting 24/7

Hotline (South Africa) : 0800 00 1672

Email:



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	ALDRICH	LOUIS	ARCELORMITTAL
Contact Details			
Mobile Number	Land Line Contact Number		Email / Fax Number
[REDACTED]	Office	[REDACTED]	[REDACTED]
	Home	[REDACTED]	[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			YES NO
Please include my details on WSP's database to contact me about future projects in my area			YES 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	10 JAN 2023	
	Signature		

ALREADY Registered →

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:

Energy, in particular gas and condensate should not simply be exported but local use and beneficiation should be prioritised. Also opportunities beyond gas-to-power should be explored, of which gas use in the steel industry for iron ore reduction is one such example and can contribute to the local decarbonisation of our steel industry.

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!

From: Natver Amtha <>
Sent: Friday, 03 February 2023 21:42
To: TEEPSA EIA
Subject: Mossel Bay off shore exploration project

I am in favor of going ahead with this project as it will create huge, much needed employment and business opportunities for RSA. This will also make the country to a certain extent self sufficient in the supply of gas and other byproducts. There is also PetroSA close by that can be utilized with the runoff from these products. The area has for many years been used for the gas and oil exploration and has no negative incidents or effect offshore and on land up till now. I give a big thumbs up for a go ahead for the exploration in the area.

Sent from my iPad

Natver Amtha
Purchasing Director

P.E Bolt & Hardware Supplies PTY LTD
349 Kempston Road, Korsten, Port Elizabeth, (NELSON MANDELA METROPOLE), South Africa, 6001 P.O.
Box 4151, Korsten, Port Elizabeth, (NELSON MANDELA METROPOLE), South Africa, 6014

TEL:

FAX:

FAX to e-mail:

Website: www.pebolt.co.za<<http://www.pebolt.co.za/>>

Email: [REDACTED] This email is solely for the named addressee. Any unauthorized use or interception of this email, or the review, retransmission, dissemination or other use of, or taking of any action in reliance upon the contents of this email, by persons or entities other than the intended recipient, is prohibited. If you are not the name addressee please notify us immediately by way of reply e-mail, and also delete this email and any attached files.

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From: Julie Anderson <>
Sent: Thursday, 02 February 2023 15:14
To: TEEPSA EIA
Cc: ZA - GLD - Teepsa Esia
Subject: Re: TEEPSA's proposed offshore Block 11B/12B development project
Attachments: EPSON015 signed letter.pdf

Included is a signed letter scanned as part of my application.

Sent from Julie Anderson

On 02 Feb 2023, at 14:55, Julie Anderson <> wrote:

Plettenberg Bay regarding the 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 distributed on 15 December 2022 refers.

Attention: WSP Public Participation Office

Contents as follows:

My full Name Julie Anderson
My email address:
My contact Number:

Referring to the TEEPSA Block 11B/12B scoping public meeting presentation from the website

<https://www.wsp.com/en-za/services/public-documents>

1. Proximity to sensitive areas

There are two unexplained (greenish) colours in the key of the maps pages 11 and 64 of the

The platforms and existing wells are conveniently placed and grouped where these areas briefly part.

The block proximity is bordering on ie touching critical biodiversity areas with proposed exploration areas marked well into critical areas.

Whaling information from 1960 cannot possibly give us the information we require to indicate that the the two marine mammal species identified will be the only two most affected. Also The list of threatened, critically threatened and near extinction

species (pages 56-59 and page 53) is far too large to even consider allowing for any further exploration and or proposed production for the block under application and scrutiny. It would seem the block size has been determined by the sensitive areas that have been studied and borders (as in touches) these areas. The sensitive areas are marine areas and therefore cannot be subjected to a walled pool that will restrict movement, overlapping WILL occur and the entire block is simply too close to consider granting licenses.

Any and all of these marine protected and critical biodiversity areas should be given a much wider berth and the environmental departments of the government should not allow licenses to even begin processing if they fall within these areas. This is therefore the fault of the department responsible for marine protection to entertain and allow the applicant to further the process of applying. This would have saved the applicant and their predecessors billions of rands. The applicant could possibly lawfully argue that damages be paid by that department and also implicated is the department of energy and minerals as they signed off on the surveys supplying the data to the petroleum industry.

Every aspect of the area under consideration is fragile ecologically. It is widely known that disturbance in the ecology has DIRECT impact on communities reliant on ocean resources. It is also widely known that the population most affected is low income families who will be forced below the poverty line. If this is acceptable to the Chairman, executives and shareholders of Total Energies then they should definitely proceed. If the notion that what they need in order to profit in any way has any affect as dire as poverty on any single family seems preposterous to the Chairman, executives and shareholders of Total Energies then they should abandon this application.

2. The unlawful seismic information gathered illegally in December 2021-2022 as well as all surveys that happened prior should be confiscated and not allowed to be used as part of the production process. It should be wiped from all memory and if exploration is what they need to confirm their suspicions that oil and gas exist there then they need to reapply to survey. The illegal seismic surveys cannot be reversed, the damage was done and future impact unknown but conveniently presumed to have none by the entire oil and gas industry.
3. What is so concerning is that rather than have a fully documented well presented safe and secure environment presentation, each new applicant for this block modifies their EIA based on the pushback they receive from the small (gaining momentum) environmentally concerned groups who relentlessly battle the giants of oil and gas. With most recent wins as court battles and the largest national environmental protest campaign encouraging concerned people of the country and the world the voice to say and then to stop further damage to the vulnerable environment heading for climate disaster.
4. Thank you for hearing the outcry and stopping the process (Regardless that it was by force of court order and not voluntary) this has allowed the applicant to obtain the necessary information to appease the affected parties. Undoubtedly Total Energies were expecting an outcome in their favour but the more new applicants research the area, the more evident it is that this should definitely NOT proceed any further than it already has.

- 5. I propose the department of environment, forestry and fishery should immediately apply to have the now well researched area declared a world heritage site. Therefore no single other applicant will be allowed to consider to apply to any interfering activities listed in the table on page 67 ever. In fact I would go so far as to propose it be named the Total Energies Marine conservation area. (As a token of appreciation for all the environmental data made available in the process)**

- 6. The application was not for nought, the push back from I&AP allowed for further studies and investigation. We could possibly see the marine protected areas of south africa increase considerably which will look like a win to the government departments concerned. It will be well received by the global community and demonstrate willingness to listen to citizens and protect the environment and most vulnerable coastal communities.**

<5 221124TEEPSA Block11B12B ESIA RegistrationCommentReplyFormEng.pdf>

Sent from Julie Anderson

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 <i>(If applicable)</i>
Mrs	Julie	Anderson	N/A
Contact Details			
Mobile Number	Land Line Contact Number		Email / Fax Number
[REDACTED]	None	Office	[REDACTED]
	None	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
Please include my details on WSP's database to contact me about future projects in my area			YES <input checked="" type="checkbox"/> 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	2 February 2023	
	Signature	[REDACTED]	

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.

From: Richard Andrew <>
Sent: Wednesday, 01 February 2023 15:59
To: TEEPSA EIA; ZA - GLD - Teepsa Esia
Subject: Objection: oil and gas drilling in Mossel bay

To whom it may concern,

Please register me as an interested and affected party for this application

I would like to object to Total's plan to drill and build new gas pipelines off Mossel Bay for the following reasons:

1. The planned area is an environmentally sensitive area which lies in the middle of the Agulhus Current that is a major highway for Whale and Sardine migration.
2. The planned area borders on a Marine Protected area.
3. Government officials stand to gain massively from the proposed x R8 billion annual income
4. Gas and Oil is a super high risk to the environment, tourism and other economic endeavors along coastline.
5. This plan will contribute to green-house gases and release of carbon stores of seabed sediment
6. The ESIA being done by WSP (A consulting firm that consults both on environmental and oil and gas drilling industry) - which is a huge **conflict of interest**.
7. There as been evidence of **serious misconduct** by the consulting firm: for the public participation meeting in George the consultants misadvertised the meeting the day before with a loud hailer telling the community of Thembalethu that they could come and sign up for jobs at the meeting. 400 people came with their ID books expecting to get a job.

regards

Richard Andrew (Wilderness, Western Cape)

From: Olivia Andrews <>
Sent: Wednesday, 01 February 2023 07:43
To: TEEPSA EIA
Subject: Objection: Total's plan to drill and build new gas pipelines off Mossel Bay

To whom it may concern,

I would like to raise my objection to Total's plan to drill and build new gas pipelines off Mossel Bay for the following reasons:

1. The planned area is an environmentally sensitive area which lies in the middle of the Agulhus Current that is a major highway for Whale and Sardine migration.
2. The planned area borders on a Marine Protected area.
3. Government officials stand to gain massively from the proposed x R8 billion annual income
4. Gas and Oil is a super high risk to the environment, tourism and other economic endeavors along coastline.
5. This plan will contribute to green-house gases and release of carbon stores of seabed sediment
6. The ESIA being done by WSP (A consulting firm that consults both on environmental and oil and gas drilling industry) - which is a huge conflict of interest.
7. There as been evidence of misconduct by the consulting firm: for the public participation meeting in George the consultants misadvertised the meeting the day before with a loud hailer telling the community of Thembaletu that they could come and sign up for jobs at the meeting. 400 people came with their ID books expecting to get a job.

Your sincerely
Olivia Andrews
Wilderness Heights

From: laetitia antonites <>
Sent: Wednesday, 01 February 2023 07:59
To: TEEPSA EIA
Subject: stop !

do not touch our oceans damage the ecosystem-laetitia antonites

Sent from my iPhone

From: Georgia Argyropoulos <>
Sent: Friday, 03 February 2023 15:27
To: ZA - GLD - Teepsa Esia
Subject: Re: REMINDER: PUBLIC COMMENT ON DRAFT SCOPING REPORT | BLOCK 11B/12B BY
TOTALENERGIES EP SOUTH AFRICA B.V. REF. NO. 12/4/013

I say no to fracking and the destruction of wild habits.

On Fri, 03 Feb 2023, 2:50 pm 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 TEEPSA 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

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.

-LAEhHhHzdJzBITWfa4Hgs7pbKl

Subject: FW: Comment on TotalEnergies' proposed offshore production and additional exploration for Block 11B/12B, Ref No: 12/4/13 PR

Attachments: 221215_teepsa-block_11b12b-esia-_meetingreplyform - submitted by Samantha Bailey.pdf; Comments by Samantha Bailey on TotalEnergies' proposed offshore production and additional exploration for Block 11B and 12B.pdf

From: Samantha Bailey <>
Sent: 03 February 2023 12:41
To: TEEPSA EIA <teepsaEIA@wsp.com>; ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com>
Subject: Comment on TotalEnergies' proposed offshore production and additional exploration for Block 11B/12B, Ref No: 12/4/13 PR

Hi There,

Please find attached my submission using the "Registration, Comment and Public Meeting Reply Form" and also copied into the attached PDF for easier reference.

Regards,
Samantha Bailey

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.

-LAEmHhHzdJzBITWfa4Hgs7pbKI

I, Samantha Kate Bailey, a citizen of the Eastern Cape with email address , hereby register my objection to TotalEnergies' proposed offshore production and additional exploration for Block 11B/12B, Ref No: 12/4/13 PR based on the following concerns:

1) The public participation process for this ESIA is deeply flawed due to bureaucratic bungling that completely ignored including any communities to the west of Mossel Bay, who would be directly affected by any major accident that might occur on the project due to the fact that the strong Agulhas current flows from east to west along that stretch of coastline and would spread any oil or other pollution along the coastline of those western communities. This includes Boggoms Bay, Gouritz, Still Bay, Witsand, Arniston, Struis Bay, Cape Agulhas, etc. **Thus the public participation process needs to be extended to include these ignored communities.**

2) At the East London public meeting that I attended on 26th January 2023, TotalEnergies stated that if they went ahead with the project, their plan would be to construct the infrastructure required (wells, pipeline, etc.) and then hand the project over to PetroSA for the actual production. PetroSA is a state-owned entity of the South African government that is mired in corruption and incompetence, and it is very questionable that they have the capacity to run the production in an efficient, effective and SAFE manner. Not only does this raise the high likelihood that the financial management of the production could be severely compromised by corruption (with impacts on maintenance, etc.) but also this hugely raises the risk of major accidents occurring with devastating long-term impacts on the environment and all social and economic activity related to that environment. PetroSA has yet to account for the environmental damage caused by their condensate pipeline running from the offshore FA platform to the GTL refinery in Mossel Bay, and this is the exact platform that TotalEnergies plans to use for this proposed project. **The ESIA specialist studies need to incorporate PetroSA's involvement in all the potential impacts and subsequent mitigation plans that are being considered for the proposed project as a whole.**

3) In the paper brochure that TotalEnergies supplied to people attending the East London public meeting, it was deeply concerning that the list of possible impacts included nothing about climate change impacts. Granted the list stated that it was incomplete and would be detailed in the ESIA's studies, but nonetheless, the omission backs up Oceans Not Oil's claim of TotalEnergies' litany of denial and deflection of attention away from the willful global endangerment by promoting fossil fuel products. The brochure also states that the ESIA will propose mitigation to reduce severity of any impact, but **the ESIA specialist studies need to examine how exactly TotalEnergies has mitigated their enormous damage to the climate to date, and how they propose to do this for this particular project.**

4) This ESIA needs to undertake a Strategic Environmental Assessment (SEA) for offshore Oil & Gas production in South Africa. Considering the potential for massive pollution being present, **a rigorous, independent and proactive SEA should be undertaken to inform the environmental viability of this offshore oil and gas proposal.**




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 <i>(If applicable)</i>		
Ms	Samantha	Bailey	private citizen		
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="checkbox"/> YES	<input type="checkbox"/> NO
I will attend the following public meetings in 2023:					
16 January, Kwanonqaba Community Hall, Mayixhale St, Kwanonqaba, Mossel Bay	<input type="checkbox"/> YES	<input type="checkbox"/> NO	21 January, Seavista Hall, Geelbek Street, St Francis Bay	<input type="checkbox"/> YES	<input type="checkbox"/> NO
17 January, Mossel Bay Town Hall, 101 Marsh Street, Mossel Bay	<input type="checkbox"/> YES	<input type="checkbox"/> NO	23 January, Pellsrus Hall, 1 Harder Street, Jeffreys Bay	<input type="checkbox"/> YES	<input type="checkbox"/> NO
18 January Thembalethu Community Hall, 66 Olympic Road, George	<input type="checkbox"/> YES	<input type="checkbox"/> NO	24 January, Feather Market Hall, 86 Baakens Street Port Elizabeth Central, Gqeberha	<input type="checkbox"/> YES	<input type="checkbox"/> NO
19 January, Khayeletu Community Hall, Mbethana Street, Knysna	<input type="checkbox"/> YES	<input type="checkbox"/> NO	25 January, Jauka Community Hall, Runeli Drive, Port Alfred	<input type="checkbox"/> YES	<input type="checkbox"/> NO
20 January, Piesang Community Hall, 7 Greenpoint Ave, Plettenberg Bay	<input type="checkbox"/> YES	<input type="checkbox"/> NO	26 January, Scenery Park Community Hall, 30 7 th Rd, Scenery Park, East London	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> 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		3 February 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:

I register my objection to TotalEnergies' proposed offshore production and additional exploration for Block 11B/12B, Ref No: 12/4/13 PR based on the following concerns:

1) The public participation process for this ESIA is deeply flawed due to bureaucratic bungling that completely ignored including any communities to the west of Mossel Bay, who would be directly affected by any major accident that might occur on the project due to the fact that the strong Agulhas current flows from east to west along that stretch of coastline and would spread any oil or other pollution along the coastline of those western communities. This includes Boggoms Bay, Gouritz, Still Bay, Witsand, Arniston, Struis Bay, Cape Agulhas, etc. Thus the public participation process needs to be extended to include these ignored communities.

2) At the East London public meeting that I attended on 26th January 2023, TotalEnergies stated that if they went ahead with the project, their plan would be to construct the infrastructure required (wells, pipeline, etc.) and then hand the project over to PetroSA for the actual production. PetroSA is a state-owned entity of the South African government that is mired in corruption and incompetence, and it is very questionable that they have the capacity to run the production in an efficient, effective and SAFE manner. Not only does this raise the high likelihood that the financial management of the production could be severely compromised by corruption (with impacts on maintenance, etc.) but also this hugely raises the risk of major accidents occurring with devastating long-term impacts on the environment and all social and economic activity related to that environment. PetroSA has yet to account for the environmental damage caused by their condensate pipeline running from the offshore EA platform to the GTL refinery in Mossel Bay, and this is the exact platform that TotalEnergies plans to use for this proposed project. The ESIA specialist studies need to incorporate PetroSA's involvement in all the potential impacts and subsequent mitigation plans that are being considered for the proposed project as a whole.

3) In the paper brochure that TotalEnergies supplied to people attending the East London public meeting, it was deeply concerning that the list of possible impacts included nothing about climate change impacts. Granted the list stated that it was incomplete and would be detailed in the ESIA's studies, but nonetheless, the omission backs up Oceans Not Oil's claim of TotalEnergies' litany of denial and deflection of attention away from the willful global endangerment by promoting fossil fuel products. The brochure also states that the ESIA will propose mitigation to reduce severity of any impact, but the ESIA specialist studies need to examine how exactly TotalEnergies has mitigated their enormous damage to the climate to date, and how they propose to do this for this particular project.

4) This ESIA needs to undertake a Strategic Environmental Assessment (SEA) for offshore Oil & Gas production in South Africa. Considering the potential for massive pollution being present, a rigorous, independent and proactive SEA should be undertaken to inform the environmental viability of this offshore oil and gas proposal.

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: ZA - GLD - Teepsa Esia
Sent: Friday, 03 February 2023 09:13
To: ZA - GLD - Teepsa Esia
Subject: FW: Registration and objection to 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.

From: Melissa Baird <>
Sent: Thursday, February 2, 2023 1:22 PM
To: TEEPSA EIA <teepsaEIA@wsp.com>; ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com>
Subject: Registration and objection to 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.

Good day

The pdf application form you have on the website is not editable so I can not complete it.

For the record here are my details and I am registering to object to the proposed plans:

Name: Melissa Baird
Email address:
Fax/Land line - n/a
Mobile number : - this is not to be used for any other purpose than this registration

Registering as an interested and affected party and request information to be sent to this email address

Comments:

Offshore drilling has many unaccounted for environmental risks that have long lasting impacts. It takes a teaspoon of oil to pollute a litre of water, so how can potential and likely oil spills be prevented? What happens if there is an oil spill, who pays for the destruction of the marine ecosystem that science has already proven is at unparalleled risk from human activities and pollution? This coast line is home to many local fishermen and small tourist businesses that rely on access to the unspoiled marine eco system for their livelihoods and well being. If an environment and its people are likely to be negatively impacted - in any shape or form - this should be enough to re-address this prospecting application until all questions are answered and guarantees are in place. Renewable energy sources are far more able to supply local community energy requirements, create jobs for skilled and semi-skilled labour without the threat of severe environmental damage. There are other viable alternatives.

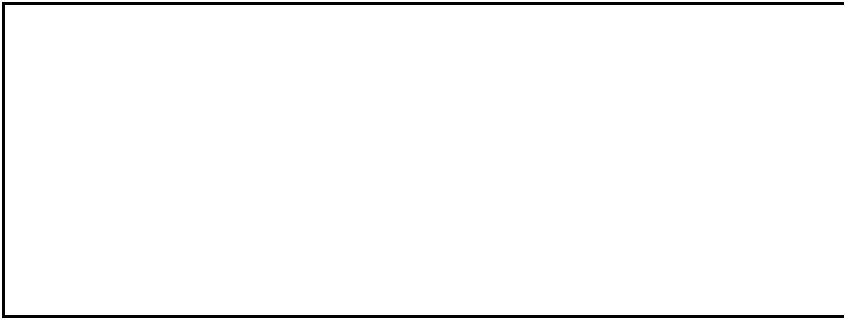
Kindly let me know my objection and registrations have been received and noted.

Yours sincerely
Melissa Baird

Melissa Baird
Editorial director

Overberg, Western Cape
South Africa, 7250

www.lifeinbalance.co.za



[Instagram](#)

From: elizabeth balcomb <>
Sent: Tuesday, 17 January 2023 13:10
To: ZA - GLD - Teepsa Esia
Subject: Re: REMINDER: INVITATION TO PUBLIC MEETINGS: Block 11B/12B by TotalEnergies EP South Africa B.V. Ref. No. 12/4/013

Follow Up Flag: Follow up
Flag Status: Completed

I wholeheartedly oppose any offshore exploration or drilling by Total.

from
Elizabeth Balcomb

On Fri, Jan 13, 2023 at 5:06 PM ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com> wrote:

Dear Stakeholder

Best wishes for a prosperous 2023!

The invitation letter to the January 2023 public meetings for the 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 distributed on 15 December 2022 refers.

This email serves as a reminder of the public meetings that will be convened from Monday, 16 January 2023 until Thursday 26 January 2023, as follows:

Date	Venue	Time
16 January 2023	Kwanonqaba Community Hall, Mayixhale Street, Kwanonqaba, Mossel Bay	10h00 – 12h00 AND 17h00 – 19h00
17 January 2023	Mossel Bay Town Hall, 101 Marsh St, Mossel Bay Central, Mossel Bay	17h00 – 19h00
18 January 2023	Themba lethu Community Hall, 66 Olympic Road, George	17h00 – 19h00
19 January 2023	Khaye lethu Community Hall, Ngcakani Road, Knysna	17h00 – 19h00
20 January 2023	Piesang Community Hall, 7 Greenpoint Ave, Plettenberg Bay	15h00 - 17h00 AND 17h00 – 19h00
21 January 2023	Seavista Hall, Geelbek Street, Cape St Francis	14h00 – 16h00
23 January 2023	Pellsrus Hall, 1 Harder Street, Jeffreys Bay	17h00 – 19h00
24 January 2023	Feather Market Hall, 86 Baakens Street, Gqeberha	17h00 – 19h00
25 January 2023	Jauka Community Hall, Runeli Drive, Port Alfred	10h00 – 14h00 AND 14h00 – 16h00

From: Jolene Banuelos <>
Sent: Thursday, 02 February 2023 07:58
To: TEEPSA EIA
Subject: bjection to Total building gas pipeline off Mossel Bay in South Africa

To whom it may concern,

My family and I object to Total's plan to build gas pipelines off Mossel Bay. This would be detrimental to the marine wildlife in the area, not to mention the whale and sardine migration. The area borders on a protected marine area. Gas and oil are high risk to the environment, tourism and the coastline. This is a bad idea all around, and we are in opposition to it.

Regards,

Jolene Banuelos

From: Marina Barkhuizen <>
Sent: Thursday, 02 February 2023 10:29
To: TEEPSA EIA
Subject: NO TO OFF SHORE DRILLING

I am TOTALLY against the idea of off shore drilling.

Marina Barkhuizen

From: Russell Barry <>
Sent: Friday, 27 January 2023 23:43
To: TEEPSA EIA
Subject: South African Coastline

I object to TotalEnergies being given the rights to prospect for and or extract oil or gas along the coastline of South Africa. I believe it will have a catastrophic impact on the environment and especially the marine life.

Regards,
Russell

From: Gisela Bean <>
Sent: Wednesday, 01 February 2023 07:12
To: TEEPSA EIA
Subject: Objection agains Total ocean pipeline in Mossel Bay

To whom it may concern,

Please register my absolute objection against the proposed Total oceanic pipeline in Mossel Bay.

As a concern South African citizen and resident of the Garden Route it is my duty and right to object to this blatant destruction of our natural resources and eco system.

Gisela Bean

From:
Sent: Saturday, 04 February 2023 01:10
To: TEEPSA EIA
Subject: PetroSA and TotalEnergies' gas project

TO WHOM IT MAY CONCERN

Our government has much to answer for, especially to the citizens of South Africa. This atrocity only adds to the sad and desperate state of what is happening in South Africa today. In supporting TotalEnergies via PetroSA, to drill off our coastline only adds to the government's continued greed and corruption. This drilling is planned for no fewer than 10 sites, along our 120km stretch of ocean.

This was a similar move made by Shell and we SAcans, stood together, and supported the fragile communities that try to eke out a living from fishing. They need and deserve to do that in pristine oceans! Not oceans polluted by oil! Look at what has happened in the Nigeria delta! The locals were totally excluded (work is NOT and NEVER will be provided for the locals, as is 'promised') and they began stealing from the oil pipes and completely contaminated that once beautiful life-giving area.

The citizens of South Africa, especially those who historically, have had to endure political, social and economic devastation over many years, deserve better treatment from the government. Why not use the financial resources to do good; plan for the future in such a way that does no harm – to our environment and to the people who deserve to live in environments that will sustain them into the future. What is being proposed is tantamount to the destruction of our natural environment at the cost of our coastline and our citizens. Stop being short-sighted, money-grabbing and self-serving! It is time to set a positive example to the people of South Africa and indeed the world! The government has the power and resources to do GOOD, SHOW KINDNESS and work for the UPLIFTMENT of humanity. The world NEEDS that. What is being proposed is only going to cause further devastation in the long run!

Please, make your legacy one that breaks the mold of just taking and leaving a trail of poverty and unhappiness. Consider the legacy you will be leaving.

L Bekker

From: Marietjie Bell <>
Sent: Friday, February 3, 2023 8:54 PM
To: ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com>
Subject: S&EIA process - Total Energies EP South Africa B.V.

Hello

Please find attached my registration form as I&AP.

Kind regards,
Marietjie Bell

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.

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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 <i>(If applicable)</i>			
Mrs	Marietjie	Bell	La Finca Tranquila			
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					YES	NO
I will attend the following public meetings in 2023: We were NOT made aware of this project soon enough to attend the public meetings and herewith object to the project due to the biodiversity impact.						
16 January, Kwanonqaba Community Hall, Mayixhale St, Kwanonqaba, Mossel Bay	YES	NO	21 January, Seavista Hall, Geelbek Street, St Francis Bay	YES	NO	
17 January, Mossel Bay Town Hall, 101 Marsh Street, Mossel Bay	YES	NO	23 January, Pellsrus Hall, 1 Harder Street, Jeffreys Bay	YES	NO	
18 January Thembalethu Community Hall, 66 Olympic Road, George	YES	NO	24 January, Feather Market Hall, 86 Baakens Street Port Elizabeth Central, Gqeberha	YES	NO	
19 January, Khayelethu Community Hall, Mbethana Street, Knysna	YES	NO	25 January, Jauka Community Hall, Runeli Drive, Port Alfred	YES	NO	
20 January, Piesang Community Hall, 7 Greenpoint Ave, Plettenberg Bay	YES	NO	26 January, Scenery Park Community Hall, 30 7 th Rd, Scenery Park, East London	YES	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		3 February 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:

I have a major concern with the impact of the offshore drilling and seismic work on the local biodiversity. The Western Cape draws a lot of tourism and should not consider projects that are detrimental to sensitive biodiversity areas.

On a further note, why are we considering gas instead of focussing on solar or even nuclear energy?

I herewith therefore want to raise my objection against this project.

I have spoken to several people in our community who are also not up to speed with this project and its impacts.

Please consider a further round of meetings to address concerns.

If the project do go ahead, what measures will be in place to protect the pipeline structures from vandalism? We have train tracks and electrical cables being stolen on a daily basis, how safe are the pipelines from damage?

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: Titia Bester <>
Sent: Wednesday, 01 February 2023 16:37
To: TEEPSA EIA
Subject: Stop Total energies off shore exploration

To whom it may concern

I, Titia Bester, object strongly to the proposed off shore exploration in our ocean. It is tremendously harmful to all sea life that will also affect us all in the future. There have already been conservation experts that have all the info needed to show exactly how harmful it is. You can do more studies to provide you with the necessary information before doing the seismic impact.

Thank you.

Titia Bester

From: Wilfried Bohm <>
Sent: Friday, 03 February 2023 13:12
To: TEEPSA EIA
Subject: Total Energies plan - Interested & Affected Party

To the WSP Public Participation Office

Re: **Plans by Total Energy for exploration off the Southern Cape coast.**

Please note me down as the following: I am an interested and affected party. I am an RSA Citizen and all that negatively impacts the ocean and environment consequently impacts me.

I look forward to hearing from you.

Regards,

Wilfried Detlef Bohm

Cell:

From: Patrick Bond <>
Sent: Friday, 03 February 2023 18:00
To: gld.teepsaesia@wsp.com; teepsaEIA@wsp.com
Subject: Re: Please record me as Interested and Affected Party: BLOCK 11B/12B -,REF NO: 12/4/13 PR
Attachments: Bond 2023 comment on 5_-221124_TEEPSA-Block_11B12B-ESIA-RegistrationCommentReplyForm_Eng-1.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

About two months ago, I requested to be considered an I&AP on anything you are working on in South Africa. My concerns are that WSP is not doing professional work on climate-related aspects of fossil fuel exploration, and your silence confirms that this is an inadequate, unsatisfactory process you are leading. My further criticisms of the ESIA are attached. Please acknowledge your receipt of these concerns.

Thanks,

Patrick Bond

On 12/5/2022 7:07 AM, Patrick Bond wrote:

> I'm a Johannesburg resident concerned about climate change.
>
> Please confirm you have added me to the IAP list for all activities
> associated with gas or oil exploration and exploitation, thanks.
>
> Patrick Bond

On 12/2/2022 2:28 AM, Patrick Bond wrote:

> Greetings, please consider me an IAEP. If there are any applications
> underway which WSP is involved in, please send me details.
>
> Thanks,
>
> Patrick




Scoping and Environmental Impact Assessment (S&EIA) process for the proposed offshore Production Right and Environmental Authorisation Application for Block 11B/12B by Total 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 <i>(If applicable)</i>
Prof	Patrick	Bond	University of
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			YES <input checked="" type="checkbox"/> NO <input 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 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	3 February 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:

I am a University of Johannesburg sociologist (a distinguished professor), specialising in public policy and environmental economics. I am writing in particular about the implications of the proposed exploratory well drilling for South Africa's climate politics. (The views expressed below are personal, not institutional.) I hold a PhD in Geography and Environmental Engineering from Johns Hopkins University (1993), having earlier studied economics at Swarthmore College and the University of Pennsylvania Wharton School of Finance. I also have engaged in many South African policy processes, having drafted the *Reconstruction and Development Programme White Paper* (1994) and many others. I also work closely with civil society organisations in South Africa, Africa and across the world.

I consider the public participation process to be, already, inadequate, since my requests to be put into the WSP/Total I&AP database and informed of the steps to be taken (in emails of 2 December 2022 and 5 December 2022), were simply ignored.

I am particularly interested and affected, as are *all South Africans, and indeed the world's citizens*, by the climate components of Total's proposed fossil fuels production process. I also believe it is important to question whether Total and its managerial leadership – as well as allied local firms – are “fit and proper” for work of this sort.

In making the case for further fossil fuels in the Environmental and Social Impact Assessment (ESIA), WSP/Total relies upon a National Business Initiative (NBI) study of gas, one which downplays the massive methane-leakage problems associated with gas, rendering the methane released 80 times more potent than CO₂, as well as Social Cost of Carbon and Methane externality liabilities, as well as climate sanctions (the “Carbon Border Adjustment Mechanism”) that will be progressively imposed on South African exports by Western trading partners in coming years. Here is WSP/Total's reflection on that report:

“Just Transition and Climate Pathways Study for South Africa (NBI) - concluded that gas is needed for South Africa's decarbonisation strategy to support transitions in the power, synfuels, industry and transport sectors. South Africa also needs to develop its local resources as infrastructure to import Liquefied Petroleum Gas (LPG) is limited.”

The obvious implicit standpoint of WSP/Total in the ESIA is that from the 2019-20 successful exploration process, there will now be production: extraction, processing, refining, transport, combustion and waste disposal. Yet damaging sources of greenhouse gas emissions and other pollutants are partially acknowledged in the ESIA, and then they are immediately downplayed:

Potential impacts on air quality and climate change of air emissions including greenhouse

gases (GHGs) generated by the Project: During operations air emissions will be emitted by various sources: drillship, specialized vessels, support vessels, flaring, etc. Potential actions to address the potential impacts include for instance: minimize potential air emissions during Project Design; conduct air emissions modelling and GHG calculations as part of the ESIA to assess potential project impacts; and identify specific mitigation measures if required.

What is utterly unsatisfactory, at this point – fully four years after the February 2019 fossil fuel discoveries – is that a proper study of climate implications *has still not occurred*. Instead, such analysis is only proposed for the future:

10.1.1 CLIMATE CHANGE AND AIR QUALITY STUDY

The climate change risk assessment will assess the effects of the Project’s greenhouse gas (GHG) emissions on climate, and the vulnerability of the Project to predicted climate changes. This will include the assessment of a set of feasible alternatives to the proposed Project.

10.1.1.1 Legal Context

The study will be contextualised within national climate change/GHG legislation (e.g., GHG reporting regulations and proposed Climate Change Act) and global commitments. There will be further consideration of the Nationally Determined Contribution (NDC), the Integrated Resource Plan (IRP), and DEAT’s Long Term Adaptation Scenarios conducted for the Third National Communication under the UNFCCC.

10.1.1.2 Baseline Assessment

The baseline assessment will comprise an analysis of the global context (i.e., the global atmosphere as the receiving environment) based on IPCC reporting of global emission trajectories and impacts. Additionally, the study will be contextualised within the national to local contexts in terms of climate change projections, considering expected changes in carbon dioxide levels and ocean acidity, air and water temperature, precipitation patterns, the rate of sea level rise, storm intensity, and wave regime, all of which could have implications for the Project.

10.1.1.3 Climate Change Impact Assessment

The project impact assessment will provide a clear designation of study boundaries, the identification of GHG emissions sources, and the selection of emission factors (with reference to IPCC, 2006, and South Africa’s Draft Methodological Guidelines for Quantification of GHG Emissions). Emission estimation will follow for Scope 1 (direct), Scope 2 (imported electricity generation), and Scope 3 (indirect) emissions. The impact of cumulative emissions will be assessed relative to South African and global inventories. Climate change impact mitigation will be considered, with reassessment of impacts under a mitigated scenario.

10.1.1.4 Air Quality Specialist Opinion

The air quality specialist opinion will consider for emission sources and associated pollutants identified in exploration activities, and the likely severity of emissions. It is anticipated key sources will comprise fuel combustion in generators and other equipment used for the drilling units and vessel emissions.

10.1.1.5 Climate Change Risk Assessment

This assessment will consider Project exposure to climate changes (changes in carbon dioxide levels and ocean acidity, air and water temperature, precipitation patterns, the rate of sea level rise, storm intensity, and wave regime), the Project sensitivity to such, and any potential climate change adaptations. There will be further assessment of transitional risks, e.g., proposed carbon taxes.

This is entirely unsatisfactory, to kick the can down the road, *because preliminary estimates of climate and associated economic damages are feasible, and would lead to a very different conclusion than what WSP/Total have provided*.

The economic impacts of further fossil fuel exploration could be enormous because, as the Makhanda High Court ruled on 1 September 2022, when it mandated a full – not salami-sliced –

analysis of the impacts of gas and oil exploration, extraction, processing, transport, combustion and disposal: “the processes are discrete stages in a single process that culminates in the production and combustion of oil and gas, and the emission of greenhouse gases that will exacerbate the climate crisis...”

The point of Total’s production is ultimately to extract and process methane gas for South African consumption. The ESIA allegation that Total is committed to carbon neutrality is impossible to believe:

Climate and carbon neutrality ambition

Total supports the objectives of the Paris Agreement, which calls for the reduction in greenhouse gas emissions and its goal of limiting the average rise in planetary temperatures to well below 2°C from pre-industrial levels. Total also supports the objective set out in the Paris Agreement of achieving global carbon neutrality – i.e. net zero emissions, which is the balance between GHG emissions and anthropogenic removals in the form of sinks and reservoirs, such as forests, carbon capture and storage facilities. Total has set an ambition of reaching carbon neutrality (net zero emissions) by 2050 in Europe, from the production to the use of the energy products sold to its customers (Scopes 1, 2, 3 as defined by the GHG Protocol) and the objective of 60% or more reduction in the average carbon intensity of energy products used worldwide.

Consistent with the National Environmental Management Act’s “polluter pays” foundational principle, it is vital for WSP/Total to properly cost the entire project, by including discussion of the potential adverse effects of consequent greenhouse gas emissions using different scenarios, as is done in the pages below. (If on the other hand, there is an intent by Total to use the gas and oil for *non-combustible* purposes in which hydrocarbons are extracted to provide lubricants, synthetic materials, necessary plastics, pharmaceutical products, etc, then this should be clarified. The assumption from the application’s discussion of gas and oil use, however, is that the product is aimed at providing energy through hydrocarbon combustion.)

The following pages assume gas condensate deposits will be found and combusted, because if there was not a strong possibility of that outcome, there would be no formal production process.

Failure to calculate climate implications through gas life-cycle analysis

Consider the economics behind a life-cycle analysis of Total’s energy extraction strategy. As is well known, methane – the main ingredient (usually 90%) in both Liquefied Natural Gas (LNG) and Liquefied Petroleum Gas (LPG) – is released during a wide variety of processes between exploratory drilling and final combustion. The exploratory phase, including seismic blasting, is part of a life-cycle of natural gas that is vital to account for, so as to quantify the total emissions in at least five stages:

- “upstream” gas production, including seismic blasting, exploratory drilling, extraction, processing and transport;
- liquefaction;

- tanker or pipeline transport;
- regasification; and
- power plant operations when the gas is burned to generate electricity.

The Natural Resources Defense Council illustrates these steps as follows:

UPSTREAM: Extraction of gas at the well, processing, and domestic pipeline transport; occurs in exporting country; greenhouse gas emitted: predominantly methane.

LIQUEFACTION: Gas is cooled to -162 degrees Celsius to reduce its volume and convert it to liquid form; occurs in exporting country; greenhouse gas emitted: almost all carbon dioxide.

TANKER TRANSPORT: Liquefied natural gas is loaded onto an LNG tanker and transported to its destination port; occurs on the high seas; greenhouse gas emitted: mostly carbon dioxide.

REGASIFICATION: Liquefied natural gas is re-warmed to convert it to a gas; occurs in importing country; greenhouse gas emitted: mostly methane.

POWER PLANT OPERATIONS: Gas is burned in a power plant to generate electricity; occurs in importing country; greenhouse gas emitted: almost all carbon dioxide.¹

WSP/Total must undertake to measure greenhouse gas emissions associated with each stage, including methane leakage at well heads, in storage, and in transport through pipelines that in this region are often poorly maintained or subject to vandalism and petroleum-product theft. While the U.S. Environmental Protection Agency regularly made estimates about greenhouse gas emissions from such sources, in August 2021 new research showed that the source-based estimates were only half the amount of methane release that were picked up in satellite imaging and atmospheric measurement, in studies by Stanford University analysts in *Nature Communications*.²

Full economic costing

The WSP/Total analysis provides no estimates as to how much methane gas is potentially available in the relevant blocks, and has no information about the market value, and the environmental costs of likely externalities. In contrast, a 10% owner of the Block 11B/12B stake claimed to an investment analyst,

“Discovered deposits are estimated by the government at 3.4 trillion cubic feet of gas and 192 million barrels of condensate; AEC says over a billion barrels of oil equivalent have been discovered.”

The context is important. The extremely large gas reserves anticipated to be found both offshore and onshore South Africa, should be considered as a major potential source of greenhouse gas emissions, especially if more than 13 trillion cubic feet (tcf) of gas are capable

¹ Christina Swanson, Amanda Levin and Amy Mall, *Sailing to Nowhere: Liquefied Natural Gas Is Not an Effective Climate Strategy*, Washington, DC: Natural Resources Defence Council (2021).

<https://www.nrdc.org/sites/default/files/sailing-nowhere-liquefied-natural-gas-report.pdf>

² Rutherford, J.S., Sherwin, E.D., Ravikumar, A.P. *et al.* Closing the methane gap in US oil and natural gas production emissions inventories. *Nature Communications* 12, 4715 (2021). <https://doi.org/10.1038/s41467-021-25017-4>

of being extracted:

- 8 tcf in the Orange Basin
- 2 tcf in the Bredasdorp Basin
- 3 tcf in the Outeniqua Basin
- discoveries that are likely in the Witwatersrand and Durban-Zululand basins

To illustrate the costs that are associated with just one particular comparative site, the Transkei-Algoa blocks on the Indian Ocean, consider three factors: the oil-barrel equivalent of estimated gas reserves; the market value price of that gas; and the estimated Social Cost of Carbon associated with these amounts.

1) First, there may be the equivalent of a billion barrels of oil in the Transkei-Algoa blocks: Impact CEO: “We would not be investing in the way that we are looking to invest in the area if we could not see a billion-barrel potential.”³

2) Second, the international market value of natural gas has zigzagged dramatically, ranging in 2022 from \$3.80 to \$9.30 per million British thermal units (MMBtu), and in November 2022 priced at around \$7.20/MMBtu.⁴

Price of natural gas, 2013-22



There are 4.5 MMBtu per barrel-equivalent. If in the Transkei-Algoa blocks – like Block 11B/12B – there are a billion barrels of oil (equivalent) to be extracted, the 4.5 billion

³ James Gavin, “Shell takes stake in Impact’s Transkei & Algoa offshore blocks,” *African Energy*, 10 September (2021), <https://www.africa-energy.com/news-centre/article/south-africa-shell-takes-stake-impacts-transkei-algoa-offshore>

⁴ <https://tradingeconomics.com/commodity/natural-gas?user=analyst14639>

MMBtus would be worth \$32.7 billion, or R570 billion (i.e., nearly 10% of annual 2021 GDP of \$320 billion). That would be potential gross income. But as for net income, there are major costs to extraction, still to be determined by local drilling conditions, fixed capital costs, operating expenses, liabilities for local ecological damage, taxes and royalties.

3) Local ecological damage can be considered priceless, especially in the event not only of exploratory drilling, but a full platform or pipeline rupture in the Agulhas Current, so it is difficult to estimate such costs. However, we do have some estimates of greenhouse gas damage to apply.

Assume that methane is 80 times more potent as a greenhouse gas (in a 20-year period) than CO₂. Indeed the biggest externalised environmental cost of all is the impact of the combustion of methane on climate. A barrel of gas generates 236 kg of CO₂-equivalents when burned, or 0.26 tons. So if there are a billion barrels of gas available in the Transkei-Algoa blocks, we can assume something close to 260 million ton-equivalents of greenhouse gas emissions.

The Social Cost of Carbon – i.e. an assessment of damages per ton – is hotly contested. Barack Obama’s administration assessed it at \$51/ton but that is expected to rise dramatically in 2022 revisions. The IMF estimates \$60/ton. The European Union currently has an Emissions Trading Scheme price closer to \$100/ton. But the latest research by scientists suggests \$3000/ton is more accurate.⁵

If we set the Social Cost of Carbon at \$3000/ton, and there are 260 million tons of CO₂-equivalents that could be released from all the gas to be extracted in Transkei-Algoa alone, the Social Cost of Carbon would be \$780 billion. Set against the gross (not net) income from a billion barrels claimed by the Impact CEO above, valued at \$32.7 billion (before costs are subtracted), this extraction obviously doesn’t make sense if we take seriously full cost accounting.

Comparisons in this exercise, where the applicant (Total’s regular South African and Namibian partner Impact) acknowledged likely deposits of a billion barrels, are appropriate if we take the billion barrel numeraire, so that if there is \$32.7 billion in gross income and the Social Cost of Carbon associated with that extraction is \$780 billion, then the damage being done for every barrel equivalent extracted, is 23 times the net income.

Further calculations not yet undertaken in Total’s exploratory proposal

In addition to a missing Social Cost of Carbon estimate, other shortcomings are obvious. Natural capital accounting and the National Environmental Management Act’s commitment to the

⁵ Kikstra, J., P. Waidelich, J. Rising, D. Yumashev, C. Hope and C. Brierley 2021. The social cost of carbon dioxide under climate-economy feedbacks and temperature variability, *Environmental Research Letters*, Volume 16, Number 9. 6 September, <https://iopscience.iop.org/article/10.1088/1748-9326/ac1d0b>

polluter pays principle are not taken seriously. It is imperative for the WSP/Total exploration assessment to undertake full cost accounting on even the roughly-estimated CO₂-equivalent emissions that are implied by any oil and gas exploration, extraction, processing, transport, combustion and waste disposal. No such estimates are attempted.

Ironically, WSP/Total makes a claim about what its ESIA intends to accomplish:

During this phase, a detailed assessment of the potential impacts will be undertaken. The assessed impacts will cover the effects of the proposed development on numerous capitals, such as natural capital, human capital, financial capital, and institutional and political capital. All economic impacts identified will be assessed and categorised in line with the rating provided by the environmental specialist.

But there is no attempt to address these various ‘capitals’ much less contend with the adverse impacts. To illustrate the danger of omitting natural capital, the Gaborone Declaration – signed in May 2012 by South African Environment Minister Edna Molewa – recognised “the limitations that GDP has as a measure of well-being and sustainable growth.” The signatories committed to “integrating the value of natural capital into national accounting and corporate planning.”⁶ For the sake of planning oil and gas extraction, WSP/Total must take the Gaborone Declaration’s mandate seriously, *not ignore it*.

There are additional costs that WSP/Total should be considering, including the associated infrastructure to process, transport and combust natural gas for South Africa’s grid (since the Total application rests upon LNG’s potential use as a “transitional” fuel to be deployed by Eskom or private suppliers such as Karpowerships. But a recent estimate by the International Institute for Sustainable Development of infrastructural costs associated with the most basic attempts to provide methane gas infrastructure – including gas plants, floating storage and regasification units, LNG terminals and pipelines – is in the \$13-17 billion range.⁷ Were such infrastructure built (without cost and time overruns, corruption and other economic, social and environmental drawbacks that bedevil South Africa the mega-projects), it would quickly assume the status of a “stranded asset,” insofar as the broader costs of such investments to the rest of the economy – especially exporters – would soon become obvious.

The claim that gas is a “transition” or “bridge” fuel was debunked yet again by a *Bloomberg* reporter in a February 2022 article entitled, “The case against methane emissions keeps getting stronger,” warning of the dangers of CH₄ emissions, which in the critical next 20 years are measured as at least 80 times more potent a greenhouse gas than CO₂.⁸ The urgent need to

⁶ Gaborone Declaration. Gaborone Declaration for Sustainability in Africa. Gaborone, Botswana 12 May (2012), <http://www.gaboronedeclaration.com/>

⁷ Richard Halsey, Richard Bridle and Anna Geddes, “Gas Pressure: Exploring the case for gas-fired power in South Africa,” London, March (2022), <https://www.iisd.org/system/files/2022-03/south-africa-no-need-for-gas.pdf>

⁸ Akshat Rashi, “The Case Against Methane Emissions Keeps Getting Stronger,” *Bloomberg*, 15 February (2022), <https://www.bloomberg.com/news/articles/2022-02-15/the-case-against-methane-emissions-keeps-getting-stronger>

reduce methane emissions by at least 45 percent during the 2020s so as to prevent global warming in excess of 2 degrees is not in question, for example at the United Nations Environment Programme, which records important public health co-benefits: “switching away from gas would reduce carbon dioxide and volatile organic compound emissions” that are causes of additional threats to public health.⁹

One argument on behalf of gas rests upon the back-up role played in the event of cloudy or windless days, and at night. For this purpose, however, already 2724 MW are available to Eskom in the form of pumped storage capacity in which water is lifted uphill by energy during the day, allowing for hydropower to generate electricity on its way down. (For context, demand on a typical winter day is rarely above 30 000 MW, hence at full capacity, pumped storage can provide 9 percent of the grid’s power already).¹⁰ In addition, the mining and smelting firm that has been Eskom’s largest consumer, Anglo American (with current iron ore, platinum and diamond mining), has committed to using 100 percent renewable energy by 2030.¹¹ Anglo’s deal with Electricité de France Renewables calls for 3 to 5 GW of solar, wind and storage.¹² And the single largest Eskom customer, BHP Billiton’s South32 subsidiary – for its Hillside smelter (aluminium) at Richards Bay – is seeking zero-carbon alternatives including energy storage.¹³

The climate-sanctions implications of ignoring full cost accounting

One simple reason to carry out such accounting is the point made by President Cyril Ramaphosa on October 11, 2021, explaining the danger to the economy of further fossil fuel development. Ramaphosa referenced the “Carbon Border Adjustment Mechanism” (CBAM) that will be imposed by Western importers of South African goods, in his Presidential letter advocating a low-carbon economy and Just Transition for affected workers and communities:

⁹ United Nations Environment Programme and Climate and Clean Air Coalition, “Global Methane Assessment: Benefits and Costs of Mitigating Methane Emissions,” Nairobi (2021), <https://www.unep.org/resources/report/global-methane-assessment-benefits-and-costs-mitigating-methane-emissions>

¹⁰ Pumped storage is defined by Eskom, as “A lower and an upper reservoir with a power station/pumping plant between the two. During off-peak periods the reversible pumps/turbines use electricity to pump water from the lower to the upper reservoir. During periods of peak demand, water runs back into the lower reservoir through the turbines, generating electricity.” The 2724 MW already available in three pumped storage schemes – Ingula, Drakensburg and Palmiet – does not include Cape Town’s 180 MW Steenbras municipal pumped storage capacity. <https://www.eskom.co.za/wp-content/uploads/2021/08/2021IntegratedReport.pdf>

¹¹ Karl Gernetzky, “Anglo American inks agreement as it eyes 100% renewable power in SA,” Business Day, 18 March (2022). <https://www.businesslive.co.za/bd/companies/mining/2022-03-18-anglo-american-inks-agreement-as-it-eyes-100-renewable-power-in-sa/>

¹² Dieketseng Maleke, “Mining company Anglo American signs contract with French renewable energy specialist EDF,” Business Report, 22 March (2022), <https://www.iol.co.za/business-report/companies/mining-company-anglo-american-signs-contract-with-french-renewable-energy-specialist-edf-22f14bce-d0ca-4a4c-a518-06977be96e72>

¹³ Charlotte Matthews, “South32 plans to end Eskom dependence as energy deregulation gathers pace,” MiningMX, 19 August (2021), <https://www.miningmx.com/news/energy/47231-south32-working-on-plans-to-end-eskom-dependence-as-energy-deregulation-gathers-pace/>

“As our trading partners pursue the goal of net-zero carbon emissions, they are likely to increase restrictions on the import of goods produced using carbon-intensive energy. Because so much of our industry depends on coal-generated electricity, we are likely to find that the products we export to various countries face trade barriers and, in addition, consumers in those countries may be less willing to buy our products.”¹⁴

Others in the private sector have similar worries. Isaah Mhlanga, chief economist at AlexanderForbes, wrote in May 2022 that

“SA must cut carbon emissions quickly – to protect its own economy: Carbon taxes will be applied and markets will be closed to those goods that have a high carbon content... SA will need to decarbonise faster to protect its exports, and thus economic growth. This is necessary because it’s a matter of time before carbon taxes are levied on all sorts of goods, and markets will be closed to those goods that have a high carbon content. Even though SA has not contributed the largest share of carbon emissions by global standards, it must adjust at the fastest rate possible, not necessarily to be a leader in efforts to move to net zero, but to protect its economic interests.”¹⁵

The largest corporate consumers of Eskom understand this threat, as well. Climate-related trade disincentives will, according to even a South African Treasury report in August 2021, soon create major vulnerabilities for exporters of iron and steel, cement, fertilizers, aluminium and automobiles.¹⁶ This problem will be amplified if a coal-to-methane gas transition occurs, not only because methane is a far more destructive greenhouse gas than CO₂. Pro-methane advocates point out that European (especially French) elites claim that “natural gas” and nuclear energy should both be considered “green” (in the official EU taxonomy), a July 2022 decision that revealed the many dangers of dependency on Russian gas imports and need to replace these instead of moving earlier to full-fledged renewable energy. Nevertheless, the likelihood of CBAM climate sanctions strengthening against both methane gas and indirect “embedded” emissions (i.e. the use of Eskom’s high-fossil energy generation in production), is inevitable, and will affect *all* future South African exports.

Thus BHP Billiton’s potential “wheeling” of electricity to its smelter originating in pumped storage at the proposed Tubatse scheme arises as a result of the threat of climate trade sanctions, according to *Mining Weekly*.¹⁷ As the leading mining magazine reported in early 2022, “the emergence of carbon border tariffs and end-user demand for green aluminium... could send the price of unabated aluminium sky-high owing to the large quantity of electricity

¹⁴ Cyril Ramaphosa, “From the desk of the president,” Pretoria, 11 October (2021), <http://www.thepresidency.gov.za/from-the-desk-of-the-president/desk-president%2Cmonday%2C11-october-2021>

¹⁵ Isaah Mhlanga, “SA must cut carbon emissions quickly — to protect its own economy,” *Business Day*, 1 May (2022), <https://www.businesslive.co.za/bt/opinion/2022-05-01-isaah-mhlanga-sa-must-cut-carbon-emissions-quickly-to-protect-its-own-economy/>

¹⁶ Treasury, “Tax Policy Discussion Document for Comment,” Pretoria, 15 December (2021), http://www.treasury.gov.za/comm_media/press/2021/TaxPolicyDiscussion/Default.aspx

¹⁷ Martin Creamer, “Pumped storage has potential to throw Hillside Aluminium green lifeline,” *Creamer’s Mining Weekly*, 10 January (2022), <https://www.miningweekly.com/article/pumped-storage-has-potential-to-throw-hillside-aluminium-green-lifeline-2022-01-10>

that is required for aluminium to be produced.”¹⁸ There is, of course, a more general case for rationing electricity and therefore disconnecting the South32 aluminium smelter and other guzzlers, contemplated even in the business media, given the irrationalities of the *status quo*.¹⁹

In each case, South African economic development requires full cost accounting to assess whether, at a time coal-fired power plants are going to be retired early, their replacement by methane gas in Karpowerships may exacerbate South Africa’s vulnerabilities. Bearing in mind the likelihood of climate sanctions if our economy remains reliant upon fossil fuels, the Social Cost of Carbon is the most appropriate polluter-pays metric to judge the full costs of the proposed exploration to be followed by exploitation and combustion.

Total as not “fit and proper” to carry out further fossil fuel extraction

Finally, there is a terribly important question to pose, as South Africa’s finally grapples with private-sector corruption of its state apparatus, a problem that in February 2023 is seen as acute given investigations of President Ramaphosa for his Phala Phala financial controversy, and an outstanding Zondo Commission on State Capture recommendation that Minister of Mineral Resources and Energy, Gwede Mantashe be investigated and potentially prosecuted for his own alleged corruption by the firm Bosasa during the 2010s when he was ANC Secretary General.²⁰ As a result of the penetration of such elements deep into the South African state and corporate sector, it is vital to enquire whether Total is a fit and proper company to be given responsibility for such extremely dangerous offshore gas and oil exploration, drilling, processing, transport and potential combustion. This is especially true, given WSP/Total’s failure to engage in rudimentary analysis about the implications, in relation to humanity’s greatest crisis.

When it comes to the Paris firm’s integrity in relation to climate change, historians Christophe Bonneuil, Pierre-Louis Choquet and Benjamin Franta note that beginning in 1971, Total’s (and its predecessors’) scientists issued initial internal warnings of rising sea levels due to CO₂ concentrations, and these were systematically ignored, followed by “overt denial of climate science... from at least 1989 to 1994.” This was followed by “multiple and subtler forms of agnogenesis, such as willful ignorance, responsibility-shifting, strategic philanthropy, promotion of peripheral solutions, and corporate controversy management... [with] a flow of complex, technical information that is difficult to interpret or challenge, helping Total to put the burden

¹⁸ Martin Creamer, “Working on options to secure green energy for Hillside Aluminium – South32,” Mining Weekly, 7 January (2022), <https://www.miningweekly.com/article/working-on-options-to-secure-green-energy-for-hillside-aluminium-south32-2022-01-07>

¹⁹ Michael Avery, “Here’s an idea: mothball electricity-guzzling smelters,” Business Day, 3 July (2022), <https://www.businesslive.co.za/bd/opinion/columnists/2022-07-03-michael-avery-heres-an-idea-mothball-electricity-guzzling-smelters/>

²⁰ Setumo Stone, “Zondo recommends Mantashe be probed for corruption,” CityPress, 2 March (2022), <https://www.news24.com/citypress/politics/zondo-recommends-mantashe-be-probed-for-corruption-20220302>

of proof on its critics and keep the upper hand in climate controversies.”²¹ Only in the mid-2000s, did the firm endorse the UN’s Intergovernmental Panel on Climate Change.

To illustrate, just before the 2015 COP21 summit in Paris, the company promoted global carbon pricing, to be administered by the United Nations (although as was accidentally revealed later by an ExxonMobil lobbyist, this was a strategic distraction – not a serious proposal – since it was extremely unlikely to be adopted).²² But the flows of money within Total are revealing, for although in early 2016, Pouyanné announced “One Total 2035” allegedly consistent with the Paris Climate Agreement’s ambition to keep warming to below 1.5 degrees in the 21st century, Total was meanwhile investing in many other reserves. For Choquet, this is because the “persistence of short-termed compensation schemes in the higher corporate hierarchy impedes the elaboration and implementation of deep decarbonisation strategies at the firm level.”²³

Hence from 2015-19, Total invested \$77 billion in oil and gas capital infrastructure, compared to \$5 billion in non-fossil fuel energy sources. According to the Reclaim Finance project of *Les Amis de la Terre France*, this trajectory – which Total admits includes its rising fossil portfolio up to a 2024 peak – would mean the company overshoots by 32 percent the level of greenhouse gas emissions in 2050 consistent with a 1.5°C degree rise. As a result, Greenpeace France, Notre Affaire à Tous, *Les Amis de la Terre* and ClientEarth sued Total in March 2022 for deceptive marketing, arguing that Pouyanné’s publicity campaign “violates European consumer law by falsely portraying the company as being on track to achieve net zero emissions.”²⁴

To be sure, in mid-2020, Pouyanné’s write-off of \$7 billion worth of Canadian oil sands project reserves raised expectations, because as industry analyst Gerard Kreeft remarked, “with one swoop of a pen, Total cast aside the petroleum classification system, which was the gold standard for measuring oil company reserves. The company simply decided that these reserves could never be produced at a profit.”²⁵ The tar sands were among the world’s most expensive petroleum sources. But so too were Russian assets, including \$4.1 billion in a Siberian gas project that Pouyanné belatedly and grudgingly wrote down in April 2022 following Western sanctions against Moscow caused by the invasion of Ukraine (during a three-month period

²¹ Christophe Bonneuil, Pierre-Louis Choquet and Benjamin Franta, “Early warnings and emerging accountability: Total’s responses to global warming, 1971–2021,” *Global Environmental Change*, 71 (2021), <https://www.sciencedirect.com/science/article/pii/S0959378021001655>

²² Chris McGreal, “ExxonMobil lobbyists filmed saying oil giant’s support for carbon tax a PR ploy,” *The Guardian*, 30 June (2021), <https://www.theguardian.com/us-news/2021/jun/30/exxonmobil-lobbyists-oil-giant-carbon-tax-pr-ploy>

²³ Pierre-Louis Choquet, “Piercing the corporate veil: Towards a better assessment of the position of transnational oil and gas companies in the global carbon budget,” *The Anthropocene Review*, 6, 3, 243-262 (2019), <https://journals.sagepub.com/doi/10.1177/2053019619865925>

²⁴ Business and Human Rights Resource Centre, “NGOs sue Total for allegedly misleading the public over Net Zero marketing claims, accusing it of greenwashing,” London, 3 March (2022), <https://www.business-humanrights.org/en/latest-news/france-ngos-sue-total-for-allegedly-misleading-the-public-over-net-zero-marketing-claims-accusing-it-of-greenwashing/>

²⁵ Gerard Kreeft, “The day after the night before,” *Africa Oil&Gas*, May (2022), <https://africaoilgasreport.com/2022/05/energy-transition/Total-the-day-after-the-night-before/>

when thanks to skyrocketing oil prices Total recorded profits of \$9 billion).²⁶

Also expensive, especially for the environment, society and political rule, were Total's Southern and Central African fossil investments dating back seven decades in Portuguese-ruled Angola. Today, Total is suffering losses at various sites in the region, due to a military conflagration in Mozambique and a sharp rise in environmental and social opposition to its exploration and extraction in South Africa. In Angola, Total has operated since 1953 and has 1600 employees, producing 45 percent of the country's oil output.²⁷ In Angola as well as Nigeria, Gabon, Congo-Brazzaville and Cameroon, oil-related corruption was prolific. One of Total's former (pre-merger) subsidiary firms – French state-owned Elf Aquitaine – robbed the peoples and environments with exceptional irresponsibility.²⁸

One scandal, entailing at least 305 million euro in misappropriation of assets (considered France's worst corporate behavior on record), occurred during President François Mitterrand's 1981-1995 term. It implicated his ally Loïk Le Floch-Prigent (Elf's leader from 1989-93) and 29 other executives including Alfred Sirven, Alain Gillon and André Tarallo (whose nickname was "Mr. Africa" because of personal connections to the continent's tyrannical rulers). In 2003, they received multiple-year jail sentences and paid tens of millions of euros in personal fines.²⁹

While the Luanda government was at war with a rightwing guerrilla army – the National Union for the Total Independence of Angola (UNITA) – originally promoted by South Africa's apartheid regime and the U.S. Central Intelligence Agency, Total gave UNITA founder Jonas Savimbi generous funding prior to his death in 2002.³⁰ As Global Witness reported, Total's leadership "bribed politicians, interfered in elections and lured governments into ruinous oil-backed loans in an attempt to protect the company's market share. By funding both sides in Angola's civil war, Elf helped to prolong a conflict that cost an estimated 1.5 million lives and displaced millions of people."³¹

In this context, Total's current leader Pouyanné began his career as Elf's Angola manager in 1997 at the age of 34, during one of the worst epochs of corrupt neo-colonial extraction. The country's president, José Eduardo dos Santos, was already in power 18 years and due to stay

²⁶ Le Monde, "Total announces start of withdrawal from gas megaproject in Russia," Paris, 28 April (2022), https://www.lemonde.fr/en/economy/article/2022/04/28/Total-announces-the-beginning-of-a-withdrawal-from-its-gas-megaproject-in-russia_5981883_19.html

²⁷ Total, "Angola: Total sells its non-operated interest in block 14," Paris, 17 January (2022), <https://Total.com/media/news/press-releases/angola-Total-sells-its-non-operated-interest-block-14>

²⁸ Total was also prosecuted successfully in both France and the United States for bribing Iranian officials, with further allegations outstanding in Myanmar and Yemen. BBC News, "Shell admits fuelling corruption," London, 11 June (2004), <http://news.bbc.co.uk/2/hi/business/3796375.stm>

²⁹ Jon Henley, "Gigantic sleaze scandal winds up as former Elf oil chiefs are jailed," The Guardian, 13 November (2003), <https://www.theguardian.com/business/2003/nov/13/france.oilandpetrol>

³⁰ Radio France International, "Decryption of Elf's African strategy: the African States concerned," Paris, 29 January (2003), http://www1.rfi.fr/actufr/articles/037/article_20564.asp

³¹ Global Witness, "Elf verdict jails the guilty, but their bitter legacy remains," London 22 May (2011), <https://www.globalwitness.org/en/press-releases/elf-verdict-jails-guilty-their-bitter-legacy-remains/>

another two decades, until 2017. During the two years Pouyanné served in Angola, the Luanda regime was already being accused of massive oil-related corruption, for as Human Rights Watch (HRW) reported, “More than \$4-billion in state oil revenue disappeared from Angolan government coffers from 1997 to 2002, roughly equal to the entire sum the government spent on all social programmes in the same period.”³² In 2003, Angola was ranked by Transparency International as among the world’s ten most corrupt states.

Matters did not improve even after peace was achieved in 2002, for the International Monetary Fund discovered unaccounted spending (mostly in the petroleum sector) of \$32 billion from 2007-10, leading HRW to criticise “corruption and mismanagement, including in connection with the state oil company, Sonangol.”³³ By 2013, Dos Santos’ eldest daughter Isabel – “Africa’s richest woman” – was exposed for her dubious acquisition of \$3.5 billion in wealth by *Forbes*, through family-state enterises.³⁴

Isabel’s father nevertheless appointed her to run Sonangol in mid-2016, and when meeting Pouyanné later that year, as she put it, “we spoke for several hours, and from there was born an intense working relationship and mutual support.”³⁵ In October 2017, as Pouyanné tweeted, they met again to “decide Total’s future projects in Angola,” at a time the French firm was responsible 40 percent of the country’s oil production.³⁶ But a month later Isabel was fired by Dos Santos’ successor João Lourenço, during an anti-corruption crackdown. She was further exposed in the “Luanda Leaks” along with her pliable accountants



³² Human Rights Watch, “Angola: Account for Missing Oil Revenues,” New York, 11 January (2004), <https://www.hrw.org/news/2004/01/11/angola-account-missing-oil-revenues>

³³ Human Rights Watch, “IMF: Withhold funds to Angola,” New York, 27 March (2012), <https://www.hrw.org/news/2012/03/27/imf-withhold-funds-angola>

³⁴ Kerry Dolan, “Daddy’s Girl: How An African ‘Princess’ Banked \$3 Billion In A Country Living On \$2 A Day,” *Forbes*, 14 August (2013), <https://www.forbes.com/sites/kerryadolan/2013/08/14/how-isabel-dos-santos-took-the-short-route-to-become-africas-richest-woman/?sh=73fdb3c45f50>

³⁵ Isabel dos Santos, Instagram, archived at https://web.archive.org/web/*/https://www.instagram.com/p/BbI9FdqIMhy/

³⁶ Patrick Pouyanné, “Avec Isabel Dos Santos, la CEO de Sonangol, pour décider des futurs projets de Total en Angola,” Twitter, 18 October (2017), <https://twitter.com/ppouyanne/status/920737701753696257>

PwC, Boston Consulting Group and McKinsey,³⁷ and by 2019 became the target of anti-corruption proceedings in Luanda as well as in Lisbon and Paris, resulting in a freeze of all her known assets.³⁸ In November 2022, Interpol issued a “red notice” for her arrest on grounds of embezzlement, fraud, influence peddling and money laundering.³⁹

Meanwhile, the country’s oil reserve in the offshore Cabinda fields was steadily depleting. With Sonangol nearing bankruptcy in late 2016 in part due to the state’s Chinese borrowing (backed by oil as collateral), big oil companies complained of non-payment, and the number of offshore rigs fell from 18 to 2 from 2014-17.⁴⁰ As one Reuters specialist put it, “The search for the ‘Angolan pre-salt’ resulted in some of the most expensive dry wells ever drilled and sapped exploration appetite. Critics say the situation was exacerbated by Isabel dos Santos.”⁴¹ Total’s joint ventures with Sonangol, Equinor (Norway), ExxonMobil and BP in older oil fields continued, and a national oil agency optimistically predicted that 2022-27 would see \$66 billion in new investments in the sector, up 40 percent on the prior five years.⁴² Yet in late 2021, Pouyanné’s attempt to revitalise Total’s stake in deeper waters failed, when offshore drilling at an unprecedented depth – 4.6 km below the sea – failed to pay off.⁴³

Moving to Mozambique, Total has been the main force not only in relation to gas extraction but also the construction and security arrangements in Cabo Delgado, specifically the Afungi Peninsula and nearby Palma, where terrible battles have raged since 2017 as a result of community and Islamic insurgencies. In March 2021, when social conflict became severe, as veteran journalist Alex Perry recounted, the Paris firm put its narrow self-interest above that of nearby villagers and its own contractors. By that point,

Total knew to expect an attack in Mozambique. It knew that from its long experience with oil and gas as a flash point for conflict, especially in Africa, and in particular when a company employed the incendiary approach it adopted in Mozambique: cut a deal with a

³⁷ Sydney P. Freedberg, Scilla Alecci, Will Fitzgibbon, Douglas Dalby and Delphine Reuter, “How Africa’s richest woman exploited family ties, shell companies and inside deals to build an empire,” Washington, DC, International Consortium of Investigative Journalists, 19 January (2020), <https://www.icij.org/investigations/luanda-leaks/how-africas-richest-woman-exploited-family-ties-shell-companies-and-inside-deals-to-build-an-empire/>

³⁸ Kerry Dolan, “How Isabel Dos Santos, Once Africa’s Richest Woman, Went Broke,” Forbes, 22 January (2022), <https://www.forbes.com/sites/kerryadolan/2021/01/22/the-unmaking-of-a-billionaire-how-africas-richest-woman-went-broke/?sh=6e31c8026240>

³⁹ Al Jazeera, “Interpol seeks arrest of Angolan tycoon Isabel dos Santos.” 1 December, <https://www.aljazeera.com/news/2022/12/1/interpol-seeks-arrest-of-angolan-tycoon-isabel-dos-santos>

⁴⁰ Libby George, “Sonangol delays payments as it battles to reform,” Reuters, 23 November (2016), <https://www.reuters.com/article/us-angola-oil-exclusive-idUSKBN1311EP>

⁴¹ Stephen Eisenhammer, “Angola battles to revive oil exploration as output declines,” Reuters, 15 November (2018), <https://www.reuters.com/article/us-angola-oil-exploration-idUSKCN1NK0KQ>

⁴² Graciosa Silva, “ANPG predicts investments of 66 billion dollars in the oil sector over the next five years,” Ver Angola, 8 June (2022), <https://www.verangola.net/va/en/062022/Energy/31236/ANPG-predicts-investments-of-66-billion-dollars-in-the-oil-sector-over-the-next-five-years.htm>

⁴³ Africa Intelligence, “Total fails ultra deepwater offshore attempt on Block 48,” London, 20 December (2021), https://www.africaintelligence.com/oil--gas_exploration-production/2021/12/20/Total-fails-ultra-deepwater-offshore-attempt-on-block-48,109712127-art

government known for corruption, keep the profits, and share as little as possible with the population... Perhaps most damning, Total knew an attack was likely coming, and that any bloodshed would affect all of Palma, because three months before it happened, the company's own advisers warned that it could.⁴⁴

In January 2021, Pouyanné signed a deal with the government of President Filipe Nyusi – which was then ranked by Transparency International within the top 20 percent of the world's most corrupt regimes⁴⁵ – for military protection. Total managers rapidly made space in the Afungi Peninsula compound to house 700 soldiers and 12 Ukrainian mercenaries with helicopters. The soldiers patrolled, but as one contractor complained to Perry, “We’d come across them midweek on the road. AK in one hand, bottle of beer in the other, motherless drunk.” By March 24 that year, “Total passed word that its staff would resume operations at Afungi” after many had been evacuated three months earlier due to insurgent attacks near the complex.⁴⁶ Also by then, the Mozambican government also recognised its own military's incapacities, having first hired Moscow mercenaries (the Wagner Group) who suffered high casualty levels – a dozen Russian deaths and two dozen injuries – in late 2019 and soon left.⁴⁷ They were soon followed by the South African firm Dyck Advisory Group, which complained that its attempt (in late March 2021) to rescue Total subcontractors under attack by Al-Shabaab were foiled by Total, whose “refusal to give fuel to rescuers trying to save civilians was stunning, and crippling.” Indeed several thousand local residents went to the Afungi fortress but were turned away by guards. As Perry concluded,

What Total also did, in employing drunk soldiers and security advisers who failed to sound a timely alarm, closing its gates to fleeing civilians, and locating its worker camps outside Afungi while its principal contractor relocated inside, was to show that, as long as it was protected, it didn't feel responsible for anyone else. Total employed the very people it would later exclude to build the very structures that would later exclude them... Total announced no compensation and sent no public message of condolence. By its own count, it helped evacuate just 2,100 people, a mere 4 percent of those who had fled Palma.⁴⁸

Total's *force majeure* in late April 2021 meant the firm could reject its contractual obligations and avoid liabilities, causing chaos and anger in Cabo Delgado and ridicule elsewhere.⁴⁹ But

⁴⁴ Alex Perry, “I’m Still Alive but Sh*t Is Getting Wild’: Inside the Siege of the Amarula,” *Outside*, 1 June (2022), <https://www.outsideonline.com/outdoor-adventure/exploration-survival/attack-amarula-hotel-palma-mozambique-africa/>

⁴⁵ Transparency International, “Mozambique,” Berlin (2021), <https://www.transparency.org/en/cpi/2021/index/moz>

⁴⁶ Perry, op cit.

⁴⁷ Peter Fabricius, “Wagner private military force licks wounds in northern Mozambique,” *Daily Maverick*, 29 November (2019), <https://www.dailymaverick.co.za/article/2019-11-29-wagner-private-military-force-licks-wounds-in-northern-mozambique/>

⁴⁸ Perry, op cit.

⁴⁹ Total, “Total declares Force Majeure on Mozambique LNG project,” 26 April (2021), <https://Total.com/media/news/press-releases/total-declares-force-majeure-mozambique-lng->

Perry's critique – from the standpoints of local community residents and international contractors abused by Total – reflected only one side of the story. Other critics demanded a different approach to the offshore methane gas: leaving it be. For example, Maputo-based political economist Tomas Selemene offered an essential rationale for a Just Transition instead of Total's resource curse: "There is no military solution to the conflict which has exploded in the gas-rich northern province of Mozambique since 2017. It will end only by addressing its root causes, among them, extreme poverty, unemployment, lack of health and education services, and lack of water supply."⁵⁰

While Southern African and Rwandan troops were deployed at Emmanuel Macron's request in mid-2021, they have not quelled the violence. In mid-2022, the insurgency revived just south of the Afungi Peninsula. Over the course of two weeks, a dozen attacks left 16 people dead and caused 11,000 to flee. Two Australian graphite mines closed down temporarily. The more aggressive Rwandan troops displaced the fighting from the coastal zone of Cabo Delgado to areas slightly to the west, as the guerrillas moved easily into forested terrain. But in May 2022, sporadic Al-Shabaab attacks continued, including a food raid on the town of Olumbe, just 20 kilometers from Afungi.⁵¹ The influential Eurasia Group consultancy concluded, "The potential for Islamic State to provide funding and resources to the insurgents and the possible arrival of reinforcements from Tanzania will likely strengthen the insurgency, making the resumption of the liquefied natural gas exploration project in the next 12 years unlikely."⁵²

Total may continue to partner with the South African/U.S.-firm Sasol in extracting and processing Mozambican gas. The two-decade long gas extraction from Sasol's Pande offshore field in the centre of Mozambique was beginning to wane as depletion rates rose. The main consumer of that gas is Sasol's facility in Secunda, which remains the single largest point source of CO₂ emissions in the world and also an extreme local pollution hotspot (especially SO₂ and NO), in part because of inefficient operations whose roots are illustrative of South Africa's "minerals energy complex."⁵³ Sasol had grown most rapidly during the 1970s, given the state's need to avert United Nations-mandated anti-apartheid oil sanctions. The firm used a technology Nazi Germany had devised to squeeze oil from coal.

At the end of the existing pipeline running from Mozambique to South Africa – through the central and southern part of the country – is a massive petrochemical complex at Sasolberg, including the Natref refinery which is mainly owned by Sasol but 36 percent by Total. However,

project#:~:text=Paris%2C%2026%20April%202021%20–
%20Considering,project%2C%20to%20declare%20force%20majeure

⁵⁰ Thomas Selemene, "From promised land to hell," *The Church in Southern Africa - Open to the World*, 5:32, Aug-Sept (2021), Pretoria.

⁵¹ Luis Nhachote, "Faltering insurgency in Mozambique still threatens lives – and gas projects," *The Continent*, 30 May (2022), <https://mg.co.za/africa/2022-05-30-faltering-insurgency-in-mozambique-still-threatens-lives-and-gas-projects/>

⁵² Agência Lusa, "Reorganização dos terroristas torna improvável regresso das petrolíferas até 2023 em Moçambique," *Observador*, 23 May (2022), <https://observador.pt/2022/05/23/reorganizacao-dos-terroristas-torna-improvavel-regresso-das-petroliferas-ate-2023-em-mocambique/>

⁵³ Ben Fine and Zav Rustomjee, *The Political Economy of South Africa*. London: Hurst (1996).

the South African refining industry suddenly went into decline in the 2020s, given new petrol and air quality standards and the inability of the old refineries to justify crude imports, given that refined imports were cheaper from the world's mega-refineries. As a result, even the two operations in Africa's largest refining complex, South Durban – one jointly owned by BP and Shell and the other by Malaysia-based Petronas with Nhleko as partner – shut down in April 2022 and December 2020, respectively. Natref's fate depended in part upon whether a massive pipeline from Durban to Johannesburg could be retooled in a manner that justified further refinery contraction on sound economic grounds.⁵⁴

Moreover, the other element working against Total's operations at Natref was growing anti-pollution sentiments from local residents of Sasolburg and their national NGO and legal allies.⁵⁵ In mid-2022, a shortage of crude petroleum available in Transnet pipelines from Durban meant the 108,000-barrel-a-day Natref refinery shut down temporarily. Break-ins and tampering with pipelines are so common that in 2019-20, Transnet acknowledged 8.5 million liters were stolen by fuel syndicates.⁵⁶

But it was on South Africa's Atlantic coastline that Total generated most eco-social resistance in early 2022, when its plans for seismic blasting became clear. Working in conjunction with Impact Africa and a tiny company, Sezigyn (run by three men whose other online presence was in providing funeral services in rural villages in the country's far north), Total chose a 3-dimensional exploration area (i.e. using much more intense, targeted blasting of the ocean floor). The leading public-interest lawyer in the movement, Wilmien Wicomb from the Legal Resources Centre in Cape Town, clarified how a judgement made against Shell two weeks earlier "confirmed the right of interested and affected communities to be consulted meaningfully, which includes the opportunity to voice their concerns about the proposed project and to have those concerns adequately addressed." Total's local partners (especially Impact Africa and Sezigyn in the 3-D zone but all the other clients of Seismic Searcher) had simply ignored their obligations, especially in relation to Wicomb's subsistence-fisherfolk clients.

In the same week, a "Scientific Advisory Group on Emergencies" within the Academy of Science of South Africa firmly weighed in against seismic blasting on marine-conservation grounds, detailing why "There is a reasonable apprehension of real harm to marine life." Their case was based on the "lack of sufficient, detailed scientific information on South Africa's offshore marine resources (both biotic and abiotic), and a flawed legal distinction between substance-

⁵⁴ Paul Burkhardt, "SA petroleum imports expected to triple next year as domestic refineries close," Bloomberg, 6 May (2022), <https://www.news24.com/fin24/economy/sa-petroleum-imports-expected-to-triple-next-year-as-domestic-refineries-close-20220506>

⁵⁵ Centre for Environmental Rights, "groundWork goes to court to defeat Minister's plan to weaken air pollution standards," Cape Town, 6 May (2019), <https://cer.org.za/news/groundwork-goes-to-court-to-defeat-ministers-plan-to-weaken-air-pollution-standards>

⁵⁶ Tabela Timse, "How armed gangs steal millions worth of fuel from buried Transnet pipelines," News24, 18 March (2022). <https://www.news24.com/fin24/companies/amabhungane-how-armed-gangs-steal-millions-worth-of-fuel-from-buried-transnet-pipelines-20220317>

based pollutants and energy-based pollutants, such as sound.”⁵⁷

These lines of argument proved successful in five out of six early-2022 High Court judgements – mainly injunctions against further seismic blasting – and were backed by dozens of protests attended by people of diverse races, classes and ages, with different agendas in attempting to halt Total, Shell and local partners. On 1 September 2022, the Makhanda High Court found in favour of Shell’s critics, on various grounds including those excerpted below in Appendix 1.

One reason for the oil companies’ defeat is that they were seen to have potentially negated good governance through financial contributions to the ruling party, whose chairperson since 2017 has been Mantashe. His role was seen as especially obnoxious, and as a result of his attempt to libel oil company critics, Mantashe forfeited his own right to play a regulatory role in adjudicating community and environmental complaints.

Whether or not Mantashe felt financial influences, Shell had been implicated in making a R15 million donation (via Batho Batho Trust) and as Rob Rose of *Business Day* explained Judge Gerald Bloem’s finding in January 2022, that “Mantashe had ‘nailed his colours to Shell’s mast’ when he accused those opposing Shell – including black fishing communities – of ‘apartheid and colonialism of a special kind.’ Speaking of Mantashe’s ‘emotive language’ in the judgment, Bloem said ‘it appears the minister had made up his mind’.”⁵⁸

Likewise, Total’s two main local partners – Johnny Copelyn, the chair of Impact Oil (parent of Impact Africa), and Phuthuma Nhleko of Pembani Group (the firm that bought the main Shanduka holdings from Ramaphosa in 2014-16) – both donated R2 million to the Cyril Ramaphosa African National Congress presidential campaign, thus also appearing to have gained influence through donations to the ruling party.⁵⁹

Corporate social responsibility is insufficient as a system of accountability, even including France’s 2017 Law on the Duty of Vigilance (based on the UN Guiding Principles on Business and Human Rights). The latter is described by Antoine Duval from the Asser Institute as “apologetic and acritical... [joining] a long tradition of processes aimed at limiting the actual responsibility of corporations.” Three NGOs critical of Total’s role in the East African Crude Oil Pipeline (linking Uganda and Tanzania) – *Les Amis de la Terre*, *the Ugandan National Association of Professional Environmentalists*, and *the Africa Institute for Energy Governance* – together

⁵⁷ Scientific Advisory Group on Emergencies Sub-committee on Marine Ecology and Risk Mitigation, “Advisory on the Use of Deep-Sea Seismic Surveys to Explore for Oil and Gas Deposits in South African Waters,” Johannesburg, 10 January (2022),

<https://www.assaf.org.za/files/2022/SAGE/SAGE%20Advisory%20on%20Shell%20Seismic%20Survey.pdf>

⁵⁸ Rob Rose, “ANC ‘donation’ twist to Shell fracas,” *Business Day*, 13 January (2022).

<https://www.businesslive.co.za/fm/opinion/editors-note/2022-01-13-rob-rose-anc-donation-twist-to-shell-fracas/>

⁵⁹ Rebecca Davis, “#CR17 email leaks: Separating the myths from the facts,” *Daily Maverick*, 21 August (2019), <https://www.dailymaverick.co.za/article/2019-08-21-cr17-email-leaks-separating-the-myths-from-the-facts-part-two/> and Sunday Independent, “How the CR17 campaign funds were channeled,” 18 August (2019), <https://www.pressreader.com/south-africa/the-sunday-independent/20190811/281505047850542>

filed a legal complaint against Total as a result.⁶⁰

It should be abundantly evident that a “fit and proper” corporation test is overdue for Total (and partners Impact Africa and Pembani, especially in the Brulpadda area, given their presumed influence – as major campaign donors – over President Ramaphosa). Such an examination would confront a recent past that, over the past quarter century, suggests the environmental, social, political and economic impacts of its oil and gas businesses are in severe conflict with sustainability and good governance.

Firms in the extractive industries should be considered as, in essence, outsourced service providers. After all, the state owns the minerals and fossil fuels in South Africa’s political territory (including offshore exploration sites). This perspective would allow management of natural resources in a very different manner, and would allow for the transparency that is now lacking (including in environmental impact assessments). The government should be considered the principal, with the citizenry acting as the custodians or trust beneficiaries, who in turn have the right to demand from service providers fit and proper behaviour. Given Total’s record, it is hard to imagine that if there *were* a genuine opportunity to bid for the extraction of South Africa’s natural resources, it could be considered a serious candidate.

Conclusion

This submission has focused on the climate damage implicit in an entire methane life-cycle process, but additional critiques by civil society and other researchers relating to the impact on biodiversity, marine life, local economic development in areas with highly-vulnerable eco-tourism assets (e.g. fishing), and (non) consultation, are of enormous importance. Again, to remind of the stakes associated with climate damage, Southern Africa was from 2000-19 the worst-hit region within Africa, as Mozambique was considered the world’s fourth most damaged country, especially as a result of the two cyclones in 2019.⁶¹ And the continent’s largest greenhouse gas emitter, South Africa, also suffered climate disasters during the 2010s, including sustained droughts in several parts of the country (resulting in a severe locust plague in 2021-22 once rain came), a “Day Zero” threat of completely depleted water reserves in the second city of Cape Town in 2017-18 and in several Eastern Cape cities in mid-2022, and four “Rain Bombs” of more than 100 mm/day in Durban: in 2017, 2019 and twice in 2022. The April-May storms dropped 351 mm and 267 mm, killing more than 500 people in mudslides.

WSP/Total’s failure to address aspects of the climate catastrophe and environmental economics discussed above, as well as its failure to confront the various ways Total fails a “fit and proper” partner test, together suggest willful blindness. Due to the failure of the proposal to properly consider the full cost accounting required for such a vital natural resource (one that

⁶⁰ Duval interview, 8 July 2022, and *Les Amis de la Terre France, The National Association of Professional Environmentalists and Africa Institute for Energy Governance v Total SA*, Versailles Court of Appeal, RG 20/01692, Paris, 10 December (2020).

⁶¹ David Eckstein, Vera Künzel and Laura Schäfer, “Global Climate Risk Index 2021,” Germanwatch, Bonn (2021), https://reliefweb.int/sites/reliefweb.int/files/resources/Global%20Climate%20Risk%20Index%202021_1_0.pdf

should also entail rudimentary natural capital accounting), due to the adverse impact on the rest of the economy as climate sanctions are imposed, due to the new precedents in which precisely such calculations led to cancellation of gas and oil offshore exploration in the United States and South Africa's Indian Ocean, and finally due to Total's status as unfit and improper, the WSP/Total team working on Total's exploratory blasting and drilling proposal must take responsibility for redoing the work by addressing these numerous shortcomings.

Sincerely,



Patrick Bond

APPENDIX 1

**IN THE HIGH COURT OF SOUTH AFRICA
(EASTERN CAPE DIVISION, MAKHANDA)
CASE NO: 3491/2021**



Reportable

In the matter between:

**SUSTAINING THE WILD COAST NPC
MASHONA WETU DLAMINI
DWESA-CWEBE COMMUNAL PROPERTY
ASSOCIATION**

**1st Applicant
2nd Applicant
3rd Applicant**

**NTSINDISO NONGCAVU
SAZISE MAXWELL PEKAYO
CAMERON THORPE
ALL RISE ATTORNEYS FOR CLIMATE AND
THE ENVIRONMENT NPC**

**4th Applicant
5th Applicant
6th Applicant
7th Applicant**

**NATURAL JUSTICE
GREENPEACE ENVIRONMENTAL ORGANIZATION
and**

**8th Applicant
9th Applicant**

**MINISTER OF MINERAL RESOURCES AND ENERGY
MINISTER OF ENVIRONMENT, FORESTRY AND
FISHERIES**

**1st Respondent
2nd Respondent**

**SHELL EXPLORATION AND PRODUCTION
SOUTH AFRICA B V**

3rd Respondent

**IMPACT AFRICA LIMITED
BG INTERNATIONAL LIMITED**

**4th Respondent
5th Respondent**

JUDGMENT

MBENENGE JP:

Introduction

[1] Stripped of verbiage, the principal question dealt with in these proceedings is whether the grant of an exploration right for the exploration of oil and gas, which has culminated in the need to conduct a seismic survey along the Southeast coast of South Africa, is lawful.

[120] The intervening parties' contention that the decision-maker gave no proper consideration to the climate change impacts of the decision to grant the exploration right is an important factor to be considered in the process of granting an exploration right.

[121] Reliance for this contention, by the intervening parties, is placed on expert testimony showing that most of the discovered reserves of oil and gas cannot be burnt if we are to stay on the pathway to keep global average temperature increases below 1.5 degrees Celsius. Authorising new oil and gas exploration, with its goal of finding exploitable oil and/or gas reserves and consequently leading to production, is not consistent with South Africa complying with its international climate change commitments.

[122] According to the respondents, climate change considerations and the right to access food and livelihood are irrelevant when considering an application for an exploration right; these considerations are premature because they fall to be considered at a much later stage.

[123] On the authority of *Director: Mineral Development, Gauteng Region and Another v Save the Vaal Environment and Others*⁶² the processes are discrete stages in a single process that culminates in the production and combustion of oil and gas, and the emission of greenhouse gases that will exacerbate the climate crisis and impact communities' livelihoods and access to food.

[124] The respondents' thesis does not find support from *Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others*,⁶³ either, where Murphy J said:

'The absence of express provision in the statute requiring a climate change impact assessment does not entail that there is no legal duty to consider climate change as a relevant consideration and does not answer the interpretative question of whether such a duty exists in administrative law. Allowing for the respondents' argument that no empowering vision in NEMA or the regulations explicitly prescribes a mandatory procedure or condition to conduct a formal climate change assessment, the climate change impacts are undoubtedly a relevant consideration as contemplated by section 240 of NEMA for the reasons already discussed. A formal expert report on climate change impacts will be the best evidentiary means of establishing that this relevant factor in its multifaceted dimensions was indeed considered, while the absence of one will be symptomatic of the fact that it was not.'⁶⁴

[125] It seems clear from the foregoing, even taking into account the contentions raised by the respondents, that, had the decision-maker had the benefit of considering a comprehensive assessment of the need and desirability of exploring for new oil and gas reserves for climate change and the right to food perspective, the decision-maker may very well have concluded that the proposed exploration is neither needed nor desirable.

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!

⁶² (133/98) [1999] ZASCA 9 (12 March 1999).

⁶³ (2017) JOL 37526 (GNP); [2017] ZAGPPHC (GP); [2017] 2 All SA 519 (GP).

⁶⁴ Para 88.

From: Move For What Matters <>
Sent: Friday, 03 February 2023 02:37
To: TEEPSA EIA
Subject: Objection to TotalEnergies drilling along East Coast

Good day,

I object to TotalEnergies being given the rights to prospect for and or extract oil or gas along the coastline of South Africa. I believe it to be outrageous and deviststing that it would even be considered. Please make the rights choice, not the profitable choice. Some things in this life are more valuable than money. Every action has a reaction, think of the consequences of these actions and the wildlife being affected.

Warmest Regards,
Belinda Book (Concerned Citizen)

Move For What Matters

From: Cordell Brewer <>
Sent: Friday, 03 February 2023 22:27
To: TEEPSA EIA
Subject: Interested party & Objection to offshore oil and gas exploration in garden route

To whom it may concern

I would like to register myself as an interested party and also state my objection to the planned exploration and potential oil and gas drilling near Plettenberg Bay and along the Garden Route. Our town and the greater Bitou area survives economically largely based on the tourism industry and businesses that cater to visitors from around South Africa and internationally.

The attraction of the area to tourists and visitors is due to the thriving natural ecosystem and beauty of the area. The survey recently conducted by Plett Tourism demonstrated that the Bay is a haven to many cherished sea animals large and small. Any activity which risks upsetting the balance of the ecosystem will have a lasting effect on the main asset of the area - which is the experience of rest and renewal that visitors have connecting with nature in the area. This would affect jobs and earnings at grass roots level and lead to unrest in an area that is relatively peaceful and secure.

The full effect of underwater sonar exploration is not understood well enough to mitigate all possible negative effects on the wellbeing and breeding of marine life including whales, dolphins, turtles and others. Any mistake or oil spill at any stage would be an unforgivable disaster.

This is a sensitive coastline with endangered species taking refuge to breed and survive. It also seems to be an important passageway for the movement of marine life.

To attempt to profit from oil mining here seems inappropriate for the area and unnecessarily risky given the nature of the area and the proposed project.

Thank you for your attention to this matter

Best regards
Cordell Brewer

From: Vanessa Brewer <>
Sent: Friday, 03 February 2023 22:34
To: TEEPSA EIA
Subject: Register as an Interested party and Objection

Follow Up Flag: Follow up
Flag Status: Completed

To whom it may concern

I would like to register myself as an interested party and also state my objection to the planned exploration and potential oil and gas drilling near Mossel Bay, Plettenberg Bay and along the Garden Route. Our town and the greater Bitou area survives economically largely based on the tourism industry and businesses that cater to visitors from around South Africa and internationally.

The attraction of the area to tourists and visitors is due to the thriving natural ecosystem and beauty of the area. The survey recently conducted by Plett Tourism demonstrated that the Bay is a haven to many cherished sea animals large and small. Any activity which risks upsetting the balance of the ecosystem will have a lasting effect on the main asset of the area - which is the experience of rest and renewal that visitors have connecting with nature in the area. This would affect jobs and earnings at grass roots level and lead to unrest in an area that is relatively peaceful and secure.

The full effect of underwater sonar exploration is not understood well enough to mitigate all possible negative effects on the wellbeing and breeding of marine life including whales, dolphins, turtles and others. Any mistake or oil spill at any stage would be an unforgivable disaster.

This is a sensitive coastline with endangered species taking refuge to breed and survive. It also seems to be an important passageway for the movement of marine life.

To attempt to profit from oil mining here seems inappropriate for the area and unnecessarily risky given the nature of the area and the proposed project.

Thank you for your attention to this matter
Vanessa Brewer

From: Petra Brits <>
Sent: Wednesday, 01 February 2023 09:20
To: TEEPSA EIA
Subject: Project

I object with all my heart.

Regards

Petra

From: Mohamed Bulbulia <>
Sent: Friday, 03 February 2023 14:23
To: TEEPSA EIA
Subject: Negative effects on the environment impact me.

I am an interested and affected party. I am a RSA citizen and all the negatively impacts the ocean and environment consequently also affects me.

Mohamed Enver Bulbulia
Tel

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Subject: FW: Comments from 17 January 2023 PUBLIC MEETINGS: Block 11B/12B by TotalEnergies EP South Africa B.V. Ref. No. 12/4/013
Attachments: Comment Reply Form 20-01-2023.docx

From: Ben Burke <>
Sent: 20 January 2023 17:21
To: TEEPSA EIA <teepsaEIA@wsp.com>
Subject: Comments from 17 January 2023 PUBLIC MEETINGS: Block 11B/12B by TotalEnergies EP South Africa B.V. Ref. No. 12/4/013

Good Afternoon,
(Comments from 17 January 2023 PUBLIC MEETINGS: Block 11B/12B by TotalEnergies EP South Africa B.V. Ref. No. 12/4/013
Please find attached my "Comment and Reply" form after I attended the 10:00 am meeting on the 17 Jan 2023 here in Mossel Bay!

Ben Burke
Cell

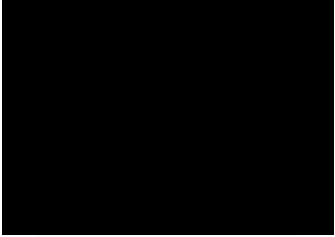
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Scoping and Environmental Impact Assessment (S&EIA) process for the proposed offshore Production Right and Environmental Authorisation Application for Block 11B/12B by TotalEnergies EP South Africa B.V.Registration, Comment and Reply Form
Draft Scoping 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	Ben	Burke	
Contact Details			
Mobile Number	Land Line Contact Number		Email / Fax Number
	N/A	Office	
	N/A	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
Please include my details on WSP's database to contact me about future projects in my area			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	23/01/2023	
	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:

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.

Comments from 17 January 2023 PUBLIC MEETINGS: Block 11B/12B by TotalEnergies EP South Africa B.V. Ref. No. 12/4/013

Firstly I would like to thank the presenters (Edwin Groenewald, Helen Crosby and Toni) for giving concise and to the point presentations about the process for the “**Proposed offshore Production Right and Environmental Authorisation Application for Block 11B/12B**” .

I fully understand this was a presentation about what TEEPSA will be responsible for ie. to supply gas and associated condensates produced by the ‘new’ subsea wells to the existing F-A platform. Thus, making PetroSA GTL refinery, TEEPSA ‘sole’ client.

PetroSA GTL refinery was commissioned in 1992 and designed for a life cycle of approximately 20 years, which bring us to 2012. Now in 2023 the development of new “Feedstock of gas and condensate”, bring concerns about the stability and viability of PetroSA infrastructure as well as the pipe line linking PetroSA to the FA platform.

A further concern is in para 6.8 pg 35, referring to the “Operational Aspects of the activity” where PetroSA will be responsible for the operation of the field once commissioned, thus the impact assessment focuses on activities required to bring the field into production whereafter ongoing reduction will take place through the existing infrastructure and staff complement at the F-A Platform. For the next 20 years!.

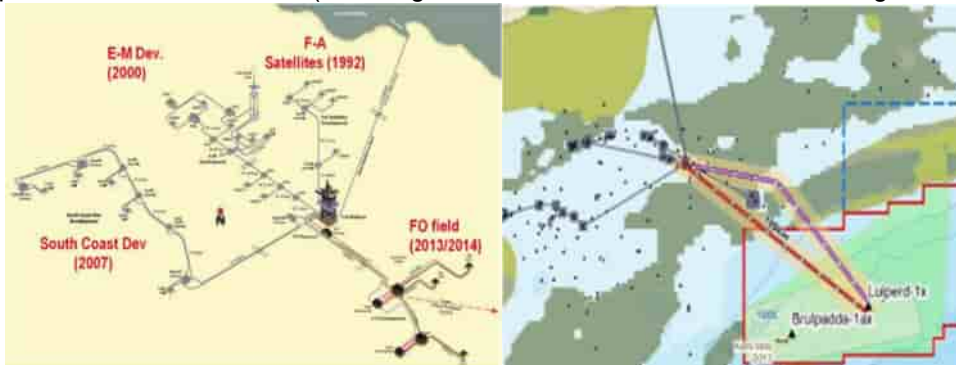
And readingArticles in the Engineering Week and News24

<https://www.engineeringnews.co.za/article/petrosa-seeks-partner-to-resume-full-production-at-mossel-bay-gtl-refinery-2023-01-18>

<https://www.news24.com/fin24/economy/wanted-partner-for-quick-restart-of-petrosa-refinery-preferably-from-an-oil-rich-nation-2023118>

Decommissioning of Existing Wells:-

In this report it is also stated that :- (ref to Figure 3-2 with 5-1 – F-A Platform existing subsea layout.)



Referring to paragraph 5.1.1 on page 16 of the report, “The proposed development assumes **no further production** from the existing PetroSA fields, enabling the Paddavissie development to **exclusively** use the Offshore installation for the treatment and export of gas and condensate.

In para 4.3 on page 14 of the report there is reference that the current gas reserve in the field is estimated to be depleted in 2029. However it is suggested, see para 5.1.1 page 16, that with this contact with TEEPSA, these existing wells will be required to be decommissions by PetroSA.

Question :- Will PertoSA 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 fund 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.

References :- (Act No. 28 of 2002) “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.

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!

Subject: FW: Objection to EIA process; Application for Block 11B/12B by Total Energies South Africa
Attachments: PT TESA Letter.Feb.2022.docx

From: Patty Butterworth <>
Sent: 02 February 2023 17:12
To: TEEPSA EIA <teepsaEIA@wsp.com>
Subject: Objection to EIA process; Application for Block 11B/12B by Total Energies South Africa

Attached please find a formal letter of objection on behalf of the Plett Tourism Association to the approval for the Scoping and Environmental Impact Assessment process for the proposed offshore Production Right and Environmental Authorisation Application for Block 11B/12B by TESA.

Please feel free to contact me should you have any questions or require additional information.

Kind regards

Patty Butterworth

Patty Butterworth | CEO | | www.pletttourism.com | T:



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-LAEmHhHzd.JzBITWfa4Hgs7pbKI



TOTAL ENERGIES SOUTH AFRICA (TESA)
DELIVERED VIA EMAIL (teepsaEIA@wsp.com)

02 February 2023

Re: Objection to the approval for the Scoping and Environmental Impact Assessment process for the proposed offshore Production Right and Environmental Authorisation Application for Block 11B/12B by Total Energies EP South Africa

I address you on behalf of the Plett Tourism Association and submit the following objection to the approval for the Scoping and Environmental Impact Assessment process for the proposed offshore Production Right and Environmental Authorisation Application for Block 11B/12B by TESA for the following reasons:

1. The lack of adequate scoping and community engagement within the Bitou area.
 - A. Firstly, Bitou has many community members who rely on fishing as their main source of income and as their main source of food. These fishermen were not previously engaged with, nor were they made aware of the meeting – this study directly affects their livelihood, and they need to be engaged with and made aware of the potential impact on their livelihood.
 - B. Secondly, the tourism industry is the main economic driver in Bitou, it fuels the building industry and it fuels the service industry. The local tourism authority was not engaged with prior to this meeting. Our branding and marketing campaign speak to sport and nature with a major focus being on our coastline and oceans and as a result the ecology of the area is uppermost in the mind of our tourists and exploration and exploitation of our natural resources such as that proposed is likely to create a negative perception in the minds of potential tourists thus adversely affecting tourism arrivals.
2. The lack of advertising within the Bitou Community about the meeting. At the meeting held in the Piesang Valley Hall on 20th of January 2023 it was stated by the Total representative that the general Bitou Public were made aware of the proposed meeting through various communication channels including:
 - Local newspapers
 - Local radio
 - Local municipality

The question was raised as to 'what channels' were used as the public were unaware of the meeting – this question asked by me. I also asked that the meeting be postponed allowing for ample representation of the community. This was seconded by another community member present. TESA representatives replied, 'We will get back to you on that'. There has been no follow-up regarding this request. Upon further investigation, the announcement of this meeting was not shared by a local newspaper (there are two, the Seaexpress and What's New Plett) and it was not shared by a local radio station (there are two, 93.4FM and Radio204).

Plett Tourism Association, Melvilles Corner, Main Street, Plettenberg Bay

PLETT TOURISM BOARD | Chairman: Bruce Richardson
Industry Representatives: Jaco Kruger, Alex Olivier, Linda Packwood, Nicole Tunmer, Victor Zingwena
Secretary & Treasurer: Liz Phillips | Bitou Municipal Representatives: Ludolph Gericke, Lesley Jacobs
Stakeholder Representative: Sally Turner (PBCPA) | Community Representative: Lulu Mzili

3. The local Bitou Municipality only informed the public with a Facebook post on 19 January 2023. Many local residents are not on Facebook, and this cannot be considered an adequate means of communication.
4. TESA has not included the need for research focused on the impact on the tourism industry along the Bitou coastline and how the proposed TESA activity may affect our tourism industry. The town of Plettenberg Bay and the area known as 'Bitou' relies on its tourism industry as the main economic contributor. Plett's most unique selling points include its beaches, rivers and lagoons which is then followed by marine life and coastal activities.
5. The bay is rich in biodiversity and ecosystems, arguably one of the most prolific in diversity for its size; and even a moderate disruption would be detrimental to such a sensitive natural environment as we have recently witnessed with changing migratory patterns of larger predators, game fish and sightings of new species frequenting our shores.
6. **Current evidence suggests potential health impacts due to exposure to oil extraction, such as cancer, liver damage, immunodeficiency, and neurological symptoms. Adverse impacts to soil, air, and water quality in oil drilling regions were also identified according to a study conducted in 2019 by the National Liberty of Medicine - also known as the NIH National Centre for Biotechnology Information.** There are no plans for short-term, mid-term, and long-term hospital and medical expense reimbursements needed for any adverse health reactions experienced by residents, visitors and/or to the migratory wildlife in Plett.
7. There appears to be no research directed at or measuring the following:
 - A. the health impact on wildlife,
 - B. the loss of tourism income and
 - C. the impact this may have on our health as a community.
 - D. There are no compensation plans in place should the town lose prospective tourism income of close to R2.1 billion due to accidents incurred or faults incurred.

This is an issue of national importance, and we believe that neither our municipality nor ourselves have the competency or adequate representation to fully comment on the process as a result of which comprehensive meetings attended by independent environmental specialists paid for by Total are required to achieve the level of comfort required by our local community is required.

We thank you in anticipation of your support and assistance herein.

Yours sincerely



Patty Butterworth
Chief Executive Officer | | |

From: Naseerah Bux <>
Sent: Friday, 03 February 2023 13:47
To: TEEPSA EIA
Subject: CONCERN OVER TOTALENERGIES

I am an interested and affected party.

I am an RSA Citizen and all that negatively impacts the ocean and environment consequently impacts me.

I did not support Shell Co and I will not support TotalEnergies.

Naseerah Bux

From: Bianca Olivia Jeanne <>
Sent: Thursday, 02 February 2023 17:33
To: TEEPSA EIA
Subject: Objection

To whom it may concern

I hereby object to the oil and natural gas exploration off the coast of South Africa.

Kind regards,
Bianca Cassell

From: Deone Claasens <>
Sent: Thursday, 09 February 2023 13:04
To: ZA - GLD - Teepsa Esia
Cc: TEEPSA EIA
Subject: Re: register as an Interested and Affected Party_ Our objections to Total Energies Plans
Attachments: image001.jpg

Good day

You can keep my comment. Please edit an autocorrect mistake 'alpine' which should be replaced with 'alone'.

Please see below the corrected version.

I am an interested and affected party.

I am an RSA Citizen and all that negatively impacts the ocean and environment consequently impacts me. I am a chemical engineer collaborating with national and international persons and companies to be able to provide energy by utilizing waste sources... etc a resource literally going to waste and causing environmental damage. We can prevent the further pollution of microplastics, toxic gases, and liquids seeping into the soil, water, and air. We are talking of billions worth of untapped resources a year. Leave the natural world alone, stop looking to tap into finite resources, and lets first make use of what is so readily available. It is the thing to do that shows wisdom, character and integrity.

Regards

Deone Claasens

On Thu, 9 Feb 2023, 12:33 ZA - GLD - Teepsa Esia, <gld.teepsaesia@wsp.com> wrote:

Dear Stakeholder

Thank you for your submission to the Scoping process of the TEEPSA Block 11B/12B ESIA . Section 42(a) of the EIA Regulations (2014), as amended, under which the ESIA is being conducted, stipulates that all persons that have provided comment are included in the register as an Interested & Affected Party (I&AP).

If you do not wish to be registered as an I&AP, kindly respond to this email requesting removal from the register. If you remain on the I&AP database, your comment will be included in the project Comment and response Register for consideration in the Scoping process.

Kind regards,



Public Participation Office

T +27 11 254 4800

From: Deone Claasens <>
Sent: Friday, February 3, 2023 1:11 PM
To: TEEPSA EIA <teepsaEIA@wsp.com>
Subject: register as an Interested and Affected Party_ Our objections to Total Energies Plans

I am an interested and affected party.

I am an RSA Citizen and all that negatively impacts the ocean and environment consequently impacts me. I am a chemical engineer collaborating with national and international persons and companies to be able to provide energy by utilizing waste sources... etc a resource literally going to waste and causing environmental damage. We can prevent the further pollution of microplastics, toxic gases, and liquids seeping into the soil, water, and air. We are talking of billions worth of untapped resources a year. Leave the natural world alone, stop looking to tap into finite resources, and lets first make use of what is so readily available. It is the thing to do that shows wisdom, character and integrity.

Regards

Deone Claasens

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-LAEmHhHzdJzBITWfa4Hgs7pbKI

From: Rose Clark <>
Sent: Wednesday, 01 February 2023 09:22
To: TEEPSA EIA
Cc: ; ; ;
< >
Subject: Objection to Proposed Offshore Oil Drilling and Pipelines off Mossel Bay in the Outeniqua Basin

[Subject: Objection to Proposed Offshore Oil Drilling and Pipelines off Mossel Bay in the Outeniqua Basin](#)

To whom it may concern,

I am writing to express my strong opposition to the proposed offshore oil drilling and building of new gas pipelines in Mossel Bay, in the Outeniqua Basin. The location of this project raises several environmental concerns that cannot be ignored.

First, the area lies in the middle of the Agulhus Current, which is a major highway for whale and sardine migration. Drilling and pipeline construction in this area will disrupt the migration patterns of these marine species and potentially cause harm to their populations.

Second, the proposed location borders on a Marine Protected Area, which is established to conserve the area's unique marine biodiversity and ecological processes. The introduction of oil drilling and pipelines will not only destroy the protected ecosystem, but also harm the livelihoods of local communities who depend on the area's resources.

Furthermore, the risks associated with offshore oil drilling are well-documented and undeniable. Gas and oil extraction is a high risk to the environment, tourism, and other economic endeavors along the coastline. The speed of ocean currents and thermal layers in the area make it extremely difficult to control any spills, as oil from the depths will be distributed across multiple depth zones and a very large area. The International Union for the Conservation of Nature (IUCN) calls for a moratorium on oil and gas exploration.

Finally, the extraction of oil and gas contributes to greenhouse gases and the release of carbon stores of seabed sediment. This will only exacerbate the effects of climate change, which is already having devastating impacts on our planet and its inhabitants.

In light of these serious concerns, I strongly urge you to reconsider the proposed offshore oil drilling and pipeline construction in Mossel Bay. I believe that we must prioritize the protection of our environment and the well-being of future generations over short-term financial gains.

Thank you for your time and consideration.

Kind regards

Rose Clark

If you are receiving this email outside of working hours, I hope you feel no pressure to read or respond until your schedule and workload permit.

From: lisa cloete <>
Sent: Wednesday, 01 February 2023 15:52
To: TEEPSA EIA
Subject: Objection

Follow Up Flag: Follow up
Flag Status: Completed

Dear WSP,

I would like to submit my objections that I gave at the hearing in East London last Thursday incase they were not taken down properly.

I object to the building and mining of a gas pipelineline in the Outeniqua Basin, Block 11B/12B by TotalEnergies on these grounds:

- It is clear any research taken or done on the existing Mosgas Pipelines have not been taken into account for this pipeline, if even done at all. This shows a lack of due diligence on the most obvious environmental and social potential impacts. It can also take decades to aquire adequate data, particularly on Ocean heating/ acidification and the release of carbon through disturbance on the seabed, all which dont just impact environments but global warming. We cannot take any risks on this and therefor do not want these mines in our ocean.

- We do not feel that of the 14 million people on our coastlines that there has been adequate public engagement around this very important and potentially distruptive mining. Particularlry by indigenous groups.

- We understand that TotalEnergies has an intention to be net zero by 2050. We object to last minute mining and suggest an investment in real green energy solutions that are sustainable and non-invasive.

Thank you.

Lisa Cloete

(I have registered my details at the meeting).

From: Nicole collier-naidoo <>
Sent: Friday, 03 February 2023 16:17
To: TEEPSA EIA
Subject: Questions about TEEPSA Block11B/12B ESIA

Dear WSP consultants

I am a member of Algoa Bay Ocean Stewards and work part time at Mandela University in Engagement.

I object to the application for exploration and production in blocks 11B and 12B made by Total.

Please could you answer the following questions:

1. How much money is expected to be paid by Total for this application?
2. To whom is this money paid?
3. How much money is Total expected to make should they find what they are looking for and go into production?
4. What is the carbon footprint or environmental cost of this entire effort over time?
5. How will Total offset this footprint/cost?
6. Is money really more important to you than life on this planet?

With dread,
Nicole

From: laetitia antonites <>
Sent: Wednesday, 01 February 2023 07:59
To: TEEPSA EIA
Subject: stop !

do not touch our oceans damage the ecosystem-laetitia antonites

Sent from my iPhone

From: Georgia Argyropoulos <>
Sent: Friday, 03 February 2023 15:27
To: ZA - GLD - Teepsa Esia
Subject: Re: REMINDER: PUBLIC COMMENT ON DRAFT SCOPING REPORT | BLOCK 11B/12B BY
TOTALENERGIES EP SOUTH AFRICA B.V. REF. NO. 12/4/013

I say no to fracking and the destruction of wild habits.

On Fri, 03 Feb 2023, 2:50 pm 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 TEEPSA 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

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-LAEhHhHzdJzBITWfa4Hgs7pbKl

Subject: FW: Comment on TotalEnergies' proposed offshore production and additional exploration for Block 11B/12B, Ref No: 12/4/13 PR

Attachments: 221215_teepsa-block_11b12b-esia-_meetingreplyform - submitted by Samantha Bailey.pdf; Comments by Samantha Bailey on TotalEnergies' proposed offshore production and additional exploration for Block 11B and 12B.pdf

From: Samantha Bailey <>
Sent: 03 February 2023 12:41
To: TEEPSA EIA <teepsaEIA@wsp.com>; ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com>
Subject: Comment on TotalEnergies' proposed offshore production and additional exploration for Block 11B/12B, Ref No: 12/4/13 PR

Hi There,

Please find attached my submission using the "Registration, Comment and Public Meeting Reply Form" and also copied into the attached PDF for easier reference.

Regards,
Samantha Bailey

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-LAEmHhHzdJzBITWfa4Hgs7pbKI

I, Samantha Kate Bailey, a citizen of the Eastern Cape with email address , hereby register my objection to TotalEnergies' proposed offshore production and additional exploration for Block 11B/12B, Ref No: 12/4/13 PR based on the following concerns:

1) The public participation process for this ESIA is deeply flawed due to bureaucratic bungling that completely ignored including any communities to the west of Mossel Bay, who would be directly affected by any major accident that might occur on the project due to the fact that the strong Agulhas current flows from east to west along that stretch of coastline and would spread any oil or other pollution along the coastline of those western communities. This includes Boggoms Bay, Gouritz, Still Bay, Witsand, Arniston, Struis Bay, Cape Agulhas, etc. **Thus the public participation process needs to be extended to include these ignored communities.**

2) At the East London public meeting that I attended on 26th January 2023, TotalEnergies stated that if they went ahead with the project, their plan would be to construct the infrastructure required (wells, pipeline, etc.) and then hand the project over to PetroSA for the actual production. PetroSA is a state-owned entity of the South African government that is mired in corruption and incompetence, and it is very questionable that they have the capacity to run the production in an efficient, effective and SAFE manner. Not only does this raise the high likelihood that the financial management of the production could be severely compromised by corruption (with impacts on maintenance, etc.) but also this hugely raises the risk of major accidents occurring with devastating long-term impacts on the environment and all social and economic activity related to that environment. PetroSA has yet to account for the environmental damage caused by their condensate pipeline running from the offshore FA platform to the GTL refinery in Mossel Bay, and this is the exact platform that TotalEnergies plans to use for this proposed project. **The ESIA specialist studies need to incorporate PetroSA's involvement in all the potential impacts and subsequent mitigation plans that are being considered for the proposed project as a whole.**

3) In the paper brochure that TotalEnergies supplied to people attending the East London public meeting, it was deeply concerning that the list of possible impacts included nothing about climate change impacts. Granted the list stated that it was incomplete and would be detailed in the ESIA's studies, but nonetheless, the omission backs up Oceans Not Oil's claim of TotalEnergies' litany of denial and deflection of attention away from the willful global endangerment by promoting fossil fuel products. The brochure also states that the ESIA will propose mitigation to reduce severity of any impact, but **the ESIA specialist studies need to examine how exactly TotalEnergies has mitigated their enormous damage to the climate to date, and how they propose to do this for this particular project.**

4) This ESIA needs to undertake a Strategic Environmental Assessment (SEA) for offshore Oil & Gas production in South Africa. Considering the potential for massive pollution being present, **a rigorous, independent and proactive SEA should be undertaken to inform the environmental viability of this offshore oil and gas proposal.**




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 <i>(If applicable)</i>		
Ms	Samantha	Bailey	private citizen		
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="checkbox"/> YES	<input type="checkbox"/> NO
I will attend the following public meetings in 2023:					
16 January, Kwanonqaba Community Hall, Mayixhale St, Kwanonqaba, Mossel Bay	<input type="checkbox"/> YES	<input type="checkbox"/> NO	21 January, Seavista Hall, Geelbek Street, St Francis Bay	<input type="checkbox"/> YES	<input type="checkbox"/> NO
17 January, Mossel Bay Town Hall, 101 Marsh Street, Mossel Bay	<input type="checkbox"/> YES	<input type="checkbox"/> NO	23 January, Pellsrus Hall, 1 Harder Street, Jeffreys Bay	<input type="checkbox"/> YES	<input type="checkbox"/> NO
18 January Thembalethu Community Hall, 66 Olympic Road, George	<input type="checkbox"/> YES	<input type="checkbox"/> NO	24 January, Feather Market Hall, 86 Baakens Street Port Elizabeth Central, Gqeberha	<input type="checkbox"/> YES	<input type="checkbox"/> NO
19 January, Khayeletu Community Hall, Mbethana Street, Knysna	<input type="checkbox"/> YES	<input type="checkbox"/> NO	25 January, Jauka Community Hall, Runeli Drive, Port Alfred	<input type="checkbox"/> YES	<input type="checkbox"/> NO
20 January, Piesang Community Hall, 7 Greenpoint Ave, Plettenberg Bay	<input type="checkbox"/> YES	<input type="checkbox"/> NO	26 January, Scenery Park Community Hall, 30 7 th Rd, Scenery Park, East London	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> 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		3 February 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:

I register my objection to TotalEnergies' proposed offshore production and additional exploration for Block 11B/12B, Ref No: 12/4/13 PR based on the following concerns:

1) The public participation process for this ESIA is deeply flawed due to bureaucratic bungling that completely ignored including any communities to the west of Mossel Bay, who would be directly affected by any major accident that might occur on the project due to the fact that the strong Agulhas current flows from east to west along that stretch of coastline and would spread any oil or other pollution along the coastline of those western communities. This includes Boggoms Bay, Gouritz, Still Bay, Witsand, Arniston, Struis Bay, Cape Agulhas, etc. Thus the public participation process needs to be extended to include these ignored communities.

2) At the East London public meeting that I attended on 26th January 2023, TotalEnergies stated that if they went ahead with the project, their plan would be to construct the infrastructure required (wells, pipeline, etc.) and then hand the project over to PetroSA for the actual production. PetroSA is a state-owned entity of the South African government that is mired in corruption and incompetence, and it is very questionable that they have the capacity to run the production in an efficient, effective and SAFE manner. Not only does this raise the high likelihood that the financial management of the production could be severely compromised by corruption (with impacts on maintenance, etc.) but also this hugely raises the risk of major accidents occurring with devastating long-term impacts on the environment and all social and economic activity related to that environment. PetroSA has yet to account for the environmental damage caused by their condensate pipeline running from the offshore EA platform to the GTL refinery in Mossel Bay, and this is the exact platform that TotalEnergies plans to use for this proposed project. The ESIA specialist studies need to incorporate PetroSA's involvement in all the potential impacts and subsequent mitigation plans that are being considered for the proposed project as a whole.

3) In the paper brochure that TotalEnergies supplied to people attending the East London public meeting, it was deeply concerning that the list of possible impacts included nothing about climate change impacts. Granted the list stated that it was incomplete and would be detailed in the ESIA's studies, but nonetheless, the omission backs up Oceans Not Oil's claim of TotalEnergies' litany of denial and deflection of attention away from the willful global endangerment by promoting fossil fuel products. The brochure also states that the ESIA will propose mitigation to reduce severity of any impact, but the ESIA specialist studies need to examine how exactly TotalEnergies has mitigated their enormous damage to the climate to date, and how they propose to do this for this particular project.

4) This ESIA needs to undertake a Strategic Environmental Assessment (SEA) for offshore Oil & Gas production in South Africa. Considering the potential for massive pollution being present, a rigorous, independent and proactive SEA should be undertaken to inform the environmental viability of this offshore oil and gas proposal.

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: ZA - GLD - Teepsa Esia
Sent: Friday, 03 February 2023 09:13
To: ZA - GLD - Teepsa Esia
Subject: FW: Registration and objection to 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.

From: Melissa Baird <>
Sent: Thursday, February 2, 2023 1:22 PM
To: TEEPSA EIA <teepsaEIA@wsp.com>; ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com>
Subject: Registration and objection to 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.

Good day

The pdf application form you have on the website is not editable so I can not complete it.

For the record here are my details and I am registering to object to the proposed plans:

Name: Melissa Baird
Email address:
Fax/Land line - n/a
Mobile number : 072 104 7536 - this is not to be used for any other purpose than this registration

Registering as an interested and affected party and request information to be sent to this email address

Comments:

Offshore drilling has many unaccounted for environmental risks that have long lasting impacts. It takes a teaspoon of oil to pollute a litre of water, so how can potential and likely oil spills be prevented? What happens if there is an oil spill, who pays for the destruction of the marine ecosystem that science has already proven is at unparalleled risk from human activities and pollution? This coast line is home to many local fishermen and small tourist businesses that rely on access to the unspoiled marine eco system for their livelihoods and well being. If an environment and its people are likely to be negatively impacted - in any shape or form - this should be enough to re-address this prospecting application until all questions are answered and guarantees are in place. Renewable energy sources are far more able to supply local community energy requirements, create jobs for skilled and semi-skilled labour without the threat of severe environmental damage. There are other viable alternatives.

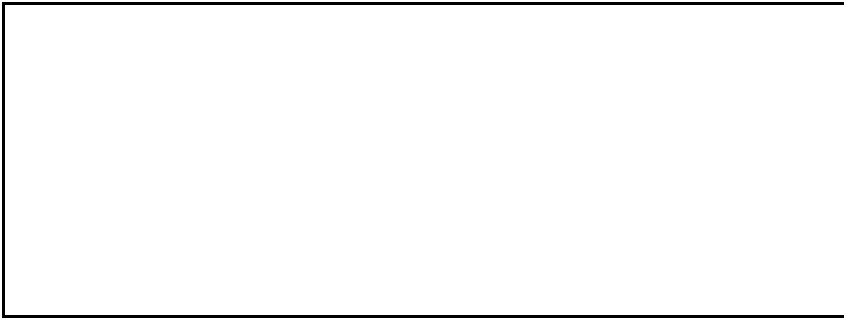
Kindly let me know my objection and registrations have been received and noted.

Yours sincerely
Melissa Baird

Melissa Baird
Editorial director

Overberg, Western Cape
South Africa, 7250

www.lifeinbalance.co.za



[Instagram](#)

From: elizabeth balcomb <>
Sent: Tuesday, 17 January 2023 13:10
To: ZA - GLD - Teepsa Esia
Subject: Re: REMINDER: INVITATION TO PUBLIC MEETINGS: Block 11B/12B by TotalEnergies EP South Africa B.V. Ref. No. 12/4/013

Follow Up Flag: Follow up
Flag Status: Completed

I wholeheartedly oppose any offshore exploration or drilling by Total.

from
Elizabeth Balcomb

On Fri, Jan 13, 2023 at 5:06 PM ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com> wrote:

Dear Stakeholder

Best wishes for a prosperous 2023!

The invitation letter to the January 2023 public meetings for the 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 distributed on 15 December 2022 refers.

This email serves as a reminder of the public meetings that will be convened from Monday, 16 January 2023 until Thursday 26 January 2023, as follows:

Date	Venue	Time
16 January 2023	Kwanonqaba Community Hall, Mayixhale Street, Kwanonqaba, Mossel Bay	10h00 – 12h00 AND 17h00 – 19h00
17 January 2023	Mossel Bay Town Hall, 101 Marsh St, Mossel Bay Central, Mossel Bay	17h00 – 19h00
18 January 2023	Thembaletu Community Hall, 66 Olympic Road, George	17h00 – 19h00
19 January 2023	Khayelethu Community Hall, Ngcakani Road, Knysna	17h00 – 19h00
20 January 2023	Piesang Community Hall, 7 Greenpoint Ave, Plettenberg Bay	15h00 - 17h00 AND 17h00 – 19h00
21 January 2023	Seavista Hall, Geelbek Street, Cape St Francis	14h00 – 16h00
23 January 2023	Pellsrus Hall, 1 Harder Street, Jeffreys Bay	17h00 – 19h00
24 January 2023	Feather Market Hall, 86 Baakens Street, Gqeberha	17h00 – 19h00
25 January 2023	Jauka Community Hall, Runeli Drive, Port Alfred	10h00 – 14h00 AND 14h00 – 16h00

From: Jolene Banuelos <>
Sent: Thursday, 02 February 2023 07:58
To: TEEPSA EIA
Subject: bjection to Total building gas pipeline off Mossel Bay in South Africa

To whom it may concern,

My family and I object to Total's plan to build gas pipelines off Mossel Bay. This would be detrimental to the marine wildlife in the area, not to mention the whale and sardine migration. The area borders on a protected marine area. Gas and oil are high risk to the environment, tourism and the coastline. This is a bad idea all around, and we are in opposition to it.

Regards,

Jolene Banuelos

From: Marina Barkhuizen <>
Sent: Thursday, 02 February 2023 10:29
To: TEEPSA EIA
Subject: NO TO OFF SHORE DRILLING

I am TOTALLY against the idea of off shore drilling.

Marina Barkhuizen

From: Russell Barry <>
Sent: Friday, 27 January 2023 23:43
To: TEEPSA EIA
Subject: South African Coastline

I object to TotalEnergies being given the rights to prospect for and or extract oil or gas along the coastline of South Africa. I believe it will have a catastrophic impact on the environment and especially the marine life.

Regards,
Russell

From: Gisela Bean <>
Sent: Wednesday, 01 February 2023 07:12
To: TEEPSA EIA
Subject: Objection agains Total ocean pipeline in Mossel Bay

To whom it may concern,

Please register my absolute objection against the proposed Total oceanic pipeline in Mossel Bay.

As a concern South African citizen and resident of the Garden Route it is my duty and right to object to this blatant destruction of our natural resources and eco system.

Gisela Bean

From:
Sent: Saturday, 04 February 2023 01:10
To: TEEPSA EIA
Subject: PetroSA and TotalEnergies' gas project

TO WHOM IT MAY CONCERN

Our government has much to answer for, especially to the citizens of South Africa. This atrocity only adds to the sad and desperate state of what is happening in South Africa today. In supporting TotalEnergies via PetroSA, to drill off our coastline only adds to the government's continued greed and corruption. This drilling is planned for no fewer than 10 sites, along our 120km stretch of ocean.

This was a similar move made by Shell and we SAcans, stood together, and supported the fragile communities that try to eke out a living from fishing. They need and deserve to do that in pristine oceans! Not oceans polluted by oil! Look at what has happened in the Nigeria delta! The locals were totally excluded (work is NOT and NEVER will be provided for the locals, as is 'promised') and they began stealing from the oil pipes and completely contaminated that once beautiful life-giving area.

The citizens of South Africa, especially those who historically, have had to endure political, social and economic devastation over many years, deserve better treatment from the government. Why not use the financial resources to do good; plan for the future in such a way that does no harm – to our environment and to the people who deserve to live in environments that will sustain them into the future. What is being proposed is tantamount to the destruction of our natural environment at the cost of our coastline and our citizens. Stop being short-sighted, money-grabbing and self-serving! It is time to set a positive example to the people of South Africa and indeed the world! The government has the power and resources to do GOOD, SHOW KINDNESS and work for the UPLIFTMENT of humanity. The world NEEDS that. What is being proposed is only going to cause further devastation in the long run!

Please, make your legacy one that breaks the mold of just taking and leaving a trail of poverty and unhappiness. Consider the legacy you will be leaving.

L Bekker

From: Marietjie Bell <>
Sent: Friday, February 3, 2023 8:54 PM
To: ZA - GLD - Teepsa Esia <gld.teepsaesia@wsp.com>
Subject: S&EIA process - Total Energies EP South Africa B.V.

Hello

Please find attached my registration form as I&AP.

Kind regards,
Marietjie Bell

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



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 <i>(If applicable)</i>			
Mrs	Marietjie	Bell	La Finca Tranquila			
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					YES	NO
I will attend the following public meetings in 2023: We were NOT made aware of this project soon enough to attend the public meetings and herewith object to the project due to the biodiversity impact.						
16 January, Kwanonqaba Community Hall, Mayixhale St, Kwanonqaba, Mossel Bay	YES	NO	21 January, Seavista Hall, Geelbek Street, St Francis Bay	YES	NO	
17 January, Mossel Bay Town Hall, 101 Marsh Street, Mossel Bay	YES	NO	23 January, Pellsrus Hall, 1 Harder Street, Jeffreys Bay	YES	NO	
18 January Thembalethu Community Hall, 66 Olympic Road, George	YES	NO	24 January, Feather Market Hall, 86 Baakens Street Port Elizabeth Central, Gqeberha	YES	NO	
19 January, Khayelethu Community Hall, Mbethana Street, Knysna	YES	NO	25 January, Jauka Community Hall, Runeli Drive, Port Alfred	YES	NO	
20 January, Piesang Community Hall, 7 Greenpoint Ave, Plettenberg Bay	YES	NO	26 January, Scenery Park Community Hall, 30 7 th Rd, Scenery Park, East London	YES	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		3 February 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:

I have a major concern with the impact of the offshore drilling and seismic work on the local biodiversity. The Western Cape draws a lot of tourism and should not consider projects that are detrimental to sensitive biodiversity areas.

On a further note, why are we considering gas instead of focussing on solar or even nuclear energy?

I herewith therefore want to raise my objection against this project.

I have spoken to several people in our community who are also not up to speed with this project and its impacts.

Please consider a further round of meetings to address concerns.

If the project do go ahead, what measures will be in place to protect the pipeline structures from vandalism? We have train tracks and electrical cables being stolen on a daily basis, how safe are the pipelines from damage?

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: Titia Bester <>
Sent: Wednesday, 01 February 2023 16:37
To: TEEPSA EIA
Subject: Stop Total energies off shore exploration

To whom it may concern

I, Titia Bester, object strongly to the proposed off shore exploration in our ocean. It is tremendously harmful to all sea life that will also affect us all in the future. There have already been conservation experts that have all the info needed to show exactly how harmful it is. You can do more studies to provide you with the necessary information before doing the seismic impact.

Thank you.

Titia Bester

From: Wilfried Bohm <>
Sent: Friday, 03 February 2023 13:12
To: TEEPSA EIA
Subject: Total Energies plan - Interested & Affected Party

To the WSP Public Participation Office

Re: **Plans by Total Energy for exploration off the Southern Cape coast.**

Please note me down as the following: I am an interested and affected party. I am an RSA Citizen and all that negatively impacts the ocean and environment consequently impacts me.

I look forward to hearing from you.

Regards,

Wilfried Detlef Bohm

Cell:

From: Patrick Bond <>
Sent: Friday, 03 February 2023 18:00
To: gld.teepsaesia@wsp.com; teepsaEIA@wsp.com
Subject: Re: Please record me as Interested and Affected Party: BLOCK 11B/12B -,REF NO: 12/4/13 PR
Attachments: Bond 2023 comment on 5_-221124_TEEPSA-Block_11B12B-ESIA-RegistrationCommentReplyForm_Eng-1.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

About two months ago, I requested to be considered an I&AP on anything you are working on in South Africa. My concerns are that WSP is not doing professional work on climate-related aspects of fossil fuel exploration, and your silence confirms that this is an inadequate, unsatisfactory process you are leading. My further criticisms of the ESIA are attached. Please acknowledge your receipt of these concerns.

Thanks,

Patrick Bond

On 12/5/2022 7:07 AM, Patrick Bond wrote:

> I'm a Johannesburg resident concerned about climate change.
>
> Please confirm you have added me to the IAP list for all activities
> associated with gas or oil exploration and exploitation, thanks.
>
> Patrick Bond

On 12/2/2022 2:28 AM, Patrick Bond wrote:

> Greetings, please consider me an IAEP. If there are any applications
> underway which WSP is involved in, please send me details.
>
> Thanks,
>
> Patrick




Scoping and Environmental Impact Assessment (S&EIA) process for the proposed offshore Production Right and Environmental Authorisation Application for Block 11B/12B by Total 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 <i>(If applicable)</i>
Prof	Patrick	Bond	University of
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	YES	<input checked="" type="checkbox"/>	NO
Please include my details on WSP's database to contact me about future projects in my area	YES	<input checked="" type="checkbox"/>	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	3 February 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:

I am a University of Johannesburg sociologist (a distinguished professor), specialising in public policy and environmental economics. I am writing in particular about the implications of the proposed exploratory well drilling for South Africa's climate politics. (The views expressed below are personal, not institutional.) I hold a PhD in Geography and Environmental Engineering from Johns Hopkins University (1993), having earlier studied economics at Swarthmore College and the University of Pennsylvania Wharton School of Finance. I also have engaged in many South African policy processes, having drafted the *Reconstruction and Development Programme White Paper* (1994) and many others. I also work closely with civil society organisations in South Africa, Africa and across the world.

I consider the public participation process to be, already, inadequate, since my requests to be put into the WSP/Total I&AP database and informed of the steps to be taken (in emails of 2 December 2022 and 5 December 2022), were simply ignored.

I am particularly interested and affected, as are *all South Africans, and indeed the world's citizens*, by the climate components of Total's proposed fossil fuels production process. I also believe it is important to question whether Total and its managerial leadership – as well as allied local firms – are “fit and proper” for work of this sort.

In making the case for further fossil fuels in the Environmental and Social Impact Assessment (ESIA), WSP/Total relies upon a National Business Initiative (NBI) study of gas, one which downplays the massive methane-leakage problems associated with gas, rendering the methane released 80 times more potent than CO₂, as well as Social Cost of Carbon and Methane externality liabilities, as well as climate sanctions (the “Carbon Border Adjustment Mechanism”) that will be progressively imposed on South African exports by Western trading partners in coming years. Here is WSP/Total's reflection on that report:

“Just Transition and Climate Pathways Study for South Africa (NBI) - concluded that gas is needed for South Africa's decarbonisation strategy to support transitions in the power, synfuels, industry and transport sectors. South Africa also needs to develop its local resources as infrastructure to import Liquefied Petroleum Gas (LPG) is limited.”

The obvious implicit standpoint of WSP/Total in the ESIA is that from the 2019-20 successful exploration process, there will now be production: extraction, processing, refining, transport, combustion and waste disposal. Yet damaging sources of greenhouse gas emissions and other pollutants are partially acknowledged in the ESIA, and then they are immediately downplayed:

Potential impacts on air quality and climate change of air emissions including greenhouse

gases (GHGs) generated by the Project: During operations air emissions will be emitted by various sources: drillship, specialized vessels, support vessels, flaring, etc. Potential actions to address the potential impacts include for instance: minimize potential air emissions during Project Design; conduct air emissions modelling and GHG calculations as part of the ESIA to assess potential project impacts; and identify specific mitigation measures if required.

What is utterly unsatisfactory, at this point – fully four years after the February 2019 fossil fuel discoveries – is that a proper study of climate implications *has still not occurred*. Instead, such analysis is only proposed for the future:

10.1.1 CLIMATE CHANGE AND AIR QUALITY STUDY

The climate change risk assessment will assess the effects of the Project’s greenhouse gas (GHG) emissions on climate, and the vulnerability of the Project to predicted climate changes. This will include the assessment of a set of feasible alternatives to the proposed Project.

10.1.1.1 Legal Context

The study will be contextualised within national climate change/GHG legislation (e.g., GHG reporting regulations and proposed Climate Change Act) and global commitments. There will be further consideration of the Nationally Determined Contribution (NDC), the Integrated Resource Plan (IRP), and DEAT’s Long Term Adaptation Scenarios conducted for the Third National Communication under the UNFCCC.

10.1.1.2 Baseline Assessment

The baseline assessment will comprise an analysis of the global context (i.e., the global atmosphere as the receiving environment) based on IPCC reporting of global emission trajectories and impacts. Additionally, the study will be contextualised within the national to local contexts in terms of climate change projections, considering expected changes in carbon dioxide levels and ocean acidity, air and water temperature, precipitation patterns, the rate of sea level rise, storm intensity, and wave regime, all of which could have implications for the Project.

10.1.1.3 Climate Change Impact Assessment

The project impact assessment will provide a clear designation of study boundaries, the identification of GHG emissions sources, and the selection of emission factors (with reference to IPCC, 2006, and South Africa’s Draft Methodological Guidelines for Quantification of GHG Emissions). Emission estimation will follow for Scope 1 (direct), Scope 2 (imported electricity generation), and Scope 3 (indirect) emissions. The impact of cumulative emissions will be assessed relative to South African and global inventories. Climate change impact mitigation will be considered, with reassessment of impacts under a mitigated scenario.

10.1.1.4 Air Quality Specialist Opinion

The air quality specialist opinion will consider for emission sources and associated pollutants identified in exploration activities, and the likely severity of emissions. It is anticipated key sources will comprise fuel combustion in generators and other equipment used for the drilling units and vessel emissions.

10.1.1.5 Climate Change Risk Assessment

This assessment will consider Project exposure to climate changes (changes in carbon dioxide levels and ocean acidity, air and water temperature, precipitation patterns, the rate of sea level rise, storm intensity, and wave regime), the Project sensitivity to such, and any potential climate change adaptations. There will be further assessment of transitional risks, e.g., proposed carbon taxes.

This is entirely unsatisfactory, to kick the can down the road, *because preliminary estimates of climate and associated economic damages are feasible, and would lead to a very different conclusion than what WSP/Total have provided*.

The economic impacts of further fossil fuel exploration could be enormous because, as the Makhanda High Court ruled on 1 September 2022, when it mandated a full – not salami-sliced –

analysis of the impacts of gas and oil exploration, extraction, processing, transport, combustion and disposal: “the processes are discrete stages in a single process that culminates in the production and combustion of oil and gas, and the emission of greenhouse gases that will exacerbate the climate crisis...”

The point of Total’s production is ultimately to extract and process methane gas for South African consumption. The ESIA allegation that Total is committed to carbon neutrality is impossible to believe:

Climate and carbon neutrality ambition

Total supports the objectives of the Paris Agreement, which calls for the reduction in greenhouse gas emissions and its goal of limiting the average rise in planetary temperatures to well below 2°C from pre-industrial levels. Total also supports the objective set out in the Paris Agreement of achieving global carbon neutrality – i.e. net zero emissions, which is the balance between GHG emissions and anthropogenic removals in the form of sinks and reservoirs, such as forests, carbon capture and storage facilities. Total has set an ambition of reaching carbon neutrality (net zero emissions) by 2050 in Europe, from the production to the use of the energy products sold to its customers (Scopes 1, 2, 3 as defined by the GHG Protocol) and the objective of 60% or more reduction in the average carbon intensity of energy products used worldwide.

Consistent with the National Environmental Management Act’s “polluter pays” foundational principle, it is vital for WSP/Total to properly cost the entire project, by including discussion of the potential adverse effects of consequent greenhouse gas emissions using different scenarios, as is done in the pages below. (If on the other hand, there is an intent by Total to use the gas and oil for *non-combustible* purposes in which hydrocarbons are extracted to provide lubricants, synthetic materials, necessary plastics, pharmaceutical products, etc, then this should be clarified. The assumption from the application’s discussion of gas and oil use, however, is that the product is aimed at providing energy through hydrocarbon combustion.)

The following pages assume gas condensate deposits will be found and combusted, because if there was not a strong possibility of that outcome, there would be no formal production process.

Failure to calculate climate implications through gas life-cycle analysis

Consider the economics behind a life-cycle analysis of Total’s energy extraction strategy. As is well known, methane – the main ingredient (usually 90%) in both Liquefied Natural Gas (LNG) and Liquefied Petroleum Gas (LPG) – is released during a wide variety of processes between exploratory drilling and final combustion. The exploratory phase, including seismic blasting, is part of a life-cycle of natural gas that is vital to account for, so as to quantify the total emissions in at least five stages:

- “upstream” gas production, including seismic blasting, exploratory drilling, extraction, processing and transport;
- liquefaction;

- tanker or pipeline transport;
- regasification; and
- power plant operations when the gas is burned to generate electricity.

The Natural Resources Defense Council illustrates these steps as follows:

UPSTREAM: Extraction of gas at the well, processing, and domestic pipeline transport; occurs in exporting country; greenhouse gas emitted: predominantly methane.

LIQUEFACTION: Gas is cooled to -162 degrees Celsius to reduce its volume and convert it to liquid form; occurs in exporting country; greenhouse gas emitted: almost all carbon dioxide.

TANKER TRANSPORT: Liquefied natural gas is loaded onto an LNG tanker and transported to its destination port; occurs on the high seas; greenhouse gas emitted: mostly carbon dioxide.

REGASIFICATION: Liquefied natural gas is re-warmed to convert it to a gas; occurs in importing country; greenhouse gas emitted: mostly methane.

POWER PLANT OPERATIONS: Gas is burned in a power plant to generate electricity; occurs in importing country; greenhouse gas emitted: almost all carbon dioxide.¹

WSP/Total must undertake to measure greenhouse gas emissions associated with each stage, including methane leakage at well heads, in storage, and in transport through pipelines that in this region are often poorly maintained or subject to vandalism and petroleum-product theft. While the U.S. Environmental Protection Agency regularly made estimates about greenhouse gas emissions from such sources, in August 2021 new research showed that the source-based estimates were only half the amount of methane release that were picked up in satellite imaging and atmospheric measurement, in studies by Stanford University analysts in *Nature Communications*.²

Full economic costing

The WSP/Total analysis provides no estimates as to how much methane gas is potentially available in the relevant blocks, and has no information about the market value, and the environmental costs of likely externalities. In contrast, a 10% owner of the Block 11B/12B stake claimed to an investment analyst,

“Discovered deposits are estimated by the government at 3.4 trillion cubic feet of gas and 192 million barrels of condensate; AEC says over a billion barrels of oil equivalent have been discovered.”

The context is important. The extremely large gas reserves anticipated to be found both offshore and onshore South Africa, should be considered as a major potential source of greenhouse gas emissions, especially if more than 13 trillion cubic feet (tcf) of gas are capable

¹ Christina Swanson, Amanda Levin and Amy Mall, *Sailing to Nowhere: Liquefied Natural Gas Is Not an Effective Climate Strategy*, Washington, DC: Natural Resources Defence Council (2021).

<https://www.nrdc.org/sites/default/files/sailing-nowhere-liquefied-natural-gas-report.pdf>

² Rutherford, J.S., Sherwin, E.D., Ravikumar, A.P. *et al.* Closing the methane gap in US oil and natural gas production emissions inventories. *Nature Communications* 12, 4715 (2021). <https://doi.org/10.1038/s41467-021-25017-4>

of being extracted:

- 8 tcf in the Orange Basin
- 2 tcf in the Bredasdorp Basin
- 3 tcf in the Outeniqua Basin
- discoveries that are likely in the Witwatersrand and Durban-Zululand basins

To illustrate the costs that are associated with just one particular comparative site, the Transkei-Algoa blocks on the Indian Ocean, consider three factors: the oil-barrel equivalent of estimated gas reserves; the market value price of that gas; and the estimated Social Cost of Carbon associated with these amounts.

1) First, there may be the equivalent of a billion barrels of oil in the Transkei-Algoa blocks: Impact CEO: “We would not be investing in the way that we are looking to invest in the area if we could not see a billion-barrel potential.”³

2) Second, the international market value of natural gas has zigzagged dramatically, ranging in 2022 from \$3.80 to \$9.30 per million British thermal units (MMBtu), and in November 2022 priced at around \$7.20/MMBtu.⁴

Price of natural gas, 2013-22



There are 4.5 MMBtu per barrel-equivalent. If in the Transkei-Algoa blocks – like Block 11B/12B – there are a billion barrels of oil (equivalent) to be extracted, the 4.5 billion

³ James Gavin, “Shell takes stake in Impact’s Transkei & Algoa offshore blocks,” *African Energy*, 10 September (2021), <https://www.africa-energy.com/news-centre/article/south-africa-shell-takes-stake-impacts-transkei-algoa-offshore>

⁴ <https://tradingeconomics.com/commodity/natural-gas?user=analyst14639>

MMBtus would be worth \$32.7 billion, or R570 billion (i.e., nearly 10% of annual 2021 GDP of \$320 billion). That would be potential gross income. But as for net income, there are major costs to extraction, still to be determined by local drilling conditions, fixed capital costs, operating expenses, liabilities for local ecological damage, taxes and royalties.

3) Local ecological damage can be considered priceless, especially in the event not only of exploratory drilling, but a full platform or pipeline rupture in the Agulhas Current, so it is difficult to estimate such costs. However, we do have some estimates of greenhouse gas damage to apply.

Assume that methane is 80 times more potent as a greenhouse gas (in a 20-year period) than CO₂. Indeed the biggest externalised environmental cost of all is the impact of the combustion of methane on climate. A barrel of gas generates 236 kg of CO₂-equivalents when burned, or 0.26 tons. So if there are a billion barrels of gas available in the Transkei-Algoa blocks, we can assume something close to 260 million ton-equivalents of greenhouse gas emissions.

The Social Cost of Carbon – i.e. an assessment of damages per ton – is hotly contested. Barack Obama’s administration assessed it at \$51/ton but that is expected to rise dramatically in 2022 revisions. The IMF estimates \$60/ton. The European Union currently has an Emissions Trading Scheme price closer to \$100/ton. But the latest research by scientists suggests \$3000/ton is more accurate.⁵

If we set the Social Cost of Carbon at \$3000/ton, and there are 260 million tons of CO₂-equivalents that could be released from all the gas to be extracted in Transkei-Algoa alone, the Social Cost of Carbon would be \$780 billion. Set against the gross (not net) income from a billion barrels claimed by the Impact CEO above, valued at \$32.7 billion (before costs are subtracted), this extraction obviously doesn’t make sense if we take seriously full cost accounting.

Comparisons in this exercise, where the applicant (Total’s regular South African and Namibian partner Impact) acknowledged likely deposits of a billion barrels, are appropriate if we take the billion barrel numeraire, so that if there is \$32.7 billion in gross income and the Social Cost of Carbon associated with that extraction is \$780 billion, then the damage being done for every barrel equivalent extracted, is 23 times the net income.

Further calculations not yet undertaken in Total’s exploratory proposal

In addition to a missing Social Cost of Carbon estimate, other shortcomings are obvious. Natural capital accounting and the National Environmental Management Act’s commitment to the

⁵ Kikstra, J., P. Waidelich, J. Rising, D. Yumashev, C. Hope and C. Brierley 2021. The social cost of carbon dioxide under climate-economy feedbacks and temperature variability, *Environmental Research Letters*, Volume 16, Number 9. 6 September, <https://iopscience.iop.org/article/10.1088/1748-9326/ac1d0b>

polluter pays principle are not taken seriously. It is imperative for the WSP/Total exploration assessment to undertake full cost accounting on even the roughly-estimated CO₂-equivalent emissions that are implied by any oil and gas exploration, extraction, processing, transport, combustion and waste disposal. No such estimates are attempted.

Ironically, WSP/Total makes a claim about what its ESIA intends to accomplish:

During this phase, a detailed assessment of the potential impacts will be undertaken. The assessed impacts will cover the effects of the proposed development on numerous capitals, such as natural capital, human capital, financial capital, and institutional and political capital. All economic impacts identified will be assessed and categorised in line with the rating provided by the environmental specialist.

But there is no attempt to address these various ‘capitals’ much less contend with the adverse impacts. To illustrate the danger of omitting natural capital, the Gaborone Declaration – signed in May 2012 by South African Environment Minister Edna Molewa – recognised “the limitations that GDP has as a measure of well-being and sustainable growth.” The signatories committed to “integrating the value of natural capital into national accounting and corporate planning.”⁶ For the sake of planning oil and gas extraction, WSP/Total must take the Gaborone Declaration’s mandate seriously, *not ignore it*.

There are additional costs that WSP/Total should be considering, including the associated infrastructure to process, transport and combust natural gas for South Africa’s grid (since the Total application rests upon LNG’s potential use as a “transitional” fuel to be deployed by Eskom or private suppliers such as Karpowerships. But a recent estimate by the International Institute for Sustainable Development of infrastructural costs associated with the most basic attempts to provide methane gas infrastructure – including gas plants, floating storage and regasification units, LNG terminals and pipelines – is in the \$13-17 billion range.⁷ Were such infrastructure built (without cost and time overruns, corruption and other economic, social and environmental drawbacks that bedevil South Africa the mega-projects), it would quickly assume the status of a “stranded asset,” insofar as the broader costs of such investments to the rest of the economy – especially exporters – would soon become obvious.

The claim that gas is a “transition” or “bridge” fuel was debunked yet again by a *Bloomberg* reporter in a February 2022 article entitled, “The case against methane emissions keeps getting stronger,” warning of the dangers of CH₄ emissions, which in the critical next 20 years are measured as at least 80 times more potent a greenhouse gas than CO₂.⁸ The urgent need to

⁶ Gaborone Declaration. Gaborone Declaration for Sustainability in Africa. Gaborone, Botswana 12 May (2012), <http://www.gaboronedeclaration.com/>

⁷ Richard Halsey, Richard Bridle and Anna Geddes, “Gas Pressure: Exploring the case for gas-fired power in South Africa,” London, March (2022), <https://www.iisd.org/system/files/2022-03/south-africa-no-need-for-gas.pdf>

⁸ Akshat Rashi, “The Case Against Methane Emissions Keeps Getting Stronger,” *Bloomberg*, 15 February (2022), <https://www.bloomberg.com/news/articles/2022-02-15/the-case-against-methane-emissions-keeps-getting-stronger>

reduce methane emissions by at least 45 percent during the 2020s so as to prevent global warming in excess of 2 degrees is not in question, for example at the United Nations Environment Programme, which records important public health co-benefits: “switching away from gas would reduce carbon dioxide and volatile organic compound emissions” that are causes of additional threats to public health.⁹

One argument on behalf of gas rests upon the back-up role played in the event of cloudy or windless days, and at night. For this purpose, however, already 2724 MW are available to Eskom in the form of pumped storage capacity in which water is lifted uphill by energy during the day, allowing for hydropower to generate electricity on its way down. (For context, demand on a typical winter day is rarely above 30 000 MW, hence at full capacity, pumped storage can provide 9 percent of the grid’s power already).¹⁰ In addition, the mining and smelting firm that has been Eskom’s largest consumer, Anglo American (with current iron ore, platinum and diamond mining), has committed to using 100 percent renewable energy by 2030.¹¹ Anglo’s deal with Electricité de France Renewables calls for 3 to 5 GW of solar, wind and storage.¹² And the single largest Eskom customer, BHP Billiton’s South32 subsidiary – for its Hillside smelter (aluminium) at Richards Bay – is seeking zero-carbon alternatives including energy storage.¹³

The climate-sanctions implications of ignoring full cost accounting

One simple reason to carry out such accounting is the point made by President Cyril Ramaphosa on October 11, 2021, explaining the danger to the economy of further fossil fuel development. Ramaphosa referenced the “Carbon Border Adjustment Mechanism” (CBAM) that will be imposed by Western importers of South African goods, in his Presidential letter advocating a low-carbon economy and Just Transition for affected workers and communities:

⁹ United Nations Environment Programme and Climate and Clean Air Coalition, “Global Methane Assessment: Benefits and Costs of Mitigating Methane Emissions,” Nairobi (2021), <https://www.unep.org/resources/report/global-methane-assessment-benefits-and-costs-mitigating-methane-emissions>

¹⁰ Pumped storage is defined by Eskom, as “A lower and an upper reservoir with a power station/pumping plant between the two. During off-peak periods the reversible pumps/turbines use electricity to pump water from the lower to the upper reservoir. During periods of peak demand, water runs back into the lower reservoir through the turbines, generating electricity.” The 2724 MW already available in three pumped storage schemes – Ingula, Drakensburg and Palmiet – does not include Cape Town’s 180 MW Steenbras municipal pumped storage capacity. <https://www.eskom.co.za/wp-content/uploads/2021/08/2021IntegratedReport.pdf>

¹¹ Karl Gernetzky, “Anglo American inks agreement as it eyes 100% renewable power in SA,” Business Day, 18 March (2022). <https://www.businesslive.co.za/bd/companies/mining/2022-03-18-anglo-american-inks-agreement-as-it-eyes-100-renewable-power-in-sa/>

¹² Dieketseng Maleke, “Mining company Anglo American signs contract with French renewable energy specialist EDF,” Business Report, 22 March (2022), <https://www.iol.co.za/business-report/companies/mining-company-anglo-american-signs-contract-with-french-renewable-energy-specialist-edf-22f14bce-d0ca-4a4c-a518-06977be96e72>

¹³ Charlotte Matthews, “South32 plans to end Eskom dependence as energy deregulation gathers pace,” MiningMX, 19 August (2021), <https://www.miningmx.com/news/energy/47231-south32-working-on-plans-to-end-eskom-dependence-as-energy-deregulation-gathers-pace/>

“As our trading partners pursue the goal of net-zero carbon emissions, they are likely to increase restrictions on the import of goods produced using carbon-intensive energy. Because so much of our industry depends on coal-generated electricity, we are likely to find that the products we export to various countries face trade barriers and, in addition, consumers in those countries may be less willing to buy our products.”¹⁴

Others in the private sector have similar worries. Isaah Mhlanga, chief economist at AlexanderForbes, wrote in May 2022 that

“SA must cut carbon emissions quickly – to protect its own economy: Carbon taxes will be applied and markets will be closed to those goods that have a high carbon content... SA will need to decarbonise faster to protect its exports, and thus economic growth. This is necessary because it’s a matter of time before carbon taxes are levied on all sorts of goods, and markets will be closed to those goods that have a high carbon content. Even though SA has not contributed the largest share of carbon emissions by global standards, it must adjust at the fastest rate possible, not necessarily to be a leader in efforts to move to net zero, but to protect its economic interests.”¹⁵

The largest corporate consumers of Eskom understand this threat, as well. Climate-related trade disincentives will, according to even a South African Treasury report in August 2021, soon create major vulnerabilities for exporters of iron and steel, cement, fertilizers, aluminium and automobiles.¹⁶ This problem will be amplified if a coal-to-methane gas transition occurs, not only because methane is a far more destructive greenhouse gas than CO₂. Pro-methane advocates point out that European (especially French) elites claim that “natural gas” and nuclear energy should both be considered “green” (in the official EU taxonomy), a July 2022 decision that revealed the many dangers of dependency on Russian gas imports and need to replace these instead of moving earlier to full-fledged renewable energy. Nevertheless, the likelihood of CBAM climate sanctions strengthening against both methane gas and indirect “embedded” emissions (i.e. the use of Eskom’s high-fossil energy generation in production), is inevitable, and will affect *all* future South African exports.

Thus BHP Billiton’s potential “wheeling” of electricity to its smelter originating in pumped storage at the proposed Tubatse scheme arises as a result of the threat of climate trade sanctions, according to *Mining Weekly*.¹⁷ As the leading mining magazine reported in early 2022, “the emergence of carbon border tariffs and end-user demand for green aluminium... could send the price of unabated aluminium sky-high owing to the large quantity of electricity

¹⁴ Cyril Ramaphosa, “From the desk of the president,” Pretoria, 11 October (2021), <http://www.thepresidency.gov.za/from-the-desk-of-the-president/desk-president%2Cmonday%2C11-october-2021>

¹⁵ Isaah Mhlanga, “SA must cut carbon emissions quickly — to protect its own economy,” *Business Day*, 1 May (2022), <https://www.businesslive.co.za/bt/opinion/2022-05-01-isaah-mhlanga-sa-must-cut-carbon-emissions-quickly-to-protect-its-own-economy/>

¹⁶ Treasury, “Tax Policy Discussion Document for Comment,” Pretoria, 15 December (2021), http://www.treasury.gov.za/comm_media/press/2021/TaxPolicyDiscussion/Default.aspx

¹⁷ Martin Creamer, “Pumped storage has potential to throw Hillside Aluminium green lifeline,” *Creamer’s Mining Weekly*, 10 January (2022), <https://www.miningweekly.com/article/pumped-storage-has-potential-to-throw-hillside-aluminium-green-lifeline-2022-01-10>

that is required for aluminium to be produced.”¹⁸ There is, of course, a more general case for rationing electricity and therefore disconnecting the South32 aluminium smelter and other guzzlers, contemplated even in the business media, given the irrationalities of the *status quo*.¹⁹

In each case, South African economic development requires full cost accounting to assess whether, at a time coal-fired power plants are going to be retired early, their replacement by methane gas in Karpowerships may exacerbate South Africa’s vulnerabilities. Bearing in mind the likelihood of climate sanctions if our economy remains reliant upon fossil fuels, the Social Cost of Carbon is the most appropriate polluter-pays metric to judge the full costs of the proposed exploration to be followed by exploitation and combustion.

Total as not “fit and proper” to carry out further fossil fuel extraction

Finally, there is a terribly important question to pose, as South Africa’s finally grapples with private-sector corruption of its state apparatus, a problem that in February 2023 is seen as acute given investigations of President Ramaphosa for his Phala Phala financial controversy, and an outstanding Zondo Commission on State Capture recommendation that Minister of Mineral Resources and Energy, Gwede Mantashe be investigated and potentially prosecuted for his own alleged corruption by the firm Bosasa during the 2010s when he was ANC Secretary General.²⁰ As a result of the penetration of such elements deep into the South African state and corporate sector, it is vital to enquire whether Total is a fit and proper company to be given responsibility for such extremely dangerous offshore gas and oil exploration, drilling, processing, transport and potential combustion. This is especially true, given WSP/Total’s failure to engage in rudimentary analysis about the implications, in relation to humanity’s greatest crisis.

When it comes to the Paris firm’s integrity in relation to climate change, historians Christophe Bonneuil, Pierre-Louis Choquet and Benjamin Franta note that beginning in 1971, Total’s (and its predecessors’) scientists issued initial internal warnings of rising sea levels due to CO₂ concentrations, and these were systematically ignored, followed by “overt denial of climate science... from at least 1989 to 1994.” This was followed by “multiple and subtler forms of agnogenesis, such as willful ignorance, responsibility-shifting, strategic philanthropy, promotion of peripheral solutions, and corporate controversy management... [with] a flow of complex, technical information that is difficult to interpret or challenge, helping Total to put the burden

¹⁸ Martin Creamer, “Working on options to secure green energy for Hillside Aluminium – South32,” *Mining Weekly*, 7 January (2022), <https://www.miningweekly.com/article/working-on-options-to-secure-green-energy-for-hillside-aluminium-south32-2022-01-07>

¹⁹ Michael Avery, “Here’s an idea: mothball electricity-guzzling smelters,” *Business Day*, 3 July (2022), <https://www.businesslive.co.za/bd/opinion/columnists/2022-07-03-michael-avery-heres-an-idea-mothball-electricity-guzzling-smelters/>

²⁰ Setumo Stone, “Zondo recommends Mantashe be probed for corruption,” *CityPress*, 2 March (2022), <https://www.news24.com/citypress/politics/zondo-recommends-mantashe-be-probed-for-corruption-20220302>

of proof on its critics and keep the upper hand in climate controversies.”²¹ Only in the mid-2000s, did the firm endorse the UN’s Intergovernmental Panel on Climate Change.

To illustrate, just before the 2015 COP21 summit in Paris, the company promoted global carbon pricing, to be administered by the United Nations (although as was accidentally revealed later by an ExxonMobil lobbyist, this was a strategic distraction – not a serious proposal – since it was extremely unlikely to be adopted).²² But the flows of money within Total are revealing, for although in early 2016, Pouyanné announced “One Total 2035” allegedly consistent with the Paris Climate Agreement’s ambition to keep warming to below 1.5 degrees in the 21st century, Total was meanwhile investing in many other reserves. For Choquet, this is because the “persistence of short-termed compensation schemes in the higher corporate hierarchy impedes the elaboration and implementation of deep decarbonisation strategies at the firm level.”²³

Hence from 2015-19, Total invested \$77 billion in oil and gas capital infrastructure, compared to \$5 billion in non-fossil fuel energy sources. According to the Reclaim Finance project of *Les Amis de la Terre France*, this trajectory – which Total admits includes its rising fossil portfolio up to a 2024 peak – would mean the company overshoots by 32 percent the level of greenhouse gas emissions in 2050 consistent with a 1.5°C degree rise. As a result, Greenpeace France, Notre Affaire à Tous, *Les Amis de la Terre* and ClientEarth sued Total in March 2022 for deceptive marketing, arguing that Pouyanné’s publicity campaign “violates European consumer law by falsely portraying the company as being on track to achieve net zero emissions.”²⁴

To be sure, in mid-2020, Pouyanné’s write-off of \$7 billion worth of Canadian oil sands project reserves raised expectations, because as industry analyst Gerard Kreeft remarked, “with one swoop of a pen, Total cast aside the petroleum classification system, which was the gold standard for measuring oil company reserves. The company simply decided that these reserves could never be produced at a profit.”²⁵ The tar sands were among the world’s most expensive petroleum sources. But so too were Russian assets, including \$4.1 billion in a Siberian gas project that Pouyanné belatedly and grudgingly wrote down in April 2022 following Western sanctions against Moscow caused by the invasion of Ukraine (during a three-month period

²¹ Christophe Bonneuil, Pierre-Louis Choquet and Benjamin Franta, “Early warnings and emerging accountability: Total’s responses to global warming, 1971–2021,” *Global Environmental Change*, 71 (2021), <https://www.sciencedirect.com/science/article/pii/S0959378021001655>

²² Chris McGreal, “ExxonMobil lobbyists filmed saying oil giant’s support for carbon tax a PR ploy,” *The Guardian*, 30 June (2021), <https://www.theguardian.com/us-news/2021/jun/30/exxonmobil-lobbyists-oil-giant-carbon-tax-pr-ploy>

²³ Pierre-Louis Choquet, “Piercing the corporate veil: Towards a better assessment of the position of transnational oil and gas companies in the global carbon budget,” *The Anthropocene Review*, 6, 3, 243-262 (2019), <https://journals.sagepub.com/doi/10.1177/2053019619865925>

²⁴ Business and Human Rights Resource Centre, “NGOs sue Total for allegedly misleading the public over Net Zero marketing claims, accusing it of greenwashing,” London, 3 March (2022), <https://www.business-humanrights.org/en/latest-news/france-ngos-sue-total-for-allegedly-misleading-the-public-over-net-zero-marketing-claims-accusing-it-of-greenwashing/>

²⁵ Gerard Kreeft, “The day after the night before,” *Africa Oil&Gas*, May (2022), <https://africaoilgasreport.com/2022/05/energy-transition/Total-the-day-after-the-night-before/>

when thanks to skyrocketing oil prices Total recorded profits of \$9 billion).²⁶

Also expensive, especially for the environment, society and political rule, were Total's Southern and Central African fossil investments dating back seven decades in Portuguese-ruled Angola. Today, Total is suffering losses at various sites in the region, due to a military conflagration in Mozambique and a sharp rise in environmental and social opposition to its exploration and extraction in South Africa. In Angola, Total has operated since 1953 and has 1600 employees, producing 45 percent of the country's oil output.²⁷ In Angola as well as Nigeria, Gabon, Congo-Brazzaville and Cameroon, oil-related corruption was prolific. One of Total's former (pre-merger) subsidiary firms – French state-owned Elf Aquitaine – robbed the peoples and environments with exceptional irresponsibility.²⁸

One scandal, entailing at least 305 million euro in misappropriation of assets (considered France's worst corporate behavior on record), occurred during President François Mitterrand's 1981-1995 term. It implicated his ally Loïk Le Floch-Prigent (Elf's leader from 1989-93) and 29 other executives including Alfred Sirven, Alain Gillon and André Tarallo (whose nickname was "Mr. Africa" because of personal connections to the continent's tyrannical rulers). In 2003, they received multiple-year jail sentences and paid tens of millions of euros in personal fines.²⁹

While the Luanda government was at war with a rightwing guerrilla army – the National Union for the Total Independence of Angola (UNITA) – originally promoted by South Africa's apartheid regime and the U.S. Central Intelligence Agency, Total gave UNITA founder Jonas Savimbi generous funding prior to his death in 2002.³⁰ As Global Witness reported, Total's leadership "bribed politicians, interfered in elections and lured governments into ruinous oil-backed loans in an attempt to protect the company's market share. By funding both sides in Angola's civil war, Elf helped to prolong a conflict that cost an estimated 1.5 million lives and displaced millions of people."³¹

In this context, Total's current leader Pouyanné began his career as Elf's Angola manager in 1997 at the age of 34, during one of the worst epochs of corrupt neo-colonial extraction. The country's president, José Eduardo dos Santos, was already in power 18 years and due to stay

²⁶ Le Monde, "Total announces start of withdrawal from gas megaproject in Russia," Paris, 28 April (2022), https://www.lemonde.fr/en/economy/article/2022/04/28/Total-announces-the-beginning-of-a-withdrawal-from-its-gas-megaproject-in-russia_5981883_19.html

²⁷ Total, "Angola: Total sells its non-operated interest in block 14," Paris, 17 January (2022), <https://Total.com/media/news/press-releases/angola-Total-sells-its-non-operated-interest-block-14>

²⁸ Total was also prosecuted successfully in both France and the United States for bribing Iranian officials, with further allegations outstanding in Myanmar and Yemen. BBC News, "Shell admits fuelling corruption," London, 11 June (2004), <http://news.bbc.co.uk/2/hi/business/3796375.stm>

²⁹ Jon Henley, "Gigantic sleaze scandal winds up as former Elf oil chiefs are jailed," The Guardian, 13 November (2003), <https://www.theguardian.com/business/2003/nov/13/france.oilandpetrol>

³⁰ Radio France International, "Decryption of Elf's African strategy: the African States concerned," Paris, 29 January (2003), http://www1.rfi.fr/actufr/articles/037/article_20564.asp

³¹ Global Witness, "Elf verdict jails the guilty, but their bitter legacy remains," London 22 May (2011), <https://www.globalwitness.org/en/press-releases/elf-verdict-jails-guilty-their-bitter-legacy-remains/>

another two decades, until 2017. During the two years Pouyanné served in Angola, the Luanda regime was already being accused of massive oil-related corruption, for as Human Rights Watch (HRW) reported, “More than \$4-billion in state oil revenue disappeared from Angolan government coffers from 1997 to 2002, roughly equal to the entire sum the government spent on all social programmes in the same period.”³² In 2003, Angola was ranked by Transparency International as among the world’s ten most corrupt states.

Matters did not improve even after peace was achieved in 2002, for the International Monetary Fund discovered unaccounted spending (mostly in the petroleum sector) of \$32 billion from 2007-10, leading HRW to criticise “corruption and mismanagement, including in connection with the state oil company, Sonangol.”³³ By 2013, Dos Santos’ eldest daughter Isabel – “Africa’s richest woman” – was exposed for her dubious acquisition of \$3.5 billion in wealth by *Forbes*, through family-state enterises.³⁴

Isabel’s father nevertheless appointed her to run Sonangol in mid-2016, and when meeting Pouyanné later that year, as she put it, “we spoke for several hours, and from there was born an intense working relationship and mutual support.”³⁵ In October 2017, as Pouyanné tweeted, they met again to “decide Total’s future projects in Angola,” at a time the French firm was responsible 40 percent of the country’s oil production.³⁶ But a month later Isabel was fired by Dos Santos’ successor João Lourenço, during an anti-corruption crackdown. She was further exposed in the “Luanda Leaks” along with her pliable accountants



³² Human Rights Watch, “Angola: Account for Missing Oil Revenues,” New York, 11 January (2004), <https://www.hrw.org/news/2004/01/11/angola-account-missing-oil-revenues>

³³ Human Rights Watch, “IMF: Withhold funds to Angola,” New York, 27 March (2012), <https://www.hrw.org/news/2012/03/27/imf-withhold-funds-angola>

³⁴ Kerry Dolan, “Daddy’s Girl: How An African ‘Princess’ Banked \$3 Billion In A Country Living On \$2 A Day,” *Forbes*, 14 August (2013), <https://www.forbes.com/sites/kerryadolan/2013/08/14/how-isabel-dos-santos-took-the-short-route-to-become-africas-richest-woman/?sh=73fdb3c45f50>

³⁵ Isabel dos Santos, Instagram, archived at https://web.archive.org/web/*/https://www.instagram.com/p/BbI9FdqIMhy/

³⁶ Patrick Pouyanné, “Avec Isabel Dos Santos, la CEO de Sonangol, pour décider des futurs projets de Total en Angola,” Twitter, 18 October (2017), <https://twitter.com/ppouyanne/status/920737701753696257>

PwC, Boston Consulting Group and McKinsey,³⁷ and by 2019 became the target of anti-corruption proceedings in Luanda as well as in Lisbon and Paris, resulting in a freeze of all her known assets.³⁸ In November 2022, Interpol issued a “red notice” for her arrest on grounds of embezzlement, fraud, influence peddling and money laundering.³⁹

Meanwhile, the country’s oil reserve in the offshore Cabinda fields was steadily depleting. With Sonangol nearing bankruptcy in late 2016 in part due to the state’s Chinese borrowing (backed by oil as collateral), big oil companies complained of non-payment, and the number of offshore rigs fell from 18 to 2 from 2014-17.⁴⁰ As one Reuters specialist put it, “The search for the ‘Angolan pre-salt’ resulted in some of the most expensive dry wells ever drilled and sapped exploration appetite. Critics say the situation was exacerbated by Isabel dos Santos.”⁴¹ Total’s joint ventures with Sonangol, Equinor (Norway), ExxonMobil and BP in older oil fields continued, and a national oil agency optimistically predicted that 2022-27 would see \$66 billion in new investments in the sector, up 40 percent on the prior five years.⁴² Yet in late 2021, Pouyanné’s attempt to revitalise Total’s stake in deeper waters failed, when offshore drilling at an unprecedented depth – 4.6 km below the sea – failed to pay off.⁴³

Moving to Mozambique, Total has been the main force not only in relation to gas extraction but also the construction and security arrangements in Cabo Delgado, specifically the Afungi Peninsula and nearby Palma, where terrible battles have raged since 2017 as a result of community and Islamic insurgencies. In March 2021, when social conflict became severe, as veteran journalist Alex Perry recounted, the Paris firm put its narrow self-interest above that of nearby villagers and its own contractors. By that point,

Total knew to expect an attack in Mozambique. It knew that from its long experience with oil and gas as a flash point for conflict, especially in Africa, and in particular when a company employed the incendiary approach it adopted in Mozambique: cut a deal with a

³⁷ Sydney P. Freedberg, Scilla Alecci, Will Fitzgibbon, Douglas Dalby and Delphine Reuter, “How Africa’s richest woman exploited family ties, shell companies and inside deals to build an empire,” Washington, DC, International Consortium of Investigative Journalists, 19 January (2020), <https://www.icij.org/investigations/luanda-leaks/how-africas-richest-woman-exploited-family-ties-shell-companies-and-inside-deals-to-build-an-empire/>

³⁸ Kerry Dolan, “How Isabel Dos Santos, Once Africa’s Richest Woman, Went Broke,” Forbes, 22 January (2022), <https://www.forbes.com/sites/kerryadolan/2021/01/22/the-unmaking-of-a-billionaire-how-africas-richest-woman-went-broke/?sh=6e31c8026240>

³⁹ Al Jazeera, “Interpol seeks arrest of Angolan tycoon Isabel dos Santos.” 1 December, <https://www.aljazeera.com/news/2022/12/1/interpol-seeks-arrest-of-angolan-tycoon-isabel-dos-santos>

⁴⁰ Libby George, “Sonangol delays payments as it battles to reform,” Reuters, 23 November (2016), <https://www.reuters.com/article/us-angola-oil-exclusive-idUSKBN1311EP>

⁴¹ Stephen Eisenhammer, “Angola battles to revive oil exploration as output declines,” Reuters, 15 November (2018), <https://www.reuters.com/article/us-angola-oil-exploration-idUSKCN1NK0KQ>

⁴² Graciosa Silva, “ANPG predicts investments of 66 billion dollars in the oil sector over the next five years,” Ver Angola, 8 June (2022), <https://www.verangola.net/va/en/062022/Energy/31236/ANPG-predicts-investments-of-66-billion-dollars-in-the-oil-sector-over-the-next-five-years.htm>

⁴³ Africa Intelligence, “Total fails ultra deepwater offshore attempt on Block 48,” London, 20 December (2021), https://www.africaintelligence.com/oil--gas_exploration-production/2021/12/20/Total-fails-ultra-deepwater-offshore-attempt-on-block-48,109712127-art

government known for corruption, keep the profits, and share as little as possible with the population... Perhaps most damning, Total knew an attack was likely coming, and that any bloodshed would affect all of Palma, because three months before it happened, the company's own advisers warned that it could.⁴⁴

In January 2021, Pouyanné signed a deal with the government of President Filipe Nyusi – which was then ranked by Transparency International within the top 20 percent of the world's most corrupt regimes⁴⁵ – for military protection. Total managers rapidly made space in the Afungi Peninsula compound to house 700 soldiers and 12 Ukrainian mercenaries with helicopters. The soldiers patrolled, but as one contractor complained to Perry, “We’d come across them midweek on the road. AK in one hand, bottle of beer in the other, motherless drunk.” By March 24 that year, “Total passed word that its staff would resume operations at Afungi” after many had been evacuated three months earlier due to insurgent attacks near the complex.⁴⁶ Also by then, the Mozambican government also recognised its own military's incapacities, having first hired Moscow mercenaries (the Wagner Group) who suffered high casualty levels – a dozen Russian deaths and two dozen injuries – in late 2019 and soon left.⁴⁷ They were soon followed by the South African firm Dyck Advisory Group, which complained that its attempt (in late March 2021) to rescue Total subcontractors under attack by Al-Shabaab were foiled by Total, whose “refusal to give fuel to rescuers trying to save civilians was stunning, and crippling.” Indeed several thousand local residents went to the Afungi fortress but were turned away by guards. As Perry concluded,

What Total also did, in employing drunk soldiers and security advisers who failed to sound a timely alarm, closing its gates to fleeing civilians, and locating its worker camps outside Afungi while its principal contractor relocated inside, was to show that, as long as it was protected, it didn't feel responsible for anyone else. Total employed the very people it would later exclude to build the very structures that would later exclude them... Total announced no compensation and sent no public message of condolence. By its own count, it helped evacuate just 2,100 people, a mere 4 percent of those who had fled Palma.⁴⁸

Total's *force majeure* in late April 2021 meant the firm could reject its contractual obligations and avoid liabilities, causing chaos and anger in Cabo Delgado and ridicule elsewhere.⁴⁹ But

⁴⁴ Alex Perry, “I'm Still Alive but Sh*t Is Getting Wild': Inside the Siege of the Amarula,” *Outside*, 1 June (2022), <https://www.outsideonline.com/outdoor-adventure/exploration-survival/attack-amarula-hotel-palma-mozambique-africa/>

⁴⁵ Transparency International, “Mozambique,” Berlin (2021), <https://www.transparency.org/en/cpi/2021/index/moz>

⁴⁶ Perry, op cit.

⁴⁷ Peter Fabricius, “Wagner private military force licks wounds in northern Mozambique,” *Daily Maverick*, 29 November (2019), <https://www.dailymaverick.co.za/article/2019-11-29-wagner-private-military-force-licks-wounds-in-northern-mozambique/>

⁴⁸ Perry, op cit.

⁴⁹ Total, “Total declares Force Majeure on Mozambique LNG project,” 26 April (2021), <https://Total.com/media/news/press-releases/total-declares-force-majeure-mozambique-lng->

Perry's critique – from the standpoints of local community residents and international contractors abused by Total – reflected only one side of the story. Other critics demanded a different approach to the offshore methane gas: leaving it be. For example, Maputo-based political economist Tomas Selemene offered an essential rationale for a Just Transition instead of Total's resource curse: "There is no military solution to the conflict which has exploded in the gas-rich northern province of Mozambique since 2017. It will end only by addressing its root causes, among them, extreme poverty, unemployment, lack of health and education services, and lack of water supply."⁵⁰

While Southern African and Rwandan troops were deployed at Emmanuel Macron's request in mid-2021, they have not quelled the violence. In mid-2022, the insurgency revived just south of the Afungi Peninsula. Over the course of two weeks, a dozen attacks left 16 people dead and caused 11,000 to flee. Two Australian graphite mines closed down temporarily. The more aggressive Rwandan troops displaced the fighting from the coastal zone of Cabo Delgado to areas slightly to the west, as the guerrillas moved easily into forested terrain. But in May 2022, sporadic Al-Shabaab attacks continued, including a food raid on the town of Olumbe, just 20 kilometers from Afungi.⁵¹ The influential Eurasia Group consultancy concluded, "The potential for Islamic State to provide funding and resources to the insurgents and the possible arrival of reinforcements from Tanzania will likely strengthen the insurgency, making the resumption of the liquefied natural gas exploration project in the next 12 years unlikely."⁵²

Total may continue to partner with the South African/U.S.-firm Sasol in extracting and processing Mozambican gas. The two-decade long gas extraction from Sasol's Pande offshore field in the centre of Mozambique was beginning to wane as depletion rates rose. The main consumer of that gas is Sasol's facility in Secunda, which remains the single largest point source of CO₂ emissions in the world and also an extreme local pollution hotspot (especially SO₂ and NO), in part because of inefficient operations whose roots are illustrative of South Africa's "minerals energy complex."⁵³ Sasol had grown most rapidly during the 1970s, given the state's need to avert United Nations-mandated anti-apartheid oil sanctions. The firm used a technology Nazi Germany had devised to squeeze oil from coal.

At the end of the existing pipeline running from Mozambique to South Africa – through the central and southern part of the country – is a massive petrochemical complex at Sasolberg, including the Natref refinery which is mainly owned by Sasol but 36 percent by Total. However,

project#:~:text=Paris%2C%2026%20April%202021%20–
%20Considering,project%2C%20to%20declare%20force%20majeure

⁵⁰ Thomas Selemene, "From promised land to hell," *The Church in Southern Africa - Open to the World*, 5:32, Aug-Sept (2021), Pretoria.

⁵¹ Luis Nhachote, "Faltering insurgency in Mozambique still threatens lives – and gas projects," *The Continent*, 30 May (2022), <https://mg.co.za/africa/2022-05-30-faltering-insurgency-in-mozambique-still-threatens-lives-and-gas-projects/>

⁵² Agência Lusa, "Reorganização dos terroristas torna improvável regresso das petrolíferas até 2023 em Moçambique," *Observador*, 23 May (2022), <https://observador.pt/2022/05/23/reorganizacao-dos-terroristas-torna-improvavel-regresso-das-petroliferas-ate-2023-em-mocambique/>

⁵³ Ben Fine and Zav Rustomjee, *The Political Economy of South Africa*. London: Hurst (1996).