



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
www.sahra.org.za

Enquiries: Nokukhanya Khumalo

Tel: 021 462 4502

Email: nkhumalo@sahra.org.za

CaseID: 21617

Date: Wednesday September 20, 2023

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## Interim Comment

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

Attention: Jan Maier

African Oil SA Corp

**The Applicants are the holders of an existing Exploration Right for Block 3B/4B in terms of the Mineral and Petroleum Resources Development Act (No. 28 of 2002 – MPRDA), as amended. The licence block covers an area of approximately 11 100 km<sup>2</sup> and is situated between latitudes 31°S and 33°S on the continental shelf in water depths ranging from 200 m to 2 000 m. The applicant is the operator and holder of an existing Exploration Right for Block 3B/4B in terms of the Mineral and Petroleum Resources Development Act (No. 28 of 2002 – MPRDA), as amended. The licence block covers an area of approximately 11 100 km<sup>2</sup>, and is situated between latitudes 31°S and 33°S on the continental shelf in water depths ranging from 200 m to 2 000 m. Block 3B/4B is located approximately 120 km west of St Helena Bay and approximately 145 km south-west of Hondeklip Bay off the West Coast of South Africa. The area of primary interest is in the north of this block, but this could also cover other areas in future. As part of the process of applying for the Exploration Right, the applicant undertook and completed the reprocessing project covering 2 000 km<sup>2</sup>, which is a subset of the 10 000 km<sup>2</sup> BHP/Shell 3D seismic datasets, focused primarily on the most northern portion of Block 3B/4B. The Environmental Impact Assessment (EIA) process will be undertaken in terms of Chapter 6 of the EIA Regulations, 2014 (GNR 982) promulgated under the NEMA (as amended). A Scoping and Environmental Impact Assessment (EIA) process will be followed. In accordance with Chapter 6 of the EIA Regulations, a public participation process will be undertaken.**

Africa Oil SA Corp, Ricocure (Pty) Ltd and Azinam Ltd are the holders of an existing Exploration Right for Block 3B/4B in terms of the Mineral and Petroleum Resources Development Act (No. 28 of 2002 – MPRDA), as amended. The licence block covers an area of approximately 11 100 km<sup>2</sup> and is situated between latitudes 31°S and 33°S on the continental shelf in water depths ranging from 200 m to 2 000 m, this area is located approximately 120 km west of St Helena Bay and approximately 145 km south-west of Hondeklip Bay off the West Coast of South Africa. The exploration programme will include the drilling of approximately 5 boreholes.

They have appointed Environmental Impact Management Services (Pty) Ltd to undertake a Scoping & Environmental Impact Assessment application process in support for an Environmental Authorisation (EA) in terms of the National Environmental Management Act, Act no 107 of 1998 (NEMA) as amended.



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

## Interim Comment

The SAHRA APM Unit acknowledges receipt of the BID application and request that the following is undertaken in terms of section 38(3) of the National Heritage Resources Act (25 of 1999) as part of the EA application process.

The proposed offshore drilling has the potential to impact negatively on heritage and/or cultural resources, therefore a maritime heritage impact assessment must be conducted. A field-based assessment of the impact to archaeological resources, ship wrecks, and other maritime cultural resources must be conducted by a qualified maritime archaeologist. The report must comply with section 38(3) of the NHRA and the SAHRA 2006 Minimum Standards: Archaeological and Palaeontological Component of Impact Assessments, and the 2012 Minimum Standards: Archaeological Component of Heritage Impact Assessments. The Minimum Standards provides allowance for a Letter of Recommendation for Exemption that can be submitted by a qualified archaeologist should they deem it appropriate.

In addition, a Desktop Palaeontological Study with a Fossil Chance Finds procedure must be drafted by a suitably qualified palaeontologist familiar with continental shelf that must be used in the event that some fossiliferous rocks and fossils are identified. **Other exploration blocks have identified underwater fossils.** The report must comply with section 38(3) of the NHRA and the SAHRA 2006 Minimum Standards: Archaeological and Palaeontological Component of Impact Assessments, and the 2012 Minimum Standards: Palaeontological Component of Heritage Impact Assessments. The Minimum Standards provides allowance for a Letter of Recommendation for Exemption that can be submitted by a qualified palaeontologist should they deem it appropriate.

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

Further comments will be issued upon receipt of the above.

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

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above in the case header.

Yours faithfully

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Nokukhanya Khumalo  
Heritage Officer  
South African Heritage Resources Agency

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Natasha Higgitt  
Manager: Development Applications Unit  
South African Heritage Resources Agency

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**ADMIN:**  
Direct URL to case: <https://sahris.sahra.org.za/node/618976>  
(DMR, Ref: )