

Our Ref:



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: Briega Williams
Tel: 021 462 4502
Email: bwilliams@sahra.org.za

Date: Wednesday September 30, 2020
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Final Comment

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

Attention: Shell South Africa Upstream BV

Carel Van Bylandtlaan 5
The Hague
Zuid - Holland
The Netherlands
2596HP

AECOM has been appointed by Shell Offshore Upstream South Africa B.V. to conduct an environmental audit on the Environmental Management Programme (EMPr) for exploration in the Northern Cape Ultra Deep Licence Area (comprising Licence Blocks 3013 and 3113). The EMPr was prepared in 2014 and approved on 6 June 2014 by the Petroleum Agency South Africa (PASA) as the competent authority (Approval Reference Number 12/3/1/2742/2/1). It is mandatory for EMPs to be audited as per Section 34 of the EIA Regulations. The scope of this environmental audit focuses on evaluating the adequacy of the mitigation measures contained in the EMPr to effectively avoid, manage and reduce the potential impacts from exploration activities. AECOM undertook the audit of this EMPr in July 2020, following agreement with PASA on the process and approach. The findings of the audit are: • the 2014 EMPr (which was prepared prior to the amended EIA Regulations) meets the requirements of the amended EIA Regulations (7 April 2017); • the 2014 EMPr is broadly aligned with Good International Industry Practice; • the EMPr presents a comprehensive assessment of the potential impacts from the proposed exploration activities; • the EMPr is considered effective in identifying and assessing the impacts; and • there are no shortcomings in the EMPr. Minor changes were required and an updated EMPr was prepared. You are hereby invited to review and submit comments on the full Environmental Audit Report and on the edits to the Updated EMPr.

The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Northern Cape Ultra Deep Licence Area: Environmental Audit Report and updated Environmental Management Programme.

SAHRAs initial awareness of the project occurred in February 2014 when the Maritime and Underwater

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Cultural Heritage (MUCH) Unit received a Background Information Document outlining a proposed exploration programme in the Northern Cape Ultra-deep License off the West Coast of South Africa. As the proposal included the disturbance of the sea bed through piston core sampling SAHRA were required issue a comment regarding any potential risk to heritage.

In May 2014 the MUCH Unit issued a comment responding that the license area is in fact outside of SAHRA's jurisdiction, being over 24 nautical miles (45kms) from the baseline. Furthermore, due to the depths and distances from shore, it was considered highly unlikely that any cultural material would be located.

The comment from 2014 still stands and no further input is required from SAHRA during this stage of the project.

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

Yours faithfully

Briega Williams
Heritage Officer
South African Heritage Resources Agency

Lesla Grange
Manager: Maritime and Underwater Cultural Heritage
South African Heritage Resources Agency

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ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/540032>
(, Ref:)

Terms & Conditions:

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