

Comments and Responses 1623 Searcher BA 2

Mr Hleketani Mukhari

Date 2024/04/19 Method Email

Comment

Good day, You can forward further available information.

Response

Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project. Please see the attached background information document for the project.

Ms Sue Reuther

Date 2024/04/24 Method Email

Comment

Hello, I would like to register as an I&AP for the project.

Response

Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project.

Ms Menka Vasant

Date 2024/07/12 Method Email

Comment

Hello! I was wondering if there is a recording or minutes of today's online meeting? If so could you please pass it on?

Response

You can download the recording of the Searcher Seismic Survey Virtual Public Meeting here:

Prof. Merle Sowman

Date 2024/05/03 Method Email

Comment

Please register me as an interested and affected party.

Response

Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project.

Patrick Dowing

Date 2024/04/20 Method Email

Comment

WESSA: Western Cape responds as follows to the notification: The purpose of this survey is to assess the potential for significant oil and gas deposits below the sea bed. Apart from the harm

Response

Dear I&AP, Thank you for your email. Your comment has been noted. A marine ecological assessment is being undertaken for the survey project as well as the compilation of the Draft

Patrick Dowing

to marine species and habitats likely to proceed from the seismic operations themselves and possible drilling and infrastructure installation that could follow, it is scientifically undeniable that subsequent combustion of said oil or gas would lead to increased carbon emissions. Such emissions are categorically linked to climate change impacts of an increasingly destructive and disrupting nature. South Africa is signatory to the Paris agreement to limit such emissions. At COP 28 there was majority consensus to transition away from the use of these fuels not to seek new such sources. Section 24 of the South African constitution establishes the intergenerational right to an environment not harmful to our health. Pursuing the implicit goal of further exploitation of fossil fuels flouts this right and should therefore not be undertaken.

Basic Assessment Report. The report will be sent to all I&APs to submit their comments when it has been released. It should be noted that authorising seismic surveys does not guarantee new oil and gas exploration or production. Future impacts associated with potential oil and gas production would need to be assessed separately as part of the EIA for those activities. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country’s energy planning strategy, there is a need for gas in South Africa’s energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed seismic activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. A Draft IRP (2023) has been published for comment as necessitated by changing circumstances. The IRP continues to highlight South Africa’s pursuit of a diversified energy mix that will provide security of supply while ensuring compliance with its emission reduction plan.

Ms Phumla Ngesi

Date 2024/07/22 Method Email

Comment

1. Executive Summary and Chapter 1 Extract: “The Orange Basin 2D Seismic Survey (Petroleum Agency South Africa (PASA) Ref: 12/1/038)) was a multiclient 2D programme off western South Africa which was terminated prior...” Comment: The reconnaissance permit was for a two (2) dimensional (2D) seismic survey for ~22 014 line km and a three (3) dimensional (3D) seismic survey for ~10 000 km2. It is therefore incorrect to indicate that this application was only for a 2D seismic survey. Recommendation: Kindly correct the sentence to include a 3D seismic survey. “The Orange Basin 2D and 3D Seismic Survey (Petroleum Agency SA (PASA) Ref: 12/1/038)) was a multiclient 2D and 3D programme off the West Coast of South Africa which was terminated prior...” 1. Executive Summary and Chapter 1 Extract: “The Orange Basin 2D Seismic Survey (Petroleum Agency South Africa (PASA) Ref: 12/1/038)) was a multiclient 2D programme off western South Africa which was terminated prior...” Comment: The reconnaissance permit was for a two (2) dimensional (2D) seismic survey for ~22 014 line km and a three (3) dimensional (3D) seismic survey for ~10 000 km2. It is therefore incorrect to indicate that this application was only for a 2D seismic survey. Recommendation: Kindly correct the sentence to include a 3D seismic survey. “The Orange Basin 2D and 3D Seismic Survey (Petroleum Agency SA (PASA) Ref: 12/1/038)) was a multiclient 2D and 3D programme off the

Response

1. The sentence has been revised accordingly. 2. The sentence has been revised accordingly. 3. The sentence has been revised accordingly. 4. The sentence has been revised accordingly. It must still be noted that only 9 000km2 of the 10 000km2 survey area was surveyed during the 2024 season. 4. The sentences have been amended and indicate the correct seismic survey window. 6. The sentences have been revised to indicates that the applicant applied for the reconnaissance permit which was subsequently accepted by PASA. 7. The paragraph is providing an explanation of the differences between 2D and 3D to clarify the applicability of the 3D seismic for this project so that I&APs do not question why the applicant is proposing 3D instead of 2D survey. 8. The sentence has been revised accordingly. 9. The sentence has been revised accordingly. 10. The second paragraph has been removed as recommended. 11. The extract indicated / referred to is incorrect. The extract is for Comment 10 Chapter 4, 4.2 above. The confusion was from the title on Table 13 which seemed it was referring to the South Coast while it was actually referring to the West Coast. The title on Table 13 has been revised accordingly as per the updated specialist report. 12. The reference was to the internet (World Wide Web). Recent supplementary peer-reviewed references have been added to the sentence. 13. The reference was to the internet (World Wide Web). Recent supplementary peer-reviewed references have been added to the

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Ms Phumla Ngesi

West Coast of South Africa which was terminated prior...” 2. Executive Summary and Chapter 1 Extract: “In 2022, Searcher then proposed to undertake a 3D seismic survey further offshore and over a smaller area offshore of the west coast of South Africa.” Comment: The application area for the reconnaissance permit bearing reference 12/1/038 during 2021 was 297 089 km² and the application area for the reconnaissance permit bearing reference 12/1/043 during 2022 was 30 000 km². On the work programme for reconnaissance permit bearing reference 12/1/043, the holder committed to acquire up to 10 000 km² 3D seismic survey which was achieved (~9000 km²). It is not clear from the extracted sentence. Recommendation: It is recommended that the sentence be restructured to remove the ambiguity. 3. Executive Summary and Chapter 1 Extract: “However, an area of approximately 7 800km² (largely in the northern section) was surveyed during the 2023-2024 survey season....” Comment: The survey was indicated, in the previous sentence of Chapter 1, to have occurred between January 2024-April 2024 which is correct. However, this extract indicates that the survey occurred during the 2023-2024 survey season and therefore the information provided is inconsistent. The seismic surveyed area is not consistent with the reports inclusive of close-out report received from the permit holder and ECO during and post the acquisition of seismic data, which indicate that the area surveyed was ~9000 km². Recommendation: Ensure that the sentence reflects that the survey occurred between January 2024 - April 2024. In addition, replace “approximately 7 800 km²” with “approximately 9 000 km²”. 1. Executive Summary and Chapter 1 Extract: Subsequently, Searcher was not able to complete the full extent of the intended survey during the 2023-2024 survey season. Comment: This statement is not correct. Searcher completed the proposed 3D seismic survey of up to 10 000 km² as per the approved work programme. Recommendation: It is therefore recommended that this sentence be amended to reflect the correct information i.e. that Searcher completed the approved work programme. 5. Executive Summary , Chapter 1 & 9.3.1.1.7 Extract: The 3D survey will take in the order of 127 days including downtime and is proposed to be undertaken during the survey period (Late December – May) but will likely commence in the first quarter of 2025 and may extend into 2026”. 9.3.1.1.7 “As the 3D survey is scheduled for the summer survey window (start December to end May), there will be some temporal overlap with the peak spawning products of commercially important species”. Comment: There seems to be a lack of consistency regarding the survey window period with section 9.3.1.1.7 indicating the start of December to May and Chapter 1 indicating late December and from the first quarter of 2025 into 2026. In addition, Section 9.3.1.1.1 indicates that December is not suitable (refer to point 13 below). It is therefore not clear, considering that the BAR indicates that the period between June and mid-December should be avoided (avoiding sensitive marine fauna). Recommendation: It is recommended that the sentences be amended and indicate the correct seismic survey window. Furthermore, the commencement period must be aligned with the assessment outcome. 6. Chapters 1; 5 & 6 Extract: Searcher has consequently applied for and received a new Reconnaissance Permit for the same previously approved activity over the same area

sentence. The specialist was requested to go through the comment and provide input. The sentence has been revised to indicate that if no mitigation measures are in place, the intensity of impacts on baleen whales is likely to be high. It must be noted that Humpbacks are often still migrating south as late as December, and then there are those that hang around feeding off Cape Columbine all summer, not to mention the Bryde’s whales whose migration is opposite to the usual southern right and humpback during winter months. This means that there is potential to encounter small numbers of migrating whales at any time during the year. The BAR has identified relevant mitigation to protect against the high presence of whales during the main migration period which is being avoided by the seasonal closures recommended i.e. no surveying allowed between June and early December. other various mitigations proposed for the nominated survey window where there is low presence of whales,the survey include but are not limited to: • 24 hr PAM (which by now is standard), • the usual 24/7 MMO presence, • implementing a “soft-start” procedure; and • terminating seismic source on observation and/or detection of penguins or feeding aggregations of diving seabirds, turtles, slow swimming large pelagic fish (including whale sharks, basking sharks, manta rays [and devil rays-Namibia only) or cetaceans within the 500 m mitigation zone, etc.

Ms Phumla Ngesi

(12/1/048)". Comment: The reconnaissance permit application was accepted (as per the letter dated 28 March 2024 from PASA) not approved/granted. The reconnaissance permit is only granted (received) once the application is processed and this process takes into consideration the outcomes of an EA application. Recommendation: It is therefore recommended that the sentence indicates that the applicant applied for the reconnaissance permit which was subsequently accepted by PASA. 1. Chapters 1; 5 & 6 Extract: Searcher has consequently applied for and received a new Reconnaissance Permit for the same previously approved activity over the same area (12/1/048)". Comment: The reconnaissance permit application was accepted (as per the letter dated 28 March 2024 from PASA) not approved/granted. The reconnaissance permit is only granted (received) once the application is processed and this process takes into consideration the outcomes of an EA application. Recommendation: It is therefore recommended that the sentence indicates that the applicant applied for the reconnaissance permit which was subsequently accepted by PASA. 7. Chapter 3 Extract: "2D surveys are typically appliedoften identified during 2D applications, providing a cube image of the subsurface geology within the survey volume." Comment: The description and inclusion of the 2D activity falls outside the scope of the project. 3D seismic survey is the only proposed activity. Recommendation: It is therefore recommended that the 2D seismic activity be removed from the activity description. Thus, creating a concise discussion on the scope of the project and thereby avoiding any confusion. 8. Chapter 4, 4.2 Extract: "The MPRDA outlines the procedural requirements that need to be met to acquire mining rights in South Africa." Comment: This application is with respect to petroleum and therefore the exclusive reference to mining rights infers that Chapter 4 of the MPRDA is applicable to this project. However, it is Chapter 6. This can cause confusion. Recommendation: The following amendment to the statement is recommended: "The MPRDA outlines the procedural requirements that need to be met to acquire petroleum exploration and production rights in South Africa." 9. Chapter 4, 4.2 Extract: "Further to an Acceptance Letter of Reconnaissance Permit (Ref: 12/1/048) dated 28th March 2024 from PASA, Searcher must now submit an application for Environmental Authorization in terms of NEMA for any activities requiring a reconnaissance permit as per Section 74 of the MPRDA." Comment: The statement "Searcher must now submit an application for Environmental Authorization in terms of NEMA...". The sentence can be confusing for those not well versed with the environmental impact assessment process as it implies that the environmental authorisation application must still be submitted. Recommendation: The following amendment to the statement is recommended: "Further to an Acceptance Letter of Reconnaissance Permit (Ref: 12/1/048) application dated 28th March 2024 from PASA, Searcher applied for an application for Environmental Authorization in terms of NEMA for any activities requiring a reconnaissance permit as per Section 74 of the MPRDA." 10. Chapter 4, 4.2 Extract: "Several amendments have been made to the MPRDA. These include, but are not limited to, the amendment of Section 102, concerning amendment of rights, permits, programmes and plans, to requiring the written permission of the Minister for any

Ms Phumla Ngesi

amendment or alteration.....One of the most recent amendments requires all mining related activities to follow the full NEMA process as per the EIA Regulations, 2014, which came into effect on 4 December 2014. Comment: The MPRDA amendments are irrelevant to the application in question. The last point of the paragraph has already been indicated in the prior paragraph. Recommendation: It is recommended that the second paragraph be removed. 1. Chapter 4, 4.2 Extract: “Several amendments have been made to the MPRDA. These include, but are not limited to, the amendment of Section 102, concerning amendment of rights, permits, programmes and plans, to requiring the written permission of the Minister for any amendment or alteration.....One of the most recent amendments requires all mining related activities to follow the full NEMA process as per the EIA Regulations, 2014, which came into effect on 4 December 2014. Comment: The MPRDA amendments are irrelevant to the application in question. The last point of the paragraph has already been indicated in the prior paragraph. Recommendation: It is recommended that the second paragraph be removed. 11. Chapter 8, 8.4.2.6.1 Extract: “Several amendments have been made to the MPRDA. These include, but are not limited to, the amendment of Section 102, concerning amendment of rights, permits, programmes and plans, to requiring the written permission of the Minister for any amendment or alteration.....One of the most recent amendments requires all mining related activities to follow the full NEMA process as per the EIA Regulations, 2014, which came into effect on 4 December 2014. Comment: The sentence indicates that Table 13 contains information regarding cetaceans most likely to be encounter in the project area, which is off the west coast. Table 13 indicates the following: “Table 13: Cetaceans occurrence off the South Coast of South Africa, their seasonality, likely encounter frequency with proposed reconnaissance activities and South African and Global IUCN Red List conservation status.” However, the frequency of encountering the cetaceans within the proposed reconnaissance area is not included in the table. Recommendation: Clarity and amendment is required concerning matter(s) stated above. 12. Chapter 9, 9.3.1.1.1 Extract: This information is largely drawn from McCauley (1994)..... supplemented by more recent peer-reviewed literature available on the WWW.” Comment: The peer-reviewed reference provided appears incomplete. Recommendation: Kindly complete the website reference. 1. Chapter 9, 9.3.1.1.1 Extract: This information is largely drawn from McCauley (1994)..... supplemented by more recent peer-reviewed literature available on the WWW.” Comment: The peer-reviewed reference provided appears incomplete. Recommendation: Kindly complete the website reference. 13. Chapter 9, 9.3.1.1.1 Extract: “Vocalisation of southward migrating whales may thus potentially be regionally comparatively high on commencement of operations in December, reducing thereafter. However, masking of communication signals is likely to be limited by the low duty cycle of seismic pulses. Should the survey overlap with the key migration and breeding period when there is a high likelihood of encountering migrating Humpback whales (including possible mother-calf pairs) and no other mitigation measures are in place, the intensity of impacts on baleen whales is likely to be high (mother-calf pairs) over

Ms Phumla Ngesi

the survey area and immediate-term duration (4 months), and of medium intensity (species specific) in the case of toothed whales over the survey area) and duration (immediate – 4 months)”. Comment: The statement indicates that there would be migrating whales and other cetaceans in December and explains the impacts if there are “no other mitigation measures are in place”. It is not clear what is meant by “no other mitigation measures are in place”. Secondly, the statement indicates that “Vocalisation of southward migrating whales may thus potentially be regionally comparatively high on commencement of operations in December, reducing thereafter” This statement implies that December is not favourable (as indicated above at point 5), yet earlier statements indicate that sensitive marine fauna should be avoided in early December. It is not clear which “key migration and breeding period” is referred to taking into the inconsistency of the survey window. Recommendation: Currently clarify what is meant by “no other mitigation measures are in place” and by “key migration and breeding period”. As per above comments (refer to point 5 above) also clarify the survey window and substantiate.

Angila Joubert

Date 2024/07/11 Method Email

Comment

Good afternoon Please see below comments from Bergrivier Municipality, myself as Environmental Planning Management officer on the BAR (Basic Environmental Assessment Report), June 2024: Section 9.3.1 on page 164 from the BAR (Basic Environmental Assessment Report), June 2024: The potential impact of seismic survey noise on whales and dolphins could include physiological injury to individuals, behavioural avoidance of individuals (and subsequent displacement from key habitat), masking of important environmental or biological sounds and indirect effects due to effects on predators or prey. Section 9.3.1.1.3 on page 167 from the (Basic Environmental Assessment Report), June 2024: The potential effects of seismic surveys on turtles include: • Physiological injury (including disorientation) or mortality from seismic noise; • Behavioural avoidance of seismic survey areas; • Masking of environmental sounds and communications; and • Indirect impacts due to effects on predators and prey. Section 9.3.1.1.4 on page 168 from the (Basic Environmental Assessment Report), June 2024 Potential impacts of seismic pulses to diving birds could include physiological injury, behavioural avoidance of seismic survey areas and indirect impacts due to effects on prey. Section 9.3.1.1.5 on page 170 from the (Basic Environmental Assessment Report), June 2024 Physical damage may lead to delayed mortality as reduced fitness is associated with higher vulnerability to predators and decreased ability to locate prey. Reduced heart rate (bradycardia) in response to the particle motion component of the sound from the seismic source, indicative of an initial flight response

Response

Good Day, Thank you for your participation in the project. Kindly see the responses in blue to your comments below: 1. How will this negative, destructive impacts on the Marine mammals be eliminated and avoided as the ocean is the natural habitat for these species as this is their natural environment and they can’t escape the noise impacts from the seismic surveys and will be impacted by it. a. The basic environmental assessment report was informed by various specialist studies including the noise acoustic study and the marine fauna study (refer to Appendix C of the BAR). It is understood and acknowledged in the Basic Assessment Report (BAR), that sound from seismic surveys may have an impact on marine fauna however the potential significance of the impact is what is important in the context of the EIA. Various mitigations measures are proposed to reduce any impacts on marine fauna to acceptable levels as proposed in Sections 9.3 and 11.4 of the BAR and the accompanying EMPr (Appendix E of the BA) which includes: i. Planning seismic surveys to avoid most sensitive periods within the survey area for some marine fauna from early June to early December; ii. Ensure the seismic vessel is fitted with PAM technology, which detects some animals through their vocalisations; iii. Defining and enforce the use of the lowest practicable seismic source volume for production; iv. Ensuring that ‘turtle-friendly’ tail buoys are used by the survey contractor or that existing tail buoys are fitted with either exclusion or deflector 'turtle guards'; v. Implementing a “soft-start” procedure; vi. Making provision for the placing of qualified MMOs on board the seismic vessel; vii. Terminating seismic source on

Angila Joubert

has also been reported. The potential impact on individual fish behaviour could therefore be of high intensity (particularly in the near-field of the seismic source array). Impacts to behavioural responses would be limited to the survey duration (immediate), and the survey area. Comment from Bergrivier Municipality: How will this negative, destructive impacts on the Marine mammals be eliminated and avoided as the ocean is the natural habitat for these species as this is their natural environment and they can't escape the noise impacts from the seismic surveys and will be impacted by it. Such surveys disturb the communication, navigation and eating habits essential to the survival of marine wildlife. These sonic waves can also damage fish with air bladders, destroy marine wildlife eggs and larvae, and cause fish and other marine species to temporarily migrate away from the affected area. This is detrimental impacts on sensitive marine species and this must be avoided. Kindly acknowledge receipt of this email with comments please

observation and/or detection of penguins or feeding aggregations of diving seabirds, turtles, slow swimming large pelagic fish (including whale sharks, basking sharks, manta rays [and devil rays-Namibia only) or cetaceans within the 500 m mitigation zone, etc. 2. Such surveys disturb the communication, navigation and eating habits essential to the survival of marine wildlife. These sonic waves can also damage fish with air bladders, destroy marine wildlife eggs and larvae, and cause fish and other marine species to temporarily migrate away from the affected area. This is detrimental impacts on sensitive marine species and this must be avoided. a. As indicated above, the basic environmental assessment report was informed by various detailed specialist studies including the noise acoustic study, the marine fauna study as well as the fisheries impact assessment (refer to Appendix C of the BAR). It is understood and acknowledged in the Basic Assessment Report (BAR), that sound from seismic surveys may have an impact on marine fauna however the potential significance of the impact is what is important in the context of the EIA. Several aspects of the proposed activities were identified as posing a potential risk to the fishing industry and these risks were assessed with respect to each commercial fishing sector operational off the West Coast. A summary of the Fisheries Impact Assessment findings and recommendations is provided in Section 11.1.3 and 11.4.2 of the BAR. The study found that the study area does not overlap with any of the fishing industries, except slightly the pelagic longline. The Reconnaissance Permit area is situated well offshore of distributional area of snoek during its spawning and migration periods (an important species for the linefish and small-scale fisheries sectors). Due to the remote location of the Reconnaissance Permit area, noise would be expected to attenuate to below threshold levels before reaching fishing grounds of all other sectors. Therefore, with the implementation of the project controls and mitigation measures, the residual impact due to seismic noise is considered to be of LOW NEGATIVE significance for the fish and fishing industry. Relevant mitigation measures are recommended to minimize impacts on assessed marine fauna and fishing industry such as soft-start approach, avoiding sensitive areas, air gun testing, Breaks in firing etc. In addition, in order to mitigate the impacts on the large pelagic longline sector, it is recommended that the survey be timed to take place between late December and May (periods of relatively low fishing activity in the Reconnaissance Permit area) as well as avoiding the most sensitive periods within the survey area for some marine fauna from early June to early December. A 5 km buffer zone where no seismic source operation is permitted is recommended around all Marine Protected Areas. Refer to Sections 9 and 11 of the BAR and the accompanying EMPr (Appendix E of the BA) for detailed impacts and mitigation measures. Thank you for your involvement in this process. Please do not hesitate to contact EIMS should you have further comments regarding the above project

Ms Jennifer Olbers

Date	2024/07/22	Method	Email
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Comments and Responses 1623 Searcher BA 2

Ms Jennifer Olbers

Comment

It is understood that this application is an extension to the previous Searcher survey undertaken between January 2024 and April 2024 (12/1/043) in the same area, with the current expiring on 10 November 2024. The WILDTRUST commented on the BAR of 12/1/043 (Annex A) as well as submitted comments on the Environmental Authorisation (Annex B). Therefore, the current comments should be read with the previous documents as the detailed concerns raised in Annex A and Annex B still remain and are applicable given that no new information is provided by the BAR or associated specialist reports to ease/allay fears around seismic survey activities. Nevertheless, comments on the ecological and biological components are given below, but by no means are comprehensive and are intended to highlight key concerns. Furthermore, socio-economic comments are given below which were not included in the previous application.

1. ECOLOGICAL, BIOLOGICAL AND ENVIRONMENTAL CONCERNS

1.1. CETACEANS The Basic Assessment Report (BAR) highlights that cetacean occurrences and likely encounters with various species are inevitable, all of which are protected in South African waters. Information supplied on cetaceans is largely based on observational data, which is somewhat outdated and does not account for population dynamics of the marine mammal species present in that area. To understand the risk of seismic surveys on cetaceans, the population status of species of concern needs to be established. This requires many years of research and depends on the temporal trends for each marine mammal species (Nowacek et al., 2015). Considering this, developing other metrics for cetacean population status, such as current distribution, ranging patterns, population structure, and body condition, should be a priority (Nowacek et al., 2015). Furthermore, without a proper understanding of the ecosystem within and surrounding the Area of Interest (AOI), it is impossible to assess the impacts of seismic noise on prey distribution, which ultimately influences the predator populations and distributions of cetaceans (Nowacek et al., 2015). Although underwater noise modelling has been employed to determine the physiological impact of seismic surveys, such as permanent threshold shifts (PTS) and temporary threshold shifts (TTS), it does not offer much insight into the detrimental after-effects on the individuals. For example, TTS and PTS can directly impact the survival of marine mammals, by hindering their ability to respond to danger, or utilise acoustic signals for prey detection, navigation and mother-calf communication, which ultimately could affect population dynamics of the affected species (Lenchine, 2023).

1.2. TURTLES Nesting of both leatherback and loggerhead turtles occurs between October and March, with a peak from December to January (Nel et al. 2013; Le Gouvello et al. 2020). This is followed by hatching between January and March when hatchlings enter the ocean (Nel et al. 2013; Le Gouvello et al. 2020). movement of turtle hatchlings and early juveniles from coastal waters into the open pelagic ocean is strongly influenced by sea currents, which aid in moving them away from inshore predatory waters and into pelagic waters where they continue to grow and mature into adult turtles (Luschi et al., 2003). The ocean current systems serve as the optimal environment for

Response

This application is not an extension but rather a new application. Since a Reconnaissance Permit is only valid for 1 year and the previous 12/1/043 permit will expire on the 10th of November 2024, Searcher has consequently applied for and received an acceptance letter for a new Reconnaissance Permit (12/1/048) over the same area as the previously approved activity. A new EA is required for the new 12/1/048 Reconnaissance Permit application. Although the current EA application relates to a new Reconnaissance Permit application by Searcher and not a renewal of the previous permission, it is for the same type of activity over the same Reconnaissance area. Please note that the comments received and included in the attached Appendix A and B, while considered applicable to the current application, were already responded to as part of the appropriate processes for the previous application. Searchers responses already provided as part of the previous appeal process are still considered applicable to the current application and should be read in conjunction with the appeal decision by DFFE (ref LSA226116 dated 23/9/2023).

1. Assumptions and limitations are included in Section 12 of the BA Report. Keeping these information gaps in mind, the assessment of impacts has adopted a strongly precautionary approach. It is acknowledged that information on deep-water habitats and their associated biota is lacking. This is primarily due to the difficulties and high costs associated with sampling beyond the inner continental shelf. Virtually all of the very scant information available has been obtained during hydrocarbon exploration projects, which in themselves provide good opportunity for collecting baseline data at depths beyond which commercial fisheries operate in. Even with these information gaps taken into consideration the level of certainty (i.e. the confidence rating) of the impact predictions in the marine fauna report is still considered high. Sound generated during the proposed seismic survey is expected to be in the order of 255 dB re 1 µPa at 1 m at an operating frequency range of 5 – 300 Hz. Section 11.1 indicates the impacts and recommendations associated with the permanent threshold shifts (PTS) and temporary threshold shifts (TTS) of marine species and behavioural disturbance due to either immediate impact from single seismic source pulses or cumulative effects of exposure to multiple seismic source pulses over a period of 24 hours. The spatial extent of the impact of seismic source noise is expected to be regional, although localised at any one time. The impact is considered to be fully reversible – any disturbance of behaviour that may occur as a result of survey noise would be temporary. With the implementation of the project controls and mitigation measures, the residual impact due to seismic noise is considered to be acceptable.

1.2. Section 9.3.1.1.3 of the BAR provides an assessment of the likely impact on turtles (including leatherback turtles) and should be read together with Section 8.4.2.4 of the BAR. The marine faunal specialist assessment states that the 'their abundance in the study area is unknown but expected to be low'. Turtles are wide ranging oceanic species whose abundance in the open ocean is naturally low based on their population numbers. Also based on Figure 24 (migration corridors) and Figure 47 (Hatchling trajectories) in the marine fauna report (Appendix C2), the survey area is not located in areas known for high

Ms Jennifer Olbers

hatchlings and juveniles where their passive dispersal movement is a consequence of drifting (Luschi et al., 2003). Tracking of these post-hatchling sea turtles poses significant challenges due to their elevated mortality rates, small size and rapid growth, complicating the attachment of tracking devices, resulting in what is termed the “lost years”- where it is unclear where sea turtles <10 years occur before returning to their shallow water foraging grounds (Musick and Limpus 1997). Further challenges to tracking these post-hatchling sea turtles include their movement from the coast into the pelagic-offshore environment and difficulty in visually spotting them due to their small size (Musick and Limpus 1997). However, a recent scientific investigation by Le Gouvello et al. (2024) employed modeling techniques to examine the trajectory of neonate turtles (><1 year) from hatching to one year of age using high-resolution ocean models in conjunction with particle tracking simulations. Hatchlings of both loggerhead and leatherback turtles, leaving their nesting areas within iSimangaliso Marine Protected Area and Ponta do Ouro take approximately 200-365 days to reach the AOI (see figures in Le Gouvello et al. 2024). This means that due to the annual introduction of new hatchlings between January and March, and the time taken for these turtles to reach the southwest coast, there is a very high likelihood that juvenile sea turtles will occur within the AOI throughout the year. Their presence, coupled with an inability to mitigate the risk of seismic surveys, means that juvenile sea turtles are at significant risk of harm.

1.3. CUMULATIVE IMPACTS As highlighted in the Basic Environmental Assessment Report, cumulative effects of seismic surveys on prey species (fish and cephalopods) requires further investigation. It is also imperative to assess the cumulative impacts such as entanglement and vessel strikes as a cumulative impact of populations, while making accurate impact assessments on species.

2. SOCIO-ECONOMIC CONCERNS Underestimation of Socio-economic Risks: the BAR asserts that the project will have a low level of socioeconomic risk due to its offshore location and the non-inclusion of drilling activities at this stage. However, this statement overlooks several critical factors, such as:

- **Fishing Industry Impact:** the offshore location does not entirely mitigate the potential disruption to fishing activities. The exclusion of fishing areas and the impact of seismic sound on catch rates can have significant adverse effects on local fishermen's livelihoods (McCauley et al., 2003). The BAR does acknowledge the need for a Fisheries Liaison Officer and communication with fishing vessels but underestimates the broader economic impact on fishing communities.
- **Local Economic Dependency:** many coastal communities depend heavily on fishing for their economic well-being. The report fails to thoroughly assess how disruptions, even temporary, could exacerbate existing economic struggles, such as poverty and loss of livelihood. The report fails to adequately consider the socio-economic vulnerabilities of local communities, particularly those dependent on fishing. This oversight could lead to increased poverty and social instability, contrary to the project's claims of minimal socio-economic impact.

2.1 Insufficient Consideration of Vulnerable Communities The report mentions that the project activities are unlikely to employ significant local labour due to the highly skilled nature of the work. This creates a socio economic disparity as local communities, already facing economic

abundance. The marine ecology specialist is of the opinion that the mitigation measures proposed in the report are more than adequate. Various mitigation measures are proposed to reduce the impact on turtles including:

- Implement a “soft-start” procedure of a minimum of 20 minutes’ duration on initiation of the seismic source if during daylight hours it is confirmed visually by the MMO during the pre- acquisition watch (60 minutes) that there are no turtles within 500 m of the seismic source.
- In the case of turtles being observed within the mitigation zone, delay the “soft-start’ until animals are outside the 500 m mitigation zone.
- Terminate seismic source on: Observation of turtles within the 500 m mitigation zone or Observation of any obvious mortality or injuries to turtles when estimated by the MMO to be as a direct result of the survey.
- For turtles, terminate source until such time as the animals are outside of the 500 m mitigation zone (seismic “pause”, no soft-start required).
- Avoid surveying within 100 m of critical foraging habitats (i.e. sea mounts).
- Ensure that ‘turtle-friendly’ tail buoys are used by the survey contractor or that existing tail buoys are fitted with either exclusion or deflector ‘turtle guards’.

The survey area does overlap with modelled hatchling occurrence, but according to the marine ecologist the abundance of hatchlings in the survey area would be low and the chances of encounter also low (which is corroborated by the actual data from the previous survey).

1.3. The BAR does address the identified cumulative impacts relevant to this activity. In terms of noise modelling, refer to Section 6.3 of the noise report (Appendix C1). Cumulative sound exposure levels are taken into consideration, cumulative modelling is carried out for a modelling area within a 60-km zone around the survey lines and with a 100-m grid size, so that the modelling area is sufficiently large to include all potential zones of impact for assessed marine fauna species. Refer to Section 4.6 of the Marine Ecology Report (Appendix C2) which deals with Confounding Effects and Cumulative Impacts, and Section 4.4 of the Fishers Assessment (Appendix C3) which addresses the increased impact on fisheries due to the combination of impacts from other projects that may take place during the same period. Furthermore, the assessment methodology used in the EIA by its nature already considers past and current activities and impacts. In particular, when rating the sensitivity of the receptors, the status of the receiving environment (benthic ecosystem threat status, protection level, protected areas, etc.) or threat status of individual species is taken into consideration, which is based to some degree on past and current actions and impacts (e.g. the IUCN conservation rating is determined based on criteria such as population size and rate of decline, area of geographic range / distribution, and degree of population and distribution fragmentation). The cumulative noise impact associated with multiple simultaneous surveys is assessed separately and the findings and recommendations regarding this are presented in Section 9.3.5 of the BAR. Further Searcher has a history of effectively conducting seismic surveys in South Africa and worldwide with successful environmental outcomes, including but not limited to no whale entanglement or strikes, attained from rigorous operating rules, environmental risk assessment, planning and management.

2. The fisheries specialist study (Appendix C3) has also assessed the impact on various commercial fishing sectors including potential impacts on small scale fishers. Sound levels for the seismic survey can notionally be

Ms Jennifer Olbers

challenges, will not benefit from job creation. Moreover, the assertion that local labour utilisation will be "extremely limited, if at all" neglects the potential for capacity building and skills development within these communities. 2.2. Environmental Justice The principle of environmental justice demands that adverse impacts should not disproportionately affect vulnerable and disadvantaged communities (Schlosberg, 2007). The BAR's current mitigation strategies do not sufficiently address this issue, leading to potential socio-economic inequities.

By not addressing the potential socio-economic inequities and focusing mainly on environmental impacts, the BAR does not align with the principles of environmental justice, which emphasise fair treatment and meaningful involvement of all people regardless of their socio-economic status (Bullard, 1993).

2.3. Inadequate Public Participation and Engagement

The BAR claims to have engaged in a public participation process, making documents available in multiple languages and conducting consultations. However, this engagement appears superficial in addressing the deeper socio-economic concerns of the communities:

- Representation and Inclusivity: effective public participation should ensure that all voices, particularly those of marginalised groups, are heard and considered in decision-making (Arnstein, 1969). The report does not provide detailed evidence of how it ensured the participation of these groups or how their concerns were integrated into the project planning. The public participation process described in the BAR appears to lack depth and genuine inclusivity, risking the marginalisation of vulnerable groups whose livelihoods and well-being are most at stake.

2.4. Limited Mitigation Measures for Socio-economic Impacts

The mitigation measures proposed in the BAR focus primarily on environmental impacts, with insufficient attention to socio-economic factors such as,

- Grievance Mechanism: while the implementation of a grievance mechanism for disruptions to fishing or navigation is mentioned, there is little detail on how grievances will be addressed or resolved promptly and fairly.
- Enhancing Positive Impacts: the BAR lacks comprehensive strategies to enhance positive socio-economic impacts, such as investing in community development projects or creating alternative livelihood opportunities for those affected by the project. The proposed mitigation measures are insufficient to address the complex socio-economic challenges posed by the project. More robust and detailed plans are needed to ensure that negative impacts are not only minimised but that opportunities for positive socio-economic development are maximised.

2.5. Impact on Local Economy and Tourism

expected to attenuate to below levels for behavioural disturbance at a distance of 4 km from the source. The current assessment is that behavioural disturbance to fish could be expected within this range and that catch rates could therefore also be affected. The spatial extent of the impact of seismic source noise emissions on catch rates is expected to be regional, although localised at any one time. The impact is considered to be fully reversible any disturbance of behaviour that may occur as a result of survey noise would be temporary. The impact of increased noise generated during the survey could affect any fishing sector that operates within 4 km of the proposed seismic survey area. Based on the distance of fishing grounds from the proposed survey area, only the large pelagic longline sector would be susceptible to impacts of elevated sound. With the implementation of the project controls, mitigation measures and the corroborating Sound Source Verification from our previous surveys, the residual impact due to seismic noise is considered to be of low significance for large pelagic longline sector. Section 9.3.4.3 identifies, describes and assesses the potential impacts on livelihoods with specific focus on the fishing communities. 2.1. The fisheries specialist study (Appendix C3) has also assessed the impact on various commercial fishing sectors including potential impacts on small scale fishers. Sound levels for the seismic survey can notionally be expected to attenuate to below levels for behavioural disturbance at a distance of 4 km from the source. The current assessment is that behavioural disturbance to fish could be expected within this range and that catch rates could therefore also be affected. The spatial extent of the impact of seismic source noise emissions on catch rates is expected to be regional, although localised at any one time. The impact is considered to be fully reversible any disturbance of behaviour that may occur as a result of survey noise would be temporary. The impact of increased noise generated during the survey could affect any fishing sector that operates within 4 km of the proposed seismic survey area. Based on the distance of fishing grounds from the proposed survey area, only the large pelagic longline sector would be susceptible to impacts of elevated sound. With the implementation of the project controls, mitigation measures and the corroborating Sound Source Verification from our previous surveys, the residual impact due to seismic noise is considered to be of low significance for large pelagic longline sector. Section 9.3.4.3 identifies, describes and assesses the potential impacts on livelihoods with specific focus on the fishing communities. 2.2. The BAR does describe and consider the interests of human communities and the social environment. A Social Impact Assessment was conducted as part of the BAR (Appendix C5). The findings from the SIA are included in the BAR and the recommendations from the SIA are included in the accompanying EMPr (Appendix E). It should also be noted that EIMS specifically consulted with the small-scale fishers and other community members and have given serious consideration to the comments and inputs from the local communities. The BAR specifically notes and considers the views raised in the public participation process. 2.3. Searcher question the statement that our engagement appears superficial. For the previous project a representative from Searcher consulted with the traditional leadership of the affected communities to establish what their understanding of meaningful consultation is and how communities should be consulted in future. A reassessment

Ms Jennifer Olbers

The report briefly mentions that the project is unlikely to affect local tourism due to its offshore nature. However, this assessment fails to consider several complex aspects, such as,

- **Perception of Environmental Degradation:** even if the physical impact on tourist sites is minimal, the perception of environmental risk associated with oil exploration can deter tourists, leading to a decline in tourism revenue. Studies have shown that tourists are highly sensitive to environmental quality and perceptions of ecological health (Becken & Simmons, 2002).
- **Local Economic Diversification:** many coastal regions rely on a combination of fishing, tourism, and small-scale commerce. Disruptions in one sector can have ripple effects, reducing. The report does not adequately address these interconnected economic dynamics. The report's failure to consider the complex impacts on tourism and local economic diversification underestimates the project's potential to disrupt these sectors. This oversight can lead to significant economic losses and reduced resilience of local economies.

2.6. Cumulative Socio-economic Impacts

The BAR tends to evaluate the project's impacts in isolation rather than considering cumulative impacts from other existing or future projects. • **Multiple Stressors:** coastal communities often face multiple environmental and socio-economic stressors, such as climate change, overfishing, and economic instability. The addition of an offshore oil project can exacerbate these issues, leading to compounded negative effects on community well-being (Halpern et al., 2008). The report lacks a thorough cumulative impact assessment which is crucial for understanding the broader socio-economic context. By not accounting for cumulative impacts, the BAR presents an incomplete picture of the socio-economic challenges faced by coastal communities. This approach undermines the assessment's reliability and the effectiveness of proposed mitigation measures.

2.7 Potential for Increased Social Conflict

The introduction of the project can lead to increased social tensions, especially if the benefits and burdens are not equitably distributed:

- **Resource Competition:** the exclusion zones around the project area can lead to increased competition for fishing grounds, potentially causing conflicts among local fishermen. The BAR does not sufficiently explore mechanisms to mitigate such conflicts or promote cooperative resource management.
- **Community Divisions:** the limited job opportunities and perceived benefits for local communities can lead to divisions and resentment, particularly if certain groups feel left out of the decision-making process or the benefits of the project (Walker & Hurley, 2004). The report needs to address how it will manage and mitigate these potential social conflicts. The lack of strategies to address potential social conflicts arising from resource competition and perceived inequities can exacerbate community divisions and instability, which are critical to social cohesion and development.

post-project was conducted on the potential effects on the identified communities and their intangible cultural heritage considering the socio-economic baseline developed during this environmental impact process against quantified economic damage and losses and human development impacts in a follow-up socio-economic assessment. This enabled the heritage specialist to evaluate the link between the socio-economic changes induced by the proposed project as it relates to changes in the intangible cultural heritage practices of the communities. Searcher understand that meaningful engagement is critical to our relationships with I&APs and further committed to develop a community engagement protocol based on the San Code of Research Ethics. This was completed in consultation with traditional leaders and the affected communities and was used to inform this Public Participation Process. It is unclear which marginalized groups are being referred to. A number of community engagements were recommended by the SIA as additional mitigation measures. Efficient engagement with a community involves more than merely setting up a meeting and inviting people. In many communities there is an expectation that outsiders should enter the community via the leadership before a community meeting can take place. Searcher has determined what the most appropriate way would be to interact and engage with the individuals and communities in a decolonised way as part of the mitigation required for the previous approved application. Searcher can now continue with engaging with the communities as a whole in an appropriate way, as recommended as part of the SIA. Education is suggested as a mitigation measure to empower community members to make informed decisions where they are in a position to weigh up the pros and cons for themselves, as was requested by community members. It should also be noted that EIMS specifically consulted with the small-scale fishers and other community members and have given serious consideration to the comments and inputs from the local communities. Small scale fishing communities have been thoroughly consulted as part of the PP process for the project and the impact of the project on small scale fishers has been assessed in the fisheries assessment. 2.4. As stated in response to Item 2.1 above: There is limited opportunity for job creation, capacity building and skills development during the seismic survey, which is typically only several months long while Searcher completes the survey. The employment benefits as well as skills development benefits would likely be realized during the production phase, if oil and gas is discovered. As stated in Section 8.3 of the EMPr (Appendix E), a key role of the Environmental Compliance Officer (ECO) would be to maintain a public consultation register in which all complaints are recorded, as well as action taken to address these complaints. The details of the mechanism and on how grievances will be address or resolved promptly and fairly is covered in our Grievance Mechanism Procedure which is provided to the FLO onboard the vessel prior to the start of a survey. Searcher has mandated times for response to a grievance and a procedure to escalate any necessary grievance to an independent external mediator to review the grievance and whos expert decision is binding on the commenter and Searcher. A register is retained of all grievances. Apart from the grievance mechanism the following additional mitigation is proposed from the social specialist: Searcher should continue to implement the community engagement

Ms Jennifer Olbers

3. HEALTH AND SAFETY CONCERNS

The BAR underplays potential health and safety risks associated with the project.

- Exposure to Pollutants: Offshore oil exploration can lead to the release of pollutants, which may affect marine life and subsequently human health through the consumption of contaminated seafood. The report does not provide a comprehensive assessment of potential health risks to local communities from exposure to pollutants (Cordner, 2015).
 - Emergency Preparedness: The BAR lacks detailed emergency response plans for potential accidents or spills, which could have severe socio-economic and health impacts on coastal communities. Effective emergency preparedness is essential to safeguard both the environment and the health and safety of local populations
- The inadequate consideration of health risks and emergency preparedness plans poses significant threats to the well-being of local populations. A more robust assessment of these factors is necessary to protect community health and safety.

4. GENDERED IMPACTS

The report does not address the potential gendered impacts of the project.

- Differential Effects: Men and women often experience the impacts of industrial projects differently. For example, disruptions to fishing might affect men's incomes more directly, while women may bear increased burdens in household management and caregiving roles if economic conditions worsen (Dankelman, 2010). The BAR should incorporate a gender analysis to ensure that mitigation measures are inclusive and equitable. The absence of gender analysis in the BAR ignores the differential impacts on men and women, potentially leading to unequal burden distribution and undermining the social equity.'
5. CONCLUSION It is crucial that the phase-by-phase approach of oil and gas development applications to the Petroleum Agency South Africa and the Department of Minerals & Energy is reconsidered. The current method, which involves authorization for each step without considering the long-term implications, does not allow for a comprehensive understanding of the risks to marine life in oil and gas development. A more holistic approach is needed to ensure the safety of our marine environment. In its current format, it remains unrealistic for regulators to reach scientifically reliable conclusions about the risks to marine life. Considering the lack of biological and ecological baseline data on species and ecosystems within the Area of Interest, the need for further studies, and the lack of mitigation measures that truly prevent harm to species, populations, and ecosystems, including endangered species, it is our opinion that seismic surveys should not continue in South African waters to grow a fossil fuel

protocol that they developed in 2023. This protocol aims to address the impact on vulnerable groups and uncertainty, and also have an educational component. No additional mitigation is required or deemed necessary in order to address the potential social impacts of the project. 2.5. No impacts on tourism were identified or are expected due to the nature of the project (the project is a survey / reconnaissance project and no exploration or production forms part of the current application), the location offshore (220 km at its closest point) and the temporary nature of the project (127 days). Impacts and risks to the environment are fully addressed in the BAR and EMPr with appropriate mitigation measures, where necessary, to negate any adverse perceptions to environmental quality, ecological health and fishing in coastal regions thereby supporting overall economic resilience. No disruptions on small-scale commerce were predicted. 2.6. See response to item 1.3 above. 2.7. See response to item 1.3 above. Section 9.3.4.7 of the BAR identifies, describes, and assesses the potential for community conflict and unrest. No local fisherman would be affected by the exclusion zone. The location of the survey is outside of the fisheries ring-fence area. The draft fisheries report (Appendix C3 clarifies these concerns regarding this aspect and Section 3.3.10 of the fisheries report contains the following information: Small-scale fishermen along the Northern Cape and Western Cape coastlines are unlikely to range beyond 20 km from the coastline; thus, inshore of the Reconnaissance Permit area, which is situated 250 km offshore of the coast at its closest point. This assessment is however cognisant of the ongoing issues related to the perceived areas fished and species targeted by SSF off the West Coast of South Africa e.g. that cultural practice of SSF may occur to 55 km offshore. While SSF regulations clearly specify that fishing is required to take place “nearshore” the actual differentiation between SSF and other fishing operations that might include SSF, such as the commercial “traditional linefish” and “pole and line” and the extent to which these commercial fisheries might include SSF, remains unclear. As such the offshore extent to which SSF may operate requires a precautionary approach in this assessment and consideration that the possibility exists (albeit a remote possibility that cannot be verified through the information made available on these fisheries), that SSF may have occurred historically and potentially in the future further offshore than suggested by the information made available for this assessment i.e. there is a remote possibility that some SSF may have targeted certain species (of which tuna and snoek are the main candidate species) further offshore than 20 km. The distance fished offshore by SSF and the associated risks determined in this assessment further necessarily considers practical aspects, notably that bottom fishing is impractical in waters deeper than 100 m and as such any bottom fishing, whether SSF or commercial, is highly unlikely beyond a precautionary depth being the 100 m depth contour. Further, in regard to migratory species, such as longfin tuna and snoek, economic and regulatory aspects relating to distances fished offshore is pertinent [i.e. such as the requirements of the South African Maritime Safety Authority (SAMSA)] in particular that most SSF are not likely to be “B” class certified (i.e. can operate up to 40 nm offshore and are longer than 9m) are likely limited to “C” class being mainly vessels of<9 m permitted to only operate > < 15 nm offshore.. As stated in the fisheries report, due to the remote location of the Reconnaissance

Ms Jennifer Olbers

	<p>Permit area, noise would be expected to attenuate to below threshold levels before reaching fishing grounds of all other sectors viz. the demersal trawl, midwater trawl, demersal longline, tuna pole-line, small pelagic purse-seine, traditional linefish, west coast rock lobster and small-scale fisheries sectors. This is regardless of the specific near-shore areas where small-scale fishing may take place. As stated in response to Item 2.1 above: There is limited opportunity for job creation, capacity building and skills development during the seismic survey, which is typically only several months long. The employment benefits as well as skills development benefits would likely be realized during the production phase, if oil and gas is discovered. 3. Please refer to the EMPr included as Appendix E of the report. Various mitigation measures are provided to deal with pollutants from the survey: The mitigations measures regarding waste management as described in Section 13.16 of the EMPr are listed below: The discharge of biodegradable wastes from vessels is regulated by MARPOL 73/78 Annex V, which stipulates that: • No disposal to occur within 3 nautical miles (± 5.5 km) of the coast. • Disposal between 3 nautical miles (± 5.5 km) and 12 nautical miles (± 22 km) needs to be comminuted to particle sizes smaller than 25 mm. • Disposal overboard without macerating can occur greater than 12 nautical miles from the coast when the vessel is sailing. Discharges of oily water (deck drainage, bilge and mud pit wash residue) to the marine environment are regulated by MARPOL 73/78 Annex I, which stipulates that vessels must have: • A Shipboard Oil Pollution Emergency Plan (SOPEP). • A valid International Oil Pollution Prevention Certificate, as required by vessel class. • Equipment for the control of oil discharge from machinery space bilges and oil fuel tanks, e.g. oil separating/filtering equipment and oil content • meter. Oil in water concentration must be less than 15 ppm prior to discharge overboard. • Oil residue holding tanks. • Oil discharge monitoring and control system</p> <p>Sewage and grey water discharges from vessels are regulated by MARPOL 73/78 Annex IV, which specifies the following: • Vessels must have a valid International Sewage Pollution Prevention Certificate. • Vessels must have an onboard sewage treatment plant providing primary settling, chlorination and dechlorination before discharge of treated effluent. • The discharge depth is variable, depending upon the draught of the seismic vessel / support vessel at the time, but will be in accordance with MARPOL 73/78 Annex IV. • Discharge of sewage beyond 12 nm requires no treatment. However, sewage effluent must not produce visible floating solids in, nor cause the discolouration of, the surrounding water. • Sewage must be comminuted and disinfected for discharges between 3 nautical miles (± 6 km) and 12 nautical miles (± 22 km) from the coast. This will require an onboard sewage treatment plant or a sewage comminuting and disinfecting system. • Disposal of sewage originating from holding tanks must be discharged at a moderate rate while the ship is proceeding on route at a speed not less than 4 knots Sewage will be treated using a marine sanitation device to produce an effluent with: • A biological oxygen demand (BOD) of<25 mg/l (if • the treatment plant was installed after 1/1/2010) or ></p>
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Comments and Responses 1623 Searcher BA 2

Swartland Local Municipality

Date 2024/06/21 Method Email

Comment

Your Reference Number: 5408068 We Acknowledge receipt of your letter dated 2024-06-20 regarding REMINDER: SEARCHER RECONNAISSANCE BA 048 PROJECT: BASIC ASSESSMENT REPORT AVAILABILITY AND PUBLIC OPEN DAYS and confirm that the correspondence is being referred to the relevant Department for attention. Reference Number: 5408068

Response

Good day, Thank you for your comment. You can submit comments anytime before the 22nd of July. Please contact us should you have any questions or request for details

Thea Jordan

Date 2024/07/23 Method Email

Comment

1. It is acknowledged that pre-emptive mitigation measures are proposed to mitigate potential impacts caused by acoustic blasts. It appears that the conclusiveness of scientific knowledge is currently being contested, as considered in the Western Cape High Court judgement in the case of Christian John Adams & Others v. Minister of Mineral Resources and Energy & Others (case number: 1306/22) where applicants in this matter presented the argument that cumulative impacts of seismic surveys have not been studied in South Africa and that the impact on fish assemblages was difficult to interpret. 2. It is recommended that a Strategic Environmental Assessment (“SEA”) process based on spatial planning principles be undertaken to assess and manage potential cumulative impacts in a holistic manner, and to identify and implement regional level mitigation measures. The decision-making authority should take cognisance of this repeated recommendation to undertake a SEA to assist specialists, EAPs and the competent authority to accurately assess cumulative impacts. 3. The Directorate: Biodiversity and Coastal Management does not support further reconnaissance, exploration, prospecting, or mining activities of the sea floor until such time that sufficient and strategic level information is available on the cumulative impacts of these activities so that informed comments can be provided on these types of applications. 4. Please note that the comments and recommendations do not pre-empt the outcome of the application. No information provided, views expressed and/or comments made should in any way be regarded as an indication or confirmation that additional information or documents will not be requested; or of the outcome of the application submitted to the competent authority. 5. The applicant is reminded of its “general duty of care towards the environment” as prescribed in section 28 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) which states that “Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised

Response

1. The BAR does address the identified cumulative impacts relevant to this activity. In terms of noise modelling, refer to Section 6.3 of the noise report (Appendix C1). Cumulative sound exposure levels are taken into consideration, cumulative modelling is carried out for a modelling area within a 60-km zone around the survey lines and with a 100-m grid size, so that the modelling area is sufficiently large to include all potential zones of impact for assessed marine fauna species. 2. EIMS is in agreement that considering the current interest in offshore oil and gas exploration that there is a need for the relevant authorities to initiate further research and strategic assessment to guide the future development scenarios. Searcher has already complied with initiating discussions within the industry as committed to within the BAR application for the previous survey, however as an SEA is a government lead initiative, the wider industry position and social license falls outside of the scope of this BA Process which focused on identifying and assessing the potential impacts associated with the seismic survey applied for. Sensitive areas in terms of marine spatial planning are discussed in 8.6 of the BAR. Refer to Section 4.6 of the Marine Ecology Report (Appendix C2) which deals with Confounding Effects and Cumulative Impacts, and Section 4.4 of the Fishers Assessment (Appendix C3) which addresses the increased impact on fisheries due to the combination of impacts from other projects that may take place during the same period. Furthermore, the assessment methodology used in the EIA by its nature already considers past and current activities and impacts. In particular, when rating the sensitivity of the receptors, the status of the receiving environment (benthic ecosystem threat status, protection level, protected areas, etc.) or threat status of individual species is taken into consideration, which is based to some degree on past and current actions and impacts (e.g. the IUCN conservation rating is determined based on criteria such as population size and rate of decline, area of geographic range / distribution, and degree of population and distribution fragmentation). The cumulative noise impact associated with multiple simultaneous surveys is assessed separately and the findings and recommendations regarding this are presented in

Thea Jordan

by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment”, read together with section 58 of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008), which refers to one’s duty to avoid causing adverse effects on the coastal environment. The Department reserves the right to revise initial comments and request further information based on any or new information received.

Section 9.3.5 of the BAR. Further to the above it should be noted that Underwater Sound Source Verification (SSV) was recommended as part of the previous survey completed by Searcher in the first quarter of 2024 including drift Bouy deployment for underwater acoustic monitoring to establish an actual baseline prior to the commencement of the survey and then operational levels of noise during the survey. This sound data was used to verify the noise modelling predictions in the current acoustic report for this new application. Drift buoys (equipped with hydrophones) were deployed during the survey route to conduct an SSV, in order to record and analyse sound levels (for comparison against background ambient levels in key fisheries areas) and to provide input and assist in Fisheries Research. In summary the model used for the acoustic report was considered validated and fit for purpose, based on the local SSV data analysed and reviewed to date by the specialist. Assumptions and limitations are included in Section 12 of the BA Report. Keeping these information gaps in mind, the assessment of impacts has adopted a strongly precautionary approach. It is acknowledged that information on deep-water habitats and their associated biota is lacking. This is primarily due to the difficulties and high costs associated with sampling beyond the inner continental shelf. Virtually all of the very scant information available has been obtained during hydrocarbon exploration projects, which in themselves provide good opportunity for collecting baseline data at depths beyond which commercial fisheries operate in. Information from such ecological baseline surveys is however not always made publicly available as it is often considered proprietary information. Even with these information gaps taken into consideration the level of certainty (i.e. the confidence rating) of the impact predictions in the marine fauna report is still considered high. 3. Your objection is noted and will be submitted to the Competent Authority for consideration and decision making. Refer to response provided to Item 1 above. 4. Comment noted. 5. Comment noted. Anticipated impacts have been identified, assessed, prevented and where such cannot be avoided management and mitigation measures have been recommended. 6. Comment noted.

Ms Stephanie Barnardt

Date 2024/06/26 Method Email

Comment

Good day Please can you provide me with HWC reference number for me to provide you with a comment. If there was no NID trigger, please not that HWC cannot comment on matters that do not form part of our mandate

Response

Good day, Thank you for your comment. The proposed project is not a development, it is only a seismic survey at this stage. We will obtain comment from SAHRA. Feel free to contact EIMS if you have any comment/queries

Niall Kramer

Date 2024/04/19 Method Email

Comments and Responses 1623 Searcher BA 2

Niall Kramer

Comment	Response
Please register me as an IAP.	Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project.

Pammela Legg

Date	2024/06/20	Method	Email	
Comment	Response			
Hi there what is this in connection with???	Good day, This is connection with a Seismic Survey that is being conducted in the West Coast by Searcher. Please visit EIMS website for more information (www.eims.co.za/public-participation) A datafree version of the web page is also available if you are unable to access the report due to data constraints: https://eims.datafree.co/2024/04/12/1623-searcher-seismic-survey-048-basic-assessment-project/			

Michele Rivarola

Date	2024/07/22	Method	Email	
Comment	Response			
With reference to the above I intend hereby registering my objections to the granting of a permit on the following premises: 1. Exploration for new oil and gas deposits runs contrary to South Africa’s commitment to a low-carbon economy. 2. Exploration for new oil and gas deposits is contrary to what the IEA and the WHO have recommended as there are already sufficient resources available to see the world through to 2050 and past 2050. 3. The natural gas cycle is in fact worse than the coal cycle when it comes to carbon equivalent emissions and therefore makes no sense investing in new natural gas plants if SA is to pursue a low carbon future making exploration for new deposits a contradiction in terms and unnecessary. 3. The assessment of the impacts on the marine environment in the study are clearly biased and have ignored reams of scientific evidence from overseas that has found that seismic surveys not only destroy phytoplankton and fish eggs and larvae but also affect communication between marine mammals. 4. The assessment of the impacts on the marine environment in the study are clearly biased and have ignored reams of scientific evidence from overseas that has found that seismic surveys not only destroy phytoplankton and fish eggs and larvae but also affect communication between marine mammals. 5. The assessment of the impacts on the marine environment are not based on local data and therefore could be statistically completely inaccurate. 6. Physical observation by so called on-ship observers is no guarantee that in days of fog and low visibility the observers will be able to spot endangered species before they reach the exclusion zone and	1. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country’s energy planning strategy, there is a need for gas in South Africa’s energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed exploration activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined. It is agreed that pending the outcome of an appraisal on the viability of extracting any oil or gas resource, which this exploration activity is likely to inform, due caution will need to be taken to ensure that South Africa complies with its international commitments and ensure a safe environment in line with our constitution and the prevailing environmental legislation that gives effect to thereto. 2. The statement is focusing on the world and not just specifically South Africa which has much more			

Michele Rivarola

are permanently injured or incapacitated by the loud seismic blasts. There is in addition no indication that during days of low visibility and/or fog the seismic prospecting will be interrupted. 7. As the Makhanda and the Gqeberha Courts have found in instances where there is no certainty about the risk of permanent and irreversible damage to ecosystems nor the amelioration measures the constitution mandates the application of the prevention principle where such activities are not permitted.

specific needs, potential lack of alternatives and security risks for reliance on imported products. The IEA has the following statements online to corroborate the difficulties in their recommendations: Oil-based fuels power millions of automobiles, aircraft and ships around the world and are integral to modern life. But burning oil is also one of the leading sources of CO2 emissions. Efforts are underway to decarbonise sectors like transport that rely heavily on oil, but this is challenging in areas such as aviation where alternatives (e.g. electric power) still cannot match the energy density of petroleum fuels. <https://www.iea.org/countries/south-africa/oil> Many people are familiar with natural gas from its use in homes for cooking and heating, but it is also an important fuel for power generation and is used to manufacture chemicals and plastics. In recent decades natural gas has seen a growing role in power generation thanks to increased availability, flexibility and lower CO2 emissions than coal and oil, but emissions from natural gas will still need to be reduced significantly to meet international climate goals. The global energy market disruptions following Russia's invasion of Ukraine have also demonstrated the energy security risks of reliance on imported gas, particularly in Europe. <https://www.iea.org/countries/south-africa/natural-gas> The 2019 Integrated Resource Plan states the following regarding Gas to Power: 5.3.5 Gas to Power Whilst the plan indicates a requirement for 1000 MW in 2023 and 2000 MW in 2027, at a 12% average load factor, this is premised on certain constraints that we have imposed on gas, taking into account the locational issues like ports, environment, transmission etc. This represents low gas utilization, which will not likely justify the development of new gas infrastructure and power plants predicated on such sub-optimal volumes of gas. Consideration must therefore be given to the conversion of the diesel-powered peakers on the east coast of South Africa, as this is taken to be the first location for gas importation infrastructure and the associated gas to power plants. It must be noted that that the unconstrained gas is a 'no regret option' because the power system calls for increased gas volumes when there are no constraints imposed. Policy Position 7: To support the development of gas infrastructure, convert all diesel-fired power plants (Peakers) to gas. WHO defines fuels and technologies that are clean for health at the point of use as solar, electricity, biogas, liquefied petroleum gas (LPG), natural gas, alcohol fuels, as well as biomass stoves that meet the emission targets in the WHO Guidelines. Without strong policy action, 2.1 billion people are estimated to still lack access to clean fuels and technologies in 2030*. There is a particularly critical need for action in sub-Saharan Africa, where population growth has outpaced access to clean cooking, and 923 million people lacked access in 2020. Strategies to increase the adoption of clean household energy include policies that provide financial support to purchase cleaner technologies and fuels, improved ventilation or housing design, and communication campaigns to encourage clean energy use. <https://www.who.int/news-room/fact-sheets/detail/household-air-pollution-and-health> In addition to the above statements, oil and gas can play a role in reducing pollution by displacing coal and investing in emission-reducing technologies, their overall impact on environmental sustainability can be managed and balanced with renewable energy sources in the broader energy transition. Natural gas is a "bridge fuel" due to its lower carbon intensity

compared to coal when burned for electricity generation. Switching from coal to natural gas can reduce greenhouse gas emissions and air pollutants like sulphur dioxide and particulate matter. Diversifying the energy mix away from coal involves integrating more renewables like wind and solar, which are intermittently available. Natural gas power plants can provide reliable backup power, supporting the integration of renewables into the grid. Seismic surveying is not only used for petroleum and natural gas exploration and development, it can in certain instances also be used for development of offshore wind, geothermal energy, and low-carbon solutions such as carbon capture and storage and also more generally for providing more insight and understanding into the regional geology of the area for scientific purposes. 3. Please refer to response provided to item 1 above. The following response was provided by Searcher regarding the natural gas cycle: This statement is incorrect, Natural gas has several advantages to the coal cycle in terms of lower carbon equivalent emissions, reduced air pollutants, and higher efficiency in power generation. These factors contribute to its role as a transitional fuel in the global energy mix, supporting efforts to mitigate climate change and improve air quality compared to more carbon-intensive alternatives like coal. With sufficient management of methane emissions these advantages include but are not limited to :

- Lower Carbon Intensity of Combustion with on average, natural gas emitting approximately 50-60% less CO₂ per unit of energy compared to coal. (<https://www.eia.gov/tools/faqs/faq.php?id=73&t=11>)
- Reduced Emissions of lower CO₂ emissions, fewer pollutants such as sulfur dioxide (SO₂), nitrogen oxides (NO_x), and particulate matter compared to coal (<https://www.epa.gov/energy/comparing-energy-sources-primary-energy-infobook>)
- Lower Levels of Trace Metals such as mercury, arsenic, lead and ash residues which coal releases into the atmosphere (<https://www.iea.org/topics/clean-coal-technologies>)
- Higher Efficiency in Power Generation translating to less fuel consumption per unit of electricity generated further reducing pollutants and CO₂ emissions (<https://www.eia.gov/energyexplained/electricity/electricity-in-the-us-generation-capacity-and-sales.php>)
- Faster Response to Demand Fluctuations (<https://www.iea.org/topics/gaspowerplants/>)
- Emission Reduction Technologies such as combined cycle gas turbines (CCGT) and carbon capture and storage (CCS). (<https://www.iea.org/topics/carbon-capture-utilisation-and-storage>)

Although the Need and Desirability of the project is linked to the potential future use of the seismic data to discover oil and gas reserves, future impacts associated with potential oil and gas production would need to be assessed separately as part of the EIA for those activities. 4. The basic environmental assessment report prepared by independent environmental assessment practitioners (EIMS) and was informed by various independent and qualified specialists including the noise acoustic study, the marine fauna study and fisheries assessment. The project team (EIMS and specialists) are guided by various legislation and are registered scientists who are always required to comply with professional body's Code of Conduct. The project team have signed declarations of independence to affirm that they have no vested interests in the proposed project or the study area. The information provided in the report is not biased, but a reflection of the outcome from the various

assessments. It is understood and acknowledged in the Basic Assessment Report, that sound from seismic surveys may have an impact on marine fauna however the potential significance of the impact is what is important in the context of the EIA. Various mitigations measures are proposed to reduce any impacts on marine fauna to acceptable levels as proposed in Sections 9.3 and 11.4 of the BAR and the accompanying EMPr (Appendix E of the BAR). The impact on plankton is assessed in Section 9.3.1.1.7 of the BA report. The reconnaissance permit area is located far offshore (220 km at its closest point) and therefore beyond the influence of coastal upwelling, which will influence both plankton abundance and the abundance of fish species that depend on plankton as a food source. In addition, the key “ring fenced” trawling area and spawning areas to the south-east of the survey area identified during previous consultation with the commercial fishing sector will be avoided. No other direct mitigation measures for potential impacts on plankton and fish egg and larval stages are feasible or deemed necessary. In addition to the above both the fisheries and marine ecology reports have been subject to peer review. 5. Although based on international standards, the mitigation measures currently applied for seismic surveys in south Africa have been specifically adapted to the local context. Assumptions and limitations are included in Section 12 of the BA Report. Keeping these information gaps in mind, the assessment of impacts has adopted a strongly precautionary approach. It is acknowledged that information on deep-water habitats and their associated biota is lacking. This is primarily due to the difficulties and high costs associated with sampling beyond the inner continental shelf. Virtually all of the very scant information available has been obtained during hydrocarbon exploration projects, which in themselves provide good opportunity for collecting baseline data at depths beyond which commercial fisheries operate in. Information from such ecological baseline surveys is however not always made publicly available as it is often considered proprietary information. Even with these information gaps taken into consideration the level of certainty (i.e. the confidence rating) of the impact predictions in the marine fauna report is still considered high. 6. PAM has been adopted for the duration of the survey for days of fog and low visibility to assist the observers to be able to spot endangered species in the vicinity of the survey vessel and before they reach the exclusion zone. As stated on page 33 of the EMPr that accompanied the draft BAR, the following mitigation is included regarding periods of low visibility: Implement a “soft-start” procedure of a minimum of 20 minutes’ duration on initiation of the seismic source if:

- during daylight hours it is confirmed: visually by the MMO during the pre-shoot watch (60 minutes) that there are no penguins or feeding aggregations of diving seabirds, slow swimming large pelagic fish, turtles, seals or cetaceans within 500 m of the seismic source, and by PAM technology that there are no vocalising cetaceans detected in the 500 m mitigation zone.
- during times of poor visibility or darkness it is confirmed by PAM technology that no vocalising cetaceans are present in the 500 m mitigation zone during the pre-shoot watch (60 minutes).

When arriving at the survey area for the first time, survey activities should, as far as possible, only commence during daylight hours with good visibility and wind speeds below Beaufort 3. However, if this is not possible due to prolonged periods of high wind speed, poor visibility (e.g. thick fog) or unforeseen

Comments and Responses 1623 Searcher BA 2

Michele Rivarola

technical issue which results in a night-time start, the initial acoustic source activation (including gun tests) may only be undertaken if the normal 60-minute PAM pre-watch and ‘soft-start’ procedures have been followed. 7. The court suspended the orders of the Makhanda High Court which had set aside Shell’s exploration right of 2014. In light of the findings by the Makhanda High Court the application by Shell may proceed but will have to be done with proper consultation with the affected communities, taking into account community rights and environmental harm. Searcher value your input into our comprehensive community consultation strategy for identifying community rights and environmental harm potentially relevant to our survey. Further the specialist team considered the proposed activity (seismic survey), identified and assessed potential environmental impacts (supported by inputs from the public consultation process), and has proposed management and mitigation measures. All impacts identified in the process can be reduced to a medium or low significance with the implementation of the management and mitigation measures proposed. The findings of the specialist studies conclude that there are no environmental fatal flaws that should prevent the proposed project from proceeding, provided that the recommended mitigation and management measures are implemented.

Mr Ismat Adams

Date2024/04/29MethodEmail

Comment

Good day Please register me as I&AP. Name: **** Organisation: CapeNature Capacity: Land-Use Scientist – Landscape West Email: ****@****.co.za Contact no.: ***** Please send Google Earth KML files or QGIS shapefiles of the activity footprint.

Response

Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project. Please also see the attached KML file and locality map of the project area.

Liziwe McDaid

Date2024/04/19MethodEmail

Comment

I would like to be involved in this process. Please can your provide additional information, Regards

Response

Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project. Please see the attached background information document for the project.

Date2024/04/19MethodEmail

Comment

Response

Comments and Responses 1623 Searcher BA 2

Liziwe McDaid

I would like to be involved in this process. Please can your provide additional information, Regards

Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project. Please see the attached background information document for the project.

Mr Daniel van den Heever

Date 2024/04/19 Method Email

Comment

Hereby please register Kookfontein Renewables Pty Ltd as well as Richtersveld Chamber of Commerce as an Interested and Affected Party for any economic benefits that will arise from this project.

Response

Dear I&AP, Thank you for your email. We can confirm that you have been registered on the I&AP database for this project.

Mrs Thesmé van Zyl

Date 2024/07/22 Method Email

Comment

Comment on BAR Searcher Reconnaissance BA 048 Project – Reference Nr 1623 Thank you for the invitation to comment on the above-mentioned Project. The Open Day hosted by EIMS on the 27th of June 2024 was highly insightful and educational regarding the proposed activities. Our coastal communities in the Matzikama area were previously unfamiliar with seismic surveying/studies, but through your direct communication and transparency, they now understand the proposed seismic activities and their potential impacts on the environment and coastal communities. Please ensure compliance with and implementation of the mitigation measures outlined in the various specialist studies with regards to the project (C1 – C5) to minimize the impact on the environment and West Coast communities. Whales with their calves visit the West Coast waters from June to November, and they have even been spotted throughout the year. As noise emissions from the activities may affect communication between whale mothers and their calves, it is strongly advised to cease activities during this period. Additionally, it is recommended to monitor and evaluate the impact of the activities on marine fauna and flora in the vicinity before, during, and after the operations.

Response

Thank you for your comments. All mitigation measures from the specialists with regards to mitigating impacts on the environment form part of the EMPr for the project (Appendix E of the BAR). Searcher will be required to ensure compliance with the requirements of the EMPr. The marine fauna report (Appendix C2) recommends planning seismic surveys to avoid sensitive areas and periods for some marine fauna: Movement of migratory cetaceans (particularly baleen whales) from their southern feeding grounds into low latitude waters (June/July and late October/November), and their aggregation on the summer feeding grounds between St Helena Bay and Dassen Island from late October to late December and ensure that migration paths are not blocked by seismic operations. The EMPR requires the following monitoring during the survey: - Independent ECO, - MMO, - PAM operator, and - FLO. Qualified, independent MMOs are required on board at all times. As a minimum, one must be on watch during daylight hours while the acoustic source is active. The marine mammal observers on board the vessel are independent of Searcher. The reports from the MMOs on boards the vessel are publicly available on Searchers website. In addition, an independent Environmental Compliance Officer is appointed to verify Searcher’s compliance with the EMPr. Please do not hesitate to contact EIMS should you have further comments regarding the above project.

Mr J Engelbrecht

Date 2024/06/20 Method Email

Comments and Responses 1623 Searcher BA 2

Mr J Engelbrecht

Comment	Response
Why are there no hard copies in Lamberts Bay? We have a large fishermen community..larger than Doring Bay and Elands Bay?? Why excluding our community? Eagerly await your feedback Regards	Please note that a hard copy is to be made available at the Lamberts Bay Library from 21 June 2024, as per the notification letter sent out on 13 June 2024. The report will also be made available on the EIMS website from 21 June (www.eims.co.za/public-participation) A datafree version of the web page is also available if you are unable to access the report due to data constraints: https://eims.datafree.co/2024/04/12/1623-searcher-seismic-survey-048-basic-assessment-project/

Ms Michelle Roffe

Date	2024/06/20	Method	Email
Comment		Response	
Please do include me as an Interested and Affected Party for the Searcher Seismic EA.		Thank you for your email. We confirm that you have been registered in the I&AP database for this project.	

Date	2024/06/20	Method	Email
Comment		Response	
Please do include me as an Interested and Affected Party for the Searcher Seismic EA.		Thank you for your email. We confirm that you have been registered in the I&AP database for this project	

Mr Khuliso Mudau

Date	2024/04/19	Method	Email
Comment	Response		
Please register me as an I&AP for this project.	Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project.		

Adri La Meyer

Date	2024/04/22	Method	Email
Comment	Response		
Dear EIMS PPP Team, Thank you for your email of 19 April 2024. Please register the Department of Environmental Affairs and Development Planning as a commenting authority for the forthcoming BA process. You may add me as the Department's contact person for this BA	Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project. A notification will be sent to all registered I&APs when the draftBAR is released for comments.		

Comments and Responses 1623 Searcher BA 2

Adri La Meyer

application. Please notify me when the Draft BAR is released for comments.

Date 2024/06/20 Method Email

Comment

Hi EIMS Team, Please urgently check your website. I am still unable to download the BAR. We therefore request an extension to submit comments by the number of days that the BAR was unavailable for download. Regards,

Response

Good day, Thank you for your comment. As indicated in the Notification letter, the BAR will be available for public review from the of 21st June. You are welcome to check the website.

Date 2024/06/20 Method Email

Comment

Hi EIMS Team, Please urgently check your website. I am still unable to download the BAR. We therefore request an extension to submit comments by the number of days that the BAR was unavailable for download. Regards,

Response

Good day, Thank you for your comment. As indicated in the Notification letter, the BAR will be available for public review from the of 21st June. You are welcome to check the website.

Mr Dave Japp

Date 2024/04/19 Method Email

Comment

I wish to be registered as an IAP for this project: Name : ***** Contact : *****@gmail.com Mobile / Whatsapp : ***** Reason : I am a fisheries specialist scientist. I am providing support and guidance on Oil and Gas to SADSTIA (Deepsea Trawling Industry) as well as to SAPFIA (Small Pelagic Fishing Association). This West Coast survey is of direct interest to these bodies as the 3D survey overlaps with fishing grounds. Please Note: The parties cc'd herein are both associated with the secretariates of the mentioned associations and should be contacted directly to register (if not already done).

Response

Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project. The parties cc'd are already included in the database as pre-identified I&APs.

Mr Dean Palmer

Date 2024/04/29 Method Email

Comment

Please register me as an I&AP for the Searcher matter with reference 1623.

Response

Dear I&AP, Thank you for your email. We can confirm that you have been registered on the I&AP database for this project.

Comments and Responses 1623 Searcher BA 2

Mrs Beverly Pickford

Date 2024/06/30 Method Email

Comment

Please could you register me as an I&AP for comments on the above Searcher Seismic Survey.

Response

Thank you for your email. We confirm that you have been registered in the I&AP database for this project.

Date 2024/07/27 Method Email

Comment

1. NEMA REQUIREMENTS: It is the Constitutional Right of all South Africans to a clean, unpolluted and healthy environment, and to decide whether oil and gas exploration directly off the coast on which they live and survive will threaten this right. All South Africans have not been addressed, and specifically excluded are those that do not own a computer or cell phone, without which it is not possible to appeal or comment in a meaningful way. 2. The EIAP has acknowledged that there are many unknowns and many potential negatives with regard to the impact of seismic blasting on marine life. Yet, since the first Searcher Seismic Survey in 2024, there has been no report back or scientific feedback to the public and I&APs on the effect of the seismic survey on the marine life. Instead of our concerns being allayed, we are faced with yet another application in the same area. Public participation is invited, but we, the public need proof from qualified scientists that seismic disruption of our ocean has low effect on the marine life. The fact that turtles, seals, dolphins and whales can be deafened, and will leave the seismic survey area which could disrupt feeding and breeding activity and that fish, particularly those with swim baldders can be killed are not low to moderate effects, seismic surveys place our marine life at risk. An environmental report on seismic blasting from Ground Up on December 2023 states: Environmental report acknowledges that seismic blasts, which are much louder than gunshots, can kill fish particularly those with swim bladders. 3. We do not simply want acknowledgement by the EIAP that there are potential negatives, we want information. But reporting back is not part of the survey. It seems the sole purpose of these reports is to advise the public of the next seismic survey or drilling exploration for oil and gas. The environment does not take priority here. We are kept in the dark, we do not even know the outcome of the first seismic survey. What of transparency? 4. TO WHOM DOES THE PROJECT AFFECTING? The portion of the population that will potentially be most affected by oil & gas exploration, are the fishers that live along the coast and those that survive from tourism along a pristine coastline, with healthy whale migrations. The EIA process is flawed at the outset if the most affected sector of the community has not been thoroughly addressed by scientists, who have experience of the negative effects of seismic surveys in other parts of the world. In Canada and Australia, there is much opposition to the disturbance of marine life by seismic blasting. There should be transparency and open discussion with regard to the potential high risk environmental hazard

Response

1. It is indeed an important element in the constitution and acts as the foundation of the National Environmental Management Act (NEMA) 107 of 1998. This act has informed much of the laws which guide processes around development, for example, the need for Environmental Impact Assessments (EIA) and subsequent Environmental Authorisations (EA) for developments with substantial footprints as prescribed by the NEMA. As such the process of undertaking an EIA in accordance with the NEMA regulations is in itself a legal instrument which aims to give effect to the constitution and the bill of rights. It is on this prescription and associated regulations that an EIA would be necessary for this project, which would provide the Competent Authority with information to make a decision as to whether the project should be given an EA. With reference to Section 7 and Appendix B of the BA Report, EIMS has undertaken the public participation and consultation processes in accordance with the requirements of the NEMA EIA Regulations. This process included notification and communication in three different languages, via several Radio and Newspaper advertisements, site notices, posters, and direct notification; as well as public open days within the potentially affected communities. Public open days were held as follows: • Port Nolloth Luvuyo Drop-In Centre: 516 Burden Street, Port Nolloth (Monday 24 June 2024 at 09:00 – 17:00). • Springbok Hananja Lodge & Restaurant: R355 Road, 5.5 km West of Springbok (Tuesday 25 June 204 at 09:00 – 17:00). • Springbok Hananja Lodge & Restaurant: R355 Road, 5.5 km West of Springbok (Wednesday 26 June 2024 at 09:00 – 17:00). • Doring Bay Maria Owies Hall: Hawe Weg 1 Miriam Owies St, Doringbaai (Thursday 27 June 2024 at 09:00 – 17:00). • Elands Bay Elands Bay Community Hall: Main Rd, Elands Bay (Friday 28 June 2024 at 09:00 – 17:00). • St Helena Bay Sandy Point Community Hall: 2 Albatros St, Sandy Point, St Helena Bay (Monday 01 July 2024 at 09:00 – 17:00). • Langebaan Seebries Saal/Sea Breeze Hall: 157 Main St, Langebaan (Tuesday 02 July 2024 at 09:00 – 17:00) • Yzerfontein Yzerfontein Community Hall: 25 Dolfyn St, Yzerfontein. (Wednesday 03 July 2024 at 09:00 – 17:00) • Hout Bay (Hangberg) Sports and Recreation Centre: Cnr Bayview & Karbonkel rd, Hout Bay Harbour. (Thursday 04 July 2024 at 09:00 – 13:00) • Mitchell’s Plain Alliance France: 18 Wall Street, Portland, Mitchell’s Plain. (Friday 05 July 2024 at 09:00 – 17:00) These open days were available for anyone with interest in the project to attend. Non-technical summaries of the BAR were made available at all the meetings. In addition, softcopy of the BAR is available on the EIMS website while hard copies of the report

Mrs Beverly Pickford

of an oil and gas operation in the heart of the fishery on which the West Coast community depends. Instead, all potential negative risks are dismissed as low impact. In whose opinion? The public are relying on the EIA to assure them, instead they dilute concerns with the fact that very little is known about what happens to marine life during seismic surveys.

5. MARINE AND EIA RESEARCHERS PRESENT ON THE EXPLORATION VESSELS There should be marine and environmental impact researchers present on the exploration vessels as observers, that are not in the employ of the oil and gas company, that can offer daily and up to the minute reports as to the effects on the marine environment and marine life. This would go much further to allaying concerns of the population and local residents as to how seismic exploration will impact their fishery than a desk top study, which simply dispels potential environmental hazards as low negative, without scientific proof or verification of facts. There are no impartial scientists as observers on the exploration vessels.

6. VISIBILITY OF WHALE MIGRATION DURING THE SURVEY I have lived on the West Coast since 2010, and before that intermittently since 2003. Every year beginning in March, I have witnessed incredible humpback whale migrations, sometimes in their hundreds all on the same day, as the whales move north from Antarctica on their way to the bulge of Africa where they will calve and spend the winter. This year, during the time of the Searcher Seismic Survey, between January and April, I, and many surfers and fishers in my area, did not see a single whale. Not one. What was reported on social media was the washing up of 2 endangered beaked whales on our beaches. This, also, during the time of the Searcher's Seismic Survey, and also never been observed before. There was no one to explain this, no one to whom we could address our concerns that the whale migration route had been disrupted to what could have severe consequence for the whales. Social media seems the only recourse, but social media is not managed by scientists or has any power to investigate the real effect of seismic blasting.

7. CUMULATIVE EFFECT TRANSPARENCY The above Searcher Seismic Survey Application follows right on the heels of Searcher's Seismic Application granted permission to proceed by the Government between January and April 2024, and the Africa Oil Drilling Application in May 2024. I find it misleading in the extreme that each application on the West Coast and its EIA is viewed as a separate entity when the cumulative effect of many enterprises, drilling, seismic surveys and ultimately oil rigs, could be of much greater impact to the fisheries and marine life.

8. It must be acknowledged that the original granting of the Geodata Seismic Permit in December 2023 which was passed in a 6-month period, when most EIAs take two years to be approved, is disturbing, particularly followed directly by the Africa Oil Drilling application in early 2024, and now at completion of the first Searcher survey, there is an application in for a second survey in 2025. It seems the government is racing headlong into an arena where the impacts are, at best, not sufficiently scientifically researched.

9. Geodata's Application is in a block approximately 200 kilometres from the coast, and the Africa Oil Application is approximately 100 kilometres from the coast, causes concerns as to where the line will be drawn in proximity to the coast? As oil & gas exploration closes in on the coast and coastal marine protected areas, more and more species of marine life and coastal life, including

are available at the following venues for those without computer access:

- The Hout Bay Public Library (Melkhout Crescent, Hout Bay, Cape Town, Western Cape).
- The Sea Point Public Library (Civic Centre, Cnr Three Anchor Bay and Main roads, Sea Point, Cape Town, Western Cape).
- The Vredenburg Public Library (2 Academy Street, (close to West Coast College), Vredenburg, West Coast, Western Cape).
- The Lamberts Bay Public Library (Church Street, Lamberts Bay, Western Cape).
- Kamiesburg Local Municipality in Hondeklip Bay (Wag Way street).
- J Bekeur Library (Robson St, Port Nolloth, Richtersveld, Northern Cape).

2. Feedback regarding the results of the previous survey was provided during the public open days noted above. Feedback was provided in the following manner: Feedback from Seiche who were involved in the marine fauna mitigation aboard the vessel during the Q1 2024 survey regarding the location and number of sightings of key marine species noted during the survey. Feedback was provided regarding Underwater Sound Source Verification (SSV) completed during the Q1 2024 survey including recording and analysis of sound levels during seismic acquisition in key fisheries areas, including the ringfenced fishery area and the inshore snoek fishery. It was recommended that Underwater SSV be implemented that would include drift Bouy deployment for underwater acoustic monitoring to establish an actual baseline prior to the commencement of the survey and then operational levels of noise during the survey. This sound data was used to verify the noise modelling predictions in the current acoustic report. The principles in NEMA (2(4)(a)(viii) states: "that negative impacts on the environment and on people's environmental rights be anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied. " In this instance the impacts have been identified and where such impacts cannot be reasonably avoided (prevented) that relevant management and mitigation measures were suggested to minimise the impacts. The impacts of seismic disturbances on marine fauna have been assessed by the marine fauna study (Appendix C2 of the BAR). The marine ecologist has indicated low negligible impacts on marine fauna provided all mitigations are implemented. It is understood and acknowledged in the Basic Assessment Report (BAR), that sound from seismic surveys may have an impact on marine fauna however the potential significance of the impact is what is important in the context of the EIA. Various mitigations measures are proposed to reduce any impacts on marine fauna to acceptable levels including soft start procedure, MMO and PAM monitoring and various other measures as proposed in the accompanying EMPr (Appendix E of the BA). The BAR not only identifies the potential impacts, but further, as is required by the regulations, assesses the significance of such impacts. The mere fact that an impact has the potential to occur does not automatically result in the significance of such impact being high. The final significance ratings are determined using information from the very extensive peer-reviewed literature together with the noise modelling results (which put the threshold distances from the source array to mortality and potential mortal injury into perspective), adopting the precautionary principle as is required when undertaking such impact assessments, and taking into account the sensitivity of receptors present in Southern African waters. Given all of the evidence, the conclusion reached is that impacts on marine ecology are either of low or very low significance.

3. See response provided to item 2 above. The

Mrs Beverly Pickford

endangered seabird species will be negatively impacted. 10. Geodata began seismic blasting off the Transkei Coast in and was stopped by the Court. They proceeded to the West Coast without a proper EIA and were once again stopped by the Court. There was good reason for these court rulings, and to now rush through hastily compiled desktop surveys of the potential impacts of oil & gas exploration on the planet, the community and the environment, is irresponsible. The West Coast has equally sensitive marine areas e.g. Child's Bank, the spawning grounds of anchovies, sardines and snoek to name a few of the species concerned. 11. FLAWS IN THE EIMS EIA The area under proposal lies 200 kilometres from the coast, and extensive research shows that all marine life lying within 10 kilometres of the drilling (and seismic) activity will either be killed, or breeding and behavioral patterns will be drastically altered. Yet, all impact on the marine life is indicated by the EIA as low negative, with the exception of an actual oil spill, which is indicated as medium negative. This leans very much to an intentional misleading of facts. Damage to the marine environment by oil entering the ocean is well documented in the media and by scientists and even after millions of dollars in clean-up efforts the environments never fully recover. A desktop evaluation of potential impact of drilling or seismic activity on our ocean, our coast and marine life, on which entire communities depend for their livelihood and survival, is not sufficient to convince the community of the legitimacy of the EIA. The community that lives along the coast, is culturally attached to their ocean and marine environment and are not prepared to threaten this, when so much is at stake and so much about the potential negative impact on the environment is unresolved. Their desire and right is to continue their tradition of fishing and life in a pristine environment and are not willing to risk this. The EIA does not reflect this standpoint. The report proposes hypothetical financial gains including employment opportunities, but this is merely a desk top assessment and fails to make clear exactly what employment opportunities will be created and what by oil and gas companies to improve the financial status of local communities by employment and cheaper fuel have fallen far short of promises made. It is rather the investment sector that has benefited from oil and gas, whilst it is the local fishers and community that have much at stake. 12. MARINE LIFE AND FISHERIES It must be acknowledged that there are some things that as the protectors of our natural resources and our marine protected areas we should not tamper with. The southern Benguela Large Marine Ecosystem, is considered one of the largest and most productive of the world's coastal upwelling systems. For this reason, it is one of the richest fisheries off the coast of Africa. Should we be risking upsetting this fine balance of nature? The EIA acknowledges that in all areas of oil & gas exploration and extraction there will be a negative impact. EIMS sets about to grade this, for the most part as 'low negative', but if we have an oil spill it will not be 'medium negative' it will be the death of the West Coast's marine life and fishery. And if the oil spill smoothers the coast, the coastal life too. No one can rule out this possibility, it has happened and will happen again. This fishery is the lifeblood of the West Coast communities. The EIA states that the fishing sector is worth R8 Billion a year. The commercial fishing sector employs over 28 000 people and thousands more in the small-

BAR and associated specialist assessment reports have been made available for public review and comment. It should be noted that this is a new separate application which is separate from the previous Searcher application that was approved in 2023. Each project needs to be assessed separately as it is subject to a separate application and reporting process. 4. Section 9 of the BAR identifies, assesses and suggests management and mitigation measures for the relevant environmental impacts. The potential impact on the fishing industry as well as impacts on marine mammals (including whales) is specifically identified and assessed. The importance of the west coast fisheries is specifically acknowledged, and the assessment considers this in the context of the proposed exploration activities and the location. Regarding the potential impact on tourism the survey area is located far offshore and is unlikely to have any impact on the nearshore and shoreline tourism industry. It should also be noted that EIMS specifically consulted with the small-scale fishers and other community members and have given serious consideration to the comments and inputs from the local communities. Small scale fishing communities have been thoroughly consulted as part of the PP process for the project and the impact of the project on small scale fishers has been assessed in the fisheries assessment. The impact assessment has been undertaken and informed by a team of qualified and experienced professionals and specialists. 5. The EMPR requires the following monitoring: - Independent ECO, - MMO, - PAM operator, and - FLO. Qualified, independent MMOs are required on board at all times. As a minimum, one must be on watch during daylight hours while the acoustic source is active. The marine mammal observers on board the vessel are independent of Searcher. The reports from the MMOs on boards the vessel are publicly available on Searchers website. In addition an independent Environmental Compliance Officer is appointed to verify Searcher's compliance to the EMPr. 6. Please note that a peer reviewed marine ecological assessment was conducted by a suitably qualified and experienced specialist to inform the BAR. The potential impact on marine ecology and fisheries was specifically identified in the BAR. The impact assessment found all impacts on marine fauna and fisheries to be of low significance after mitigation measures were implemented. The potential impacts of seismic noise at ecosystem level are discussed in the Marine ecology specialist assessment. The marine fauna report (Appendix C2) recommends planning seismic surveys to avoid sensitive areas and periods for some marine fauna: Movement of migratory cetaceans (particularly baleen whales) from their southern feeding grounds into low latitude waters (June/July and late October/November), and their aggregation on the summer feeding grounds between St Helena Bay and Dassen Island from late October to late December and ensure that migration paths are not blocked by seismic operations. It should be noted here that feeding aggregations (which is more likely what is being referred to) do not occur every year as they are dependent on prey abundance which in turn is dependent on upwelling events. Strandings of odontocetes is not uncommon along our coastline (see for example Seakamela et al. 2020, 2021) and is more likely the result of natural mortality or shipstrikes, the latter being recognised as globally the biggest threat to whales (Schoeman et al. 2020). While seismic acquisition may result in behavioural responses in marine mammals, the mitigations in place

Mrs Beverly Pickford

scale, subsistence and recreational fishing sector. This is a community of fishermen. It is reckless to jeopardize this cultural stronghold where food on the table is paramount. 1. LIVELIHOOD OF FISHING COMMUNITY The EIA states: 'The largest and most valuable fisheries are the deep-sea trawl industry and the pelagic-directed purse-seine fishery targeting pilchard, anchovy and red-eye round herring. The spawning areas for anchovy, sardine, hake and snoek lie off the West Coast and Cape Columbine. The EIA diagrams show some overlap between the area proposed for survey and spawning areas, and in most diagrams they lie directly alongside each other. The most fundamental research on the recorded movement of spawning grounds will show that this is in response to movement of current, water temperature and water turbidity, so spawning areas do change. For proposed seismic exploration, drilling and oil & gas extraction right next to, or in spawning areas, we cannot rely on a desktop evaluation to assess a highly unpredictable and changeable situation. The coastal community and it's associated oceanic industries will be exposed to extreme risk if oil & gas exploration in the heart of spawning areas proves detrimental. A desktop evaluation is chronically insufficient in evaluating this danger. 14. Tuna fish, the target of pelagic long-line fishers, are highly migratory and found on the high seas; there is no map as to where they will be found. Tuna, like all marine species, including plankton and invertebrates, are part of a very delicately balanced food-chain, we cannot afford to tamper with this at any level. Bio-diversity is the key to a pristine eco-system. With one of the world's most productive coastal upwelling systems in our hands, can we afford to upset the balance? 15. MARINE LIFE The West Coast islands and peninsulas are also the stronghold and breeding areas for dolphins, seals and numerous seabird species, some of which are endangered, and all of these are known to feed far offshore. They are entirely dependent on the movement of the krill, anchovies and sardines. 16. WHARE MIGRATION ROUTE The EIA is deficient in acknowledging the scale of one of most significant humpback whale migrations on earth. Between March and September each year thousands of whales migrate northwards along the West Coast to their calving grounds off Angola and Gabon. Then between September and December the whales migrate southwards again towards their feeding grounds off Antarctica. The EIA is deficient in acknowledging the scale of one of most significant humpback whale migrations on earth. Between March and September each year thousands of whales migrate northwards along the West Coast to their calving grounds off Angola and Gabon. Then between September and December the whales migrate southwards again towards their feeding grounds off Antarctica. Added to this is the year-round presence of Critically Endangered Sperm Whales, which are deep ocean whales, preferring depths of around 1000 metres, and the seasonal presence of the Southern Right Whales between July and September, which are frequently seen with calves in the St Helena Bay area. Throughout the EIA there is insufficient conclusive evidence that there can be mitigation measures to avoid a dire effect on the whale migrations. An on-board observer can only observe whales in the immediate vicinity in perfect weather conditions and daylight, whales can hear noise and detect vibration for hundreds of kilometres under water at all hours of the day. Researchers believe that some 'low frequency

during surveys would ensure that mortality as a consequence of seismic surveying is highly unlikely. 7. Section 4.6 of the Marine ecology study (Appendix C2) deals with cumulative impacts. Figure 51 shows the 2D survey lines shot between 2001 and 2018, and indicates 3D survey areas on the West Coast. The report states: despite the density of seismic survey coverage over the past 17 years, the southern right whale population is reported to be increasing by 6.5% per year (Brandaõ et al. 2017), and the humpback whale by at least 5% per annum (IWC 2012) over a time when seismic surveying frequency has increased, suggesting that, for these population at least, there is no evidence of long-term negative change to population size as a direct result of seismic survey activities. EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant, and in accordance with the requirements of the NEMA EIA Regulations. The impacts have been assessed by relevant and suitably qualified scientists and specialists, and where impacts cannot be prevented, relevant management and mitigation measures are suggested to minimise the significance of these impacts. Any subsequent authorization would be restricted to these specifically assessed activities. Should the applicant or other applicants wish to undertake any additional exploration activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a consequent need to apply for the relevant permissions. These would include a formal application for an Exploration or Production Right as well as a new EA. The impacts of such proposed activities would consequently require specific assessment and public consultation prior to approval. It is premature to assess the likely impacts of further invasive exploration activities or production activities or future utilization of any resource as the extent, duration, location, and magnitude applicable to these activities are unknown at this stage. Consequently, it is not possible to ascertain whether any of these impacts constitutes a fatal flaw or the extent to which such impacts can be managed or mitigated. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, and production activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed prior to implementation on their merits as and when they are proposed. The Reconnaissance will not necessarily lead to exploration, or production. 8. The length of an Environmental Authorisation is dependent on the type of process (Basic Assessment or Scoping and EIA) and the complexity of the application. While a Scoping and EIA Process is a much longer process, a Basic Assessment process typically takes 4-6 months to complete. The application process and timeframes are guided by NEMA EIA Regulations 104, as amended. 9. Refer to response provided to item 7 above. 10. With reference to Section 8.6.3 of the BAR the survey area avoids these topographical features and sensitive areas. As the proposed survey area is located far offshore, it is not deemed necessary to implement mitigation measures to avoid the key spring spawning periods thereby mitigating potential impacts on plankton to some degree. In addition, Searcher has agreed to avoid the key "ring fenced" trawling area and spawning areas to the south-east of the survey area identified during previous consultation with the commercial fishing sector. No other direct mitigation measures for potential impacts on plankton and fish egg and larval stages

Mrs Beverly Pickford

whale sounds can travel more than 10,000 miles in some levels of the ocean'. If one puts this information in context of seismic and drilling activity, we are embarking into an area where we know there will be disturbance, disorientation and even death, but this EIA has not even touched the surface of the potential damage that could be done. 17. DESIRABILITY The application itself begs the query as to why we (South Africa) are even contemplating seeking oil when the trend of the international community is clearly on a move away from this reliance and its drastic effects on the planet? At COP23 on December the 23rd 2023, the United Nations stated unequivocally that the phase-out of fossil fuels is inevitable. The argument that the application, if successful, will potentially bring relief to the cost of fuel in South Africa, must be tempered by the term of its feasibility for doing this, which, at possibly three decades, is brief in terms of history. The consequences of which, however, will have a far deeper reach with very long-term consequences not only for South Africa but all of the planet. To those who would heed the warning that the time to change is now, the staunch refusal of large oil conglomerates (the applicant in this case) to do so must bring about the disturbing realisation that this application and multiple others for the same off our coasts, are in fact motivated almost exclusively by profit, with a sincere disregard to the cost to the planet and all humanity. This is contravention of the concerns of both NEMA and our Constitution. 18. Corruption and war are well documented as extreme results of similar projects in other countries, particular third world countries where the mineral and fossil fuel reserves are in the hands of corrupt politicians. South Africa. 1. CHANGES IN COASTAL COMMUNITIES The coastal communities of South Africa that thrive and survive off the ocean where oil and gas exploration and potentially an oil and gas industry is to be established, must have a detailed report on how this industry is to compensate for what they have at stake, and how this industry is to be managed and governed to avoid falling into the hands of the corrupt. An oil and gas industry with all the visual impact, pollution and potential drastic negative environmental hazards will irrevocably change a pristine and unpolluted coastline, where presently wildlife and marine life on which the communities depend thrive in harmony. In a world-wide arena where fossil fuel energy is now well documented to be the primary cause of climate change, alongside deforestation, the risks should be very seriously weighed and the communities and the dire warnings of impartial scientists should be heard.

are feasible or deemed necessary. 11. The potential impact of the seismic survey on marine ecology (including mortality and behavioural changes) is described and assessed in section 9.3.1 of the BAR and is supported by relevant peer reviewed literature. Your reference to the impacts on the marine environment within 10 km of the drilling and seismic is noted. No reference to the specific research being referred to is however provided. No drilling is proposed as part of this seismic survey application. As per Section 9.3.2.3.1 of the BAR Small instantaneous spills of marine diesel at the surface of the sea can potentially occur during seismic survey operation during bunkering and such spills are usually of a low volume. Larger volume spills of marine diesel could occur in the event of a vessel collision or vessel accident. The significance of the impact is rated as low before mitigation is applied and not medium negative as stated. Section 9.3.3 of the BAR identifies and assesses the potential impact on both the tangible and intangible cultural heritage. The heritage specialist is of the opinion that the impact of the proposed project on the cultural heritage resources can be mitigated through the implementation of the recommendations in the Heritage Assessment Report and reflected in the BA Report. Section 9.3.4 of the BAR identifies and assesses the potential social impacts. Employment opportunities during the survey project are limited. EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant. Any subsequent/resulting authorization would be restricted to these specifically assessed activities. Should the applicant or other applicants wish to undertake any additional exploration activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a consequent need to apply for the relevant permissions. These would include a formal application for an Exploration or Production Right as well as a new EA. The impacts of such proposed activities would consequently require specific assessment and public consultation prior to approval. It is premature to assess the likely impacts of further invasive exploration activities or production activities as the extent, duration, location, and magnitude applicable to these activities are unknown at this stage. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, and production activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed on their merits as and when they are proposed. Given that this project seeks to undertake reconnaissance only, and would not provide authorization for potential future exploration or production activities, it is our view that it is premature to assess the likely impacts (including climate change) of further future speculative invasive exploration activities or production activities or future utilization of any resource, as the extent, duration, location, and magnitude of potential impacts, all of which are crucial to be able to assess the likely environmental impact, are unknown at this stage. Any such assessment is unlikely to be realistic and would consequently be subject to challenge. 12. Numerous sanctuaries, marine protected area (MPA) exist offshore and along the coastline of the Western Cape, however none of them overlap with the Reconnaissance Permit Area. No drilling is proposed as part of this seismic survey application. As per Section 9.3.2.3.1 of the BAR Small instantaneous spills of marine diesel at the surface of the sea can potentially occur during seismic survey operation

Mrs Beverly Pickford

during bunkering and such spills are usually of a low volume. Larger volume spills of marine diesel could occur in the event of a vessel collision or vessel accident. The significance of the impact is rated as low before mitigation is applied and not medium negative as stated. Although the Need and Desirability of the project is linked to the potential future use of the seismic data to discover oil and gas reserves, future impacts associated with potential oil and gas production would need to be assessed separately as part of the EIA for those activities. The importance of the west coast fisheries is specifically acknowledged, and the assessment considers this in the context of the proposed exploration activities and the location. The potential impact on fisheries was specifically identified in the Basic Assessment Report. The impact assessment found all impacts on fisheries to be of low significance after mitigation measures were implemented. Numerous sanctuaries, marine protected area (MPA) exist offshore and along the coastline of the Western Cape, however none of them overlap with the Reconnaissance Permit Area. No drilling is proposed as part of this seismic survey application. As per Section 9.3.2.3.1 of the BAR Small instantaneous spills of marine diesel at the surface of the sea can potentially occur during seismic survey operation during bunkering and such spills are usually of a low volume. Larger volume spills of marine diesel could occur in the event of a vessel collision or vessel accident. The significance of the impact is rated as low before mitigation is applied and not medium negative as stated. Although the Need and Desirability of the project is linked to the potential future use of the seismic data to discover oil and gas reserves, future impacts associated with potential oil and gas production would need to be assessed separately as part of the EIA for those activities. The importance of the west coast fisheries is specifically acknowledged, and the assessment considers this in the context of the proposed exploration activities and the location. The potential impact on fisheries was specifically identified in the Basic Assessment Report. The impact assessment found all impacts on fisheries to be of low significance after mitigation measures were implemented. 13. The overlap of spawning areas in the survey area is incorrect. As stated in the executive summary of the fisheries assessment: The Reconnaissance Permit area does not coincide with spawning areas of key commercial species and noise generated by the seismic source would be expected to attenuate to below threshold levels for behavioural disturbance before reaching inshore recruitment and/or nursery areas. The potential impact on fisheries was specifically identified in the Basic Assessment Report. The impact assessment found all impacts on fisheries to be of low significance after mitigation measures were implemented. The fisheries assessment (Appendix C3) found that impacts on the small-scale fishing sector due to seismic noise is considered to be of low negative significance for the large pelagic longline sector – refer to Section 9.3.2 of the BAR. Sound levels for the seismic survey can notionally be expected to attenuate to below levels for behavioural disturbance at a distance of 4 km from the source. The current assessment is that behavioural disturbance to fish could be expected within this range and that catch rates could therefore also be affected. The spatial extent of the impact of seismic source noise emissions on catch rates is expected to be regional, although localised at any one time. The impact is considered to be fully reversible and any disturbance of behaviour that may

occur as a result of survey noise would be temporary. Due to the remote location of the survey area, noise would be expected to attenuate to below threshold levels before reaching fishing grounds of all other sectors viz. the demersal trawl, midwater trawl, demersal longline, tuna pole-line, small pelagic purse-seine, traditional linefish, west coast rock lobster and small-scale fisheries sectors. The survey area does not coincide with spawning areas of key commercial species and noise generated by the seismic source would be expected to attenuate to below threshold levels for behavioural disturbance before reaching inshore recruitment and/or nursery areas. The survey area is situated well offshore of distributional area of snoek during its spawning and migration periods (an important species for the linefish and small-scale fisheries sectors). The impact on catch rates due to sound elevation levels was assessed and sensitivity/vulnerability differences amongst the targeted fish species identified for each sector. With the implementation of the project controls and mitigation measures, the impacts of the proposed survey is considered to be of low significance for large pelagic longline sector. There is no impact expected on other fisheries sectors— the demersal trawl, midwater trawl, demersal longline, small pelagic purse-seine, tuna pole-line, line fish, west coast rock lobster, netfish and small-scale fishing sectors. 14. The statement that there is no map depicting the spatial distribution of the pelagic long-line fishing is incorrect. Figure 51 in the BAR provides an overview of the spatial distribution of fishing effort expended by the longline sector targeting large pelagic fish species in relation to the proposed survey area. The impact on plankton is assessed in Section 9.3.1.1.7 of the BA report. The reconnaissance permit area is located far offshore (220 km at its closest point) and therefore beyond the influence of coastal upwelling, which will influence both plankton abundance and the abundance of fish species that depend on plankton as a food source. 15. The survey area does not overlap with any west coast islands or peninsulas. The impact on whales and dolphins is assessed in Section 9.3.1.1.1 of the BA report. The proposed mitigation measures, which are essentially designed to keep animals out of the immediate area of impact and thereby reduce the risk of deliberate injury to marine mammals would reduce the intensity of most impacts to medium, and the residual impacts will reduce to low consequence and low significance. Section 11.4.1 of the BAR contains detailed mitigation measures for cetaceans. The noise impact on seabirds is discussed in Section 9.3.1.1.4. With the implementation of the mitigation measures, the impact on potential physiological injury or behavioural avoidance by seabirds as well as masking of sounds and indirect impacts on food sources would remain very low. 16. The marine fauna report (Appendix C2) recommends planning seismic surveys to avoid sensitive areas and periods for some marine fauna: Movement of migratory cetaceans (particularly baleen whales) from their southern feeding grounds into low latitude waters (June/July and late October/November), and their aggregation on the summer feeding grounds between St Helena Bay and Dassen Island from late October to late December and ensure that migration paths are not blocked by seismic operations. A discussion of the migration of various cetaceans is provided in Section 8.4.2.6 of the BAR. Please note no drilling is proposed as part of the seismic survey. It should be noted here that feeding aggregations (which is more likely what is being referred to) do

Mrs Beverly Pickford

	<p>not occur every year as they are dependent on prey abundance which in turn is dependent on upwelling events. Strandings of odontocetes is not uncommon along our coastline (see for example Seakamela et al. 2020, 2021) and is more likely the result of natural mortality or shipstrikes, the latter being recognised as globally the biggest threat to whales (Schoeman et al. 2020). While seismic acquisition may result in behavioural responses in marine mammals, the mitigations in place during surveys would ensure that mortality as a consequence of seismic surveying is highly unlikely. 17. Section 5 of the BAR discussed the Need and Desirability of the project in regard to the need and desirability for the proposed activities. EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant. Any subsequent/resulting authorization would be restricted to these specifically assessed activities. Should the applicant or other applicants wish to undertake any additional exploration activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a consequent need to apply for the relevant permissions. These would include a formal application for an Exploration or Production Right as well as a new EA. The impacts of such proposed activities would consequently require specific assessment and public consultation prior to approval. It is premature to assess the likely impacts of further invasive exploration activities or production activities or future utilization of any resource as the extent, duration, location, and magnitude applicable to these activities are unknown at this stage. Consequently, it is not possible to ascertain whether any of these impacts constitutes a fatal flaw or the extent to which such impacts can be managed or mitigated. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, and production activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed prior to implementation on their merits as and when they are proposed. Although the Need and Desirability of the project is linked to the potential future use of the seismic data to discover oil and gas reserves, future impacts associated with potential oil and gas production would need to be assessed separately as part of the EIA for those activities. There are no significant GHG emissions directly related to the proposed activity nor are there significant climate change vulnerability risks. Should the applicant or other applicants wish to undertake any additional exploration, production, or combustion activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a need to apply for the relevant permissions. These would include a formal application for new EA and where relevant an exploration and production Right, informed by a comprehensive Environmental Impact Assessment and stakeholder consultation assessing the merits of these specific activities. The impacts of such proposed activities would consequently require specific assessment of the associated impacts and public consultation prior to approval. Given that this project seeks to undertake reconnaissance only, and would not provide authorization for potential future exploration or production activities, it is our view that it is premature to assess the likely impacts (including climate change) of further future speculative invasive exploration activities or production activities or future utilization of any resource, as the extent, duration, location, and</p>
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Comments and Responses 1623 Searcher BA 2

Mrs Beverly Pickford

	magnitude of potential impacts, all of which are crucial to be able to assess the likely environmental impact, are unknown at this stage. Any such assessment is unlikely to be realistic and would consequently be subject to challenge. 18. The purpose of the assessment is to identify and assess the potential environmental impacts associated with a specific project or activity. Your concerns about corruption and war are more related to broader governance, political stability, and the enforcement of laws, and as such fall beyond the scope of this EIA. 19. Although the Need and Desirability of the project is linked to the potential future use of the seismic data to discover oil and gas reserves, future impacts associated with potential oil and gas production would need to be assessed separately as part of the EIA for those activities
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Ms Michele Rivarola

Date	2024/04/19	Method	Email
Comment	Response		
I request to be registered as an Interested and Affected Party (IAP)	Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project.		

Keely Harris

Date	2024/04/19	Method	Email
Comment	Response		
Please include me in your list of interested parties requesting information on the EIA.	Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project.		

Ms Jacolette Adam

Date	2024/04/23	Method	Email
Comment	Response		
Please register me, Thanks	Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project.		

Ms Etienne Roux

Date	2024/07/28	Method	Email
Comment	Response		

Ms Etienne Roux

The Directorate has reviewed the documentation and has the following comments in terms of the National Environmental Management: Air Quality Act No. 39 of 2004 (NEM: AQA): 1. AIR QUALITY IMPACT MANAGEMENT 1.1. It is noted that an impact to air quality is likely to be experienced in the operations phase due to machinery and equipment. 1.2. Should this application be approved, D:AQM recommends that: 1.2.1. Measures to monitor, control and minimise impacts to air quality must be implemented strictly as stipulated in the EMPr. 2. NOISE CONTROL MANAGEMENT 2.1. From the information contained in the Report, it is noted that Seismic Surveys will be conducted. 2.2. Should this application be approved, it is recommended that the measures to monitor and prevent noise impacts on the biota in the ocean should be implemented as per the EMPr, including, but not limited to, only performing seismic surveys during the day-time to ensure that the Marine Mammal Observer has clear sight and document any adverse impacts on the ocean biota as well as the ceasing of seismic survey activities when in close proximity to ocean wildlife, as mentioned in the EMPr. 2.3. In addition, the D:AQM notes that aircraft utilized during the proposed seismic survey at the project site could potentially generate noise. It is recommended that the measures to monitor and prevent noise impacts from the aircraft also be implemented as per the EMPr, should the application be approved. 1. GENERAL The Department would like to draw the applicant’s attention to Section 28 of the National Environmental Management Act No. 107 of 1998 (NEMA), i.e. “Duty of Care” which states that: “Every person who causes has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorized by law or cannot reasonably be avoided or stopped, to minimize and rectify such pollution or degradation of the environment.” 1.1. No information provided, views expressed and/or comments made by the DEA&DP, D: AQM should in any way be seen as an indication or confirmation: 1.2. That additional information or documents will not be requested; or of the outcome of any application submitted to the authorities. 1.3. Kindly be informed that the D: AQM reserves the right to review the above-mentioned comments, should additional information come to light.

1. Thank you for your comment. The management and mitigation measures included in the EMPr must be implemented and all recommendations therein will be binding on the Holder. Thank you for your comment. The management and mitigation measures included in the EMPr must be implemented and all recommendations therein will be binding on the Holder. Various approaches have been adopted over the years to improve Marine Mammal Observer efficiency, particularly at night, with infra-red binoculars and mast-mounted infra-red (IR) cameras being tested. As these have, however, not proven as effective as initially anticipated, due to lack of detectable temperature differences, Searcher have therefore implemented 24/7 PAM surveillance for the survey duration to mitigate any potential impacts and successfully conduct night-time acquisition. From a seismic operator’s perspective, it is not feasible, environmentally sound or cost-effective to cease airgun operations at night as this would prolong the duration of the survey possibly requiring multiple seasons to complete the acquisition. This would also add substantially to the overall survey duration and cumulative impacts . 3. Comment noted. The environmental consequences applicable to the planned exploration activities have been identified and assessed in the BA Report. A team of qualified specialists considered the proposed activity, identified and assessed potential impacts, and where applicable made recommendations to manage and mitigate the impacts. All impacts assessed can be reduced to a medium or low significance with the implementation of management and mitigation measures described in the BA report and accompanying EMPr.

Ms Ilse Van Wyk

Date 2024/07/19 Method Email

Comment

The I&AP requested the BAR for the Searcher Seismic Survey (048) during the Public Open Day.

Response

Thank you for attendance and participation in the workshop and public open day session. As indicated in your comment: The softcopy version of the Basic Assessment Report (BAR) can be accessed on the EIMS website: <https://www.eims.co.za/public-participation/> The hard copy of the report can be viewed at: 1. The Hout Bay Public Library (Melkhout Crescent, Hout Bay, Cape

Ms Ilse Van Wyk

Town, Western Cape). 2. The Sea Point Public Library (Civic Centre, Cnr Three Anchor Bay and Main roads, Sea Point, Cape Town, Western Cape). 3. The Vredenburg Public Library (2 Academy Street,(close to West Coast College), Vredenburg, West Coast, Western Cape). 4. The Lamberts Bay Public Library (Church Street, Lamberts Bay, Western Cape). 5. Kamiesburg Local Municipality in Hondeklip Bay (Wag Way street). 6. A. J Bekeur Library (Robson St, Port Nolloth, Richtersveld, Northern Cape). The BAR was released for public review and comment on the 21st of June 2024. Comments on the BAR are to be submitted by 22 July 2024, allowing a commenting period of 30 days. All inputs received by EIMS on the BAR will be included in subsequent submissions to the competent authority for consideration in their decision-making process. Please submit all comments or queries via letter, fax, phone call, or email to the following contact details: Contact Person: Alex Msipa EIMS Reference Number: 1623 Postal Address: P.O. Box 2083; Pinegowrie; 2123 Telephone: (011) 789 7170 / Fax: (086) 571 9047 E-mail: Searcher48@eims.co.za

Ms Tabisile Mhlana

Date2024/07/23MethodEmail

Comment

Based on the submitted draft BAR with associated reports, the Branch O&C presents the comments stipulated below for consideration. Please note the recommendations for your consideration: 1. This Branch notes that the Searcher was only able to undertake the 3D seismic surveys as part of the 12/1/043 Reconnaissance Permit and EA between January and April 2024. Subsequently, Searcher was not able to complete the full extent of the intended survey during the 2023-2024 survey season. Therefore, the draft report and Marine Impact Assessment should include any new data from the monitoring during the short-term surveys. 2. Many marine animals, from small invertebrates to large cetaceans, use underwater sounds extensively for important biological activities such as intraspecific communication, predator avoidance, navigation, larval orientation, foraging, and reproduction. It should be noted that anthropogenic noise can interfere with the ability of these animals to detect and/or use their ‘acoustic’ or ‘auditory’ scene and potentially decrease their fitness and chance of survival therefore implementation of the recommended mitigation measures is key to minimizing the disturbance that may lead to displacement from feeding or breeding areas, to auditory damage, tissue trauma, and mortality. 3. Future planned socio-economic growth of the Northern Cape coastal area and the ongoing efforts for the facilitation of public access along the Northern Cape coast are key factors that would require prospecting activities to be set as far away from the coast as practicable to ensure that future activities that would have a conflict with prospecting activities can be catered and planned for. 4. The report indicates there are six offshore Marine Protected Areas (MPAs) that fall within the broader project area, the report

Response

1. As part of the previous survey commitments, Searcher subcontracted Seiche Ltd (Seiche) to conduct Sound Source Verification involving the recording and analysis of underwater sound levels during seismic acquisition operations in key fisheries areas. These measurements included the offshore ringfenced and inshore snoek fishery areas, as well as Marine Mammal detection. Drift buoys (equipped with hydrophones) were deployed during the survey route to conduct an underwater Sound Source Verification (SSV), in order to record and analyse sound levels (for comparison against background ambient levels in key fisheries areas) and to provide input and assist in Fisheries Research. In summary, the noise model was considered validated and fit for purpose for the current application, based on the data analysed and reviewed to date by the acoustic specialist. The Model Validation is included in Section 5 of the acoustics reports (Appendix C1). 2. Regarding seismic disturbances on marine fauna please note that this has been thoroughly assessed by the marine fauna study (Appendix C2 of the DBAR). The marine ecologist has indicated low negligible impacts on marine fauna, including birds, mammals, reptiles, fish and Chondrichthyes, provided all mitigations measures are implemented. Sound levels for the seismic survey can notionally be expected to attenuate to below levels for behavioural disturbance at a distance of 4 km from the source. 3. The proposed project area is located significantly far offshore, between approximately 256 km offshore of St Helena Bay, extending north along the western coastline to approximately 220 km offshore of Hondeklip Bay. This project is unlikely to affect any planned prospecting or coastal access along the Northern Cape coast. 4. The reconnaissance survey area does not overlap with any Marine Protected Areas (MPA) and

Ms Tabisile Mhlana

should include the distance of all these MPAs to the surveying area and where required a 5km buffer zone is justified given its importance for commercial fish stocks, and the need to be precautionary as to uncertainties about potential impacts on sensitive fauna and habitats and recognition to seasonal avoidance of the spawning period. 5. Should the survey area coincide with important fisheries research surveys, the report should identify what will be done in this event as seismic surveys might be conducted concurrently with these research surveys and may influence the data output of these surveys. 6. It must be ensured that at least two qualified, independent, and experienced MMOs and at least two qualified, independent, and experienced PAM operators are always on board. It is essential to have at least two properly qualified MMOs and at least two qualified PAMs, to ensure proper shifts and avoid the effects of fatigue on performance. 7. For any bunkering during the operation of the proposed seismic survey should be conducted outside the sensitive areas and or Marine Ecologically and Biologically Significant Areas even though the report indicates that spills from bunkering are usually of a low volume. 8. The following additional measures are recommended: 8.1. Enhance Baseline Data Collection: Include detailed baseline environmental data collection to assess pre-survey conditions accurately. 8.2. Seasonal Restrictions: Implement seasonal restrictions to avoid sensitive periods for marine fauna. 8.3. Comprehensive Monitoring and Adaptive Management: Develop and implement adaptive management strategies based on real-time monitoring data. 9. Please see below recommendations for baseline data to be collected: Marine Biodiversity • Species Inventory: Identify key species that might be affected by the survey. • Habitats: Map out critical habitats such as breeding grounds, feeding areas, coral reefs, and seagrass beds. Water Quality • Physical Parameters: Measure temperature, salinity, turbidity, and dissolved oxygen levels. • Chemical Parameters: Test for contaminants such as heavy metals, hydrocarbons, and nutrients. • Biological Parameters: Assess plankton diversity and abundance as indicators of water quality. Sediment Quality • Contaminant Levels: Measure concentrations of contaminants in the sediment, such as heavy metals and hydrocarbons. • Benthic Invertebrates: Document the presence and diversity of benthic invertebrate communities as indicators of sediment health. Acoustic Environment • Ambient Noise Levels: Measure baseline ambient noise levels in the survey area to understand the existing acoustic environment. • Sound Propagation: Model how sound propagates in the local marine environment to predict the potential impact of seismic survey noise. Oceanographic Data • Currents and Circulation: Document ocean currents, circulation patterns, and tidal flows in the survey area. • Wave Climate: Record wave heights, frequencies, and directions. Socio-Economic Data • Fishing Activities: Collect data on local fishing activities, including types of fisheries, fishing seasons, and economic dependency on fisheries. • Cultural and Recreational Uses: Identify areas used for cultural or recreational purposes that might be impacted by the survey. Climate and Weather • Seasonal Variations: Document seasonal weather patterns and climate conditions that could affect the survey operations and environmental conditions.

Ecologically and Biologically Significant Areas (EBSA) as discussed in section 8.6 of the BAR. The marine specialist has considered the proximity of the survey area to various sensitive marine areas and the interconnectivity of the ecological processes (refer to Section 4.3.8 of the Marine Biodiversity and Ecosystem Services Report). A 5 km buffer zone where no seismic source operation is permitted is recommended and will be adopted around all MPAs. 5. Figure 3.44 of the fisheries report shows the Reconnaissance Permit area in relation to the research trawl (demersal) start positions carried out between 2013 and 2021 as well as the research effort undertaken during the November 2020 spawner biomass survey and May 2021 recruitment survey for small pelagic species. The Reconnaissance Permit area is situated at least 25 km from the deepwater range of demersal research trawls and 150 km offshore of the deepwater extent of research survey transects and there is no spatial overlap expected (please refer to Figure 59 of the BAR). The proposed survey area therefore does not coincide with important fisheries research surveys and the noise generated during the survey is expected to attenuate to below the threshold level for behavioural disturbance within 4 km of the seismic survey vessel. Also shown are the survey transects of recruitment and spawner biomass research surveys undertaken by DFFE in May 2021 and November 2020, respectively, in relation to the Reconnaissance Permit application area. 6. The requirement for MMOs and PAM is already included in the BAR and EMPr. As indicated in Section 9.3.1 of the BAR and Section 13.2 of the EMPr, qualified, independent MMOs are required on board at all times. As a minimum, one must be on watch during daylight hours while the acoustic source is active. Similarly, it is recommended, and will be adopted, that qualified, independent PAM Operators are required on board at all times. As a minimum one must be on watch while the acoustic source is active. 7. The EMPr has been updated to reflect that bunkering should not take place within MPAs or within the 5km buffer from MPAs. 8.1: See response to item 9 below. 8.2: The Marine Fauna Assessment and Section 13.10 of the EMPr already includes mitigation to avoid key periods for marine fauna as follows: Plan seismic surveys to avoid most sensitive periods within the survey area for some marine fauna from early June to early December, notably: Movement of migratory cetaceans (particularly baleen whales) from their southern feeding grounds into low latitude waters and Aggregations of migratory cetaceans on the summer feeding grounds between St Helena Bay and Dassen Island from late October to late December 8.3: The EMPr includes an Environmental Management System including Monitoring and Adaptive Management with respect to management strategies, as discussed in Section 9 of the EMPr (Appendix E). The use of MMOs during the survey, as recommended in the EMPr, is also considered an example of adaptive monitoring. 9. Regarding recommendations for baseline data collection please see responses below: Marine Biodiversity Key species have already been identified and listed in the Marine Biodiversity Report included as Appendix C2 of the BAR. This includes maps of critical habitats. The MMO reports to be completed as part of the survey would include detail of sightings of marine mammals within and near to the survey area for the duration of the survey. It is the responsibility of the on-board MMO to observe and record responses of marine fauna to seismic source from optimum vantage

Ms Tabisile Mhlana

	<p>points, including seabird, turtle, seal and cetacean incidence and behaviour and any mortality or injuries of marine fauna as a result of the seismic survey. Data captured would include species identification, position (latitude/longitude), distance/bearing from the vessel, swimming speed and direction (if applicable) and any obvious changes in behaviour (e.g. startle responses or changes in surfacing/diving frequencies, breathing patterns) as a result of the seismic activities. Both the identification and the behaviour of the animals must be recorded accurately along with current seismic sound levels. Any attraction of predatory seabirds, large pelagic fish or cetaceans (by mass disorientation or stunning of fish as a result of seismic survey activities) and incidents of feeding behaviour among the hydrophone streamers should also be recorded. The MMO will also record sightings of any injured or dead protected species (marine mammals, large pelagic fish (e.g. sharks), seabirds and sea turtles), regardless of whether the injury or death was caused by the seismic vessel itself. The role of the MMO is discussed further in Section 8.4 of the EMPr (Appendix E). As environmental information gathered during surveys is of high scientific value, such information should be made available (inter alia to SANBI, SAEON, and the DFFE) to contribute to the knowledge base of deep-water environments. Data sharing condition has been added to the BAR (Executive Summary) and EMPr (Section 13.19). Further baseline data on marine biodiversity which is informed by MMO reports and actual data from the previous survey is included in Section 8.4 of the BAR. Water Quality Baseline water information is already included in Section 8.3 of the BAR. The planned survey will not have any significant impacts on water quality or plankton abundance. The reconnaissance permit area is located far offshore (220 km at its closest point) and therefore beyond the influence of coastal upwelling, which will influence both plankton abundance and the abundance of fish species that depend on plankton as a food source. Sediment Quality Baseline information on sediments is included in Section 8.2 of the BAR. Acoustic Environment Source Verification and noise baseline measurements have already been conducted as part of the noise model validation discussed in section 5 of the acoustics report based on drift buoy measurements taken during the previous survey. This data has been provided to the DFFE. Oceanographic Data Baseline oceanographic data is already included in Section 8.3 of the BAR. It is the view of the marine ecology specialist that the level of this data is adequate to inform this impact assessment. Socio-Economic Data The project is located significantly far offshore that it will not overlap with any specific areas for cultural or recreational use. Fishing activities are typically not undertaken within the survey area while the survey is underway and the survey area is located well outside of the fisheries ring-fence area. The deepwater trawl fisheries are all located on the shelf edge, well inshore of the proposed survey area. Even the pelagic longline fisheries typically operate inshore of the area. Refer to baseline data already included for fisheries in Section 8.5 of the BAR and the social environment in Section 8.7 of the BAR. Climate and Weather As discussed in section 8.4 of the EMPr (Appendix E) It is the responsibility of the MMO to record meteorological conditions at the beginning and end of the observation periods, and whenever the weather conditions change significantly.</p>
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Comments and Responses 1623 Searcher BA 2

Malibongwe Daweti

Date 2024/06/20 Method Email

Comment

Greetings I would like to humbly request the English version of the 7 page EIMS document. I have registered for the virtual meeting of the 10th July but would like to read first. Your assistance in this regard will be highly appreciated.

Response

The report will be made available on the EIMS website from 21 June (www.eims.co.za/public-participation) A datafree version of the web page is also available if you are unable to access the report due to data constraints: <https://eims.datafree.co/2024/04/12/1623-searcher-seismic-survey-048-basic-assessment-project/>

Mr David Mtshali

Date 2024/07/26 Method Email

Comment

These submissions are made by Natural Justice and The Green Connection in response to the Basic Assessment Report (BAR) published for comment by Environmental Impact Management Services (Pty) Ltd for the proposed Searcher Seismic Reconnaissance permit over 12/1/038 on 21 June 2024. Natural Justice and The Green Connection have previously submitted comments on the Draft BAR in 2022 where we set out our objection to the exploitation of oil and gas resources. We stand by those comments. In this document, we deal with the BAR for the new reconnaissance permission that was awarded to Searcher. Insofar as the contents of this document do not specifically change our previous comments, our previous comments stand. 1. PASA’S ACCEPTANCE OF MULTI-CLIENT SPECULATIVE SURVEYS IS UNLAWFUL 1.1. We submit that the acceptance of Searcher’s reconnaissance permit application in circumstances where exploration rights are held by another person/s over the area, is unlawful. In terms of s74 of the MPRDA, ‘any person’ who wishes to apply to the Minister for a reconnaissance permit must lodge the application as indicated in subsection (1)(a) to (c), and PASA must within 14 days accept an application for a reconnaissance permit if, among other things, ‘no other person holds3 a technical co-operation permit, exploration right or production right for petroleum over any part of the area’(emphasis added). 4 If the application does not comply with the requirements of this section, the designated agency must notify the applicant in writing within 14 days of the receipt of the application and provide reasons. 1.2. In the Searcher judgement referred to above, Thulare J interpreted the meaning of the wording in s75(1)(c) of the MPRDA. While dealing with the issuing of a reconnaissance permit, the wording of s75(1) is similar to the wording used in s74(2): s75(1) provides that the Minister must issue a reconnaissance permit if the provisions of s75(1)(c) are met, namely that the reconnaissance will not result in unacceptable pollution, ecological degradation or damage to the environment and that an environmental authorisation is granted. Thulare J explained what is required as follows: 1.4. Applying the reasoning of Thulare J to section 74(2) of the MPRDA, it follows that there must be

Response

Please note that the comments received during the BAR in 2022 were already responded to as part of the applicable processes for the previous application. Searchers responses already provided as part of the previous appeal process are still considered applicable to the current application and should be read in conjunction with the appeal decision by DFFE (ref LSA226116 dated 23/9/2023. This application is not an extension but rather a new application. Since a Reconnaissance Permit is only valid for 1 year, and the previous 12/1/043 permit will expire on the 10th of November 2024, Searcher has consequently applied for and received an acceptance letter for a new Reconnaissance Permit (12/1/048) over the same area as the previously approved activity. A new EA is required for the new 12/1/048 Reconnaissance Permit application. Responses to ‘PASA’S ACCEPTANCE OF MULTI-CLIENT SPECULATIVE SURVEYS IS UNLAWFUL’ 1.1 This comment was raised and addressed in the initial application in 2022 as part of the 12/1/043 Reconnaissance Permit and EA. Section 74(2)(b) of the Act provides that the designated Agency must accept an application for a reconnaissance permit on condition that no other person holds a Technical Co-operation Permit, Exploration Right or Production Right for petroleum over any part of the area. It is clear that the primary intention of the provision in question is to afford security of tenure to permit/right holders as stated in the preamble of the Act. Consequently, applicants for reconnaissance permits seeking to acquire multi-client seismic data over acreage already encumbered are required to obtain unequivocal and unconditional consent from the permit/right holders for the Agency to proceed to process and possibly grant a Reconnaissance Permit over such encumbered acreage. It therefore follows that an application for a Reconnaissance Permit can and should be granted if the permit/right holder gives the necessary consent for the acquisition of multi-client data over its acreage. Searcher in this instance has obtained the necessary consent/s from the relevant permit/right holders The applicant was issued an Acceptance Letter in terms of Section 74(2) of the Minerals and Petroleum Resources Development Act (MPRDA), by the Petroleum Agency SA (PASA). The application for EA was

Mr David Mtshali

evidence that no other person holds an exploration right for petroleum over any part of the area, and that PASA would be acting unlawfully if it accepted a reconnaissance permit application where section 74(2)(b) was not satisfied. 1.5. The BAR indicates that the survey area covers a number of blocks – Petroleum License Blocks Covered by Application Area (12/3/274 ER; 12/3/343 ER; 12/3/339 ER. 1.6. This clearly indicates that three exploration rights have been granted in respect of three of the Petroleum License Blocks covered by the application area. These exploration rights are held by other persons, not Searcher. 1.7. We submit further that there is no statutory basis in the MPRDA for the granting of reconnaissance permits to seismic survey companies to conduct speculative multi-client seismic surveys in Blocks where exploration rights are held by other persons, and that the Minister would be acting ultra vires the enabling provisions of the MPRDA should he grant a reconnaissance permit to Searcher. 2. PRECAUTIONARY PRINCIPLE 2.1. The cumulative impact of seismic surveys on the marine environment has not been researched extensively and there is no scientific consensus on the impacts of seismic surveys on the marine environment. In other words, there is no indication that seismic surveys do not cause ecological damage. The Precautionary Principle is an established environmental law principle that necessitates caution in the absence of scientific certainty on the significance of a proposed project's harm. This principle therefore is relevant not only in the awarding of Environmental Authorisations, but also in the environmental impact assessment phase as an environmental management tool. We therefore submit that it is not acceptable to apply a 'subjective approach' in the absence of scientific certainty or guideline recommendations to reach a conclusion on the significance of harm. Instead, the precautionary principle should be applied, and noise impacts of seismic surveys on fish eggs and larvae should be assumed to be unsafe in the absence of credible science. 2.2. In the Shell Wild Coast Seismic Survey judgment in the main case, the court referred to applicants' relying on expert reports for their contention that the anticipated harm to marine and bird life is a fundamental consideration, noting that these experts were in agreement that there is a reasonable apprehension of harm to marine and bird life and that the mitigation measures proposed by Shell did not adequately manage the threat of harm. The court also referred to the experts relied upon by Shell to refute the suggestion of possible harm to marine life, and noted that the respondents suggest that the detrimental effect of seismic surveys are not known and that, in so far as there is a possibility of death or stranding of marine animals from exposure to sound from seismic surveys, there are appropriate mitigating and monitoring measures in place. The court went on to point out that '[b]ecause of the apparent dispute between the experts as to the adequacy of the mitigation measures minimising the known effects of seismic surveys, it would be incumbent on the decision-maker to invoke the precautionary principle'. 3. FAILURE TO CONSIDER CLIMATE CHANGE AS PART OF NEED AND DESIRABILITY ASSESSMENT 3.1. Refusal to consider climate change impacts In an attempt to justify the desirability of the proposed project, the BAR expressly rejects the need to consider climate change impacts that may result from the activities of the proposed project. The relevant

initiated based on this acceptance letter. Your concern regarding PASA's ability to accept the application has been noted and is herewith submitted to the decision maker for consideration. Please note that ingress letters / consent letters have been received from the various Rights Holders for all Petroleum License Blocks covered by the project. These letters were submitted to PASA. 1.2 No reference to the Thulare Judgement was provided, however it is assumed that reference is being made to the Thulare Judgement taken against Searcher in March 2022 in the Western Cape High Court (case # 1306/22). Searcher recently undertook 3D seismic surveys approximately 220km off the West Coast between January and April 2024 acquiring an area of approximately 9000 km2 within the 30 000km2 authorised area as part of the 12/1/043 Reconnaissance Permit and EA. Based on independent scientific data and reporting (verified by independent parties and made available for third-party review) from Seiche as well as direct engagement with community members along the West Coast found that no pollution, ecological degradation or damage to the environment as well as no impacts were experienced by the communities during the survey undertaken as part of 12/1/043 Reconnaissance Permit and EA. The proposed project is the same type of activity within the same Reconnaissance Permit (30 000km2) footprint. It is understood and acknowledged in the Basic Assessment Report (BAR), that sound from seismic surveys may have an impact on marine fauna however the potential significance of the impact is what is important in the context of the EIA. Various mitigations measures are proposed to reduce any impacts on marine fauna to acceptable levels as proposed in Sections 9.3 and 11.4 of the BAR and the accompanying EMPr (Appendix E of the BAR). 1.3 Refer to the response on item 1.2 above 1.4 Refer to the response on item 1.1 above. 1.5 Various license blocks are covered by the application area which includes 12/3/274 ER, 12/3/343 ER, 12/3/339 ER and Open area. 1.6 Ingress letters / consent letter have been received from the various Rights Holders for all Petroleum License Blocks covered by the project. These letters have been submitted to PASA. 1.7 Refer to the response on item 1.1 above. 2. The BAR not only identifies the potential impacts, but further, as is required by the regulations, assesses the significance of such impacts. The mere fact that an impact has the potential to occur does not automatically result in the significance of such impact being high. The final significance ratings are determined using information from the very extensive peer-reviewed literature together with the noise modelling results, informed by real sound source verification in the same local, (which put the threshold distances from the source array to mortality and potential mortal injury into perspective), adopting the precautionary principle as is required when undertaking such impact assessments, and taking into account the sensitivity of receptors present in Southern African waters. The assessment of impacts for the application has adopted a strongly precautionary approach. It is also noted that a similar survey was undertaken in the area during 2024. The BAR includes provision of relevant management and mitigation measures aimed at avoiding or reducing the potential impacts. These are captured in the EMPr, which the applicant will be required to comply with. The court suspended the orders of the Makhanda High Court which had set aside Shell's exploration right of 2014. In light of the findings by the Makhanda High Court the

Mr David Mtshali

passage of the report reads as follows: “From a climate change perspective, it is not currently possible to accurately assess the risks associated with oil and gas activities, given that the specific details of these potential future activities are not known and therefore climate change impacts would need to be assessed in detail during any subsequent Scoping and EIA processes for any potential subsequent oil and gas production projects.” (par 5.2). 3.2. According to the BAR, this refusal to consider climate change impacts in respect of the activities proposed is informed by the fact that NEMA lists activities for seismic surveys separate from those of production activities, and that production activities require their own separate EIA processes. This argument and the allegation that it is not possible to accurately assess the risks associated with oil and gas activities at this stage is flawed and incorrect. Section 1 of NEMA defines “environment” as, amongst other things, surroundings within which humans exist and that are made up of the land, water and atmosphere of the earth. Section 24O of NEMA requires decision-makers to consider all relevant factors including environmental impacts. 3.3. It is a globally accepted scientific fact that fossil fuels (oil, coal, and natural gas) are the biggest contributors of greenhouse gas emissions which result in climate change (see Paris Agreement 2015). The South African government made several commitments to reduce greenhouse gas emissions, it set a fixed target for greenhouse gas emissions levels (NDC 2015 updated in 2021) and developed an investment plan to transition the country's energy sources away from non-renewables to renewables (South Africa's Just Energy Transition Investment Plan 2023-2027). 3.4. Likewise, the impacts of climate change have already been factually established (see IPCC Special Report on global warming, amongst others). It is also accepted by our courts that a comprehensive assessment that looks at the need and desirability of a project may result in information that is pivotal for decision-makers or the competent authority (see *Sustaining the Wild Coast NPC and Others v Minister of Mineral Resources and Energy and Others* 2022 (6) SA 589 (ECMk) paragraph 125; *Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others* 2017 2 All SA 519 (GP) paragraph 115). 3.5. Contrary to its findings on the possibility of assessing climate change risks, the BAR mentions future economic benefits of the project to justify its desirability (paragraph 5.2.), despite its finding that production activities which may take place in the future are subject to a separate environmental assessment. On one hand, the BAR finds the proposed project desirable because of its future economic benefits and on the other hand, it argues that future climate change impacts are impossible to assess this is not a production EIA. This is a contradiction that can be avoided by conducting a comprehensive assessment that assesses, inter alia, climate change impacts. 3.6. Furthermore, the BAR missed an opportunity to assess the impact of climate change, environmental degradation, and food insecurity on children and their environmental rights. There is consensus amongst scholars and researchers that climate change affects children in different parts of the globe differently (see Sheridan Bartlett “Understanding the impacts for children of factors related to climate Change” 2008; Sheffield P E and Landigan P J “Global Climate Change and Children's Health: Threats and Strategies for Prevention” 2011; Currie J and Deschênes O

application by Shell may proceed but will have to be done with proper consultation with the affected communities, taking into account community rights and environmental harm. In alignment with these findings Searcher value your input into our comprehensive community consultation strategy for identifying community rights and environmental harm potentially relevant to the survey. It is noted that this comment was also raised by Natural Justice as a ground of appeal during the previous EA issued for Searcher. This ground of appeal was subsequently dismissed by the Minister. The decision to dismiss the appeal was not taken on review. 3. Although the Need and Desirability of the project is linked to the potential future use of the seismic data to discover oil and gas reserves, future impacts associated with potential oil and gas production would need to be assessed separately as part of the EIA for those activities. Seismic surveying is not only used for petroleum and natural gas exploration and development, it can in certain instances also be used for development of offshore wind, geothermal energy, and low-carbon solutions such as carbon capture and storage and also more generally for providing more insight and understanding into the regional geology of the area for scientific purposes. EIMS has conducted the impact assessment on the basis of the activities proposed by the applicant. Any subsequent authorization would be restricted to these specifically assessed activities. Should the applicant or other applicants wish to undertake any additional exploration activities which are not addressed in the current Environmental Authorisation (EA) application, there would be a consequent need to apply for the relevant permissions. These would include a formal application for an Exploration or Production Right as well as a new EA. The impacts of such proposed activities would consequently require specific assessment and public consultation prior to approval. It is premature to assess the likely impacts of further invasive exploration activities or production activities or future utilization of any resource as the extent, duration, location, and magnitude applicable to these activities are unknown at this stage. Consequently, it is not relevant to this seismic survey to ascertain whether any of these impacts constitutes a fatal flaw or the extent to which such impacts can be managed or mitigated. The NEMA EIA Regulations make a clear distinction between the reconnaissance, exploration, and production activities in that these are listed as distinct and separate listed activities. There is provision in law for these activities to be assessed prior to implementation on their merits as and when they are proposed. Significant climate change impacts are not expected as a result of this seismic survey. Climate Changes impacts should be identified and addressed in the EIA for exploration and/or production phases. However, as emphasised in the BAR, it cannot be said with absolute certainty that exploration drilling, let alone production activities, will be undertaken in the future. As such, it is not currently possible to accurately assess the risks associated with these activities, given that the specific details of these potential future activities are not known. The proposed 3D seismic surveys, if approved, will allow the applicant to determine if there is an economically viable resource (natural gas including Helium) available in the area. It is important to note that the permission will not provide the required authorisation for production activities to be undertaken. As such, any future intention to undertake production of hydrocarbons within the exploration

Mr David Mtshali

“Children and Climate Change: Introducing the Issue” 2016; Akresh R “Climate Change, Conflict and Children” 2016. etc). The difference in how climate change affects children is thought to be largely influenced by the preexisting social and economic disparities and geographical variabilities. Notably, according to the BAR, the project will require highly skilled personnel and therefore there will be limited jobs for interested and affected communities. This makes it difficult to even argue in favour of the economic development part of the project. The impacts are uniquely different for children compared to adults because of the vulnerability of their developing bodies. The warm spells and heat waves caused by climate change exposes children to heat stress, respiratory and vector-borne diseases, and malnutrition with long term implications. Heavy precipitation events and intense tropical cyclones put children at higher risk of death than adults, exposes them to water-borne /water washed illnesses and malaria, reduces their options for play and social interaction etc. Furthermore, extreme high sea levels may increase the risk of death and bad health for children. 4. Failure to consider negative impacts of exploration drilling or production. 4.1. The stated objective of engaging in the proposed seismic survey is to discover oil and gas reserves to explore. The Eastern Cape High Court judgment in Sustaining the Wild Coast and Others, held that seismic surveys are stages leading to oil and gas production, which contribute to greenhouse gas emissions, worsening climate change and affecting people's livelihood and food security. The court underscored the fact that a comprehensive assessment of the impact of new oil and gas reserves is required for proper assessment of the need and desirability of the project. The BAR fails to evaluate the negative long-term effects of oil and gas production, and totally ignores risks to coastal communities' livelihoods. 5. Reliance on benefits of production to justify need and desirability of reconnaissance activities 5.1. The BAR highlights future benefits of exploiting oil and gas to justify need and desirability of the proposed activities. However, it deliberately avoids dealing with negative impacts of such exploitation. While acknowledging the importance of understanding the full scope of seismic data, the BAR focuses on the perceived advantages, including using natural gas as a transition fuel, reducing greenhouse gas emissions, supporting renewable energy initiatives and creating jobs. It does not adequately assess the long-term risks associated with oil and gas exploration and production. 6. Assumption of gas as transition fuel 6.1. The BAR argues that natural gas can act as a transition fuel to help South Africa meet its climate goals, citing its lower carbon dioxide emissions compared to coal and oil. It argues that natural gas emits significantly less carbon dioxide than coal and oil, especially when using Combined Cycle Gas Turbines. However, these claims are unsubstantiated. The BAR overlooks the lifecycle impacts of natural gas which includes potential methane leaks during extraction and transportation which makes natural gas more harmful than coal. 6.2. It is worth noting that, the impending global carbon border adjustment mechanisms will restrict the exportation of products with high carbon footprints. This will make South Africa's economy vulnerable if it relies on gas for electricity generation instead of cleaner renewable options. In sum, investing in fossil fuels is not a sustainable approach for South Africa to balance its climate commitments

right area would require a further application, investigation and public consultation process. The environmental consequences applicable to the planned survey activities have been identified and assessed in this BA Report. Further according to the Integrated Resource Plan 2019 (IRP 2019), which is the country's energy planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. Oil and gas can play a role in reducing pollution by displacing coal and investing in emission-reducing technologies, their overall impact on environmental sustainability can be managed and balanced with renewable energy sources in the broader energy transition. Natural gas is a "bridge fuel" due to its lower carbon intensity compared to coal when burned for electricity generation. Switching from coal to natural gas can reduce greenhouse gas emissions and air pollutants like sulphur dioxide and particulate matter which supports climate change initiatives. Diversifying the energy mix away from coal involves integrating more renewables like wind and solar, which are intermittently available. Natural gas power plants can provide reliable backup power, supporting the integration of renewables into the grid. It is also important to note that this comment was also raised by Natural Justice as a ground of appeal during the previous EA issued for Searcher. This ground of appeal was subsequently dismissed by the Minister. The decision to dismiss the appeal was not taken on review. 4. Refer to response provided to item 3 above. 5. Refer to response provided to item 3 above. 6. Refer to response provided to item 3 above. No methane leaks would potentially occur as a result of the seismic survey. The application is for data acquisition only and does not include other invasive exploration or production activities. There is provision in law for these activities to be assessed prior to implementation on their merits as and when they are proposed. According to the Integrated Resource Plan 2019 (IRP 2019), which is the country's energy planning strategy, there is a need for gas in South Africa's energy mix in the future. This need is driven in part by the expectation that natural gas may act as a transition fuel, whilst other greener technologies mature. According to the National Department of Forestry, Fisheries and the Environment (DFFE), targets have been determined to achieve our national GHG Emissions commitments. These targets consider the likely GHG emissions outcome of the implementation of current South African policies including the IRP. The proposed exploration activities may be used to determine whether a viable gas or oil resource is present. The outcomes of this could provide insight into potential alternative supply options to inform the future energy planning and policy for South Africa. Considering this, and other new information on supply options, as well as the rapid technological advancements in the energy sector (and specifically in the low carbon alternatives), it is crucial that the energy planning for South Africa is continually reassessed and revised to ensure that the most suitable and sustainable strategy is defined. It is agreed that pending the outcome of an appraisal on the viability of extracting any oil or gas resource, which this exploration activity is likely to inform, due caution will need to be taken to ensure that South Africa complies with its international commitments and ensure a safe environment in line with our constitution and the prevailing environmental legislation that gives effect to thereto. Oil and

Mr David Mtshali

with economic development. Conclusion The BAR failed to adequately assess the need and desirability of the proposed project by failing to consider and assess climate change long-term impacts. 7. INTEGRATED COASTAL MANAGEMENT 7.1. Section 63 of NEM: ICMA requires a competent authority to take account of additional considerations when deciding whether or not to grant an environmental authorisation under the NEMA for 'coastal activities'. Whilst the BAR sets out the requirements of the ICMA, it passes the buck in terms of actually evaluating and assessing the considerations in the BAR itself to the Competent Authority. This is unacceptable. 7.2. Notably, it fails to describe Searcher's compliance with previous authorisations. 8. SUBSTANTIVE CONCERNS IN PREVIOUS SUBMISSIONS 8.1. Natural Justice and The Green Connection submitted comments in the previous EIA process, and appealed against the decision to grant environmental authorisation. In our view, the issues raised therein have not been addressed either through the appeal process, or in the current EIA. 8.2. We therefore reiterate our concerns, as raised in the appeal, which we attach as Annex A for convenience, we summarise those concerns below: 9. The seismic survey activities will result in unacceptable, significant impacts on the marine environment that cannot be effectively mitigated. 9.1. As part of its comments on the 2022 EIA Report, and attached to its appeal, Natural Justice appended a report by WILDTRUST marine scientists, Dr Kendyl Wright, Dr Jennifer Olbers and Dr Jean Harris contesting many of the findings and mitigation measures in the Final BAR. These scientists concluded: o That there is a high likelihood and risk that environmental harm will occur when seismic surveys are undertaken, and that harm is likely to be significant; o That the proposed mitigation measures are insufficient to allay fears of environmental harm; and 9.2. That very little biological and ecological data exists in respect of the seismic survey area, and the FBAR is based on the entire Orange Basin Area. Substantive information relating to the specific area, species and ecosystems that are at risk is absent. The subjective rating system, despite data gaps, does not provide confidence of no harm during reconnaissance activities. Some of the proposed mitigation measures are irrelevant for species and ecosystems in the seismic survey area. 9.3. These gaps in information and concerns regarding the impacts and inadequate mitigation measures have not been addressed by the information contained in the new BAR. 9.4. These impacts were not adequately addressed by the Minister in her 2023 appeal decision and no changes have been made to mitigation measures in this application which would adequately mitigate the impacts. More is also required to demonstrate understanding of baseline conditions, and we note that Searcher has not taken the opportunity during its previous surveys, or during this new application, to advance understanding of baseline conditions. 10. Noise impacts have not been adequately assessed 10.1. The assessment of noise impacts is woefully inadequate. It does not consider cumulative impacts of noise and does not consider the impacts of noise before the 160dB threshold. 10.2. Further, the mitigation measures associated with noise impacts are designed to only attempt to avoid permanent threshold shifts. They also do not include any seasonal avoidance considerations, which would help to reduce harms on species undertaking activities particularly sensitive to acoustic

gas can play a role in reducing pollution by displacing coal and investing in emission-reducing technologies, their overall impact on environmental sustainability can be managed and balanced with renewable energy sources in the broader energy transition. Natural gas is a "bridge fuel" due to its lower carbon intensity compared to coal when burned for electricity generation. Switching from coal to natural gas can reduce greenhouse gas emissions and air pollutants like sulphur dioxide and particulate matter. Oil and gas companies have invested in technologies like carbon capture and storage (CCS) to mitigate emissions from fossil fuel use. These technologies aim to capture carbon dioxide emissions from power plants and industrial processes, reducing their environmental impact. Diversifying the energy mix away from coal involves integrating more renewables like wind and solar, which are intermittently available. Natural gas power plants can provide reliable backup power, supporting the integration of renewables into the grid. It is also noted that should Carbon Border Adjustment Mechanisms be implemented then utilising gas as an energy source as opposed to the current use of coal has the potential to reduce the current CBAM exposure due to the fact that coal power generally has higher GHG emissions than natural gas. Seismic surveying is not only used for petroleum and natural gas exploration and development, it can in certain instances also be used for development of offshore wind, geothermal energy, and low-carbon solutions such as carbon capture and storage and also more generally for providing more insight and understanding into the regional geology of the area for scientific purposes. 7. The obligation to consider the Section 63 Factors rests with the decision making authority. The BAR does in large part consider the factors specified in Section 63 of the ICMA. In terms of the NEM:ICMA the coastal protection zone consists of— (a) land falling within an area declared in terms of the Environment Conservation Act, 1989 (Act No. 73 of 1989), as a sensitive coastal area within which activities identified in terms of section 21(1) of that Act may not be undertaken without an authorisation; (b) any part of the littoral active zone that is not coastal public property; (c) any coastal protection area, or part of such area, which is not coastal public property; (d) any land unit situated wholly or partially within one kilometre of the highwater mark which, when this Act came into force— (i) was zoned for agricultural or undetermined use; or (ii) was not zoned and was not part of a lawfully established township, urban area or other human settlement; (e) any land unit not referred to in paragraph (d) that is situated wholly or partially within 100 metres of the high-water mark; (f) any coastal wetland, lake, lagoon or dam which is situated wholly or partially within a land unit referred to in paragraph (d)\(g) or (e)\ (g) any part of the seashore which is not coastal public property, including all 5 privately owned land below the high-water mark; (h) any admiralty reserve which is not coastal public property: or (i) any land that would be inundated by a 1:50 year flood or storm event. (2) An area forming part of the coastal protection zone, except an area referred to in subsection (1)(g) or (h). may be excised from the coastal protection zone in terms of 10 section 26. No impacts on public property would be expected due to the location of the survey area. The proposed project area is located between approximately 256 km offshore of St Helena Bay, extending north along the western coastline to approximately 220 km offshore of Hondeklip Bay.

Mr David Mtshali

disturbance. 10.3. Despite concerns raised in the previous process, no new mitigation measures are proposed, and no new noise assessments accompany this application. 11. The FBAR focuses inappropriately on the direct ‘footprint’ impacts of the project and ignores the wider landscape, indirect and cumulative impacts, and the heightened legislative protections afforded to the coastal environment. 11.1. Direct and indirect impacts can overlap in time and space. In the marine environment, the spatial relationship of direct and indirect impacts is complex due to ecosystem interconnectivity and also the variable spatial extent where impacts occur across different features. 11.2. NEM:BA, NEM:PAA and the NEM:ICMA play a critical role in terms of protecting and conserving the three identified CBAs within the survey area, as well as the nearby EBSAs and MPAs. However, the value of these areas and the extent of potential negative impacts of exploratory activities on these areas have not been considered. 11.3. The DBAR and the Marine Ecology Assessment do not adequately assess, consider, or present the legislatively mandated protection and conservation objectives in these three SEMAs with regard to the broader seascape impacts. The legislative status of these areas and the importance of their protection are minimized on the basis that none of the numerous sanctuaries, marine protected areas (MPAs) that exist offshore and along the Western Cape's coastline, overlap with the Reconnaissance Permit Area. 12. The bar does not contain a proper and objective assessment of the negative impacts of the project on people's human rights 12.1. Small-scale and subsistence fishers, who fish around the West Coast fish to meet basic food and livelihood needs and are integral members of the communities in which they reside. For many small-scale fishers and their communities, the ocean and the fish in it represent far more than just subsistence, it also represents a way of life. 12.2. The geographical area in which prominent coastal fishing towns are situated, such as Port Nolloth, Hondeklipbaai, Alexander Bay, supports the vibrant small-scale fisheries sector, which has been recognized as a critical economic sector in the Western and Northern Cape provinces, the full value of which both the monetary and non-monetary, has not been assessed in the BAR. 12.3. The socio-economic report fails to evaluate the cascading impacts on food webs, and how this will impact on the right to access of sufficient food. 13. The spiritual and cultural rights, identities and practices of coastal communities were not adequately assessed 13.1. Neither the BAR nor the Cultural Heritage Report provide evidence that the concerns raised during previous processes by coastal communities about their cultural and heritage associations with the ocean have been considered. 13.2. Further, the proposed and authorised mitigation measures are totally inadequate. The mitigation measure set out in the EMPr is to re-assess impacts post-project.1 This is flawed for a number of reasons, including: o Firstly, it in no way mitigates the impacts of the operations and cannot be described as a mitigation measure; 13.3. Secondly, the measure is aimed at providing “resources and support for communities to develop and undertake safeguarding measures or plans to enhance the mitigation capacity of their intangible cultural heritage by fostering dialogue, mutual understanding and reconciliation between and within communities”, which in no way holds Searcher accountable for any impacts caused by the

Impacts on coastal resources are identified and assessed in the Marine Biodiversity and Ecosystem Services Report (Appendix C2) and fisheries assessment (Appendix C3). There is no requirement in the ICMA to describe the applicants compliance with any previous authorizations. The independent Environmental Compliance Officer (ECO) audit reports associated with the previous survey have been forwarded to PASA as required and relevant daily reports are available on Searcher's website. 8. The previous appeal by Natural Justice and the Green Connection was dismissed in a letter from the minister on 23 September 2023. The decision to dismiss the appeal was not taken on review. Where Natural Justice cites the ground of appeal from the previous Application, the corresponding responses provided in that appeal process are still considered applicable to the current application and should be read in conjunction with the appeal decision by DFFE (ref LSA226116 dated 23/9/2023). 9. The EAP and specialists are of the opinion that the project should be authorized, on condition that the suggested management and mitigation measures are implemented. All impacts can be reduced to a low / medium significance with the implementation of the suggested management and mitigation measures in the BAR and accompanying EMPr. It is not clear which specific impact or risk is deemed by the Appellant to result in a high likelihood of significant harm. The Appellant and specifically Annex B1 of the Appellants submission refers to an Annexure B, titled “REPORT ON SCIENTIFIC BASIS FOR CONCERNS OF SIGNIFICANT HARM INFLICTED TO MARINE WILDLIFE BY 2D and 3D SEISMIC SURVEYS ON THE SOUTH AND WEST COASTS OF SOUTH AFRICA”. It is noted that this report, which it is assumed underpins the Annex B1 submission relates to the reconnaissance area for a completely separate and substantially different survey which was originally applied for by Searcher in 2021. This originally applied for, and unrelated, reconnaissance area referred to is significantly larger (almost 10 fold) than the current reconnaissance area. This disparate survey covered significant and distinctive sensitive environmental and fisheries areas, which the current reconnaissance area specifically avoids. The mere fact that an impact has the potential to occur does not automatically result in the significance of such impact being high. The final significance ratings are determined using information from the very extensive peer-reviewed scientific literature together with the noise modelling results (which put the threshold distances from the source array to mortality and potential mortal injury into perspective), adopting the precautionary principle as is required when undertaking such impact assessments, and taking into account the sensitivity of receptors present in Southern African waters. All impacts can be reduced to a low / medium significance with the implementation of the suggested management and mitigation measures in the BAR and accompanying EMPr. It is incorrect to state that this survey will result in unacceptable, significant impacts on the marine environment that cannot be effectively mitigated. It should be noted that the activity which was appealed by Natural Justice has subsequently been successfully undertaken with no unacceptable or significant impacts on the marine environment. Searcher has a history of effectively conducting seismic surveys worldwide and now in South Africa with successful environmental outcomes attained from rigorous operating rules, environmental risk assessment, planning, management and mitigation

Mr David Mtshali

reconnaissance activities; and 13.4. Thirdly, it fails to comprehend and mitigate any of the economic or other harm to livelihoods, and cultural and heritage practices and identity. 13.5. The pre-mitigation significance given to this impact is rated as Medium, and then Low post mitigation. If mitigation does not actually change the impact then it cannot change the rating. There is no rational connection between the results of the arbitrary, and somewhat absurd, mitigation measure and any change in the impact caused by the reconnaissance activities on coastal communities. 13.6. Further, and unacceptably, cumulative impacts on these rights have not been considered: "At this stage, cumulative impacts are purely speculative. Still, the potential for the future increase in cumulative impacts due to current and future seismic surveys and the potential for future Oil and Gas production cannot be excluded but is not quantifiable at this stage for cultural heritage." 14. Failure to notify Namibian government or Convention bodies of transboundary impacts 14.1. South Africa is a party to the Benguela Current Convention and the Abidjan Convention, and is bound by the obligations of the Conventions. Although Namibia has not ratified the Abidjan Convention, the Namibian territorial waters form part of the Convention Area. 14.2. The DBAR merely lists the Benguela Current Convention as one of many international marine conventions which may be applicable to the proposed seismic activities, and it does not mention the Abidjan Convention. It does not consider the obligations under these conventions at all. 15. Failure to assess transboundary impacts. 15.1. Despite the proximity of the seismic survey area to the territorial waters of Namibia, the DBAR fails to identify and assess impacts that are transboundary in nature. This is especially concerning, given the significance associated with the three Ecologically or Biologically Significant Areas ("EBSAs") spanning the border between South Africa and Namibia,³ that the Benguela Current flows in a generally northerly direction, and that "[t]he major feature of the Benguela Current is coastal upwelling and the consequent high nutrient supply to surface waters leads to high biological production and large fish stocks". 15.2. Given international law obligations, the EIA process should have included an assessment of transboundary impacts. Failure to do so renders the assessment deficient. 16. FAILURE TO CONSIDER ALTERNATIVES 16.1. The Guideline requires that: "the consideration of 'need and desirability' during an application process... must consist of a primary description of the relevant considerations... in relation to feasible and reasonable alternatives. During the actual assessment stages of an EIA process the need and desirability must be specifically assessed and evaluated, including specialist input/studies as required." 16.2. Reasonable and feasible alternatives include the option of not implementing the activity. 16.3. The need and desirability evaluation directs the reader to section 6 of the report. Section 6 says only the following regarding the No Go Alternative: The no go alternative would imply that no seismic survey activities are undertaken. As a result, the opportunity to identify potential oil and gas resources within the survey area would not exist. This will negate the potential negative and positive impacts associated with the proposed survey activities. 16.4. Consequently, the option of not implementing the activity has not been assessed adequately, or at all. 16.5. We submit that the

measures which were applied during the seismic survey. Further, direct engagement with community members along the West Coast in a post survey reassessment on the potential effects on the identified communities and their intangible cultural heritage considering the socio-economic baseline developed during this environmental impact process against quantified economic damage and losses and human development impacts, found that no pollution, ecological degradation or damage to the environment as well as no impacts were experienced by the communities during the survey undertaken as part of 12/1/043 Reconnaissance Permit and EA. It is incorrect to assume that Searcher has not advanced their understanding of baseline conditions or that no changes have been made to mitigation measures proposed since the previous Searcher project in this application. Local conditions, Marine Fauna observations, Sound Source Verification drift buoys and other valuable environmental information gleaned from the previous survey has informed the BAR and the specialist reports. Several changes and updates to mitigation measures are provided for in the BAR and EMPr for the current application. That said the current application covers the same area and is for the same activity as that previously assessed in the 2022/2023 Searcher BAR, and therefore most of the mitigation measures remain the same as previously identified. These mitigations are considered sufficient to manage all potential impacts associated with the seismic survey. Refer to Section 6.3 of the noise report (Appendix C1). Cumulative sound exposure levels are taken into consideration, cumulative modelling is carried out for a modelling area within a 60-km zone around the survey lines and with a 100-m grid size, so that the modelling area is sufficiently large to include all potential zones of impact for assessed marine fauna species. Refer to Section 4.6 of the Marine Ecology Report (Appendix C2) which deals with Confounding Effects and Cumulative Impacts, and Section 4.4 of the Fishers Assessment (Appendix C3) which addresses the increased impact on fisheries due to the combination of impacts from other projects that may take place during the same period. Furthermore, the assessment methodology used in the EIA by its nature already considers past and current activities and impacts. In particular, when rating the sensitivity of the receptors, the status of the receiving environment (benthic ecosystem threat status, protection level, protected areas, etc.) or threat status of individual species is taken into consideration, which is based to some degree on past and current actions and impacts (e.g. the IUCN conservation rating is determined based on criteria such as population size and rate of decline, area of geographic range / distribution, and degree of population and distribution fragmentation). The cumulative noise impact associated with multiple simultaneous surveys is assessed separately and the findings and recommendations regarding this are presented in Section 9.3.5 of the BAR. Further to the above it should be noted that Underwater Sound Source Verification (SSV) was conducted as part of the previous survey completed by Searcher in the first quarter of 2024 including drift Bouy deployment for underwater acoustic monitoring to establish an actual baseline prior to the commencement of the survey and then operational levels of noise during the survey. This sound data was used to verify the noise modelling predictions in the current acoustic report for this new application. Drift buoys (equipped with hydrophones) were deployed during the survey route to

Mr David Mtshali

no-go alternative has not been adequately assessed, and that the BAR should include consideration of the negative implications of potential future oil and gas development and attendant economic and social costs that will or may result. This would necessarily include the economic and social costs of GHG emissions that would result from future oil and gas development, as well as the social and economic costs that would result from a major oil spill arising from an uncontrolled wellhead blow-out (during any subsequent exploration or production well drilling). We are also of the view that a proper assessment of the no-go alternative should identify and assess the potential ecological and socio-economic benefits of the no-go option for small-scale fishers and fishing dependent communities. The assessment should also necessarily include a consideration of alternative means to generate energy and provide sustainable feedstocks for associated industrial applications, including renewable energy alternatives that do not pose a significant inter-generational ecological and socio-economic risk. 17. PUBLIC PARTICIPATION CONCERNS We note that this BAR notes concerns about participation fatigue in the specialist reports. This has the potential of hollowing out the purpose of the public participation process and given that the BAR covers the same area that was previously surveyed, people who are opposed to the project may not see the purpose in participating in this process once again. Previous public participation processes have failed to meaningfully engage concerns around the impacts of these projects and there is no indication as to how this process will differ to ensure that this is reached. 18. DOCUMENT REQUEST 18.1. The 2023 EA included a number of monitoring conditions. This includes: 18.2. Condition 5.7.1: The holder of this authorisation must submit daily and monthly environmental monitoring reports during seismic survey operations. o Daily MMP and PAM reports 18.3. The approved EMPR also contained a number of monitoring, auditing and reporting requirements. 18.4. Notably, the EA was defective in that did not include mandatory auditing requirements, despite the requirements of regulation 26(e), (f) and (h) of the EIA Regulations. However, given regulation 34, read with Appendix 7, remained applicable, and Searcher was required to undertake auditing processes, and make those audit reports available to the public. 18.5. We therefore request: o Copies of monitoring reports; o Copies of audit reports; and o Associated responses from the competent authority. 19. CONCLUSION We request that our comments are taken into consideration and that the DBAR be updated to address the inadequacies of the existing assessment.

conduct an SSV, in order to record and analyse sound levels (for comparison against background ambient levels in key fisheries areas) and to provide input and assist in Fisheries Research. In summary the model used for the acoustic report was considered validated and fit for purpose, based on the local SSV data analysed and reviewed to date by the specialist. 12. It is EIMS' opinion that the Public Participation (PP) process included meaningful consultation with regard to small scale fishers. It should also be noted that EIMS specifically consulted with the small-scale fishers and other community members and have given serious consideration to the comments and inputs from the local communities. Small scale fishing communities have been thoroughly consulted as part of the PP process for the project and the impact of the project on small scale fishers has been assessed in the fisheries assessment. No impacts are expected on the small scale fishing sector, and no significant impacts on food webs are anticipated. As stated in the fisheries report, due to the remote location of the Reconnaissance Permit area, noise would be expected to attenuate to below threshold levels before reaching fishing grounds of all other sectors viz. the demersal trawl, midwater trawl, demersal longline, tuna pole-line, small pelagic purse-seine, traditional linefish, west coast rock lobster and small-scale fisheries sectors. This is regardless of the specific near-shore areas where small-scale fishing may take place. The Reconnaissance Permit area does not coincide with spawning areas of key commercial species and noise generated by the seismic source would be expected to attenuate to below threshold levels for behavioural disturbance before reaching inshore recruitment and/or nursery areas. The Reconnaissance Permit area is situated well offshore of distributional area of snoek during its spawning and migration periods (an important species for the linefish and small-scale fisheries sectors). There is no impact expected on the demersal trawl, midwater trawl, demersal longline, small pelagic purse-seine, tuna pole-line, traditional linefish, west coast rock lobster, small-scale and netfish sectors. 13. It is EIMS' opinion that the Public Participation (PP) process included meaningful consultation with regard to small scale fishers. It should also be noted that EIMS specifically consulted with the small-scale fishers and other community members and have given serious consideration to the comments and inputs from the local communities. Small scale fishing communities have been thoroughly consulted as part of the PP process for the project and the impact of the project on small scale fishers has been assessed in the fisheries assessment. No impacts are expected on the small scale fishing sector, and no significant impacts on food webs are anticipated. As stated in the fisheries report, due to the remote location of the Reconnaissance Permit area, noise would be expected to attenuate to below threshold levels before reaching fishing grounds of all other sectors viz. the demersal trawl, midwater trawl, demersal longline, tuna pole-line, small pelagic purse-seine, traditional linefish, west coast rock lobster and small-scale fisheries sectors. This is regardless of the specific near-shore areas where small-scale fishing may take place. The Reconnaissance Permit area does not coincide with spawning areas of key commercial species and noise generated by the seismic source would be expected to attenuate to below threshold levels for behavioural disturbance before reaching inshore recruitment and/or nursery areas. The Reconnaissance Permit area is situated well

Mr David Mtshali

	<p>offshore of distributional area of snoek during its spawning and migration periods (an important species for the linefish and small-scale fisheries sectors). There is no impact expected on the demersal trawl, midwater trawl, demersal longline, small pelagic purse-seine, tuna pole-line, traditional linefish, west coast rock lobster, small-scale and netfish sectors. Direct engagement with community members along the West Coast in a post survey reassessment on the potential effects on the identified communities and their intangible cultural heritage considering the socio-economic baseline developed during this environmental impact process against quantified economic damage and losses and human development impacts, found that no pollution, ecological degradation or damage to the environment as well as no impacts were experienced by the communities during the survey undertaken as part of 12/1/043 Reconnaissance Permit and EA. In the heritage assessment (Appendix C4 of the BAR), marine-related intangible cultural heritage and people's connection to the ocean is relevant. This type of heritage incorporates the unique ethos and identity of specific places linked with fishing villages; oral history; popular memory; cultural traditions; indigenous knowledge systems, rituals, beliefs, and practices (e.g., fishing techniques) associated with the ocean. A pre-mitigation negative impact is projected on a regional scale over the long term with a moderate intensity due to the potential indirect impact on the communities and, ultimately, their heritage, with a high probability of this impact occurring. The pre-mitigation impact is rated as medium. The potential residual impact with mitigation measures from the heritage assessment is projected as low with a medium confidence factor. Considering the assessment is based on the findings of the fieldwork as well as the scientific studies relating to the impact on fisheries, the heritage specialist is of the opinion that the impact of the proposed project on the cultural heritage resources can be mitigated through the implementation of the recommendations in the Heritage Assessment Report and reflected in the BAR. Given all of the evidence, the conclusion reached for the various assessments is that impacts are either of medium, low or very low significance after mitigation measures have been applied. Please refer to the relevant sections of the BAR (8.8.4 & 9.3.3.1) regarding impacts on intangible heritage. Also refer to Section 6 of the HIA where specific stakeholder engagement was undertaken as part of the HIA. Targeted focus group discussions were specifically held with community and leadership structures as part of the SIA and HIA studies. Section 7 of the HIA includes particular stakeholder engagements undertaken as part of the HIA. This included attendance of the heritage specialist at public meetings as well as focus group meetings and discussions with selected representatives and groupings identified during the public engagements. These discussions are summarized in Table 5 of the HIA. Concerns regarding cumulative impacts were specifically addressed in Section 8.1 of the HIA (Appendix C4). The reference in the HIA is regarding the speculative nature of future exploration and production projects. Future impacts associated with potential oil and gas production would need to be assessed separately as part of the EIA for those activities. 14. The Namibian Government and Benguela Current Commission were both pre-identified as potential stakeholders / I&APs from the inception of the project. Proof of notifications is provided in Appendix B of the BAR. No</p>
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Comments and Responses 1623 Searcher BA 2

Mr David Mtshali

	comment was received from the Namibian Government or the Benguela Current Commission during any stage of this project. The FBAR has been updated to include mention of the Abidjan Convention in section 4.9.3 The obligations Various international marine conventions are listed in Section 4.9.3 of the BAR. The FBAR has been updated to include the main obligations that would be applicable under each of these conventions. 15. The Namibian Government was pre-identified as a potential stakeholder / I&AP from the inception of the project. No comment was received from the Namibian Government during any stage of the project. Appropriate notifications were implemented for the transboundary impacts on the previous survey that will be implemented again if required prior to survey commencement. The EIA included an assessment of all potential environmental impacts. The extent of each impact was assessed by all specialists. None of the identified potential marine environmental impacts are
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Ms Cebile Nzuza

Date	2024/04/22	Method	Email	
Comment	Response			
I want to register as an interested and Affected party for the seismic survey. I am responsible for Environmental Management nationally for all commercial ports in South Africa. The survey is in proximity to the ports of Mossel Bay, Cape Town, and Saldanha which is of interest to TNPA	Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project.			

Elna van Zyl

Date	2024/05/24	Method	Email	
Comment	Response			
Please add me for registration as n interested and affected party to receive information about your planned exploration on the West Coast. Thankyou	Thank you for your email. We confirm that you have been registered in the I&AP database for this project.			

Ms Gwendeline Saal

Date	2024/04/19	Method	Email	
Comment	Response			
As Richtersveld Economic Development Co-operative we would like to register as an Interested and Affected Party on the Environmental Authorization Application Process on the Proposed Seismic Project Reference number: 1623	Dear I&AP, Thank you for your email. We confirm that you have been registered on the I&AP database for this project.			

Comments and Responses 1623 Searcher BA 2

Mr GP Kriel

Date	2024/04/24	Method	Email
Comment		Response	
Kindly register me as an interested and affected party for the above project.		Dear I&AP, Thank you for your email. We confirm that you have been registered in the I&AP database for this project.	