



21 August 2023

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**RE: Comments for the PROPOSED AFRICA OIL SOUTH AFRICA CORP (AOSAC) BLOCK 3B/4B EXPLORATION RIGHT (Reference:1570)**

The concerns we have are the following:

**IMPACTS ON LIVELIHOODS**

There may be impacts to the fishing (subsistence, small-scale and commercial), tourism and aquaculture sectors should the proposed project result in decreased fish and marine species populations in the area. The project will affect livelihoods as many people in South Africa survive of the ocean. The project is also unlikely to result in increased employment opportunities for the local community near the project site. Job creation that is promised will be for highly skilled people, and there will be few of them.

**IMPACTS ON CULTURE AND HERITAGE**

The oceans have critical spiritual importance to many indigenous groups. Indigenous people also have vast knowledge on ocean conservation and marine life. Oil and gas production in the ocean can disrupt the cultural way of life and livelihoods of local people who have a connection to the sea. It can lead to the destruction of cultural and spiritual resources, both built and natural, which are key to the sense of self, identity and dignity. The ocean also has significant importance to traditional healers as ocean water is often used for rituals, initiations, and healing.

**IMPACTS ON FISH AND MARINE SPECIES**

Oil and gas exploration can result in fish and marine species being disturbed, their breeding grounds destroyed, their migratory patterns being interrupted and can even result in die-offs. The scoping report states that the colossal squid and the giant squid may be encountered in the project area. Growing in excess of 10m in length, they are the principal prey of the sperm whale, and are also eaten by beaked whales, pilot whales, elephant seals and sleeper sharks. The report further states that the fish most likely to be encountered in the offshore waters of Block 3B/4B are the large migratory

pelagic species, including various tunas, billfish and sharks, many of which are considered threatened according to the International Union for the Conservation of Nature (IUCN), primarily due to overfishing. Additionally, it is likely that juvenile great whites, right whales and whale sharks would migrate through Block 3B/4B. Oil and gas exploration has detrimental impacts on zooplankton, small organisms that are the basis of ocean food chains. Exposure to seismic noise can lead to hearing damage, behavioral and feeding changes, and even death in zooplankton populations.

### **NOISE AND POLLUTION OF WATER**

Due to the license area being located within the main vessel traffic routes that pass around southern Africa, ambient noise levels will be naturally elevated. This, together with additional noise associated with the proposed exploration project, would have a cumulative impact on marine fauna. The report also provides that the potential effects of seismic noise on fish populations such as baleen and toothed whales is unknown due to a lack of information. In addition to the increased noise impacting marine fauna, a big concern is oil spills which will have a devastating impact on the local environment.

### **SUBSISTENCE FISHERFOLK**

Thousands of subsistence fisherfolks rely on the ocean as their only means of income. Regardless of the testing zone's distance from the shore, marine ecosystems and animal migration will be impacted by the testing at a larger scale. There will be a depletion in fish stocks which will cause a devastating impact in the subsistence fisherfolk's livelihood.

### **INCREASE IN CLIMATE CHANGE**

Investing in more fossil fuels deepens the climate crisis. Oil and gas, once it is exploited, will increase the amount of carbon dioxide in the atmosphere, which contributes to climate change. Climate change results in more extreme weather conditions and a warming ocean, which can impact coastal communities.

### **ECONOMIC IMPACT**

Oil and Gas exploration will also have negative impacts on tourism along the coastline. A large portion of the businesses along the testing zone's coast rely on tourism, surfing, fishing, and boating. Potential hydrocarbon spills or accidents related to oil exploration would decimate the economy along the coast by diminishing tourism opportunities.

### **CONFLICT AND SECURITY**

The scoping report failed to consider the impact that seismic testing has on conflict and potential instability in coastline communities. The growing conflict and insurgency in northern Mozambique serves as an example. The exploration and discovery of massive oil reserves in the Cabo Delgado region in the mid-2010s brought promises of huge wealth and opportunities for Mozambiquans. However, the oil discovery not only increased inequality in the region but also raised economic stakes and tensions. Due to poor management of resources and the loss of land and

employment from gas infrastructure, many impoverished people became marginalized and radicalized. Violence insurgency grew, and since 2017, over 4,000 people have died and 800,000 have been displaced by the conflict. In a recent study in Cabo Delgado, 45% of respondents said that the main root cause of the insurgency was the discovery of natural gas. Although South Africa is currently at peace, oil exploration and dependency have the power to transform nations to instability and conflict, like what happened in Mozambique. Given that oil exploration is controversial and likely to cause tensions amongst poorer South Africans, potential conflict from seismic testing must not be overlooked. However, the scoping report does not address this critical potential impact on peace, security, and conflict, so it must not be approved.

For these reasons, South Durban Community Environmental Alliance opposes the Scoping Report for the proposed Africa Oil South Africa CORP (AOSAC) Block 3B/4B Exploration Right.

Thank you

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