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Your reference:  
Our reference: EIA/2015/033  
Date: 20 November 2015

**FOR ATTENTION: MATTHEW HEMMING &  
STELLA MOEKETSE**

Delivered: By email ([mhemming@slrconsulting.com](mailto:mhemming@slrconsulting.com) &  
[smoeketse@slrconsulting.com](mailto:smoeketse@slrconsulting.com))

Dear Matthew and Stella

**RE: DRAFT SCOPING REPORT FOR ENVIRONMENTAL AUTHORISATION: EXPLORATION RIGHT FOR PETROLEUM ON VARIOUS FARMS IN THE MAGISTERIAL DISTRICTS OF MATATIELE AND MOUNT FLETCHER, EASTERN CAPE.**

Thank you for providing the Eastern Cape Parks and Tourism Agency (ECPTA) with the opportunity to review and comment on the Draft Scoping Report for Environmental Authorisation: Exploration Right for Petroleum on Various Farms in the Magisterial Districts of Matatiele and Mount Fletcher, Eastern Cape. Please note that the ECPTA understand the motivation of the project to secure improved supply of energy resources to South Africa as well as the socio-economic possibilities that an entity of this scale may offer, however due to the high level of sensitivity of the proposed development site and its surrounding, ECPTA cannot support this development. This is based on the following:

- The project area is directly adjacent to northeastern and southeastern boundaries of Ongeluksnek Nature Reserve (ONR) and falls also within 5km buffer zone of the Reserve. Please note that our comments further below only pertain to possible biodiversity related impacts on ONR and will require further investigation and mitigation measures should be proposed to mitigate the negative impacts on ONR as well as the surrounding 5km buffer zone.
- There are numerous red-flags for this project area as it is a national and international biodiversity priority area. The area forms part of the internationally recognized Drakensberg-Alpine centre of endemism, as such the area is home to some of the rarest endemic animals and plants in the country and it is a global biodiversity hotspot (Maputaland-Pondoland-Albany biodiversity hotspot). Also, based on the Eastern Cape Biodiversity Conservation Plan (Berliner and Desmet, 2007) almost the entire project area falls within a Critical Biodiversity Area (CBA) 1 and partly within CBA 2 which are critical for conserving biodiversity and maintaining ecosystems functioning.
- The catchments around this area are extremely important from a water provision perspective, especially for the eastern part of the Province. South Africa being one of the water scarce countries, retaining the remaining water source areas is essential and a priority. Also, the water sources within the project area is crucial for the maintenance of the highly sensitive biodiversity areas mentioned above



- The area is very susceptible to any form of disturbance with erosion quickly following any disturbance on the landscape, as such this issue will require intensive investigation before any activity starts (i.e exploration). Due to the soil, terrain and the high rainfall of the area it likely that the heavy machinery will exacerbate the erosion thus resulting in higher siltation in rivers of adjacent catchments.
- Due to the sensitivity from a biodiversity, landscape and water-provision perspective as noted above, parts of the project area have been earmarked by the Eastern Cape Protected Area Expansion Strategy (ECPAES) as priority areas for inclusion into the ONR.

### Conclusion

The impacts on biodiversity and ecosystem services are of most concern to ECPTA, whilst we acknowledge the need to contribute to strengthening the security of energy supply as well as the socio-economic benefits of the project. However, as the designated Protected Area Management Agency for the Eastern Cape, our perspective needs to be wider than these opportunities, as the project will have a significant negative impact on the environment and heritage value where the project is proposed, as noted above. It is recommended that further other energy source alternatives are investigated such as renewable energy. Best practice dictates that all feasible development alternatives should be investigated and the alternative with the lowest environmental impact should be selected.

The ECPTA reserves the right to revise initial comments and request further information based on any additional information that may be received. It would be appreciated if ECPTA could be included in all future correspondence relating to this application.

Should you wish to discuss the above comments please do not hesitate to contact Ms. Shanè October (E-mail: shane.october@ecpta.co.za or Tel 043 705 4400 extension 2291).

Yours sincerely



(Signature)

**Bev Geach**

**Senior Conservation Planner**

**EASTERN CAPE PARKS AND TOURISM AGENCY**



(Date)

### Reference:

- Berliner D. & Desmet P. 2007. Eastern Cape Biodiversity Conservation Plan: Technical Report. Department of Water Affairs and Forestry Project No 2005-012, Pretoria. 1 August 2007.

