



11 April 2016

Dear Sir / Madam,

Comment: SCOPING REPORT FOR THE PROPOSED EXPLORATION RIGHT APPLICATION FOR PETROLEUM ON VARIOUS FARMS IN THE MAGISTERIAL DISTRICTS OF MATATIELE AND MT FLETCHER, EASTERN CAPE

The Endangered Wildlife Trust would like to make the following submissions in respect of the above.

1) Preamble:

The Endangered Wildlife Trust (EWT) is opposed to the exploration, production or activities related to the production of shale gas. The economic benefits of shale gas have been overstated and the environmental risks understated; through investments into shale gas the country is inhibiting progress towards sustainable energy.

It is in our opinion, debatable that (given a full lifecycle assessment) shale gas represents a cleaner alternative to conventional fossil fuels. We further contend that the successful extraction and production of shale gas will not substitute other fossil fuels currently used and there is currently no policy guiding such substitution. If anything, the extraction and use of shale gas will increase environmental vulnerability and represent an unwise investment in our country's energy future.

2) Project Specific:

We wish to submit the following in respect of this application¹:

- a) This application takes place within a deeply rural setting where communities are faced with having to participate in a highly technical process. The lack of formal technical training places communities at an unfair disadvantage and skews the public participation process in a manner that is inconsistent with the spirit and intentions of the National Environmental Management Act (NEMA).

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The Endangered Wildlife Trust is a non-profit, public benefit organisation dedicated to conserving species and ecosystems in southern Africa to the benefit of all people.

NPO Number: 015-502, **PBO number:** 930 001 777, **Member of IUCN** - The International Union for Conservation of Nature
The Endangered Wildlife Trust is US 501(c)(3) compliant under **US IRS Registration number:** EMP98-0586801.



- b) The area identified for exploration contains significant terrestrial and aquatic biodiversity². The EWT strongly supports the integrity of protected areas such as the Ongeluksnek Nature Reserve (including buffer areas) and will oppose any incompatible development that could negatively influence such integrity. Several endangered and vulnerable species are found within the proposed area.
- c) The area concerned represents a significant water production area and given climate change scenarios and our current drought scenario, ecological infrastructure should not be compromised. Large areas within the Jordan river basin represent temporary or seasonal wetlands. Wetlands are one of South Africa's most threatened habitat types and our country can simply not afford to lose or compromise any additional wetlands.
- d) Should areas of irreplaceable biodiversity value, protected areas, buffer zones, other sensitive areas and residential areas be excluded from this application, the remaining extent may be deemed economically unviable for exploration.
- e) The conservation sector (consisting of various Not-for-Profit organisations) has made significant strides in this area and has managed to create a conservation economy that employs and empowers a significant number of individuals. The proposed activity will threaten gains made.
- f) We further are of the opinion that the "need and desirability" of this application has not been demonstrated satisfactorily.

The Endangered Wildlife Trust (EWT) supports the "precautionary principle" enshrined in the National Environmental Management Act 108 of 1998. As such, activities with uncertain impacts should not proceed until such time as information is gained to accurately assess its impacts. We are of the opinion that processes surrounding the exploration, extraction or production of shale gas carry uncertain risks and impacts and as such cannot be allowed to proceed unless these are clarified.

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Given the close relationship of energy, water and food security, and the urgent requirement to protect our ecosystems' resilience in the light of climate change, we believe that an alternative energy vision is required which this application does not satisfy.

Yours Sincerely,



Cobus Theron

Endangered Wildlife Trust

Regional Coordinator

¹ Please note that we align ourselves with the technical submission made by the Umzimvubu Catchment Partnership Programme (UCPP) and submitted to SLR by Ms. Nicky MCleod on 11 April 2016.

² Biodiversity layers can be obtained from the Eastern Cape Department of Economic Development and Environmental Affairs.

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