

11 April 2016

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Good day,

Re: Scoping report for Environmental Assessment for Proposed Petroleum Exploration in the magisterial districts of Matatiele and Mt Fletcher, Eastern Cape.
PASA FILE REFERENCE NUMBER: 12/3/295 ER.

Thank you for the opportunity to comment on the above study.

BirdLife South Africa supports the responsible development of renewable energy and access to South Africa's energy resources. To this end, BirdLife South Africa is actively involved in a number of energy projects across South Africa, working alongside developers such as Eskom and the various bidders in the independent power producers (IPP)'s process. BirdLife South Africa was also involved in the strategic Environmental Impacts Assessment (SEA) that was conducted for the Karoo Basin regarding shale gas exploration there.

BirdLife South Africa wishes to place on record our objection to the further exploration for shale gas in the area described. We have the following objections:

- The Eastern Cape is in parts water-rich and supports a wide range of biodiversity and human habitation. Any suggested course of action needs to be weighed against the far vaster potential impacts than those anticipated in South Africa's dryer ecosystems.
- There has been no attempt at a government-lead SEA to address the cumulative impacts of exploration and / or shale gas exploitation in this area. To begin significant exploration appears premature until rational government policy is formalised in this regard.
- Although some protected areas are listed in the scoping report, this list is far from exhaustive and makes no mention of any other areas that may be sensitive to activity, including Important Bird and Biodiversity Areas (IBAs). Nor does it take into account necessary buffer zones, areas of biodiversity value outside of protected areas or any of the other concerns that even the most basic assessment would have to address closely.

It is BirdLife South Africa's view that this course of action is premature. Read together with the concurrent applications also made by Rhino Oil & Gas Exploration for prospecting in KwaZulu-Natal, it is clear that no detailed impact assessment can possibly be adequately taken on such a vast area.

BirdLife South Africa is a partner of BirdLife International, a global partnership of nature conservation organisations.
Member of IUCN (International Union for Conservation of Nature).
Reg No: 001 – 298 NPO
PBO Exemption No: 930004518

BirdLife South Africa requests that the Department do not grant this prospecting licence until such time as a detailed SEA addressing shale gas exploration and exploitation is undertaken for the area in question.

Furthermore, BirdLife South Africa insists that each individual prospecting site be assessed on its merits and the accumulative impact of all sites proposed also be considered.

To provide a blanket authorisation for any number of sites with no location or any other information provided would be irresponsible in the extreme.

In response to the scoping report itself, the listing of only four possible avifaunal species of concern (Table 5.4, pg 5-133) shows a significant lack of rigour has been applied. No mention is made of any raptor or vulture species or any of the mobile bustards etc. that may traverse the area. This section is clearly underdeveloped.

Furthermore, it is claimed (pg 5-119) that a desktop study that “draws extensively” on data provided to the specialists from, among others, BirdLife South Africa, was undertaken. There is no evidence that such a study has been undertaken. Please provide a source for which data from BirdLife South Africa was used and what information was gleaned therefrom.

The impact of the proposed activity on wetlands in the area, particularly between Ongeluksnek Nature Reserve and Matatiele which may be a site for future Important Bird and Biodiversity Area (IBA) declaration, needs to be addressed.

It is our view that this scoping study in no way meets even the most basic provisions for decision making as far as avifauna is concerned and thus object to it being accepted in its current format.

Yours sincerely

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