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The Green Connection: [greenconnectcpt@gmail.com](mailto:greenconnectcpt@gmail.com)

**Re: Response to CGG Authorisation to Conduct Seismic Testing and Actions off the Southeast Coast, South Africa (Ref. 12/1/045); 12 000 square kilometres adjacent to Block 11B/12B (Ref: EAP Reg No: 2022/5486)**

**11 December 2023**

Thank you for the opportunity to comment on the above application by CGG Systems SAS, Reference 12/1/045, EAP Registration 2022/5486. The Plett Tourism Association, the official Destination Marketing, Destination Management and Destination Development office as appointed by the Bitou Municipality, adamantly objects to the application as presented. The Plett Tourism Association is owned and operated by its hospitality members, the Bitou Municipality, the Community Police Forum, previously disadvantaged community members and the Bitou Business Chamber. The Tourism Industry is the main economic driver for the town.

I address you, on behalf of the Plett Tourism Association and submit the following comments to object to the approval for the authorized conduct of seismic testing and actions off the Southeast Coast of South Africa (Ref. 12/1/045), EAP Registration Number 2022/5486; for the following reasons:

- **There are enormous risks associated with this project.**

The risks of negative impacts and/or losses of habitat and livelihoods far outweigh the benefits for local communities, livelihoods (fishers, tourism) and the environment.

- We are a tourism destination that is focused on the coastline, waterways and all the activities and wildlife that live and breed is our most unique selling point. Human interference with the migration, habitat and the well-being of our most economically sustainable future will be compromised.

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Plett Tourism Association, Melvilles Corner, Main Street, Plettenberg Bay

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PLETT TOURISM BOARD | Chairman: Bruce Richardson

Industry Representatives: Jaco Kruger, Alex Olivier, Linda Packwood, Nicole Tunmer, Victor Zingwena | Secretary & Treasurer: Liz Phillips

Bitou Municipal Representative: Jofre Lottering | Stakeholder Representative: Plettenberg Bay Community Police Forum

Business Chamber Representative: Mike Scholtz | Community Representative: Sbosh Tom

- We are committed to the observation, preservation, and conservation of our most precious natural resource – the coastline and all its inhabitants. In fact, Plettenberg Bay has been nominated for 14 years in a row as Africa’s favourite beach destination, we are flanked by a World Heritage site (which includes coastal areas), 6 internationally recognized Blue Flag beaches, we are a Green Coast location, we are a world recognized coastal ‘Hope Spot’ and earlier in 2023 we were declared a Cetacean Whale Heritage Site. We are also home to several endangered marine life and coastal bird species, including the Humpback Dolphin, the Great White Shark, the Copper Shark, the Knysna Seahorse and the African Penguin, Cape Cormorant, and Cape Gannet.
- **The need and desirability for mining gas for power generation is questionable:**
  - Renewable energy and battery storage (possibly green hydrogen) can provide less costly generating capacity while greatly reducing the environmental risks of gas. Our area has the greatest number of sunny days in South Africa, surely there is more potential to harness natural energy in this form.
- **There are too many gaps in marine science knowledge for such a high-risk application and the precautionary principle must apply.** Further research is required for a comprehensive understanding of marine ecosystems and the cumulative impacts of proposed activities over time. As a resident and invested stakeholder of Bitou, we have experienced an extremely unprofessional public participation and notification process with this application, additionally the applicant has not provided the community of Bitou / Plettenberg Bay the appropriate research required to conduct research as approved.
- **The socio-economic impacts are unacceptable.**
  - The potential devastation to coastal areas in the event of a well blow-out–would be disastrous, affecting coastal estuaries and beaches. The town relies on tourism. If an unfortunate situation were to occur, it would have a devastating effect on the economy and the livelihood of every resident in Bitou as it would irreversibly impact the main economic driver – Tourism.
  - Under normal operating conditions, there will be impacts to fish spawning areas and potential impacts to whale, dolphin, shark, and bird migration routes which would have a detrimental impact on the tourism industry which drives the economy of Bitou as well as the Garden Route.
  - The area of operation overlaps with commercial and small-scale fishing grounds. Impacts will affect the livelihoods of communities dependent on income from these areas.
- **The environmental impacts are unconscionable.**
  - The activities will devastate marine life on the seabed in the area of operation due to sediment and toxic chemicals discharged as well as disruption to habitat.
  - Underwater noise will affect marine mammals – whales, dolphins and seals.
  - The migration routes of marine mammals will be affected.
  - Fish, plankton, seabirds and fish and squid spawning areas will be affected.
  - Block 11B/12B is an area with many endemic, vulnerable and endangered species.
  - Critical biodiversity areas, ecological support areas, and several Marine Protected Areas will be impacted due to sub-sea infrastructure and drilling discharges.
  - Plettenberg Bay is a Cetacean Whale Heritage Area and an international Hope Spot.
- **The application and associated reports are inconclusive:** Socio-economic and economic reports should be referring to increased job creation. Very few jobs would be created. This does not weigh heavily on the impact of job creation for Bitou.
- **The public participation has been inadequate:** Advertisements for the public participation process were not adequate for all communities in Bitou. Local newspapers and local radio stations were not used.
- **Fossil fuels and global climate agreements:**
  - South Africa has signed the Paris Agreement regarding reducing greenhouse gas emissions and this is a legally binding international treaty.
  - Greenhouse gases are required to peak by 2025 so it makes no sense to mine new fossil fuel wells that will continue for 25 years.

- Scientists are clear that '*deep, rapid and sustained*' global greenhouse gas emissions reductions are needed '*this decade*' to secure a livable future for all.
- **The Constitution of South Africa:** According to the constitution, everyone has the right to a healthy environment and development must be ecologically sustainable and justifiable. The application is contrary to this.
- **National Environmental Management Act (NEMA):** According to NEMA an environmental and social impact assessment is required to support sustainable development, ensure that activities pose minimal risk to life, livelihoods, and the environment. ***This application is contrary to this.***

**We thank you in anticipation of your support and assistance herein.**

Yours sincerely



**Patty Butterworth**

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