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TO: Director-General
Department of Mineral Resource
Private Bag X59
Arcadia
0007
Director: Legal Services

AND TO: Director General
**Environmental Affairs
B. E. E. Molewa
Dr Alan Boyd
Ms Nosipho Ngcaba
Ms Lindiwe Mekwe mekwel@petroleumagencysa.com

Dear Sir,

Grounds of Appeal against Petroleum Geo-Services Speculative 2D And 3D Seismic Surveys Off The South And East Coasts Of South Africa (Slr Project Ref: 720.16030.00003)

This letter serves as a statement setting out the grounds of appeal against the proposed speculative two-dimensional (2D) seismic and three-dimensional (3D) seismic survey by Petroleum Geo-Services (Project Reference 720.16030.00003) off the Southern and Eastern coasts of South Africa in the area situated approximately 15 km offshore roughly between Mossel Bay and Port Edward.

The grounds for the appeal are based on the following, *inter alia*:

- 1) Environmental Impact Assessment Regulations for Seismic Surveys
- 2) Lack of legislative protection, no consultation required for survey extensions
- 3) Assumption that impacted species will move away from the sound source is flawed
- 4) Protection of the environment to prevent any further loss of biodiversity not a priority even though there is global divestment in oil and gas globally.
- 5) Impacts on marine fauna, particularly cetaceans.
- 6) Recommendations for a white paper listing resolutions and mitigation measures regarding ocean noise pollution and that a local dedicated organization be established.

For all the above reasons, I look forward to your most urgent response.

Yours sincerely,

Janet Solomon

