

SUBMISSION ON THE DRAFT SCOPING REPORT (DSR) FOR THE PROPOSED FIELD DEVELOPMENT AND ASSOCIATED PRODUCTION ACTIVITIES IN BLOCK 11B / 12B. SOUTH AFRICA**To: SLR Consulting (South Africa) (Pty) Ltd****Email: 11b12bproduction@slrconsulting.com****Date: 15 October 2026****1 . INTRODUCTION AND GENERAL OBJECTIVES**

This submission provides formal comments from the Southern African Faith Communities Environment Institute, SAFCEI, on the Draft Scoping Report (DSR) issued on 14 September 2026 for the proposed offshore gas production by Main Street 1549 (Pty) Ltd.

As representatives of faith and local communities whose livelihoods, socio-economic well-being, and cultural ties are inextricably linked to the ocean, we submit these comments to ensure that the upcoming Environmental and Social Impact Assessment (ESIA) phase does not marginalise local voices. Following the exit of international majors in 2024, the project's operational landscape shifted significantly, requiring rigorous scrutiny of domestic capacity, safety, and community protections.

2. SUBSTANTIVE COMMENTS AND SCOPING EXCLUSIONS TO BE ADDRESSED**Overarching substantive comments:****Scenario 1: Pipeline Transport and Onshore Infrastructure:**

This scenario involves subsea pipeline transport, offshore mooring alternatives, separation, onshore gas receiving, and Gas-to-Power facilities, and condensate export. It is our view that the applicant must: (i) explicitly assess and express the incremental disturbance that will be caused to marine life because of pipeline installation and long-term seabed disruption, (ii) as well as the onshore environmental and community impacts of receiving facilities, (iii) localised air emissions, and (iv) safety risks near coastal infrastructure.

Scenario 2: Offshore Liquefied Natural Gas (LNG) and Tanker Exports:

This scenario relies on floating LNG (FLNG) processing, offshore conversion, subsea storage, and offshore tanker transfers. As we see it, the applicant must: (i) explicitly assess the grave operational and marine safety risks presented by deepwater offshore transfers in the high-intensity Agulhas Current, (ii) assess disastrous spill scenarios, adding technical weight that is difficult for developers to dismiss, (iii) assess constant light and underwater noise pollution, and (iii) assess the localised displacement of small- scale fisheries around extensive offshore safety zones.

Both scenarios present conservative, maximum- footprint development pathways. The applicant must therefore comprehensively assess upper-bound, worst- case scenarios for each alternative to ensure complete transparency concerning the potential impacts on fragile and critical marine environments, small- scale and commercial fisheries, coastal tourism, and the socio- economic dependence and livelihoods of coastal communities.

SECTION A

Small-Scale Fishers and Livelihood Displacement - The project boundaries and safety exclusion zones (specifically around the production wells and pipelines) directly overlap with historical and active fishing grounds along the South Coast.

Direct Demands for the ESIA:

- The ESIA must include a standalone, peer-reviewed Fisheries Impact Assessment that maps small-scale and subsistence fishers, not just large industrial commercial trawlers.
- The ESIA must detail clear, legally binding mitigation and financial compensation frameworks for fishers who lose access to their traditional ocean spaces.

SECTION B

Infrastructure Integrity and Financial Liability (PetroSA / SANPC Integration) - The proposed development relies entirely on tie-ins to PetroSA's existing, aging offshore F-A Platform infrastructure. Given the well-documented financial and operational strains surrounding PetroSA's infrastructure and its

transition into the South African National Petroleum Company (SANPC), communities are deeply concerned about safety.

Direct Demands for the ESIA:

- A comprehensive Asset Integrity and Engineering Risk Audit of the F-A Platform and existing pipelines must be made public.
- The ESIA must explicitly clarify the legal and financial liability chain: If a spill or pipeline rupture occurs due to legacy infrastructure failure, who bears the financial burden of clean-up and community restitution?

SECTION C

Localised Socio-Economic Realities Versus Macroeconomic Promises - Scoping reports frequently over-promise direct job creation based on national GDP modeling, whereas deepwater gas extraction is highly specialised and relies heavily on international technical labor.

Direct Demands for the ESIA

- The socio-economic specialist study must explicitly decouple "national economic benefits" from "direct local employment."
- The applicant must provide concrete projections for long-term, low-to-medium-skilled employment opportunities reserved specifically for members of the immediate coastal municipalities.

Intangible Cultural Heritage and Spiritual Ties - For centuries, indigenous coastal communities, including the Khoi-San and traditional coastal healers along the South Coast, have maintained a profound spiritual, cultural and historical relationship with the ocean. The sea is viewed as a sacred living entity, central to cultural identity, ancestral rituals, cleaning ceremonies and traditional healing practices. Culturally, the ocean cannot be separated from the land. Heavy industrial gas infrastructure, drilling noise and the physical scarification of the seabed via deepwater pipeline corridors represent a direct violation of these sacred spaces.

Direct Demands for the ESIA

- The applicant must commission a standalone and independent Intangible Cultural Heritage Impact Assessment (CHIA) led by specialists qualified in local indigenous history.
- This assessment must explicitly study how underwater noise pollution and pipeline footprints impact the spiritual and cultural landscape, rather than

restricting heritage studies to tangible “shipwrecks” or land-based archaeological sites

- Public participation must include dedicated, culturally appropriate consultation sessions with traditional leaders, local Khoi-San councils, and traditional in their native language to map and respect these sacred coastal zones.

Flawed Policy Alignment and Outdated IEP / IRP Assumptions - The applicant's socio-economic justification for the development of Block 11B / 12B relies heavily on national policy directives that gas is a “transition fuel” within South Africa's Integrated Resource Plan (IRP) framework. However, the Integrated Energy Plan (IEP) input data and assumptions, which are legally meant to dictate the broader energy mix, are subject to severe public contestation and lack alignment with the Climate Change Act (Act 22 of 2024). The economic assumptions underpinning gas infrastructure fail to account for the catastrophic “stranded asset” risk if international carbon taxes penalise South African exports, or if localised marine ecosystem degradation outpaces any short-term electricity stabilisation benefits.

Direct Demands for the ESIA

- The ESIA must explicitly evaluate the economic risk of stranded infrastructure. If the IEP assumptions change, South Africa is forced to accelerate its decarbonisation timeline due to international climate finance commitments, what happens to the pipeline and platform infrastructure left in the ocean? Will Main Street 1549 hold full financeability for removing it, or will it be left to rot at the expense of coastal ecology?
- The economic modeling in the report must decouple itself from generic “gas transition” talking points and prove specifically how extracting high-cost deepwater gas from the volatile Agulhas Current provides a lower-cost energy security benefit to the immediate Eastern and Western Cape communities compared to localised renewable energy investments.

SECTION D

Climate Change and Cumulative Impacts - This project cannot be assessed in isolation. The South Coast is facing a barrage of exploration applications, and South Africa is legally bound to transition away from fossil fuels under international climate pacts.

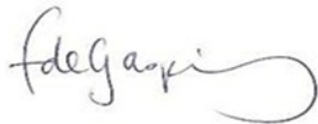
Direct Demands for the ESIA

- A Cumulative Climate Impact Assessment must be conducted to measure the total impact of multiple oil and gas blocks operating simultaneously along the Agulhas Current.
- The "No-Go" Alternative must be evaluated fairly, factoring in the ecological and economic benefits of a preserved marine economy (tourism, sustainable fishing and marine conservation)
- The applicant must also model a 100% renewable energy and storage alternative to prove that regional energy security can be achieved without locking the Southern Cape into fossil gas infrastructure.
- Given the multicultural and multilingual demographics of the South Coast (including Afrikaans, isiXhosa, and indigenous Khoi-San languages). We call for extended comment periods and accessible, translated community workshops to ensure that procedural justice grounds cannot be easily sidestepped by the environmental assessment practitioner.
- We ask that the applicant disclose full, ring-fenced financial guarantees for offshore decommissioning upfront, rather than relying on future corporate assurances.

SECTION F**CONCLUSION AND PROCEDURAL RIGHTS**

We record that this submission is preliminary. We request that SLR Consulting formally acknowledge receipt of this document, log all points within the official Comments and Responses Report (CRR), and notify our organisation directly when the Final Scoping Report (FSR) and the subsequent Environmental Impact Report (EIR) guidelines are released.

With regards,



Francesca de Gasparis
Executive Director