



## WILDLIFE ANIMAL PROTECTION FORUM SOUTH AFRICA

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**URGENT**

26 November 2021

His Excellency, Honourable Ministers and Chairs,

### **NATIONAL AND INTERNATIONAL ORGANISATIONS URGE THE SOUTH AFRICAN GOVERNMENT TO DESIST FROM THE CURRENT SEISMIC SURVEY ACTIVITIES TO ALLOW FOR FURTHER URGENT SCIENTIFIC RESEARCH**

The Wildlife Animal Protection Forum South Africa (WAPFSA), an alliance of diverse South African NGOs that share certain values, knowledge and objectives and that collectively comprise a body of expertise from scientific, conservation, welfare, rights, tourism, social justice, indigenous rights, public advocacy sectors and the law.

The undersigned national and international organisations refer to the proposed seismic exploration activity by Shell and Shearwater GeoServices that is due to begin on or around the 1<sup>st</sup> of December 2021 and fully support the actions and campaign from the collation called *Oceans Not Oil*.

The undersigned members are opposed to the proposed exploration activities due to a host of reasons which are outlined below:

In 2013, Impact Africa Limited applied for an Exploration Rights in terms of Section 79 of the Mineral and Petroleum Resources Development Act (MPRDA) to explore for oil and gas in the Transkei and Algoa Exploration Areas off the East Coast of South Africa. An Environmental Impact Assessment (EIA) report was, at that stage, not a requirement in the application process and an Environmental Management Plan (EMP) was drawn up instead. In the eight years since the exploration rights were applied for, legislation has changed and it is now mandatory that an EIA is carried out for projects of this nature. It is vitally important that a high level of research and study be undertaken before such a large scale seismic survey can be permitted. Various assessments need to be conducted by scientists to determine the effects of the proposed project before it can be allowed to commence.

There are five Marine Protected Areas (MPAs) that fall within the proposed exploration site of the project. The EMP states that no seismic activity will take place in the MPAs, nor within a 2km buffer zone around these MPAs.

WAPFSA members strongly believe that insufficient research has been undertaken to fully understand and prepare for the negative effects of the seismic activity on the ecosystems in the area and on the aquatic life within them. What scientific study has been carried out in order to suggest that a 2km zone will offer sufficient protection from the seismic activity? A 2km buffer zone cannot offer protection against the acoustic waves which travel tens to hundreds of kilometres from the blast site.

Marine mammals are extremely dependent on sound in order to communicate and navigate. It is common knowledge that cetaceans such as whales and dolphins are sensitive to seismic testing and have been linked to beaching or stranding.

The EMP reports that the seismic exploration blasting will begin slowly, increasing gradually, in an attempt to allow animals in the area to move away. The proposed blasting will be active continuously throughout the survey period of four to five months.

Smaller animals who are unable to move out of the area will be subjected to non-stop blasting, which can have life threatening, detrimental effects on them. The larger animals who may move from the area due to the blasting will be forced to leave their respective ecosystems and protected areas, putting them at unnecessary risk.

Intense noise, from seismic blasting, has been shown to cause body malformations and delay of development in marine larvae, as well as eliciting endocrinological stress in many fish. Potential biological effects of air seismic gun noise includes physical/physiological effects, behavioral disruption, and indirect effects associated with altered prey availability. Physical/physiological effects could include hearing threshold shifts and auditory damage and masking of communication signals ( e.g. cetaceans) as well as non-auditory disruption, (e.g. feeding decline) and can be directly caused by sound exposure or the result of behavioral changes (including habitat displacement) in response to sounds, (e.g. recent observations suggesting that exposure to loud noise may result in decompression sickness).

There is insufficient research-based evidence to confirm the impacts of the seismic activity, negative or other, on fish who are confined to fish farms in the Algoa Bay area.

Marine species who are scared away from the MPAs due to the seismic activity will leave said MPAs and enter unprotected waters where they risk being fished, hunted and poached. The very purpose of the MPAs will then be made null and void by the impacts of the seismic exploration.

Migration routes of numerous species, which have been passed down and utilised through generations will be altered due to the seismic activity. The migration patterns of about 130.000 whales from East Africa towards the West Coast where they breed and nurse their young is directly intercepted by the exploration area.

WAPFSA members feel that not enough research has been conducted on the knock-on effects of the disturbance of the migration routes. These include the important migration routes of whales and the endangered loggerhead turtle.

While mitigation measures included in the management plan is to attempt to avoid blasting during migration seasons for larger whale species such as southern right and humpback whales, semi-migratory and other species will still be within the survey area during the blasting period and will be affected by the noise.

These include beaked whales, Bryde's whales and sperm whales. A beaked whale species called True's has never been seen alive at sea, with not much being known about their behaviour, distribution and abundance. There are other species of turtles, squid and fish for whom the same can be said, and so the effects of the seismic activity on these species cannot be known or adequately prepared for. It is of concern that deep diving beaked whales may surface too quickly and die from barotrauma as a result of the blasting. Bowhead whales have been shown to change their surface respiration and cease their calls.

Tissue damage has been recorded, especially in mammals but in other, smaller animals as well. Temporary and permanent hearing loss has been observed and whale calves have been separated from their mothers due to the noise levels. Foraging and nursing could be affected. Behavioural changes could involve changes in time spent at the water's surface, dive times and energy costs due to having to travel greater distances in an attempt to evade the sound. The stress that is caused by the seismic blasts can change body physiology, affecting growth and reproduction and can even result in death. Fish also depend on sound for communicating with group members and young, food-finding, reproduction, avoiding predators and hazards, navigation and sensing their environment. Without any baseline surveys having been done to determine the effects of the airgun blasting on marine life in the area, we can rely only on the limited information available and this information paints a bleak picture for the aquatic animals along our coast.

The incredible biodiversity found along our coast should be protected, not exposed to danger and/or chased away. Within the five MPAs that fall within the exploration area, there is a vast spectrum of biodiversity. Underwater features, ecological transition zones, fish and cetacean species ranging from critically endangered to vulnerable, including endemic species such as the red steenbras. There are major concerns on the effects of seismic blasting on corals, turtles, dolphins or whales; some devastating effects on the ocean's zooplankton have recently been documented. Other species of great concern are the numerous turtle species found along the South African coast, Cape Fur Seals, African Penguins and Black Oystercatcher.

Algoa Bay was declared the Bottlenose Dolphin Capital of the World in 2016, hosts the Addo Marine Protected Area and is home to various vulnerable and endangered species, including 43% of the global population of the African penguin which is classified as Endangered in the Red IUCN list. The area is also a significant breeding population of Cape cormorant and Bird Island is one of only six breeding sites in the world for the Cape gannet and is home to Cape fur seals and albatrosses.

There is an active boat-based whale and dolphin watching industry in Algoa Bay which, together with the scuba diving eco-tours, can offer close-up encounters with the unique wildlife in the bay and can ultimately offer potentially long term and regenerative jobs.

Mitigation measures state that no airguns are to be set off if there are large or small cetaceans, diving seabirds or turtles within a 500m range for a period of at 30 minutes prior to firing. In the same point, it is stated that if

small cetaceans are still within 500m of the airguns after 30 minutes, the normal soft start procedure will be allowed to commence for at least a 20 minute duration. How does a method that is in direct contradiction with the previous statement serve as compliance?

Mass disorientation or stunning of fish as a result of seismic survey activities has been observed. This indicates that effects on fish populations in the area are expected. These effects will no doubt have knock on effects throughout the ecosystems and these have not been adequately examined and mitigated for. Small fish mortality associated with airgun operation and unusual bird sightings are also listed as impacts to be noted, showing once again that these negative effects on the fauna of the area are expected.

In terms of monitoring impacts to assist with any possible compensation negotiations, the compliance audit states that noise levels during the survey will be monitored in areas within 25km of the Marine Protected Areas. Why is it that noise levels within 25km are being monitored when seismic activity is allowed to take place a mere 2km away from the MPAs? This implies that larger impacts are expected.

If resources are found, the following offshore drilling will potentially produce petroleum along with a host of other environmentally harmful substances including arsenic, nickel, copper, chromium, zinc and barium. Heavy metals and hydrocarbons can be devastating for the health of marine organisms and to the people who live and feed off the coast. Another major environmental concern is linked to the disposal of highly toxic production waste caused by the hydrocarbon drilling. Oil spills can quickly traverse vast distances. The Benguela current is one of the strongest and most dangerous in the world, which can have devastating effects in the case of an oil spill. These types of devastation will also destroy livelihoods to over 50 000 subsistence fisher folk who eke out a living daily. Even small occasional spills will impact local communities and increase poverty and lead to more people joining the unemployment line. The risk of an oil spill polluting our beaches is also of grave concern, which would have far reaching consequences on the ecosystems and aquatic life along our coastline.

The decline in sea bird populations, the destruction of fish eggs and larvae, the immune system suppression in organisms, the destruction of delicate seabeds, the temporary or permanent hearing loss in fish and mammals, the abandonment of habitats, the disruption of mating and feeding, disorientation, stranding or beaching and death of many species are of grave concern to us. For whales and dolphins, who rely on their hearing to find food, communicate and reproduce, being able to hear is a life-or-death matter. These blasts have shown to cause massive mortality and destruction in zooplankton, which is the basis of all marine food chains. This would also result in increased economic challenges.

With regards to the health of the communities who rely on a healthy oceanic system to make out their living, the following health impacts have been found: itchy eyes, watery eyes, nosebleeds, wheezing, sneezing, and coughing are all symptoms of exposure to crude oil. Chest pain, respiratory problems, dizziness, gastrointestinal problems are also common ailments. A study of clean-up workers from the 2002 Prestige oil spill in Spain found increased DNA damage, especially among those who worked along beaches. Such genetic changes can lead to cancer. Mental health increases in symptoms of post-traumatic stress, generalized anxiety disorder and of depression.

These activities will affect all the coastal communities and businesses and the economies and the health of residents; we find unacceptable that further investments are directed towards fossil fuels and activities which are harmful for present and future generations in view of the recent climate change agreements during COP26 in Glasgow.

The conclusion of the compliance audit is as follows, "The compliance audit against the EMPr was largely not applicable, since no activities in respect of the Transkei Algoa Exploration Right have commenced at the time of reporting. Additionally, the EMPr contains management and mitigation measures in line with current legislative requirements and industry standards." There is simply not enough research or experience on the

short and long term effects of the seismic exploration on the marine ecosystems, nor on the fauna found within them, to allow for these activities to proceed in good conscience.

WAPFSA members and the undersigned organisations hereby urge the South African government to desist from the current seismic surveys activities, to allow for further urgent scientific research. Further research must also be carried out whereby the negative long-term effects for the South African tourism industry, the livelihoods of South Africans and health of South Africans living in this coastal region can be established.

South Africa should be looking to attract foreign investment in alternative eco-energy sources.

Yours sincerely,



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**WILDLIFE ANIMAL PROTECTION  
FORUM SOUTH AFRICA**

**FOR URGENT MEDIA DIFFUSION**

**SIGNED BY THE FOLLOWING WAPFSA MEMBERS:**

African Climate Alliance	Climate Dep	Sairusha Govindsamy
Animal Talk Africa	Founder	Wynter Worsthorne
Baboon Matters	Founder	Jenni Trethowan
Baboons of the South	Founder	Lorraine Holloway
Ban Animal Trading	Director	Smaragda Louw
Beauty Without Cruelty (South Africa)	Chairperson	Toni Brockhoven
Betty's Bay Baboon Action Group	Co- Founders	Renee Bish and Peter Oxford
Centre for Animal Rehabilitation and Education	Director	Stephen Munro

Elephant Reintegration Trust	Chairperson	Brett Mitchell
EMS Foundation	Director	Michele Pickover
Four Paws (SA)	Director	Fiona Miles
Future 4 Wildlife	Co-Founder	Stefania Falcon
Gifted for Good	Env. Education	Jabu Myeni
Global White Lion Protection Trust	CEO Founder	Linda Tucker
Institute for Critical Animal Studies (Africa)	Director	Les Mitchell
Monkey Helpline	Co-Founder	Steve Smit
OSCAP-Outraged SAfrican Citizens Against Poaching	Director	Kim Da Ribeira
Parliament for the People	Reg Farming	Vivien Law
Rhinos in Africa	Founder	Megan Carr
SAIFAC SA Institute for Advanced Constitutional Law	Director	Professor David Bilchitz
South Peninsula Khoi Council	Senior Chief	Stephen Fritz
Southern African Fight for Rhinos	Director	Lex Abnett
Vervet Monkey Foundation	Founder	Dave Du Toit
WildAid Southern Africa	Director	Guy Jennings
Youth Climate Group	Climate Justice	Sera Farista

### **SUPPORTED BY THE FOLLOWING NATIONAL AND INTERNATIONAL ORGANISATIONS:**

Pro Wildlife	Chair of the Board	Andrea Hoepfner
Fondation Franz Weber - Switzerland	President/CEO	Vera Weber, President & CEO,
Global Law Alliance for Animals and the Environment	Director	Erica Lyman
Born Free Foundation -UK	Veterinarian	Dr Mark Jones
CATCA Environmental and Wildlife Society (CEWS)	CEO	Ericka Ceballos
International Marine Mammal Project of Earth Island Institute Associate	Director	Mark J. Palmer
Brazilian Nature Conservation Institute - IBRACON	President	Nalu Machado
Augusto Carneiro Institute	President	Kathia Vasconcellos Monteiro,
Divers for Sharks	Co-founder	José Truda Palazzo, Jr.,
Brazilian Humpback Whale Institute	President	Eduardo Camargo
Marine Mammal Conservation of Mexico COMARINO	Founder	Dr Yolanda Alaniz
Global Law Alliance for Animals and the Environment Senior Attorney - Latin America	Director	Nicholas Fromherz

Vogelgat Private Nature Reserve, South Africa	Warden	Giorgio Lombardi
Hands-off Fernkloof, South Africa	Founder	Peter Hodgskin
Society for the Conservation of Marine Mammals Denmark	Chairman	Birgith Sloth
M.E.E.R. e.V. Germany	President	Fabian Ritter
KYMA sea conservation & research	PhD – Research	Silvia Frey
Natural Resources Defense Council (NRDC)	Director	Zak Smith
No Whales In Captivity – Canada	President	Annelise Sorg

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