



**To:** Mr Moses Ramakukusha  
The Deputy Director-General  
Department of Forestry, Fisheries and the Environment

**By email:** [mmp@dfpe.gov.za](mailto:mmp@dfpe.gov.za)

**Date:** 12 May 2023

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Dear Mr Ramakulukusha

**Comment from Extinction Rebellion South Africa on the draft Offshore Oil and Gas Sector Plan**

**What is Extinction Rebellion South Africa?**

Extinction Rebellion (XR) South Africa is part of Extinction Rebellion International which has voluntary groups in 75 countries. XR acts out of love for humanity to resist the systems that are killing life on Earth. We demand a steep reduction in greenhouse gas emissions and protection and repair of nature, and call for the necessary political, social and economic change to achieve this.

XR groups commit themselves to the values, principles and demands of XR but act autonomously. The comments below on South Africa's draft offshore oil and gas sector plan represent the views of XR South Africa and have only been discussed within XR South Africa.

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**We wholly support the submission of Oceans not Oil and add here our own perspective,** in the context of XR's three demands which are: Tell the truth; Act now; Decide together.

To quote from the XR UK website:

We are facing an unprecedented global emergency. Life on Earth is in crisis: scientists agree we have entered a period of abrupt climate breakdown and we are in the midst of a mass extinction of our own making.

Our comments are as follows:

**The draft offshore oil and gas plan must justify itself in terms of South Africa's commitments in terms of the Paris Agreement**

The fingerprint of climate change is being felt everywhere on the planet, including floods in Durban in 2022 and an intense multi-year drought that has devastated the economy of the Northern Cape. Yet the draft offshore oil and gas sector plan only mentions climate change once, in Section 6, in relation to climate change affecting appetite for investment in oil and gas.

Scientists are telling us over and over that the world has a small carbon budget left before we exceed a temperature of 1.5 degrees C, with devastating consequences. Every signatory to the Paris Agreement, and South Africa is one, has pledged to decrease its greenhouse gas (GHG) emissions. year-on-year. If South Africa is to open new oil and gas fields then it must explain in detail the implications in terms of our GHG emissions, how this compares to adopting an alternative renewable energy route, how we can reduce GHGs in other sectors of the economy to compensate, and how this action is compatible with South Africa's commitments under the Paris Agreement.

**We reject the statement in the draft offshore oil and gas sector plan that South Africa can “secure low carbon emissions in the future through gas resources”,** as stated in Part 1. Oil and gas majors portray gas as a cleaner fossil fuel and therefore useful in SA's energy transition away from coal. However, according to the most recent IPCC climate change report, in order to keep the climate liveable, methane needs to be reduced by 34%. Recent satellite imagery has shown that gas leaks from gas extraction operations are more widespread than previously thought. Will South Africa have capacity to monitor our gas and oil fields and pressurise oil and gas companies to act to curb leaks? These risks are too high. As a potential renewable energy powerhouse, South Africa should be ambitiously exploiting its very high renewable energy potential.

### **The oil and gas sector plan poses a grave risk to the ocean's role as a climate sink**

Oceans play a unique role in regulating our climate. The ocean is a vital carbon sink. It has absorbed a quarter to one third of the CO<sub>2</sub> that we have put into the atmosphere and more than 90% of the excess heat that we have caused. It is impossible to exaggerate its importance. Scientists fear that oceans will lose their climate-buffering properties if we continue to harm the oceans through ever-increasing marine traffic, pollution, mining, oil and gas extraction and over-fishing. We need to severely dial back the pressures we are putting on the ocean. This is the crucial decade for bending the curve on climate emissions and turning back on our attack on nature; South Africa is proposing to do the exact opposite by hugely expanding offshore oil and gas.

### **The oil and gas sector plan poses a grave risk to South Africa's marine biodiversity**

Over one-third of marine mammals and nearly one-third of sharks and reef-forming corals are threatened with extinction, according to the 2019 Global Assessment Report on Biodiversity and Ecosystem Services. Knowing this, it is difficult to see any rational justification for launching an assault on the rich marine life of South Africa. South Africa is a signatory to The United Nations Convention on the Law of the Sea, The United Nations Convention on Biological Diversity and the Convention on the Conservation of Migratory Species of Wild Animals (the Bonn Convention). We call on the South African government to ACT NOW to fulfil its commitments in terms of the Paris Agreement and its responsibilities in terms of custodianship of our oceans and marine life.

## **The spatial plan does not address the particularities of a marine environment**

Ocean spatial planning must take into account the particularities of a marine environment. Marine mammals migrate up and down our coast. Currents change and the forces of the sea and storms are constantly sculpting and changing the coast. Oil spills can be carried by currents into other marine zones. [Steadily rising ocean temperatures are forcing fish to abandon their historic territories and move to cooler waters.](#) This will affect fishing and fisheries regulators are having to incorporate climate change into their planning. Any spatial plan must be flexible and dynamic and should exclude any marine activity whose activities can irreparably harm other marine uses. We include oil and gas in that category.

## **The proposed oil and gas prospective zones are extensive and dwarf other marine uses**

The draft offshore oil and gas sector plan proposes oil and gas prospective zones covering 40% of the Western Marine Planning Area, 25% of the Southern Marine Planning Area and 30% of the Eastern Marine Planning Area, as stated in Part 4. This is an enormous area. South Africa's marine protected areas currently cover 5% of South Africa's ocean territory which is paltry in comparison. This shows how we are stacking the dice against nature. To meet the Ocean Economy and Sustainability Goals of the United Nations, South Africa must work towards further protection. If we give rights to oil and gas exploitation to such a huge area, how will we extend marine protected areas, as South Africa intends to do, and what will be the impact on other marine uses?

**The main argument for pursuing the exploitation of oil and gas is that it will bring wealth to South Africa but for whom, and at what cost?** The companies that will be given licences to exploit oil and gas will project the profits they can make, but these profits accrue to distant capital, and very little trickles down to local communities. Nor do they set against those profits huge debits which are not monetised and therefore not seen, counted or valued. These debits include:

- Damage to the ocean, the seabed, coastal areas and marine life
- Loss of the ability of the ocean to act as a carbon sink
- Warming and acidifying of the ocean which could lead to the extinction of ocean life
- Loss of fish and other marine foodstuffs for coastal people who live from subsistence fishing
- Destruction of a way of life and a source of income for small-scale fisherfolk, local communities and first nations
- Loss of cultural and spiritual heritage for fishing communities
- Loss of a spiritual connection to the sea experienced by many people which is not captured by the term 'leisure activities' which is used in the draft plan to refer to people's engagement with our oceans.

And then there is the cost of damage repair. On 8 May 2023, [News 24 reported](#) on a study which estimates that the US needs \$30bn to seal 14 000 unplugged offshore oil and gas wells. The costs of any serious oil spill would be immense.

## **In conclusion**

In 2021, the Green Connection hosted an Oceans Tribunal on the blue economy<sup>1</sup>. The judges for this tribunal included prominent national legal experts and international environmental leaders. The judges heard testimonies from various coastal communities dependent on fishing for survival. The judges' statement at the end of the tribunal included these wise words which we wholly support:

*'That government declares a moratorium on further oil and gas exploration, and embraces the opportunity to craft a new economy based on renewable energy, and which serves the interests of current and future generations of South Africans through a transparent, inclusive and just transition.*

*That the right to fish and other marine living resources be recognised and respected by government, and that small-scale fishers and communities (including first nations) are not denied access to and control over the land of their forebearers'.*

Extinction Rebellion South Africa

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<sup>1</sup> <https://thegreenconnection.org.za/wp-content/uploads/2022/07/The-Green-Connection-Oceans-Tribunal-Verdict-Statement>