

FISH HOEK VALLEY RATEPAYERS & RESIDENTS ASSOCIATION

(Incorporating Fish Hoek, Clovelly and Sun Valley)

~~65B Central Circle, Fish Hoek 7975~~

Web: <https://www.fhvrra.org.za/> Facebook: www.facebook.com/FHVRRRA/

Heritage Western Cape: Conservation Body

TO: THE DEPUTY DIRECTOR-GENERAL: DEPARTMENT OF FORESTRY,
FISHERIES AND THE ENVIRONMENT
ATTENTION: MR MOSES RAMAKULUKUSHA mmp@dffe.gov.za

SUBJECT: COMMENTS ON THE DRAFT MARINE SECTOR PLANS OF THE MARINE
SPATIAL PLANNING ACT 16 OF 2018

DUE DATE: 22 MAY 2023

We, the Fish Hoek Valley Ratepayers and Residents Association (FHVRRRA) note that the purpose of the general and sector development guidelines in each sector plan is to provide a framework for planners and sectoral decision-makers to enable **sustainable** ocean development throughout the Marine Planning Areas.

We are concerned as the Minister of Forestry, Fisheries and Environment, Barbara Creecy's Marine Oil and Gas Sector plan gives 'primary use' in South African seas to oil and gas seismic surveys, exploration and development. We are opposed to such use.

Our comments on the various plans are as follows:

Marine Biodiversity Sector Plan

If marine biodiversity is really a goal, then why are municipalities allowed to dump / pump insufficiently treated waste water into the identified marine zones? Many are marine protected or (some critical) biodiversity conservation areas, which includes our entire coast. Surely this is a prohibited use (guidelines) or abuse of our natural resource. These zones are certainly not being protected from such practices and marine organisms will not be sustainable in this environment. Mammalian bacteria and cumulative physiologically active pharmaceuticals have no place in a marine environment.

"The basis for this [long-term existence of services and benefits] is that economic development cannot occur at the expense of the environment and its ecological functioning, as this will result in inevitable collapse of marine biodiversity and its associated benefits. Therefore, effective management of marine biodiversity is not an impediment to socio-economic development, but rather its foundation." Then surely, sonic boom exploration should not be allowed as they are not compatible with marine life and, therefore, this activity should be prohibited.

Coastal and Marine Tourism Sector Plan

If the objective of "Part 2: [is] Protecting the marine environment", then surely sonic boom exploration should not be allowed. If the marine environment is not protected now, there will be no marine zone to propose (Part 4).

Marine Transport and Ports Sector Plan

“South Africa is a primary goods export-oriented economy and one of the world’s top 15 sea-trading nations. 58% of South Africa’s GDP is based on trade and 98% of South Africa’s trade volume moves by ships. In addition, the country generates a significant 3.5% of the world’s seaborne trade volume.” This was taken from a study done in 2016. The Transnet National Ports Authority has destroyed this notion.

Part 2: Sector development objectives' item “4. Ensure sustainable growth and development of the existing ports and harbours as well as future ports and harbours as the country’s key hubs for seaborne trade, maximising its potential to facilitate cargo movement, passenger movement and support to other sectors” is laudable, but has Transnet grown or developed any ports or harbours lately?

Regarding MT: SeeDG5's terrestrial planning processes, the City of Cape Town has offered to take over the running of the Cape Town port with the associated budget also being transferred or to rather relocate cargo handling to Saldanha Bay due to the shipping backlog and inefficient cargo handling resulting in traffic backing into the City. As a result, the Proposed Anchorage Zones becomes more important due to the sea lane backlog. Thus, we feel that the Table Bay Anchorage Zones should be expanded.

Maritime and Underwater Cultural Heritage Sector Plan

No comments – we'll leave this plan for the divers to comment.

Marine Defence (Navy) Sector Plan

We think our Navy should be protecting our coast rather than playing war games with BRICS or loading ammunition at Simon's Town causing our rand exchange value to drop. Surely there are better long-term disposal sites for disused ammunition than at sea. Actually, perhaps these sites should be interspersed where trawler nets regularly drag on the ocean floor (bottom) destroying everything in its path.

Marine Science and Innovation Sector Plan

We would like to see more marine research on aquatic farming, ranching and aquaculture. Google Malta Fish Farming.

Marine Aquaculture Sector Plan

We'd like to see the SA Navy being used to protect our marine aquaculture sector. We agree that this “sector contributes to local economic development opportunities and is critical in sustaining livelihoods for communities”, especially in the Western Cape. Thus, we'd also like to see netted aquaculture and ranching greatly expanded. Google Malta Fish Farming.

Methanol from seaweed might be a more important source of alternative fuel and is sustainable / renewable, rather than relying upon oil and gas exploration.

We wish that somewhere closer to Cape Town could be included as priority aquaculture and ranching zones.

Marine offshore Oil and Gas Sector Plan

“The advancement of oil and gas exploration in South Africa has not been rapid as envisaged by the Operation Phakisa, whereby the Oil and Gas Lab formulated an

objective to 'drill 30 exploration wells in the next 10 years. This 30-well aspiration is unlikely to be achieved in the three remaining years of the target set out through Operation Phakisa, with only two (2) exploration wells and one (1) pilot well,..." and "in the event of a discovery." Wake up - the world is turning away from fossil fuels (oil and gas).

There will always be external factors, economic, price of oil, pestilence and disease, external demand, climate change, etc. When the world's oil reserves dwindle, then the big oil companies with deep pockets will be more willing to drill for new reserves. We'd rather see the agricultural development of methanol substrate, possibly from fast growing kelp.

"The minimisation of the environmental impacts associated with exploration and production activities" is a major concern to us as there always seem to be catastrophic oil spills somewhere; even our beaches are a hazard to walk upon due to the oil leaking / bilge cleaning from passing ships.

Part 2. item "8. Exploration and production of oil and gas resources is developed in an orderly and sustainable manner, consistent with section 24 of the Constitution of the Republic of South Africa and environmental legislative framework, to ensure that while benefits are realised, environmental and socio-economic concerns are addressed."

Part 3. Oil Gas: See DG1 "environmental impacts assessment(s)" should be mandatory for all "proposed activities and obtain all mandatory authorisations and permits before any activities are allowed within the EEZ."

Part 6. "rights holders progress"ing "through their exploration phases". We feel that sonic boom exploration should not be allowed in order to build "reliable knowledge of resources / reserves".

Marine Underwater Infrastructure Sector Plan

We do not support "oil and gas exploration and production activities (e.g. pipelines, wellheads, manifolds, etc.)" as exploitation of hydrocarbon resources is passe.

Also, we do not support wastewater being "discharged into the sea through pipelines close to the shore in the proximity of larger cities and metro areas." This goes against the Marine Biodiversity Sector Plan. Within the plume area, divers often only see brittle stars / sea stars, which have no commercial value. This is hardly biodiversity. We do support Part 2: Sector development objectives to "[e]nhance and expand land-based wastewater treatment facilities to further minimise and eventually eradicate discharge of wastewater into the marine environment." Tertiary treated wastewater needs to be rendered potable for human consumption sans toxins, pharmaceuticals and bacteria.

Obviously, bottom trawlers should not be allowed to operate in areas where submarine cables exist. This should be monitored for compliance by the SA Navy.

Wild Fisheries Sector Plan

The SA Navy should protect our marine waters from other countries trying to capture our fishery products, especially in our nursery and spawning areas. Some of the marine life listed are no longer available, even at harbour fish sales. We'd like to see more fish farming zones and tax incentives.

Regarding Part 2: Sector development objectives (g) the need to minimise marine pollution; we feel that municipalities should not be allowed to dump / pump insufficiently treated waste water into the identified marine zones.

We support more area closures and promotion of more fisheries.

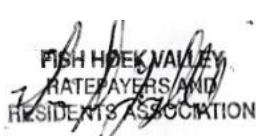
SUMMARY

In conclusion, we do not support:

- Oil and gas exploration and production;
- (Sonic boom) seismic surveys; and
- Municipalities dumping / pumping insufficiently treated waste water into the identified marine zones;

We do support:

- Table Bay Anchorage Zones being expanded;
- SA Navy protecting our marine zones;
- More marine research on aquatic farming, ranching and aquaculture including the possibility of methanol production from seaweed;
- Priority aquaculture and ranching zones closer to Cape Town; and
- More area closures and promotion of more fisheries.

NAME & SURNAME	Brian Youngblood, Chair: Fish Hoek Valley Residents and Ratepayers Association (FHVRRA)
CONTACT NUMBER	Cell: 084 399 9933
E-MAIL ADDRESS	FishHoekRRA@gmail.com
SIGNATURE	
DATE	14 May 2023