



Intervention #8 - Regulation 48 - Environmental Impact Statement - Delivered on 13/07/2023 by Patricia Esquete

Thank you Madam Facilitator,

We listened with interest to the proposal by South Africa to remove the peer review process from the EIS before submission. We question whether the same role will be performed by the LTC. A peer review is a process that looks at the EIS data and methodology in great detail and validates the accuracy of these. The role of the LTC is to review the EIS against their decision-making criteria, and report to the Council. We are unsure that the LTC could also be expected to verify all of the contractor's data and findings, in the same way as a peer reviewer. We would therefore suggest to retain the peer review requirement, a. As a useful layer of independent expert review, that can help the LTC and the Council to do their job.

In addition, DOSI supports the inclusion of paragraph 4k. These are important verification mechanisms, and should be reported even if no impacts have occurred.

Thank you, Madam Facilitator