



environment, forestry & fisheries

Department:
Environment, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

APPLICATION FORM FOR ENVIRONMENTAL AUTHORISATION

File Reference Number: NEAS Reference Number: Date Received:	(For official use only)
	DEA/EIA/

Application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

PROJECT TITLE

Proposed 2AFRICA/GERA (East) Submarine fibre optics cable system to be landed at Duynefontein, South Africa.
--

Indicate if the **DRAFT** report accompanies the application

Yes
No

PRE-APPLICATION CONSULTATION

Was a pre-application meeting held	Yes		No	<input checked="" type="checkbox"/>
Date of the pre-application meeting	A request for a pre-application meeting was submitted to the Department on the 23/07/2020. DEFF indicated no pre-application meeting was necessary (See Appendix 1)			
Reference number of pre-application meeting held	N/A			
Was minutes compiled and submitted to the Department for approval	Yes		No	N/A <input checked="" type="checkbox"/>

A copy of the pre-application meeting minutes must be appended to this application as **APPENDIX 1**.

Kindly note the following:

1. This form must always be used for applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting where this Department is the Competent Authority.
2. This application form is current as of **June 2020**. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at <https://www.environment.gov.za/documents/forms>.
3. The onus is on the Applicant/EAP to determine all applicable listed activities that would require Environmental Authorisation prior to the commencement of the construction activities. Should any revision of your development comprise any other activities that constitute a listed activity/ies as defined in Listing Notice 1, 2, or 3 of the EIA Regulations, 2014 as amended, it must also form part of the Application for Environmental Authorisation.
4. An application fee is applicable (refer to **Section 2**). Proof of payment must accompany this application. The application will not be processed without proof of payment unless one of the exclusions provided for in the Fee Regulations is applicable AND such information in the exclusion section of this application form has been confirmed by this Department.
5. A cover letter on your company letterhead indicating the nature of this application must be appended to this form i.e. new application for Environmental Authorisation, updated application for Environmental Authorisation.
6. An electronic copy of the signed application form must be submitted of both the Applicant and EAP.

7. This form must be marked ***“for Attention: Chief Director: Integrated Environmental Authorisations”*** and submitted to the Department at the format as prescribed in the process to upload documents form.
8. The required information must be typed within the spaces provided in the form. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. Spaces are provided in tabular format and will extend automatically when each space is filled with typing. A legible font type and size must be used when completing the form. The font size should not be smaller than 10pt (e.g. Arial 10).
9. Where applicable black out the boxes that are not applicable in the form.
10. The use of the phrase “not applicable” in the form must be done with circumspection. Where it is used in respect of material information that is required by the Competent Authority for assessing the application, this may result in the rejection of the application as provided for in the Regulations.
11. Unless protected by law, all information contained in and attached to this application, will become public information on receipt by the Competent Authority. Upon request during any stage of the application process, the Applicant / EAP must provide any registered interested and affected party with the information contained in and attached to this application.
12. Should a specialist report or report on a specialised process be submitted at any stage for any part of this application, the terms of reference for such report and declaration of interest of the specialist must also be submitted.
13. Please note that this form must be copied to the relevant Provincial Environmental Department(s)
14. An application for Environmental Authorisation lapses if the applicant fails to meet any of the timeframes prescribed in terms of the EIA Regulations, 2014, as amended.
15. An application for environmental authorisation must be accompanied by a report generated by the web based environmental screening tool (in Appendix 11). This has been stipulated as a requirement for the submission of applications for environmental assessment in the Environmental Impact Assessment Regulations. The Screening Tool allows for the generation of a Screening Report referred to in Regulation 16(1)(v) of the Environmental Impact Assessment Regulations 2014, as amended, whereby a Screening Report is required to accompany any application for Environmental Authorisation.

Departmental Details

Online Submission:

EIAapplications@environment.gov.za or <https://sfiler.environment.gov.za:8443/>.

Please read the process for uploading files to determine how files are to submitted to this Department.

Postal address:

Department of Environment, Forestry and Fisheries
 Attention: Chief Director: Integrated Environmental Authorisations
 Private Bag X447
 Pretoria
 0001

Physical address:

Department of Environment, Forestry and Fisheries
 Attention: Chief Director: Integrated Environmental Authorisations
 Environment House
 473 Steve Biko Road
 Arcadia

Queries must be directed to the Directorate: Coordination, Strategic Planning and Support at:
 Email: EIAAdmin@environment.gov.za

1. COMPETENT AUTHORITY

Identified Competent Authority to consider the application:

National Department of Environmental Affairs, Forestry and Fisheries (DEFF)
(Formally DEA)

Reason(s) in terms of S24C of NEMA:

The Minister must be identified as the competent authority in terms of Section 24C, as the project

- Has a development footprint that falls within the boundaries of more than one province or traverses' international boundaries.
- The proposed cable extends from South Africa out into international waters and is a project of national importance.

2. FEES

Applicants are required to tick the appropriate box below to indicate that either proof of payment is attached or that, in the applicant's view, an exclusion applies. Proof of payment or a motivation for exclusions must be attached as **APPENDIX 2** of this application form.

Proof of payment	<input checked="" type="checkbox"/>
Exclusion applies	<input type="checkbox"/>

An applicant is excluded from paying fees if:

- The activity is a community based project funded by a government grant; or
- The applicant is an organ of state.

TYPE OF EXCLUSION	Tick where applicable. Proper motivation must be attached to the application
The activity is a community based project funded by a government Grant	
The applicant is an organ of state	

FEE AMOUNT	Fee
Application for an environmental authorisation for which basic assessment is required in terms of the Environmental Impact Assessment Regulations	
Application for an environmental authorisation, for which S&EIR is required in terms of the Environmental Impact Assessment Regulations	R10 000 x

Department of Environment, Forestry and Fisheries banking details for the payment of application fees:

<p>Payment Enquiries: Email: eiafee@environment.gov.za</p> <p>Banking details: ABSA Bank Branch code: 632005 Account number: 1044 2400 72 Current account</p> <p>Reference number: Reference number to be provided in the specific format indicating centre point coordinates of site in decimal degrees to 5 or 6 decimal places: latitude/longitude</p>

e.g. -33.918861/18.423300

The proof of payment attached with this application has the reference number S 33.694417 E 18.439769

Status: Tax exempted

3. GENERAL INFORMATION

Name of the Applicant:	Mobile Telephone Network (Pty) LTD		
RSA Identity/ Passport Number:	N/A		
Name of contact person for applicant (if other):	Mr Peet Janse van Rensburg		
RSA Identity/ Passport Number:	64 05 03 5076 08 7		
Responsible position, e.g. Director, CEO, etc.:	Cable Landing Station Manager		
Company/ Trading name (if any):	MTN SA		
Company Registration Number:	1993/001436/07		
BBBEE status:	Level 1		
Physical address:	216 - 14th Avenue, Fairlands, Gauteng, 2195, Republic of South Africa		
Postal address:	N/A		
Postal code:	N/A	Cell:	+27 83 222 1880
Telephone:	N/A	Fax:	N/A
E-mail:	peet.jansevanrensburg@mtn.com		

Name of the landowner:	National Department of Public Works (Cape Town Regional Office)		
Name of contact person for landowner (if other):	Mr. Basson Geldenhuys (Chief Town Planner)		
Postal address:	Customs House, Lower Heerengracht Street, Cape Town		
Postal code:	8001	Cell:	+27 71 648 8656
Telephone:	+27 21 402 2174	Fax:	N/A
E-mail:	Bassoon.geldenhuys@dpw.gov.za		

Name of Person in control of the land:	National Department of Public Works		
Name of contact person for person in control of the land:	Mr. Basson Geldenhuys		
Postal address:	Customs House, Lower Heerengracht Street, Cape Town		
Postal code:	8001	Cell:	+27 71 648 8656
Telephone:	+27 21 402 2174	Fax:	N/A
E-mail:	Bassoon.geldenhuys@dpw.gov.za		

In instances where there is more than one landowner, please attach a list of those landowners with their contact details as **APPENDIX 3**.

Unless the application is in respect of linear activities or Strategic Infrastructure Projects as contemplated in the Infrastructure Development Act (Act No. 23 of 2014), written consent of landowner/s must be submitted in **APPENDIX 3**.

The originally signed declaration undertaking by the applicant must be submitted as **APPENDIX 9**.

Provincial Environmental Authority:	Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1)		
Name of contact person:	Adri La Meyer		
Postal address:	Private Bag X 9086, Cape Town		
Postal code:	8000	Cell:	N/A
Telephone:	021 483 2887	Fax:	021 483 4185
E-mail:	Adri.LaMeyer@westerncape.gov.za		

Local Municipality:	City of Cape Town		
Name of contact person in (Environmental Section)	Ms P Titmuss		
Postal address:	P O Box 35, Milnerton, 7435		
Postal code:	7435	Cell:	Not Available
Telephone:	021 444 0597	Fax:	021 444 0605
E-mail:	Pat.Titmuss@capetown.gov.za		

In instances where there is more than one Local/Provincial Authority involved, please attach a list of those Local/Provincial Authorities with their contact details as **APPENDIX 4**.

4. ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP) INFORMATION

Company of Environmental Assessment Practitioner:	ACER (Africa) Environmental Consultants			
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	4	Percentage Procurement recognition	100%
EAP name:	Mr. Giles Churchill			
EAP Qualifications:	MSc.			
Professional affiliation/registration:	EAPASA registration no. (2019/1687) SACNASP registration no. (116348)			
Physical address:	26 Hely Hutchinson Rd, Suites 5/6 Golden Penny Centre, Mtunzini			
Postal address:	PO Box 503, Mtunzini, 3867, South Africa			
Postal code:	3867	Cell:	082 907 9738	
Telephone:	035 340 2715	Fax:	035 340 2235	
E-mail:	giles.churchill@acerafrica.co.za			

The appointed EAP must meet the requirements of Regulation 13 of the EIA Regulations, 2014 as amended. The declaration of independence of the EAP and undertaking under oath or affirmation that all the information submitted or to be submitted for the purposes of the application is true and correct must be submitted as **APPENDIX 10**.

5. PROJECT DESCRIPTION

Please provide a **detailed** description of the project.

Alcatel Submarine Networks (ASN) has been contracted to supply and install the proposed 2AFRICA/GERA (East) Cable System (2AFRICA) with one of the South African landings at Dufnefontein on the west coast of South Africa. This is to be operated by MTN (Pty) Ltd (MTN) as the South African landing partner (Project Applicant).

Via the 2AFRICA/GERA (East), MTN (Pty) Ltd. will facilitate more affordable and effective transport of voice, data, Internet and television services in South Africa. Furthermore, the cable will support the objectives set out by the New Partnership for Africa's Development (NEPAD) and contribute to providing a means of fulfilling the South African Government's requirements in terms of digital television broadcasting in the country.

The main 2AFRICA (East) cable trunk will be located approximately 200 to 500 km from the shoreline in international waters and South Africa's Exclusive Economic Zone (EEZ). From the main cable, branches will run through exclusive economic zones and territorial waters to the landing sites in each country. The proposed Dufnefontein landing site in South Africa is the southern-most point of the trunk cable (end station) which enters South Africa's EEZ from Mozambique (Figure 1 and 2).

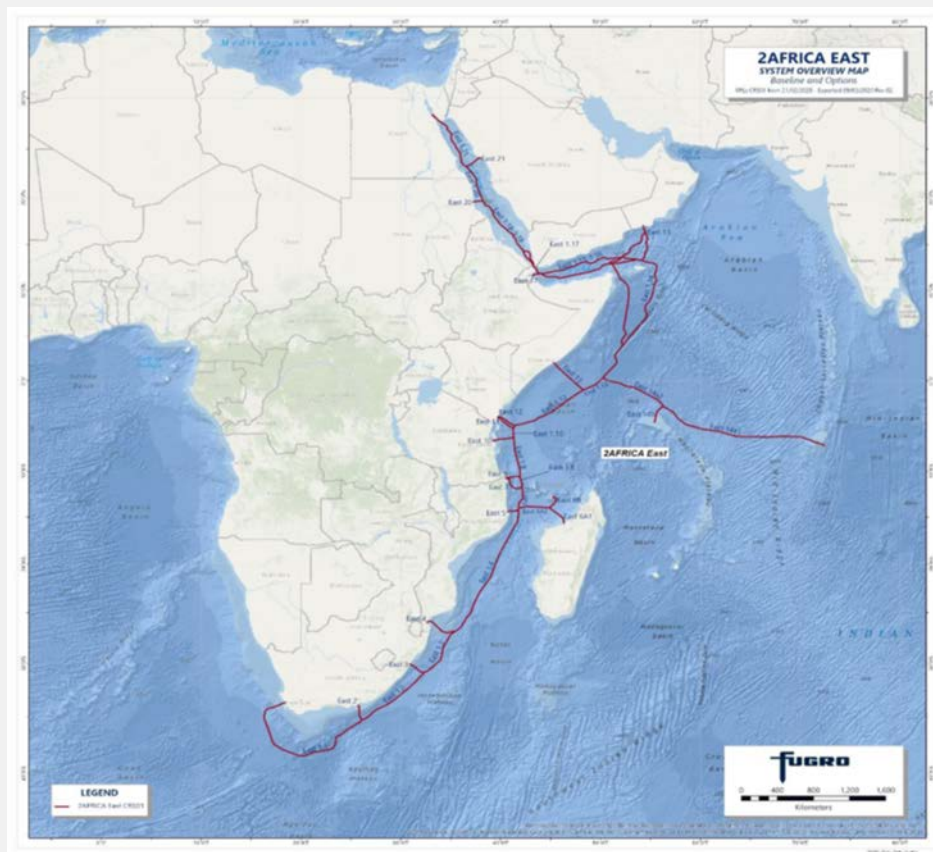


Figure 1: Overview of the 2AFRICA/GERA (East) Cable System

The 2AFRICA (East) Cable System will enter South African Territorial Waters approximately 22 km from the seashore (12 Nm). The exact position of the final section of the cable will be identified based on a combination of engineering, environmental and economic factors and will require offshore and nearshore surveying of the seabed; however, the general alignment for this landing will make landfall near the ACE Cable landing point and will take into consideration existing cable systems within the area (SAT2, SAT3, ACE and the future Equiano cable system).

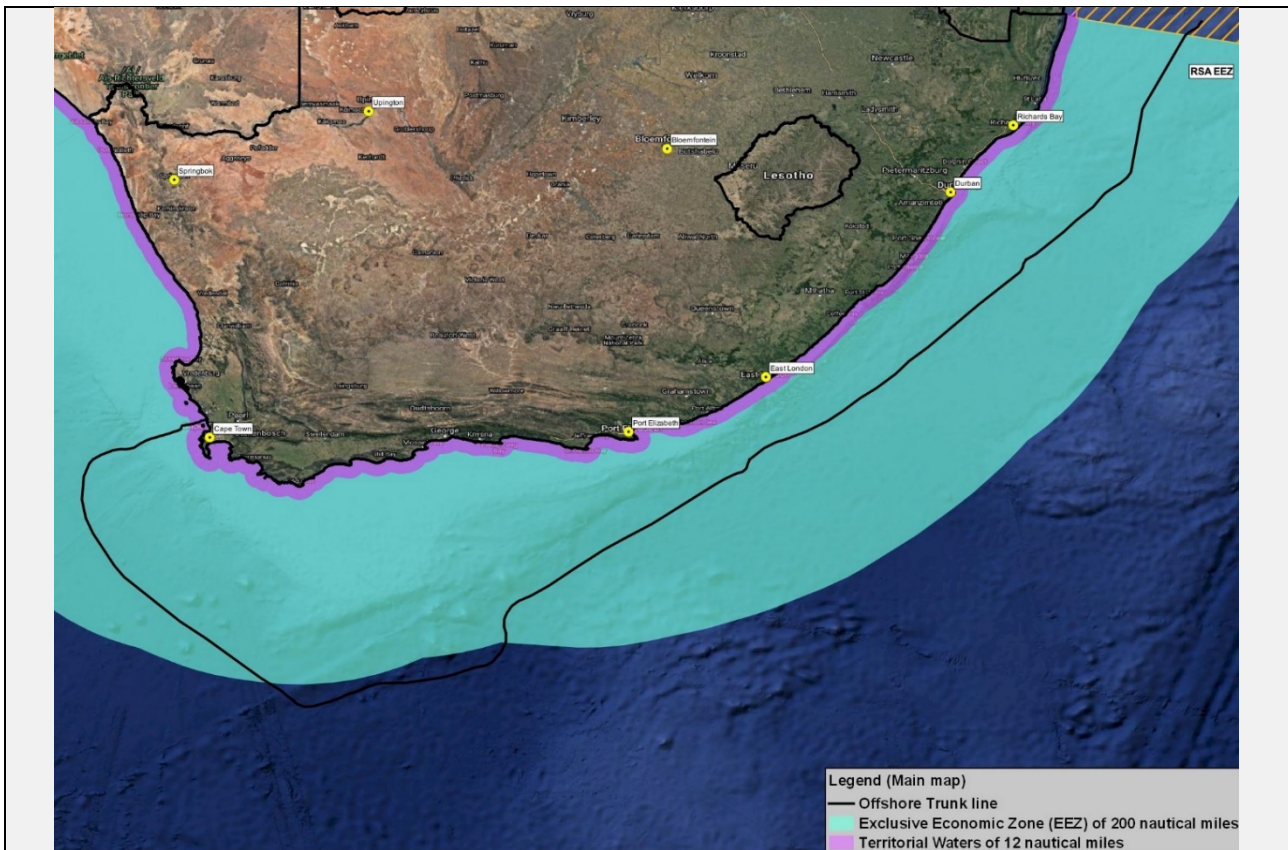


Figure 2: 2AFRICA/GERA (East) Cable System Dwynefontein Landing

The proposed 2AFRICA (East) cable to Dwynefontein will include the installation and operation of the following project components:

- ❑ Laying of the cable in the offshore environment, including cable burial to a water depth of up to 1,500 m.
- ❑ The laying of the cable within the shallow water environment is likely to involve a direct shore end operation where the shore end of the subsea cable is installed directly from the main subsea cable installation vessel and floated to the beach landing point using buoys and assisted by small boats and divers. The cable will be buried in sediment wherever possible and the route will be adjusted to avoid obvious visible rock. The aim is to bury the cable to a depth of 1 m where possible.
- ❑ Excavations within the intertidal zone are to bury the cable before it is anchored into the existing ACE Cable System anchor block and Beach Manhole (BMH) (already constructed and located directly inland of the beach at the preferred landing point). The BMH is a concrete utility vault where the marine portion of the subsea cable is connected to the terrestrial portion.
- ❑ On the beach, the cable will be buried to a depth of 2 meters, substrate permitting.

Once the 2AFRICA cable has been installed to the existing ACE BMH, no further disturbance to the terrestrial environment will occur as the 2AFRICA (East) cable at Dwynefontein will be accommodated within existing cable sleeves from the BMH to the ACE Cable Landing Station (CLS) (operated by MTN).

Importantly, with respect to the preferred landing point at Dwynefontein the site does have existing submarine cable landing infrastructure installed for the ACE Cable System. As MTN is the 2AFRICA (East) landing partner at Dwynefontein, no agreements are needed for the sharing of the ACE infrastructure operated by MTN including:

- ❑ Buried sleeves from the beach anchor point up to the BMH.
- ❑ The BMH.
- ❑ The onshore cable section between the BMH and the CLS.
- ❑ The CLS site in Dwynefontein.

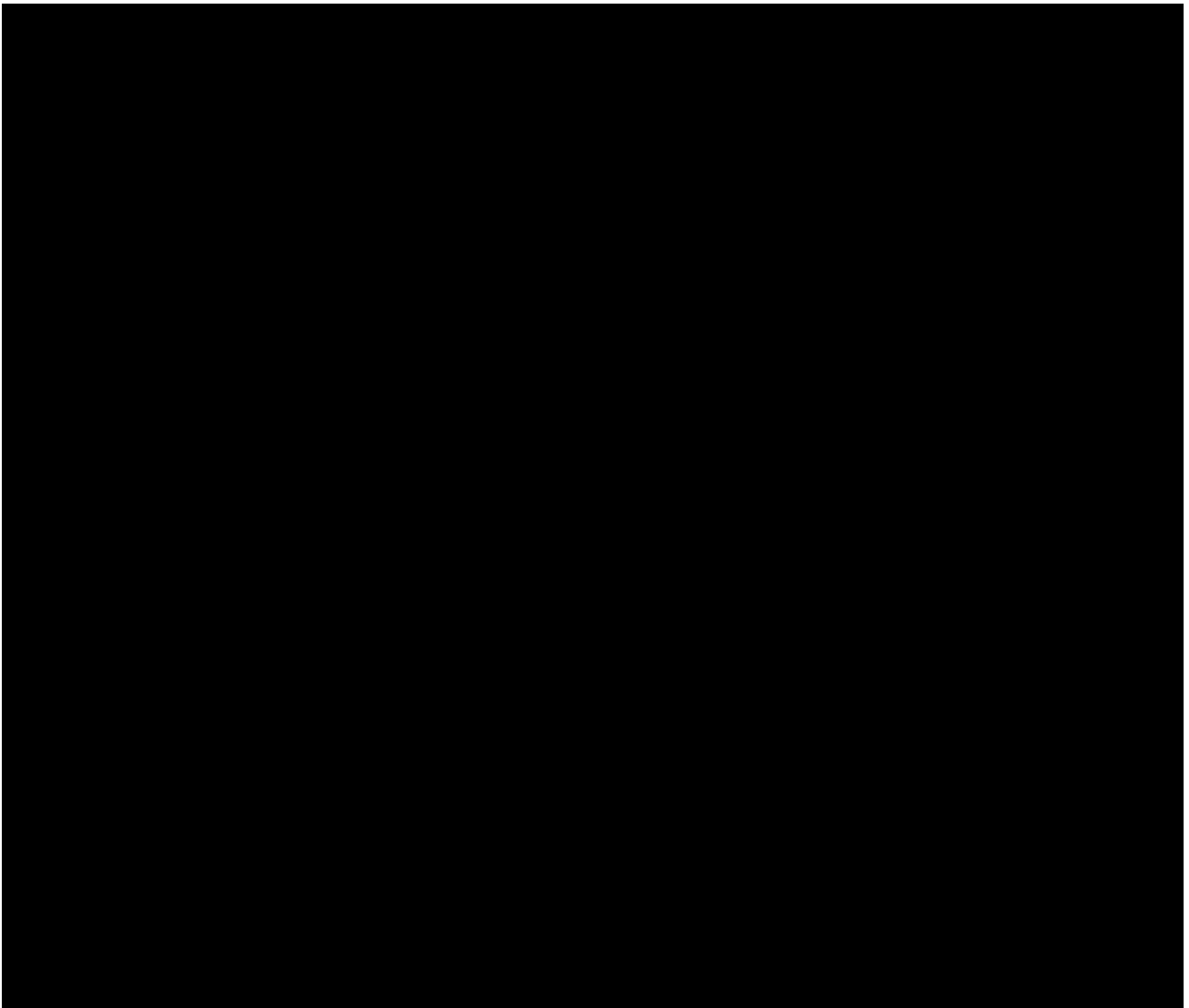
Does the project form part of a Renewable Energy Development Zone (REDZ) as per GN 114?		NO ✓
Does the project form part of an Electricity Grid Infrastructure (EGI) as per GN 113?		NO ✓
Does the project form part of any of the Strategic Infrastructure Projects (SIPs) as described in the National Development Plan, 2011?		NO✓
Did you attached the confirmation of SIP obtained from the relevant sector representative (SIP Coordinators) and not a motivation from an EAP		NO✓

If **YES**, is selected:

- For an application in terms of GN 113 and/or 114, then a map confirming this must be attached;
- For a SIP project, kindly indicate which SIPs are applicable in **APPENDIX 5** and **attach** the confirmation of SIP applications from the relevant sector representative in **APPENDIX 5**. Should no proof be provided, the application will be considered as a normal EIA Application.

Please indicate which sector the project falls under by ticking the relevant block in the table below:

Table 1: National Sector Classification in terms of Regulation 9 of the EIA Regulations, 2014 as amended



12	Infrastructure /Localised infrastructure - Infrastructure in the Sea/Estuary/Littoral Active Zone/Development Setback/100M Inland/or coastal public property.	✓
----	---	---

27	Utilities Infrastructure - Marine Cables	✓
----	--	---

78	Any activity in an estuary, on the seashore, in the littoral active zone, or in the sea.	✓
----	--	---

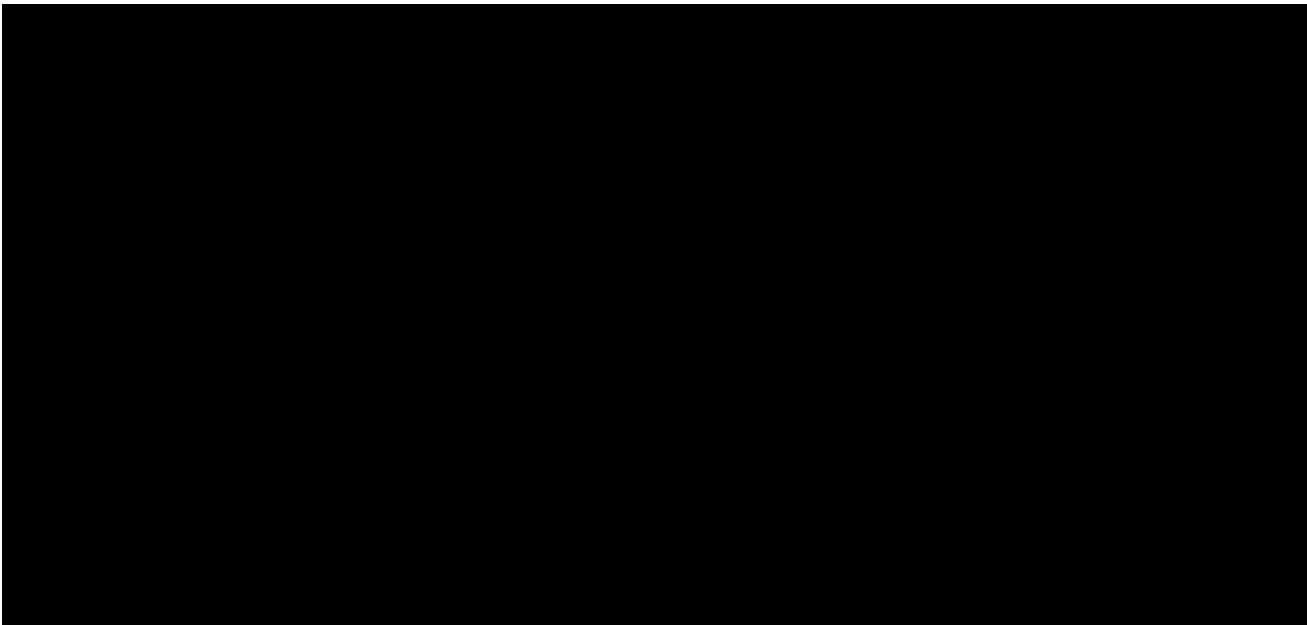


Table 1

Does the listed activity/ies applied for form part of a larger project which is not a listed activity itself e.g. a road that is a listed activity that is needed to access a drilling site where the drilling does not constitute a listed activity.	YES ✓	
<p>If indicated yes above, please provide a brief description on how the activity/ies relate to the larger project that forms part there of:</p> <p>The 2AFRICA/GERA (East) telecommunications cable landing in Duynfontein aims to contribute towards improving the network and connectivity in South Africa. Furthermore, it aims to strengthen the connectivity between South Africa and other African countries.</p> <p>The cable landing in Duynfontein which is the terminal landing of the 2AFRICA/GERA (East) Cable System will facilitate the landings of the following cable landings in South Africa:</p> <ul style="list-style-type: none"> ❑ 2AFRICA/GERA (East) – landing in Port Elizabeth. ❑ 2AFRICA/GERA (East) – landing in Amanzimtoti. 		

6. SITE DESCRIPTION

Provide a detailed description of the site involved in the application.

Province/s	Western Cape
District Municipality/ies	City of Cape Town Municipality
Local Municipality/ies	City of Cape Town Municipality
Ward number/s	Ward 23
Nearest town/s	Cape Town
Farm name/s and number/s	Melkboschstrand (2302, 2312, 2084) – These refer to the properties between the BMH and the offshore cable.
Portion number/s	N/A

Surveyor General 21 digit code:

(If there are more than 4, please attach a list with the rest of the codes as **APPENDIX 6**. Where the 21 digit SGID and farm name are not available, the coordinates of the boundary of the property or properties must be provided in **APPENDIX 6**.)

1	2	3	4	5																

<p>Locality map:</p>	<p>A locality map must be attached to the application form, as APPENDIX 7. The scale of the locality map must be at least 1:50 000. For linear activities of more than 25 kilometres, a smaller scale e.g. 1:250 000 can be used. The scale must be indicated on the map. The map must include the following:</p> <ul style="list-style-type: none"> • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; • the prevailing wind direction; • site sensitivities, including but not limited to vegetation, wetlands, watercourses, heritage sites, critical biodiversity area/s, World Heritage Site, etc. and it must be overlaid by the study area; and • GPS co-ordinates (Indicate the position of the proposed activity with the latitude and longitude at the centre point for each alternative site. The co-ordinates should be in degrees and decimal minutes. The minutes should be to at least three decimal places. The projection that must be used in all cases is the WGS-84 spheroid in a national or local projection)
<p>Project Plan (e.g. Gantt chart)</p>	<p>A project schedule must be submitted as APPENDIX 8, and must include milestones for:</p> <ul style="list-style-type: none"> • public participation (dates for advertisements, workshops and other meetings, obtaining comment from organs of state including state departments); • the commencement of parallel application processes required in terms of other statutes and where relevant, the alignment of these application processes with the EIA process; • the submission of the key documents (e.g. Basic Assessment Report, Scoping Reports, EIA Reports and Environmental Management Programmes). <p>Note: All the above dates must take into account the statutory timeframes for authority responses that are stipulated in the 2014 NEMA EIA Regulations. Possible appeals may impact on project timeframes/milestones. Regulation 45 states that "An application in terms of these Regulations lapses, and a competent authority will deem the application as having lapsed, if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless extension has been granted in terms of regulation 3(7)." It is recommended that the Department be approached for guidance on the process to be followed, prior to submitting an application.</p>

7. ACTIVITIES APPLIED FOR

For an application for authorisation that involves more than one listed activity that, together, make up one development proposal, all the listed activities pertaining to this application must be provided below.

Activity No(s):	Activity(ies) as set out in Listing Notice 1 of the EIA Regulations, 2014 as amended.	Portion of the proposed project to which the applicable listed activity relates.
Activity 15	<p>The development of structures in the coastal public property where the development footprint is bigger than 50 square metres, excluding -</p> <ul style="list-style-type: none"> i. [...]; ii. [...]; iii. [...]; or <p>[...].</p>	<p>The project will entail the landing of a marine telecommunications cable at Van Riebeeckstrand Beach. This will require digging of a trench across the beach (coastal public property) into the intertidal zone and the installation of the telecommunications cable and associated activities.</p>
Activity 17	<p>Development-</p> <ul style="list-style-type: none"> a. in the sea; b. [...]; c. within the littoral active zone; d. in front of a development setback; or e. if no development setback exists, within a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater; <p>in respect of-</p> <ul style="list-style-type: none"> i. [...]; ii. [...]; iii. [...]; iv. [...]; or v. infrastructure with a development footprint of 50 square metres or more - <p>but excluding-</p> <ul style="list-style-type: none"> (aa) [...]; (bb) [...]; (cc) [...]; or (dd) [...]. 	<p>The project will entail the landing of a marine telecommunications cable at Van Riebeeckstrand Beach. This will require the digging of a trench across the beach into the intertidal zone and the installation of the telecommunications cable, which will be buried to provide additional protection. In shallow waters (less than 1,500 m in depth) the cable will be buried under the seabed to provide extra protection.</p>
Activity 18	<p>The planting of vegetation or placing of any material on dunes or exposed sand surfaces of more than 10 square metres, within the littoral active zone, for the purpose of preventing the free movement of sand, erosion or accretion, excluding where –</p> <ul style="list-style-type: none"> i. the planting of vegetation or placement of material relates to restoration and maintenance of indigenous coastal vegetation undertaken in accordance with a maintenance management plan; or <p>[...].</p>	<p>The project will entail the rehabilitation of the shoreline on Van Riebeeckstrand Beach where construction activities associated with the laying of the telecommunications cable will disturb vegetation on the shoreline.</p>
Activity 19A	<p>The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from –</p> <ul style="list-style-type: none"> i. the seashore; ii. the littoral active zone, an estuary or a distance of 100 metres inland of the high- 	<p>The project will entail the excavation and deposition of more than 5 m³ of material within a 100 m of the high-water mark of the sea when trenching for, and backfilling of, the marine telecommunications cable.</p>

	<p>water mark of the sea or an estuary, whichever distance is the greater; or</p> <p>iii. the sea; —</p> <p>but excluding where such infilling, depositing, dredging, excavation, removal or moving -</p> <p>a. [...];</p> <p>b. [...];</p> <p>c. [...];</p> <p>d. [...]; or</p> <p>[...].</p>	
	Activity(ies) as set out in Listing Notice 2 of the EIA Regulations, 2014 as amended.	Portion of the proposed project to which the applicable listed activity relates.
Activity 14	<p>The development and related operation of-</p> <p>i. [...];</p> <p>ii. an anchored platform; or</p> <p>iii. any other structure or infrastructure – on, below or along the seabed;</p> <p>excluding -</p> <p>(a) [...]; or</p> <p>(b) [...].</p>	<p>The proposed 2AFRICA Cable System will be placed on the surface of the seabed in deep waters. In shallow waters (less than 1,500 m in depth) the cable will be buried under the seabed to provide extra protection, where the substrate allows.</p>
Activity 26	<p>Development--</p> <p>iv. in the sea;</p> <p>v. [...];</p> <p>vi. within the littoral active zone;</p> <p>vii. [...]; or</p> <p>viii. if no development setback exists, within a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater;</p> <p>in respect of –</p> <p>a. [...];</p> <p>b. [...];</p> <p>c. inter- and sub-tidal structures for entrapment of sand;</p> <p>d. [...];</p> <p>e. [...];</p> <p>f. [...];</p> <p>g. [...]; or</p> <p>h. underwater channels;</p> <p>but excluding the development of structures within existing ports or harbours that will not increase the development footprint of the port or harbour.</p>	<p>Although unlikely to be triggered, this listed activity has been included as the trench for the marine cable may result in the entrapment of sand within the inter- and sub-tidal zones. In addition, the trench in which to bury the cable may be construed as an underwater channel.</p>
Activity No(s):	Activity(ies) as set out in Listing Notice 3 of the EIA Regulations, 2014 as amended.	Portion of the proposed project to which the applicable listed activity relates.
Activity 12	<p>Activity 12 of Listing Notice 3 (No. R. 985 of 2014)</p> <p>The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.</p>	<p>The proposed development will require the removal of indigenous primary dune vegetation where the cable system lands at Van Riebeeckstrand if the Alternative 2 BMH is constructed. In addition, Cape Flats Dune Strandveld (FS 6) is listed as an “endangered” ecosystem in NEMBA (2011), will be impacted on by the front haul alignment from the Alternative 2 BMH to the existing ACE BMH which the cable will tie into.</p>

	<p>a) In Eastern Cape, Free State, Gauteng, Limpopo, North West and Western Cape provinces:</p> <p>i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA</p> <p>iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; or</p> <p>iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning.</p>	
Activity 15	<p>Activity 15 of Listing Notice 3 (No. R. 985 of 2014)</p> <p>The transformation of land bigger than 1000 square metres in size, to residential, retail, commercial, industrial or institutional use, where, such land was zoned open space, conservation or had an equivalent zoning, on or after 02 August 2010.</p> <p>(c) In Western Cape:</p> <p>i. Outside urban areas, or</p> <p>ii. Inside urban areas in:</p> <p>(aa) Areas zoned for conservation use or equivalent zoning, on or after 02 August 2010;</p> <p>(bb) A protected area identified in terms of NEMPAA, excluding conservancies; or</p> <p>(cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act as adopted by the competent authority.</p>	<p>The proposed development (Alternative 2) will require the trenching of approximately 900 m of trench through areas zoned as public open space and conservation near Van Riebeeckstrand. It is anticipated that servitudes will have to be registered with the City of Cape Town and as such this listed activity is triggered if the Alternative 2 BMH is constructed.</p>

Please note that any authorisation that may result from this application will only cover activities specifically applied for. Only those activities listed above shall be considered for authorisation. The onus is on the applicant to ensure that all applicable listed activities are included in the application. Environmental Authorisation must be obtained prior to commencement with each applicable listed activity.

Coordinate points indicating the location of each listed activity must be provided as part of **APPENDIX 6** as well part of the reports to be submitted. Coordinates must be provided in degrees, minutes and seconds using the Hartebeesthoek94 WGS84 co-ordinate system.

8. PUBLIC PARTICIPATION

Provide details of the public participation process proposed for the application as required by Regulation 41(2) of the EIA Regulations, 2014 as amended.

The public participation process has been designed to comply with the requirements of the EIA Regulations (Sections 41 to 44 of Regulation 982) and NEMA. The important elements relating to the public participation process that are required by the Regulations are the following:

- ❑ The manner in which I&APs were notified of the application for environmental authorisation, and that a public participation process was mandatory. This includes on-site notice boards, giving written notice to landowners, letters, Background Information Documents (BID) and advertisements in the media (Section 41).
- ❑ Opening and maintaining a register, which contains the names and addresses of I&APs. These include all persons who have submitted comments, attended meetings, and are organs of State who have jurisdiction in the assessment process, and all those who have requested that they be placed on the register as registered I&APs (Section 42).
- ❑ Registered I&APs are entitled to comment, in writing, on all written submissions made to the competent authority by the applicant or the Environmental Assessment Practitioner managing the application, and to bring to the attention of the competent authority any issues, which that party believes may be of significance when the application is considered for authorisation (Section 43).
- ❑ The comments of registered I&APs must be recorded and included in the reports submitted to the competent authority (Section 44).

The objectives of public participation in an EIA are to provide sufficient and accessible information to I&APs in an objective manner to assist them to:

- ❑ During the Scoping Phase.
 - Identify issues of concern and provide suggestions for enhanced benefits and alternatives.
 - Contribute local knowledge and experience.
 - Verify that their issues have been considered.
- ❑ During the Impact Assessment.
 - Verify that their issues have been considered either by the EIA Specialist Studies, or elsewhere.
 - Comment on the findings of the Environmental Impact Assessment Report (EIAR), including the measures that have been proposed to enhance positive impacts and reduce or avoid negative ones.

The key objective of public participation is to assist to define the scope of the technical specialist studies to be undertaken during the Impact Assessment.

Notification of the application

Stakeholders will be informed of applicants (MTN) intention to apply for environmental authorisation via a Background Information Document (BID), media advertisements and on-site notice boards. The application will also be posted on ACER's website for stakeholder review.

Identification and registration of Interested and Affected Parties (I&APs)

Key stakeholders and other I&APs, who include local, provincial and national government authorities, conservation authorities, community-based organisations, local businesses, environmental interest groups, affected landowners/users and neighbours were identified and their contact details incorporated in a project database.

Project announcement

To date the opportunity to participate in the EIA has been announced as follows:

- ❑ Advertisements in local and provincial newspapers:
 - Table View Tygerburger (02 September 2020).
 - Cape Times (03 September 2020)
- ❑ A Background Information Document (BID) was compiled and emailed to all key stakeholders. All I&APs who registered following the project announcement adverts were also sent the BID for their records. Hard copies of the BID were posted to all government departments and other relevant commenting authorities.
- ❑ Notifications by telephone.

- ❑ Placement of an on-site notice board at the Telkom cable landing station along 14th Street in Melkbosstrand and a notice at the Koeberg Public Library in Duynfontein.

Draft Scoping Report:

- ❑ Notification letters will be sent to all registered I&APs and notices will be placed at strategic points (local shops, library, etc.) within and around Yzerfontein notifying the public of the availability of the Draft Scoping Report for review and comment.
- ❑ The Draft Scoping Report will be uploaded to ACER's website where members of the public can download the report for review and comment.
- ❑ A hard copy and electronic copy of the report will be placed at the Darling Public Library and the Municipal Offices in Yzerfontein.
- ❑ ACER will engage with I&APs who do not have access to the internet telephonically where the EAP will undertake the following:
 - Disseminate information regarding the proposed project to I&APs.
 - Provide I&APs with an opportunity to interact with the relevant project team members.
 - Discuss the studies to be undertaken during the EIA.
 - Supply more information regarding the EIA process.
 - Answer questions regarding the project and the EIA process.
 - Receive input regarding the public participation process and the proposed development.
 - Provide I&APs not previously registered on the project database with an opportunity to be formally registered and, therefore, be informed of progress for the remainder of the project.

Obtaining and dealing with comments from I&APs

The following opportunities will be provided to I&APs during Scoping and the Impact Assessment phase of the EIA process to contribute comments:

- ❑ Completing and returning Registration and Comment Sheets.
- ❑ Providing comments telephonically or by email.
- ❑ Should the need arise a Public Open Day will be held during the DSR and DEIR review period. The primary aim of these open days will be to:
 - Disseminate information regarding the proposed project to I&APs.
 - Provide I&APs with an opportunity to interact with the EAP and relevant Openseve officials.
 - Discuss the studies to be undertaken within the Environmental Impact Assessment.
 - Supply more information regarding the EIA process.
 - Answer questions regarding the project and the EIA process.
 - Receive input regarding the public participation process and the proposed Development.
 - Provide I&APs not previously registered on the project database with an opportunity to be formally registered and, therefore, be informed of progress for the remainder of the project.
- ❑ Focus group meetings will be held with key stakeholders should the need arise to discuss the project and to address concerns raised by key stakeholders.

The Public Participation Plan was submitted and approved by DEFF on the 27 July 2020.

9. OTHER AUTHORISATIONS REQUIRED

Are there any other applications for Environmental Authorisation on the same property?		NO ✓
If YES, please indicate the following:		
Competent Authority		
Application Reference Number		
Project Name		
Please provide details of the steps taken to ascertain this information:		
Results were established following a review of property searches and through the DEA Screening Tool which was used to generate the site report.		

IF YES IS SELECTED, PLEASE ATTACH OTHER AUTHORISATIONS ISSUED.

Applications in terms of the National Environmental Management Act ("NEMA") & specific environmental management Acts ("SEMA's"):

LEGISLATION	AUTHORISATION REQUIRED		APPLICATION SUBMITTED
Is Section 50(5) of the National Environmental Management: Protected Areas Act applicable to your proposed development? (The proposed development is within a proclaimed protected area as defined the Act.)	YES ✓	NO	NO ✓
National Water Act (Act No. 36 of 1998)		NO ✓	NO ✓
National Environmental Management: Air Quality Act (Act No. 39 of 2004)		NO ✓	NO ✓
National Environmental Management: Biodiversity Act (Act No. 10 of 2004)		NO ✓	NO ✓
National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008)	YES ✓		NO ✓
National Environmental Management: Protected Areas Act (Act No. 57 of 2003)	YES ✓		NO ✓
National Environmental Management: Waste Act (Act No. 59 of 2008)		NO ✓	NO ✓
Others: Please specify		NO ✓	NO ✓

Please be advised that:

- If a Waste Management license is required in terms of the National Environmental Management: Waste Act, please contact the Department for guidance on the **Integrated Permitting System**. An **IPS application can only be lodged with this Department in the event that this Department is the Competent Authority for both the EIA and Waste related activities**;
- If Sections 7B and 7C of the National Environmental Management: Integrated Coastal Management Act is applicable to your proposed development, you are required to obtain pre-approval for a reclamation application prior to an Application for Environmental Authorisation being lodged with the Competent Authority;
- If Section 50(5) of the National Environmental Management: Protected Areas Act is applicable to your proposed development, you are required to obtain approval from the Management Authority prior to an Application for Environmental Authorisation being lodged with the Competent Authority; and

- If Section 38 of the National Heritage Resources Act (Act No. 25 of 1999) is applicable to your proposed development, you are requested to submit the Notice of Intent form to the relevant SAHRA or a Provincial Heritage Resources Authority and attach a copy to this form. If it is indicated that a Heritage Impact Assessment will be required, the Heritage Impact Assessment must be undertaken as one of the specialist studies of the EIA process to be undertaken in terms of the NEMA EIA Regulations, 2014, as amended.

10. LIST OF APPENDICES

		SUBMITTED	
APPENDIX 1	Copy of the pre-application meeting minutes	YES ✓	
APPENDIX 2	Proof of Payment	YES ✓	
APPENDIX 3	List of land owners (with contact details) and written consent of land owners.	YES ✓	
APPENDIX 4	List of Local/Provincial Authority involved (with contact details)	YES ✓	
APPENDIX 5	Strategic Infrastructure Projects		NO
APPENDIX 6	List of SGIDs and coordinates	YES ✓	
APPENDIX 7	Locality map	YES ✓	
APPENDIX 8	Project schedule	YES ✓	
APPENDIX 9	Declaration of Applicant	YES ✓	
APPENDIX 10	Declaration of EAP and undertaking under oath or affirmation	YES ✓	
APPENDIX 11	Screening Tool Report	YES ✓	
APPENDIX 12	Undertaking under Oath / Affirmation	YES ✓	

APPENDIX 1
COPY OF THE PRE-APPLICATION MEETING MINUTES

From: Thulisile Nyalunga <TNyalunga@environment.gov.za>
Sent: Thursday, 23 July 2020 13:04
To: Giles Churchill <giles.churchill@acerafrica.co.za>
Cc: Matlhodi Mogorosi <MMogorosi@environment.gov.za>; Fiona Grimett <FGrimett@environment.gov.za>; Sindiswa Dlomo <SDlomo@environment.gov.za>
Subject: Pre-Application Meeting Request

Dear Gills

As we discussed over the phone. We are not going to have a pre-app meeting for the three projects (Duynefontein, Port Elizabeth and KZN). We are familiar with these type of projects and we have worked with you before.

You are requested to submit the public participation plan to the Department for approval.

Kind regards

Ms Thulisile Nyalunga

Integrated Environmental Authorisations

National Development infrastructure

Private Bag X447

Pretoria

0001

Tel: (+27) 012 399 9405

From: Giles Churchill [<mailto:giles.churchill@acerafrica.co.za>]
Sent: Thursday, July 23, 2020 2:06 PM
To: Thulisile Nyalunga <TNyalunga@environment.gov.za>
Cc: Matlhodi Mogorosi <MMogorosi@environment.gov.za>; Fiona Grimett <FGrimett@environment.gov.za>; Sindiswa Dlomo <SDlomo@environment.gov.za>
Subject: RE: Pre-Application Meeting Request

Hi Thulisile

Please see attached the planned Public Participation Plan for the 2AFRICA Duynfontein Landing. Please let me know if this meets the departments requirements.

Regards

Giles

Giles Churchill

ACER (Africa) Environmental Consultants

Tel: +27 35 340 2715

Mobile: +27 82 9079738

E-mail: giles.churchill@acerafrica.co.za



Please consider the environment before printing this mail



From: Fiona Grimett <FGrimett@environment.gov.za>
Sent: Wednesday, 29 July 2020 16:31
To: giles.churchill@acerafrica.co.za
Cc: Thulisile Nyalunga <TNyalunga@environment.gov.za>; Sindiswa Dlomo <SDlomo@environment.gov.za>
Subject: PPP plan approval for ZAFRICA Duynfontein Landing

Dear Giles,

Apologies, I have been trying to send this email since Monday, because of IT difficulties.

The attached public participation plan for ZAFRICA Duynfontein Landing refers.

The Department has reviewed the attached Public Participation Plan, submitted in terms of the Directions Regarding Measures to Address, Prevent and Combat the Spread of COVID-19 Relating to National Environmental Management Permits and Licences. The proposed plan contains suitable public consultation measures, and is hereby approved, however please also make provision for the possibility of virtual meetings / posting of executive summaries as reasonable alternative methods of public participation, where I&APs request such, because they are unable to utilise some of the methods provided (e.g. if full hardcopy reports cannot be safely placed or accessed at the library) . You may proceed with the implementation of the PPP plan.

Further note that the attached directions apply with regards to the process for submitting the draft documents to the Competent Authority for comment.

1

Regards,

Fiona Grimett

Department of Environmental Affairs

Chief Directorate: Integrated Environmental Authorisations

Directorate: National Infrastructure Development: National Infrastructure Projects

Email: fgrimett@environment.gov.za

APPENDIX 2
PROOF OF PAYMENT/ MOTIVATION FOR EXCLUSION



NOTIFICATION OF PAYMENT

To Whom It May Concern:

First National Bank hereby confirms that the following payment instruction has been received:

Date Actioned	: 2020/12/09
Time Actioned	: 15:48:36
Trace ID	: HG5M8G1G

Payer Details

Payment From	: Agric Com Env & Rural Dev Consultants
Cur/Amount	: 10,000.00

Payee Details

Recipient/Account No	: . . 240072
Name	: DEFF
Bank	: ABSA Bank
Branch Code	: 632005
Reference	: S33.694417 E18.439769

END OF NOTIFICATION

To authenticate this Payment Notification, please visit the First National Bank website at fnb.co.za, select the "Verify Payment" link and follow the on-screen instructions.

Our customer (the payer) has requested First National Bank Limited to send this notification of payment to you. Should you have any queries regarding the contents of this notice, please contact the payer. First National Bank Limited does not guarantee or warrant the accuracy and integrity of the information and data transmitted electronically and we accept no liability whatsoever for any loss, expense, claim or damage, whether direct, indirect or consequential, arising from the transmission of the information and data.

**APPENDIX 3
LIST OF LAND OWNERS
WRITTEN CONSENT OF LAND OWNERS**



**CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD**

**SPATIAL PLANNING AND ENVIRONMENT DIRECTORATE
ENVIRONMENTAL MANAGEMENT DEPARTMENT**

Morné Theron
Senior Environmental Professional

T: +27 21 444 0601 **F:** +27 21 444 0605
E: morne.theron@capetown.gov.za

13 October 2020

Acer (Africa) Environmental Consultants
P.O. Box 503
MTUNZINI
3867

Attention: Mr Giles Churchill

Email: ace-cable@aceafrica.co.za
(Tel: 035 3402715; **Fax:** 035 340 2232)

Dear Sir

PROPOSED NEW MARINE TELECOMMUNICATION CABLE SYSTEM (2AFRICA/GERA – EAST) TO MAKE LANDFALL AT DUYNEFONTEIN, MELKBOSSTRAND: BACKGROUND INFORMATION DOCUMENT (BID)

The Background Information Document submitted under your e-mail, dated 2 September 2020, pertaining to the proposed 2Africa/Gera (East) marine telecommunications cable system, refers

According to the BID, the project entails the laying of a new fibre optic submarine cable from the Middle East, down the east coast of Africa, to make landfall at Duynfontein, Melkbosstrand at Erf 3094. From there the existing MTN on-land sleeves will be used to pull the new cable to the MTN Cable Landing Station at Erf 3619, Duynfontein.

1. Kindly register the Environmental Management Department: Blaauwberg District as the official City of Cape Town entry point for comment on the aforementioned EIA. Be advised that the Environmental Management Department (EMD) is the duly mandated department to provide co-ordinated City of Cape Town comment on EIAs conducted within the municipality's jurisdiction. As Melkbosstrand falls within the Blaauwberg District of the City of Cape Town all future reports must be submitted to this office for comment.
2. In order for the City to meet the statutory commenting deadline(s) you are required to timeously submit electronic copies of the various Environmental Impact Assessment reports to this office before EMD can circulate the draft reports to all our affected line departments. The public participation commenting period will be calculated from the date that this office receives the flash disk and hard copy. Please ensure that the necessary documentation is delivered to our physical address as stated below.
3. In the interim the following comment is provided based on the information provided in the BID:
 - 3.1. **Spatial Planning and Environment Directorate: Environmental Management Department - Coastal Management Branch**
The Coastal Management Branch (CMB) requires that the following points are addressed in the Environmental Assessment and appropriately mitigated:
 - 3.1.1. Applicable legislation:
 - 3.1.1.1. In addition to the NEMA EIA regulations, the applicant must also consider the Integrated Coastal Management Act as well as the remaining provisions of the Seashore Act (specifically as it relates to lease

MILNERTON CIVIC CENTRE MILNERTON IZIKO LEENKONZO ZOLUNTU MILNERTON BURGERSENTRUM
87 PIENAAR ROAD MILNERTON 7441 PO BOX 35 MILNERTON 7435
www.capetown.gov.za

Making progress possible. Together.

agreements that may need to be entered into for infrastructure located in the intertidal zone. DEA&DP is the lead agent on lease agreement determinations).

3.1.2. Landing site:

3.1.2.1. CMB supports the preferred alternative (Alternative 1). The existing MTM fibre optic infrastructure must be used to limit any negative impacts/disturbance associated with the landing, and installation of, the cable.

3.1.2.2. The cable must be aligned as close as possible to the existing MTM cable at this site in the littoral active zone, and up to the existing BMH.

3.1.3. Operating a vehicle in the coastal zone:

3.1.3.1. In respect of the control of the use of vehicles in the coastal zone regulations, a permit may be required if a vehicle/excavating machine is used to construct a trench across the beach. The National Department of Environment, Forestry and Fisheries is the lead agent in respect and must be approached to determine whether an ORV permit is required, and if so, an ORV permit application must be submitted by the applicant.

3.1.4. Public access, health and safety:

3.1.4.1. All necessary precautions must be undertaken to ensure that the area is made safe during the two-week landing period.

3.1.4.2. In the event a section of the beach (Coastal Public Property) is cordoned off, the duration that such cordoning off must be kept to an absolute minimum.

3.1.4.3. The landing of the cable may not take place during peak season (December, school holidays) as this may result in the beach having to be closed at the expense of the public. As far as possible, every attempt should be made to limiting work on the beach over weekends.

3.1.5. Depth of cable in the littoral active zone:

3.1.5.1. The cable must be laid deep enough not to be exposed when beach profiles drop, especially during winter months.

3.1.6. Rehabilitation:

3.1.6.1. The determination of whether rehabilitation is required must rest with the City's Environmental Management Department.

3.1.6.2. If rehab is required as determined by the EMD, it must be undertaken must be undertaken in accordance with a City approved Site Rehabilitation Management Plan.

3.1.6.3. Should rehabilitation be required, the cost of rehabilitation will be for the account of the applicant.

3.1.6.4. Rehabilitation will need to be completed to the satisfaction of the City and which is consistent with the standards/principles set out in the City's Dune and Beach Maintenance Management Plan, the completion of which must be signed off by the EMD.

3.2. **Spatial Planning and Environment Directorate: Environmental Management Department - Environmental & Heritage Management Branch**

3.2.1. Both landing alternatives of the telecommunications system are proposed in an area of high archaeological sensitivity.

- 3.2.2. The proposed telecommunications system triggers Section 38(1)(a) of the National Heritage Resources Act, no 25 of 1999. In this regard, a Notification of Intent to Develop (NID) must be submitted to Heritage Western Cape (HWC). Prior to submission to HWC, the NID must be submitted to this office for written comment to be included in the submission to HWC.
- 3.2.3. Both proposed cable route alternatives will dissect sections of Critical Biodiversity Areas (CBA). Figure 1 below, illustrates the location of the CBA as identified by the City of Cape Town: Biodiversity Network Map (2016). In this regard the following should be given early consideration:
- 3.2.3.1. A botanical impact assessment must be included as a specialist study;
- 3.2.3.2. Directional drilling must be considered as a construction method alternative in order to ensure the preservation of both the primary dune's stability and the indigenous vegetation that the dune supports (refer to Position A in Figure 1);



FIGURE 1: Location of the CBA as identified by the City of Cape Town: Biodiversity Network Map (2016).

- 3.2.4. Both proposed landfall site alternatives A and B are situated between the 1 – 5km Precautionary Action Zone (PAZ) boundary of the Koeberg Nuclear Power Station (KNPS). Figure 2 below, indicates the location of Alternatives A and B in relation to the PAZ. The Disaster Risk Management Centre (DRMC) is the custodian (on behalf of the City of Cape Town) of the execution of the Koeberg Nuclear Power Station Radiological Release Hazard Disaster Risk Management Plan (RRR). It is tasked with the responsibility of ensuring that the public safety arrangements are in place in the case of a nuclear emergency and that individual citizens are not endangered with particular emphasis on the population residing and working in the UPZ of the 0 – 16km area from the KNPS. In light of the aforementioned, the DRMC require the following:
- 3.2.4.1. That a risk assessment and emergency / evacuation management plan for the marine telecommunications system (during the construction and operational phases) be compiled; and
- 3.2.4.2. That this application be tested against the Koeberg Nuclear Power Station Traffic Evacuation Model (TEM). In order for the TEM model to be run the anticipated population increase during the construction phase of each alternative must be provided in the TEM form 2 (as attached). The duly completed TEM form 2 must be included in the various scoping- and environmental impact assessment reports of this project.

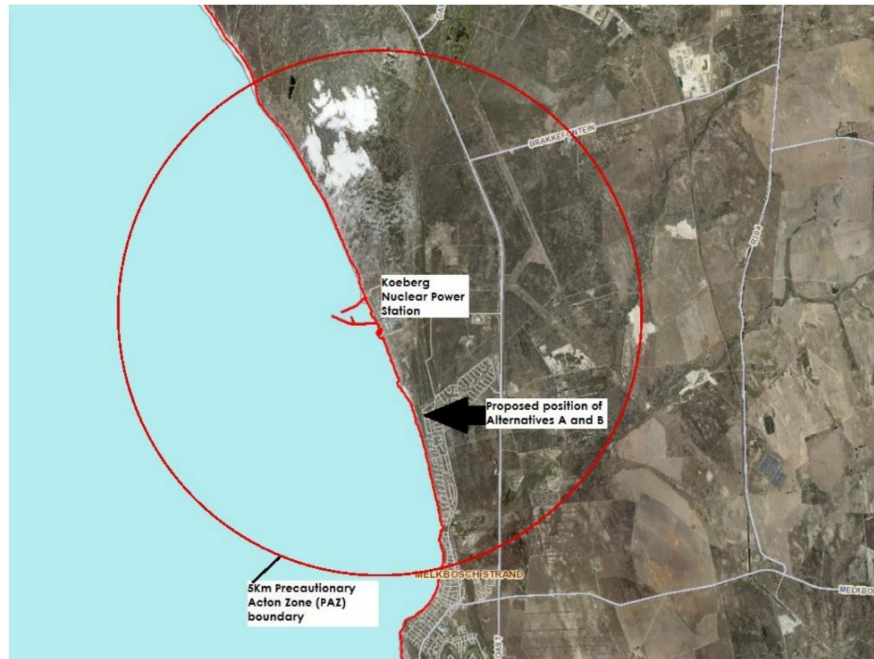


FIGURE 2: Location of Alternatives A & B in relation to the Koeberg Nuclear Power Station Precautionary Action Zone

3.3. **Water & Sanitation Department: Technical Services Branch**

The Water & Sanitation: Technical Services Branch indicated the following:

3.3.1. Water & Sewer Reticulation

Proposed Alternative 1

3.3.1.1. There is an existing 50mmØ water main as well as a sewer pump station, 150mmØ rising main and 150mmØ sewer main on erf 2633-re within close proximity to the alternative 1 site as illustrated in Figure 1 below:



Figure 1 Existing Services – Alternative 1

Proposed Alternative 2

- 3.3.1.2. There is an existing 100mmØ water main and a 150mmØ sewer main in Die Bad Road, close to the proposed alternative 2 site as illustrated in Figure 1 below:



Figure 2: Existing Water & Sanitation reticulation services at Alternative

3.3.2. Bulk Water

- 3.3.2.1. No infrastructure under the control of the City of Cape Town's Bulk Water Branch exists in the immediate vicinity of the proposed development shown in the application.

3.3.3. Wastewater Treatment

- 3.3.3.1. The property falls within the catchment of the Melkbos Wastewater Treatment Works (WWTW). The Melkbos WWTW will not be affected by this application.

3.3.4. Water & Sanitation mitigation requirement

- Caution must be exercised when using heavy vehicles and machinery within close proximity to the abovementioned municipal infrastructure.

Water & Sanitation Directorate General/ Disclaimer

Information provided is based on best available data.

The abovementioned City of Cape Town comment must be included in the Scoping Report

Yours faithfully

Pat Titmuss

Head: Environmental and Heritage Management Branch – Northern Region

From: [Basson Geldenhuys](#)
To: [Giles Churchill](#)
Subject: RE: 2AFRICA - Duynefontein and Yzerfontein Landings
Date: Wednesday, 04 November 2020 09:37:47
Attachments: [image002.png](#)

Good morning Giles

I can confirm that I am aware of the intended processes.

Kind regards

Basson Geldenhuys Pr.Pl |chief town planner|projects and professional services |national department of public works and Infrastructure, cape town regional office|room 1419, customs house |lower heerengracht street |cape town |e-mail: basson.geldenhuys@dpw.gov.za |telephone number: +27 21 402 2174|Fax number: 086 272 8660|cell phone number: 071 648 8656

From: Giles Churchill [mailto:giles.churchill@acerafrica.co.za]
Sent: 04 November 2020 09:15
To: Basson Geldenhuys <Basson.Geldenhuys@dpw.gov.za>
Subject: 2AFRICA - Duynefontein and Yzerfontein Landings
Importance: High

Dear Basson

As you are aware ACER (Africa) Environmental Consultants are commencing with the Environmental Authorisation processes to have two marine telecommunications cables landed on the West Coast of South Africa namely the 2AFRICA GERA/EAST Cable System landing at Duynefontein and the 2AFRICA (West) Cable System landing at Yzerfontein. As the Department of Public Works is the landowner/custodian of the beach and intertidal environment please could you confirm that you are aware of these two projects.

As the EIA progresses you will be notified of the availability of reports and your department will be engaged with in terms of formalising lease agreements.

Regards
Giles

Giles Churchill
ACER (Africa) Environmental Consultants

Tel: +27 35 340 2715
Mobile: +27 82 9079738
E-mail: giles.churchill@acerafrica.co.za



APPENDIX 4
LIST OF LOCAL/PROVINCIAL AUTHORITY INVOLVED

The proposed development falls within the administrative area of the City of Cape Town metropolitan municipality and as such no local municipalities will be influenced by the proposed development. The contact person within the City of Cape Town for the Environmental Authorisation Process is Ms P Titmuss whose contact details are provided below:

Pat Titmuss

Regional Manager
Environmental & Heritage Management: Districts B & C
Environmental Resource Management Department
P O Box 35, Milnerton, 7435
Milnerton Civic Centre, 87 Pienaar Road, Milnerton 7441
Tel 021 444 0597
Fax 021 444 0605
Electronic fax 086 576 2229
pat.titmuss@capetown.gov.za

Basson Geldenhuys Pr.Pln

Chief Town Planner Projects and Professional Services
National Department of Public Works and Infrastructure
Cape Town regional office
Room 1419, Customs House
Lower Heerengracht Street
Cape Town
Tel: +27 21 402 2174
Fax: 086 272 8660
Email: basson.geldenhuys@dpw.gov.za

Ms Adri La Meyer

Department of Environmental Affairs and Development Planning
Attention: Directorate: Development Management (Region 1)
Private Bag X 9086, Cape Town
8000
Tel: 021 4832887
Fax: 021 483 4185
Email: Adri.LaMeyer@westerncape.gov.za

Ms Nontsasa Tonjeni / Ms Funanani Ditinti

Directorate: Coastal Conservation strategies
Department of Environment, Forestry & Fisheries – Oceans & Coasts EIA
2nd Floor, East Pier Building, East Pier Road, Victoria & Alfred Waterfront
Cape Town
8000
Tel: 021 819 2432
Email: OCEIA@environment.gov.za / fditinti@environment.gov.za

Dr Ane Oosthuizen

National Marine Co-ordinator
SAN Parks
643 Leyds Street
Muckleneuk, Pretoria
Tel: 041 508 5411
Email: Ane.Oosthuizen@sanparks.org

Mr Rhett Smart

Scientist: Land Use Advice (Scientific Services)
CapeNature: Scientific Services
P/Bag X5014
Assegaaibosch Nature Reserve, Jonkershoek
Stellenbosch, 7599
Tel: 021 866 8017
Fax: 086 529 4992
Cell: 072 835 8741
Email: rsmart@capenature.co.za

Ms Lesa La Grange

Senior Heritage Officer
The South African Heritage Resource Agency
111 Harrington Street
Cape Town, 8001
Tel: 021 202 8658
Email: llagrange@sahra.org.za

Stephanie-Anne Barnardt

Heritage Officer (Archaeology)
Heritage Western Cape
3rd Floor, Protea Assurance Building, Green Market Square
Cape Town, 8001
Tel: 021 483 9543
Email: Stephanie.Barnardt@westerncape.gov.za

**APPENDIX 5
STRATEGIC INFRASTRUCTURE PROJECTS**

“Improvement in Africa’s information technology infrastructure via telecommunication cables will remove one of the current key inhibitors to overall development in Africa and support economic growth and opportunities on the continent. In South Africa, the Presidential Infrastructure Coordinating Commission (PICC) launched the Strategic Integrated Project (SIP) 15: Expanding Access to Communication Technology. This is led by the Department of Communications and supported by the Department of Public Enterprises and Department of Science and Technology. SIP 15 aims to ensure universal service and access to reliable, affordable and secure broadband services by all South Africans, prioritising rural and under-served areas and stimulating economic growth. This project, although not registered with the South African Government as a SIP project, will support SIP 15.

While expanding access to communication technology will be done primarily through broadband infrastructure roll-out, this requires a national backbone connected to the rest of the world. In this case, the proposed 2AFRICA/GERA (East) Cable System supports SIP 15 via is international connectivity, capacity and speed”

<p>SIP 1: Unlocking the northern mineral belt with Waterberg as the catalyst</p> <ul style="list-style-type: none"> • Unlock mineral resources • Rail, water pipelines, energy generation and transmission infrastructure • Thousands of direct jobs across the areas unlocked • Urban development in Waterberg - first major post-apartheid new urban centre will be a “green” development project • Rail capacity to Mpumalanga and Richards Bay • Shift from road to rail in Mpumalanga • Logistics corridor to connect Mpumalanga and Gauteng. 	
<p>SIP 2: Durban-Free State-Gauteng logistics and industrial corridor</p> <ul style="list-style-type: none"> • Strengthen the logistics and transport corridor between SA’s main industrial hubs • Improve access to Durban’s export and import facilities • Integrate Free State Industrial Strategy activities into the corridor • New port in Durban • Aerotropolis around OR Tambo International Airport. 	
<p>SIP 3: South-Eastern node & corridor development</p> <ul style="list-style-type: none"> • New dam at Mzimvubu with irrigation systems • N2-Wild Coast Highway which improves access into KwaZulu-Natal and national supply chains • Strengthen economic development in Port Elizabeth through a manganese rail capacity from Northern Cape • A manganese sinter (Northern Cape) and smelter (Eastern Cape) • Possible Mthombo refinery (Coega) and transshipment hub at Ngqura and port and rail upgrades to improve industrial capacity and performance of the automotive sector. 	
<p>SIP 4: Unlocking the economic opportunities in North West Province</p> <ul style="list-style-type: none"> • Acceleration of investments in road, rail, bulk water, water treatment and transmission infrastructure • Enabling reliable supply and basic service delivery • Facilitate development of mining, agricultural activities and tourism opportunities • Open up beneficiation opportunities in North West Province. 	
<p>SIP 5: Saldanha-Northern Cape development corridor</p> <ul style="list-style-type: none"> • Integrated rail and port expansion • Back-of-port industrial capacity (including an IDZ) • Strengthening maritime support capacity for oil and gas along African West Coast • Expansion of iron ore mining production and beneficiation. 	

<p>SIP 6: Integrated municipal infrastructure project Develop national capacity to assist the 23 least resourced districts (19 million people) to address all the maintenance backlogs and upgrades required in water, electricity and sanitation bulk infrastructure. The road maintenance programme will enhance service delivery capacity thereby impacting positively on the population.</p>	
<p>SIP 7: Integrated urban space and public transport programme Coordinate planning and implementation of public transport, human settlement, economic and social infrastructure and location decisions into sustainable urban settlements connected by densified transport corridors. This will focus on the 12 largest urban centres of the country, including all the metros in South Africa. Significant work is underway on urban transport integration.</p>	
<p>SIP 8: Green energy in support of the South African economy Support sustainable green energy initiatives on a national scale through a diverse range of clean energy options as envisaged in the Integrated Resource Plan (IRP2010) and support bio-fuel production facilities. <i>Indicate capacity in MW:</i></p>	
<p>SIP 9: Electricity generation to support socioeconomic development Accelerate the construction of new electricity generation capacity in accordance with the IRP2010 to meet the needs of the economy and address historical imbalances. Monitor implementation of major projects such as new power stations: Medupi, Kusile and Ingula. <i>Indicate capacity in MW:</i></p>	
<p>SIP 10: Electricity transmission and distribution for all Expand the transmission and distribution network to address historical imbalances, provide access to electricity for all and support economic development. Align the 10-year transmission plan, the services backlog, the national broadband roll-out and the freight rail line development to leverage off regulatory approvals, supply chain and project development capacity.</p>	
<p>SIP 11: Agri-logistics and rural infrastructure Improve investment in agricultural and rural infrastructure that supports expansion of production and employment, small-scale farming and rural development, including facilities for storage (silos, fresh-produce facilities, packing houses); transport links to main networks (rural roads, branch train-line, ports), fencing of farms, irrigation schemes to poor areas, improved R&D on rural issues (including expansion of agricultural colleges), processing facilities (abattoirs, dairy infrastructure), aquaculture incubation schemes and rural tourism infrastructure.</p>	
<p>SIP 12: Revitalisation of public hospitals and other health facilities Build and refurbish hospitals, other public health facilities and revamp 122 nursing colleges. Extensive capital expenditure to prepare the public healthcare system to meet the requirements of the National Health Insurance (NHI) system. The SIP contains major builds for 6 hospitals.</p>	
<p>SIP 13: National school build programme A national school build programme driven by uniformity in planning, procurement, contract management and provision of basic services. Replace inappropriate school structures and address basic service backlog and provision of basic services under the Accelerated School Infrastructure Delivery Initiative (ASIDI). In addition, address national backlogs in classrooms, libraries, computer labs and admin buildings. Improving the learning environment will strengthen outcomes especially in rural schools, as well as reduce overcrowding.</p>	
<p>SIP 14: Higher education infrastructure Infrastructure development for higher education, focusing on lecture rooms, student accommodation, libraries and laboratories, as well as ICT connectivity. Development of university towns with a combination of facilities from residence, retail to recreation and transport. Potential to ensure shared infrastructure such as libraries by universities, FETs and other educational institutions. Two new universities will be built - in Northern Cape and Mpumalanga.</p>	

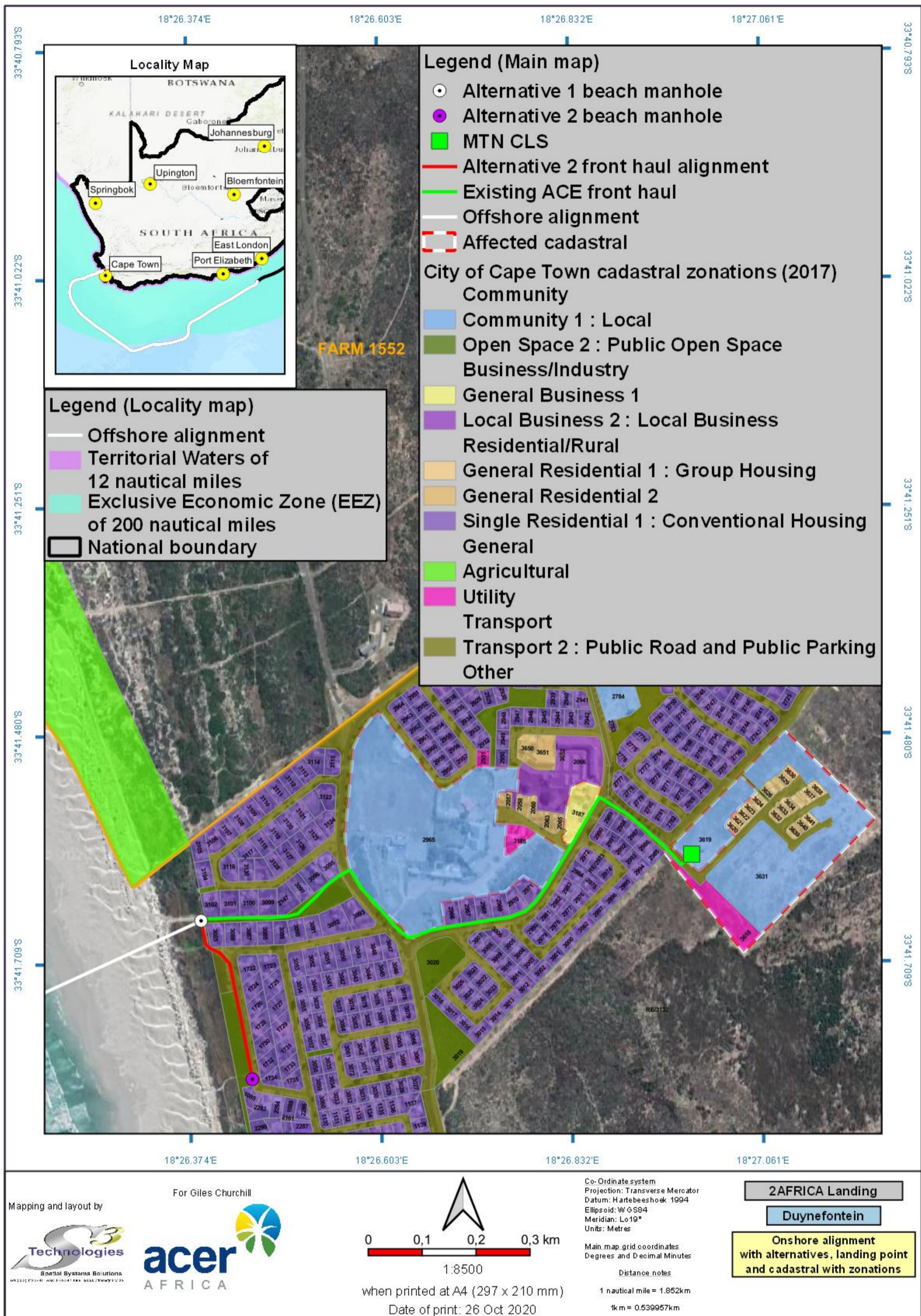
<p>SIP 15: Expanding access to communication technology Provide for broadband coverage to all households by 2020 by establishing core Points of Presence (POPs) in district municipalities, extend new Infracore fibre networks across provinces linking districts, establish POPs and fibre connectivity at local level, and further penetrate the network into deep rural areas. While the private sector will invest in ICT infrastructure for urban and corporate networks, government will co-invest for township and rural access, as well as for e-government, school and health connectivity. The school roll-out focus is initially on the 125 Dinaledi (science and maths-focussed) schools and 1525 district schools. Part of digital access to all South Africans includes TV migration nationally from analogue to digital broadcasting.</p>	
<p>SIP 16: SKA & Meerkat SKA is a global mega-science project, building an advanced radio-telescope facility linked to research infrastructure and high-speed ICT capacity and provides an opportunity for Africa and South Africa to contribute towards global advanced science projects.</p>	

APPENDIX 6
LIST OF SGIDS / COORDINATES OF THE BOUNDARY OF THE PROPERTY OR PROPERTIES /
COORDINATES OF LISTED ACTIVITIES

The properties affected by the development falls under the jurisdiction of the Department of Public Works: City of Cape Town. The offshore cable will be landed at a Beach Man Hole (BMH) in Duynfontein and feed into infrastructure for the existing MTN ACE cable. Property information/ details are only provided for the areas between the BMH and offshore alignment.

Property Details (Obtained from the National DEA Screening Tool).

No.	Farm Name	Farm/ Erf No.	Portion	Latitude	Longitude	Property Type
1	Melkboschstrand	2302	0	33°41'58.19S	18°26'28.49E	Erven
2	Melkboschstrand	2312	0	33°41'59.76S	18°26'28.87E	Erven
3	Melkboschstrand	1084	0	33°42'11.04S	18°26'31.03E	Public Space

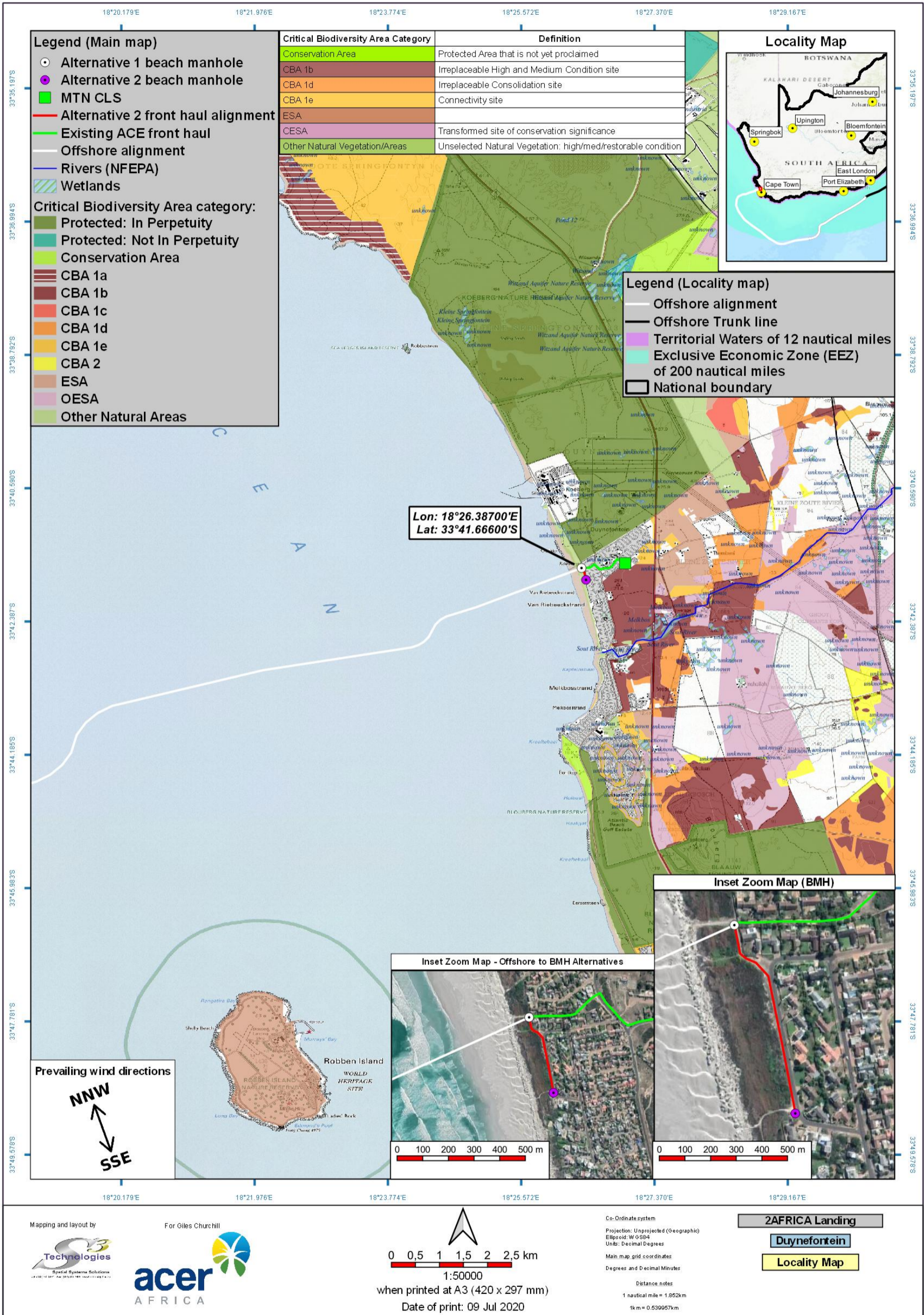


Properties surrounding the proposed Duynefontein Cable Onshore Alignment (Note no impact on these properties will take place as the cable will be placed within the existing cable sleeves already installed from the Beach Man Hole to the Cable Landing Station)

APPENDIX 7 LOCALITY MAP

The following maps are attached overleaf:

1. Onshore cable alignment locality map
2. Offshore cable alignment locality map
3. Offshore alignment in relation to Robben Island Marine Protected Area
4. Offshore alignment in relation to the



Legend (Main map)

- Alternative 1 beach manhole
- Alternative 2 beach manhole
- MTN CLS
- Alternative 2 front haul alignment
- Existing ACE front haul
- Offshore alignment
- Rivers (NFEPA)
- ▨ Wetlands

Critical Biodiversity Area category:

- Protected: In Perpetuity
- Protected: Not In Perpetuity
- Conservation Area
- CBA 1a
- CBA 1b
- CBA 1c
- CBA 1d
- CBA 1e
- CBA 2
- ESA
- OESA
- Other Natural Areas

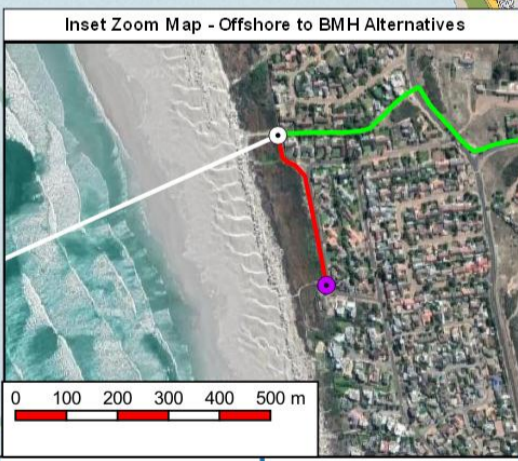
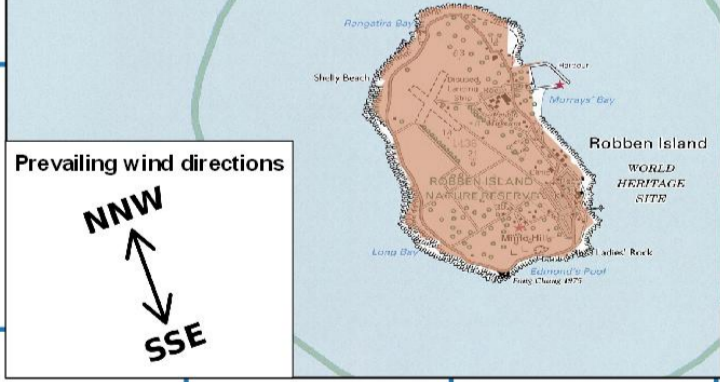
Critical Biodiversity Area Category	Definition
Conservation Area	Protected Area that is not yet proclaimed
CBA 1b	Irreplaceable High and Medium Condition site
CBA 1d	Irreplaceable Consolidation site
CBA 1e	Connectivity site
ESA	Transformed site of conservation significance
Other Natural Vegetation/Areas	Unselected Natural Vegetation: high/med/restorable condition



Legend (Locality map)

- Offshore alignment
- Offshore Trunk line
- Territorial Waters of 12 nautical miles
- Exclusive Economic Zone (EEZ) of 200 nautical miles
- National boundary

Lon: 18°26.38700'E
Lat: 33°41.66600'S



Mapping and layout by **Technologies** For Giles Churchill

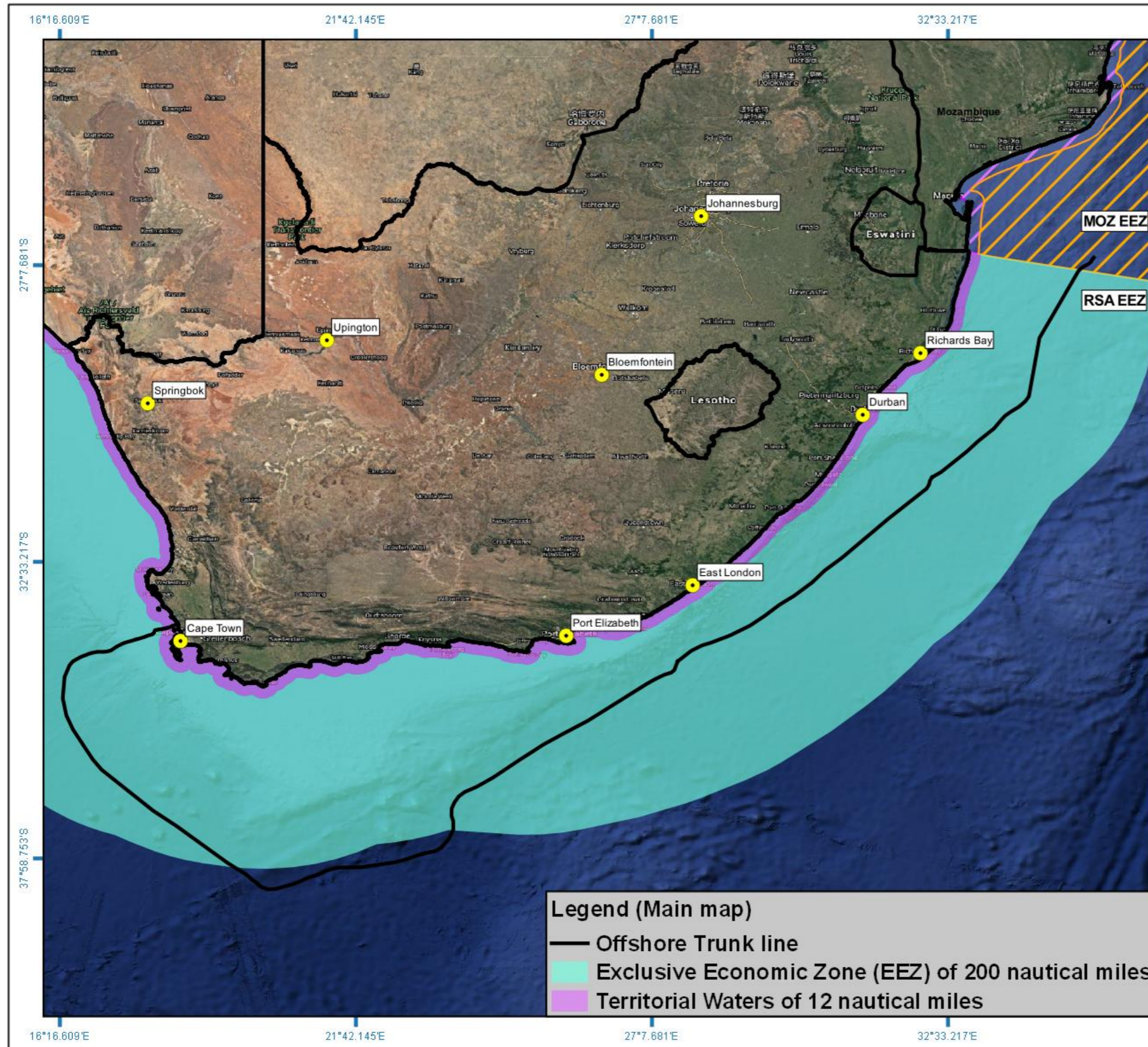
0 0.5 1 1.5 2 2.5 km
1:50000
when printed at A3 (420 x 297 mm)
Date of print: 09 Jul 2020

Co-Ordinate system
Projection: Unprojected (Geographic)
Ellipsoid: WGS84
Units: Decimal Degrees
Main map grid coordinates
Degrees and Decimal Minutes
Distance notes
1 nautical mile = 1.852km
1km = 0.539957nmi

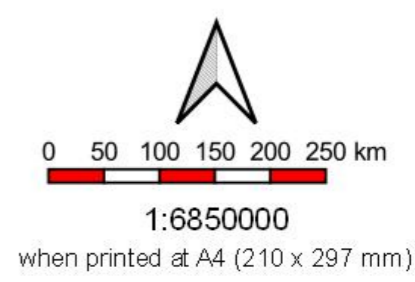
2AFRICA Landing

Durynfortein

Locality Map



2AFRICA Landing
Duynfontein
Locality Map with offshore alignment and trunk line to Mozambique



Co-Ordinate system
 Projection: Unprojected (Geographic)
 Ellipsoid: WGS84
 Units: Decimal Degrees
 Main map grid coordinates
 Degrees and Decimal Minutes

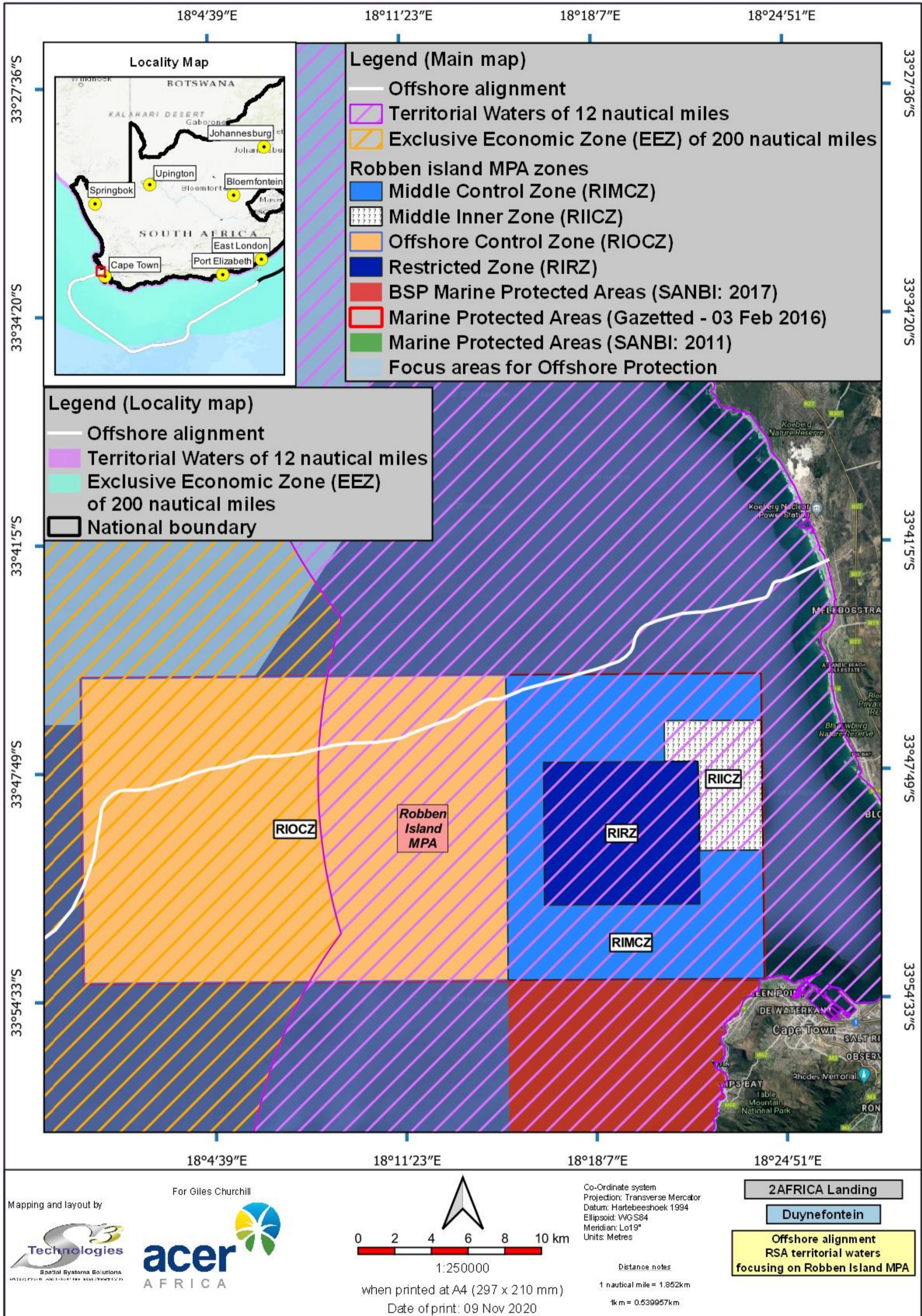
Distance notes
 1 nautical mile = 1.852km
 1km = 0.539957km

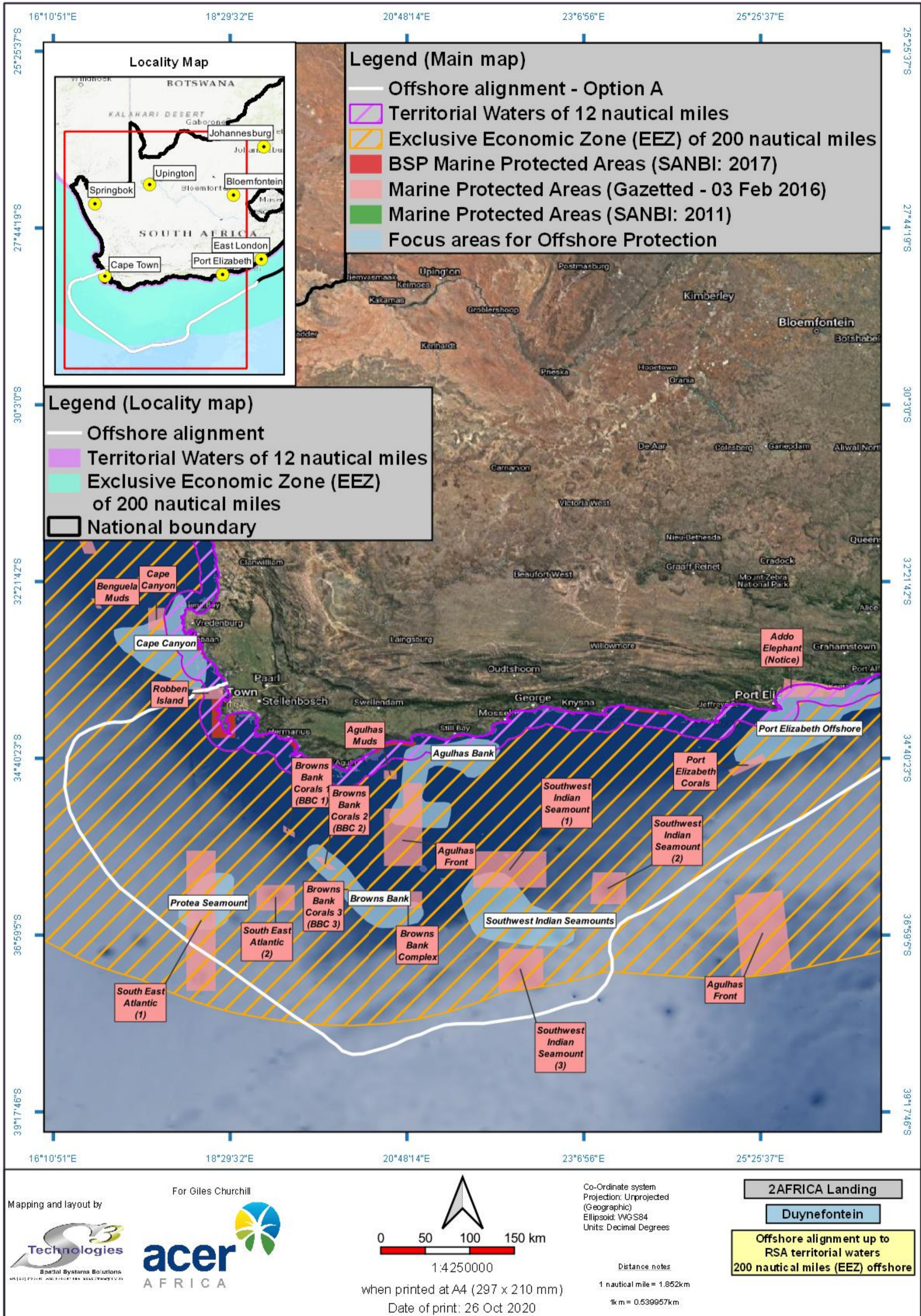


For Giles Churchill

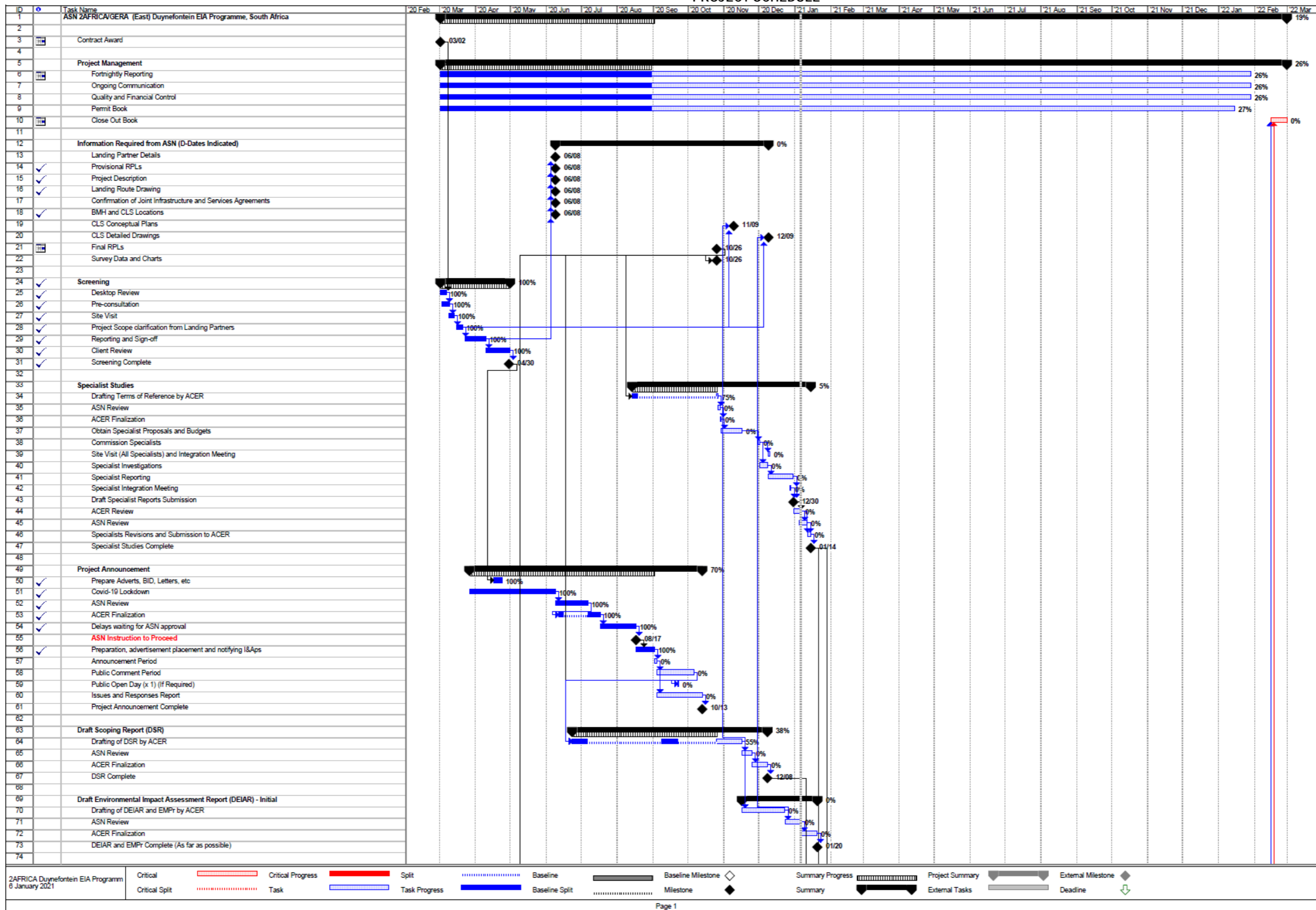


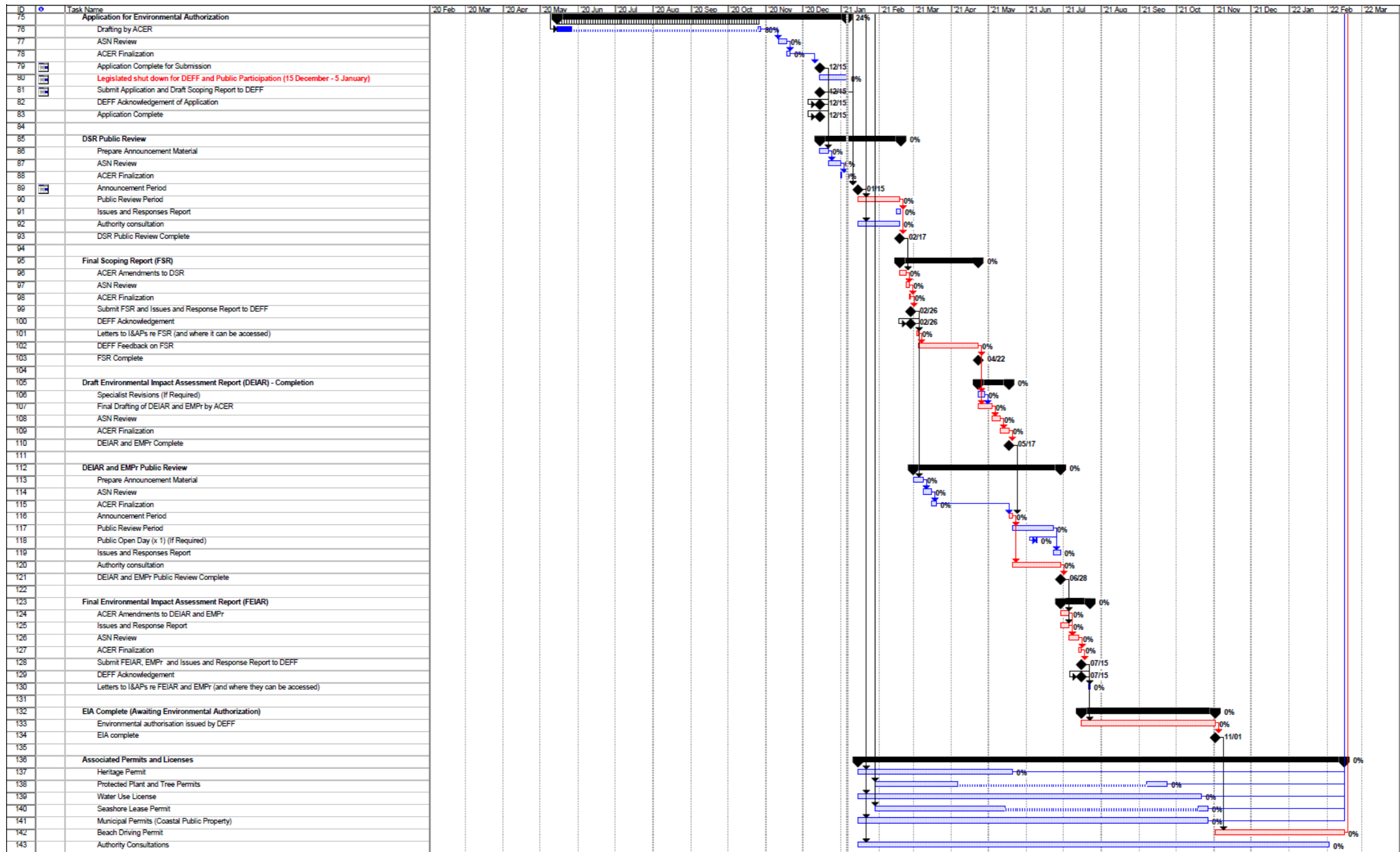
Date of print: 26 Oct 2020





APPENDIX 8 PROJECT SCHEDULE





2AFRICA Dnyefontein EIA Program 6 January 2021	Critical		Critical Progress		Split		Baseline		Baseline Milestone		Summary Progress		Project Summary		External Milestone	
	Critical Split		Task		Task Progress		Baseline Split		Milestone		Summary		External Tasks		Deadline	

PROJECT SCHEDULE SUMMARY - KEY DATES FOR 2AFRICA YZERFONTEIN EIA PROCESS

#	Activity	Dates
1	Project Announcement	03 Sep 2020
2	Initial Comment Period (30 days)	03 Sep - 05 Oct 2020
3	Submit DSR and Application to DEFF	15 Jan 2021
4	DSR Public Review Period/	15 Jan – 17 Feb 2021
5	Submit Final Scoping Report and Plan of Study for Impact Assessment to DEFF	26 Feb 2021
6	DEFF acknowledgement of receipt	26 Feb 2021
7	Acceptance of Final Scoping Report and Plan of Study for Impact Assessment by DEFF (43 days from submission)	22 Apr 2021
8	Specialist studies and preparation of DEIAR & EMPr	Jan – Apr 2021
9	DEIAR & EMPr Public Review Period (30 days)	21 May – 22 Jun 2021
10	Revision of EIAR and EMPr according to public comment	23 Jun - 14 July 2021
10	Submit FINAL EIAR and EMPr to DEFF	15 Jul 2021
11	DEFF Decision making (107 days) and issue of EA	1 Nov 2021

**APPENDIX 9
DECLARATION OF THE APPLICANT**

I, HP Janse van Rensburg_____, declare that –

- I am, or represent¹, the applicant in this application;
- I have appointed an Environmental Assessment Practitioner (EAP) to act as the independent EAP for this application / have obtained exemption from the requirement to obtain an EAP²;
- I will take all reasonable steps to verify whether the EAP and specialist/s appointed are independent and have expertise in conducting environmental impact assessments or undertaking specialist work as required, including knowledge of the Act, the EIA Regulations and any guidelines that have relevance to the proposed activity;
- I will provide the EAP and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the Regulations, including but not limited to –
 - costs incurred in connection with the appointment of the EAP or any person contracted by the EAP;
 - costs incurred in respect of the undertaking of any process required in terms of the Regulations;
 - costs in respect of any fee prescribed by the Minister or MEC in respect of the Regulations;
 - costs in respect of specialist reviews, if the Competent Authority decides to recover costs; and
 - the provision of security to ensure compliance with conditions attached to an environmental authorisation, should it be required by the Competent Authority;
- I will inform all registered interested and affected parties of any suspension of the application as well as of any decisions taken by the Competent Authority in this regard;
- I am responsible for complying with the conditions of any environmental authorisation issued by the Competent Authority;
- I hereby indemnify the Government of the Republic of South Africa, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action which the applicant or EAP is responsible for in terms of these Regulations;
- I will not hold the Competent Authority responsible for any costs that may be incurred by the applicant in proceeding with an activity prior to obtaining an environmental authorisation or prior to an appeal being decided in terms of these Regulations;
- I will perform all obligations as expected from an applicant in terms of the Regulations;
- all the particulars furnished by me in this form are true and correct; and
- I am aware of what constitutes an offence in terms of Regulation 48 and that a person convicted of an offence in terms of Regulation 48(1) is liable to the penalties as contemplated in section 49B of the Act.
- I am aware that in terms of Section 24F of the National Environmental Management Act, as amended (Act No. 107 of 1998) that no listed activity may commence prior to an environmental authorisation being granted by the Competent Authority.



Signature³ of the applicant/ Signature on behalf of the applicant

Mobile Telephone Network (Pty) LTD

Name of company (if applicable)

06 January 2021

Date:

¹ If this is signed on behalf of the applicant, proof of such authority from the applicant must be attached. If the applicant is a juristic person, a signature on behalf of the applicant is required as well as proof of such authority.

² If exemption is obtained from appointing an EAP, the responsibilities of an EAP will automatically apply to the person conducting the environmental impact assessment in terms of the Regulations.

³ Only original signatures will be accepted. No scanned, copied or faxed signatures will be accepted. An EAP may not sign on behalf of an applicant.

APPENDIX 10
DECLARATION OF THE EAP



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

File Reference Number:	(For official use only)
NEAS Reference Number:	DEA/EIA/
Date Received:	

Application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

PROJECT TITLE

2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT DUYNFONTEIN, CITY OF CAPE TOWN, WESTERN CAPE, SOUTH AFRICA

Kindly note the following:

1. This form must always be used for applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting where this Department is the Competent Authority.
2. This form is current as of 01 September 2018. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at <https://www.environment.gov.za/documents/forms>.
3. A copy of this form containing original signatures must be appended to all Draft and Final Reports submitted to the department for consideration.
4. All documentation delivered to the physical address contained in this form must be delivered during the official Departmental Officer Hours which is visible on the Departmental gate.
5. All EIA related documents (includes application forms, reports or any EIA related submissions) that are faxed; emailed; delivered to Security or placed in the Departmental Tender Box will not be accepted, only hardcopy submissions are accepted.

Departmental Details

Postal address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Private Bag X447
Pretoria
0001

Physical address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Environment House
473 Steve Biko Road
Arcadia

Queries must be directed to the Directorate: Coordination, Strategic Planning and Support at:
Email: EIAAdmin@environment.gov.za

Details of EAP, Declaration and Undertaking Under Oath

Page 1 of 4

1. ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP) INFORMATION

EAP Company Name:	ACER (Africa) Environmental Consultants		
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	4	Percentage Procurement recognition
EAP name:	Giles John Churchill		
EAP Qualifications:	MSc		
Professional affiliation/registration:	EAPASA registration no. (2019/1687) SACNASP registration no. (116348)		
Physical address:	26 Hely Hutchinson Rd, Suites 5/6 Golden Penny Centre, Mtunzini		
Postal address:	PO Box 503, Mtunzini, 3867, South Africa		
Postal code:	3867	Cell:	082 907 9738
Telephone:	035 340 2715	Fax:	035 340 2235
E-mail:	giles.churchill@acerafrica.co.za		

The appointed EAP must meet the requirements of Regulation 13 of GN R982 of 04 December 2014, as amended.

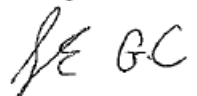
2. DECLARATION BY THE EAP

I, Giles John Churchill, declare that –

- I act as the independent environmental assessment practitioner in this application;
- I have expertise in conducting environmental impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I will take into account, to the extent possible, the matters listed in Regulation 13 of the Regulations when preparing the application and any report relating to the application;
- I undertake to disclose to the applicant and the Competent Authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the Competent Authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the Competent Authority, unless access to that information is protected by law, in which case it will be indicated that such information exists and will be provided to the Competent Authority;
- I will perform all obligations as expected from an environmental assessment practitioner in terms of the Regulations; and
- I am aware of what constitutes an offence in terms of Regulation 48 and that a person convicted of an offence in terms of Regulation 48(1) is liable to the penalties as contemplated in Section 49B of the Act.

Details of EAP, Declaration and Undertaking Under Oath

Page 2 of 4



Disclosure of Vested Interest (delete whichever is not applicable)

- I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations;



Signature of the Environmental Assessment Practitioner

ACER (Africa) Environmental Consultants

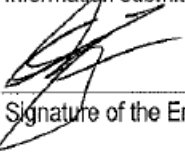
Name of Company:

7/1/2021

Date

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, Giles John Churchill, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.



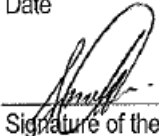
Signature of the Environmental Assessment Practitioner

ACER (Africa) Environmental Consultants

Name of Company

7 January 2021

Date



Signature of the Commissioner of Oaths

7 January 2021

Date

SENZO EMMANUEL MABASO
 EX OFFICIO COMMISSIONER OF OATHS
 PRACTISING ATTORNEY RSA
 GROUND FLOOR, GOLDEN PENNY CENTRE
 28 HELY HUTCHINSON STREET, MTUNZINI
 TEL: 035 340 1351

Details of EAP, Declaration and Undertaking Under Oath

Page 3 of 4



APPENDIX 11 SCREENING TOOL REPORT

The following Screening Tool reports were completed for the 2AFRICA/GERA (East) telecommunications cable landing at Duynfontein:

1. Report for the location of the BMH.
2. Report from the BMH into offshore waters (within South African Waters).
3. Report within South African Waters (to Mozambique)

1. BMH Screening Tool Report

SCREENING REPORT FOR AN ENVIRONMENTAL AUTHORIZATION OR FOR A PART TWO AMENDMENT OF AN ENVIRONMENTAL AUTHORISATION AS REQUIRED BY THE 2014 EIA REGULATIONS – PROPOSED SITE ENVIRONMENTAL SENSITIVITY

EIA Reference number: N/A

Project name: 2AFRICA/GERA (East) Submarine Telecommunications Cable

Project title: Proposed ASN 2AFRICA/GERA (East) Submarine Telecommunications Cable to be landed at Duynefontein, South Africa - BMH

Date screening report generated: 07/01/2021 11:02:55

Applicant: Mobile Telephone Network (MTN)

Compiler: ACER (Africa) Environmental Consultants

Compiler signature:

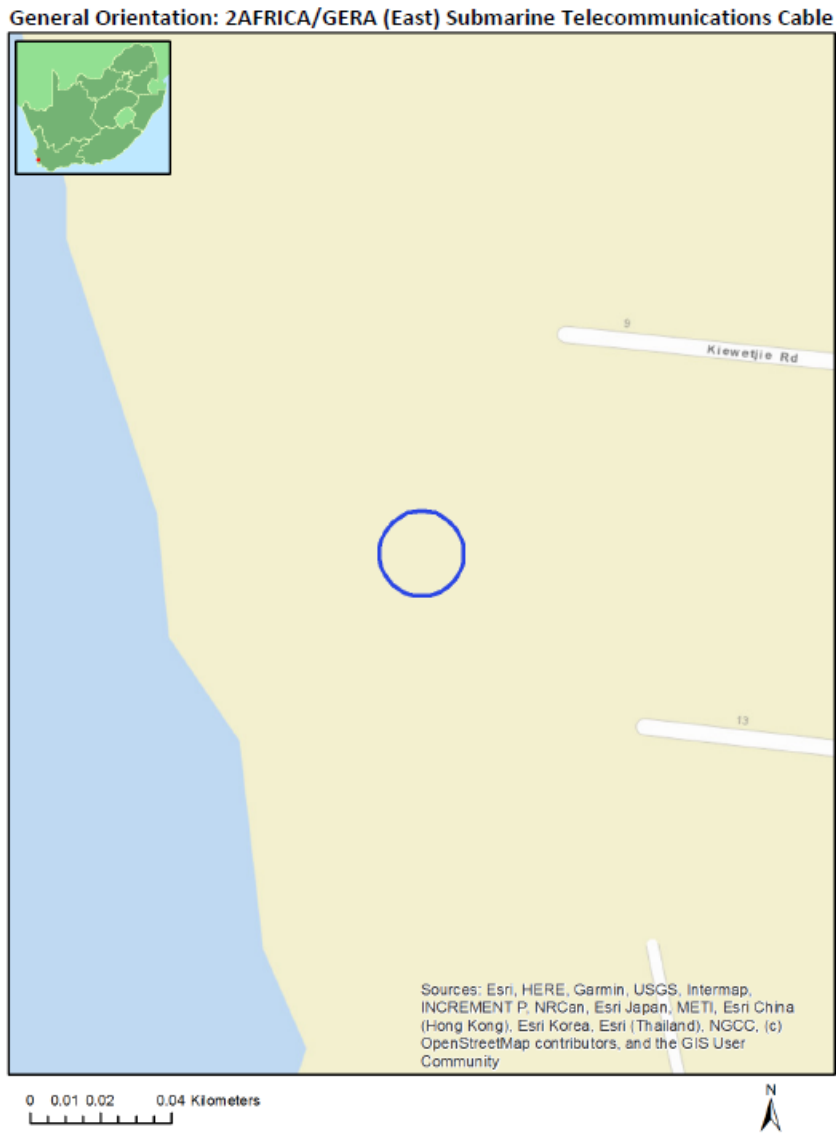


Table of Contents

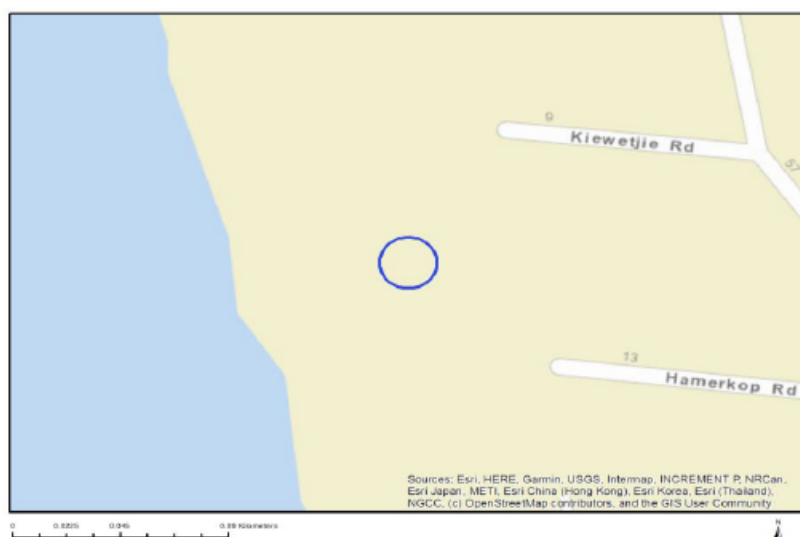
Proposed Project Location	3
Orientation map 1: General location	3
Map of proposed site and relevant area(s)	4
Cadastral details of the proposed site	4
Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area	4
Environmental Management Frameworks relevant to the application	5
Environmental screening results and assessment outcomes	5
Relevant development incentives, restrictions, exclusions or prohibitions	5
Map indicating proposed development footprint within applicable development incentive, restriction, exclusion or prohibition zones.....	6
Proposed Development Area Environmental Sensitivity.....	6
Specialist assessments identified.....	7
Results of the environmental sensitivity of the proposed area.	8
MAP OF RELATIVE ANIMAL SPECIES THEME SENSITIVITY.....	8
MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY	9
MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY	10
MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY	11
MAP OF RELATIVE DEFENCE THEME SENSITIVITY.....	12
MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY	13
MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY	14
MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY	15

Proposed Project Location

Orientation map 1: General location



Map of proposed site and relevant area(s)



Cadastral details of the proposed site

Property details:

No	Farm Name	Farm/ Erf No	Portion	Latitude	Longitude	Property Type
1	MELKBOSCH STRAND	2302	0	33°41'58.19S	18°26'28.49E	Erven
2	MELKBOSCH STRAND	2312	0	33°41'59.76S	18°26'28.87E	Erven
3	MELKBOSCH STRAND	1084	0	33°42'11.04S	18°26'31.03E	Public Place

Development footprint¹ vertices:

No development footprint(s) specified.

Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area

No	EIA Reference No	Classification	Status of application	Distance from proposed area (km)
1	12/12/20/2109	Solar PV	Approved	24.3

¹ "development footprint", means the area within the site on which the development will take place and includes all ancillary developments for example roads, power lines, boundary walls, paving etc. which require vegetation clearance or which will be disturbed and for which the application has been submitted.

Environmental Management Frameworks relevant to the application

No intersections with EMF areas found.

Environmental screening results and assessment outcomes

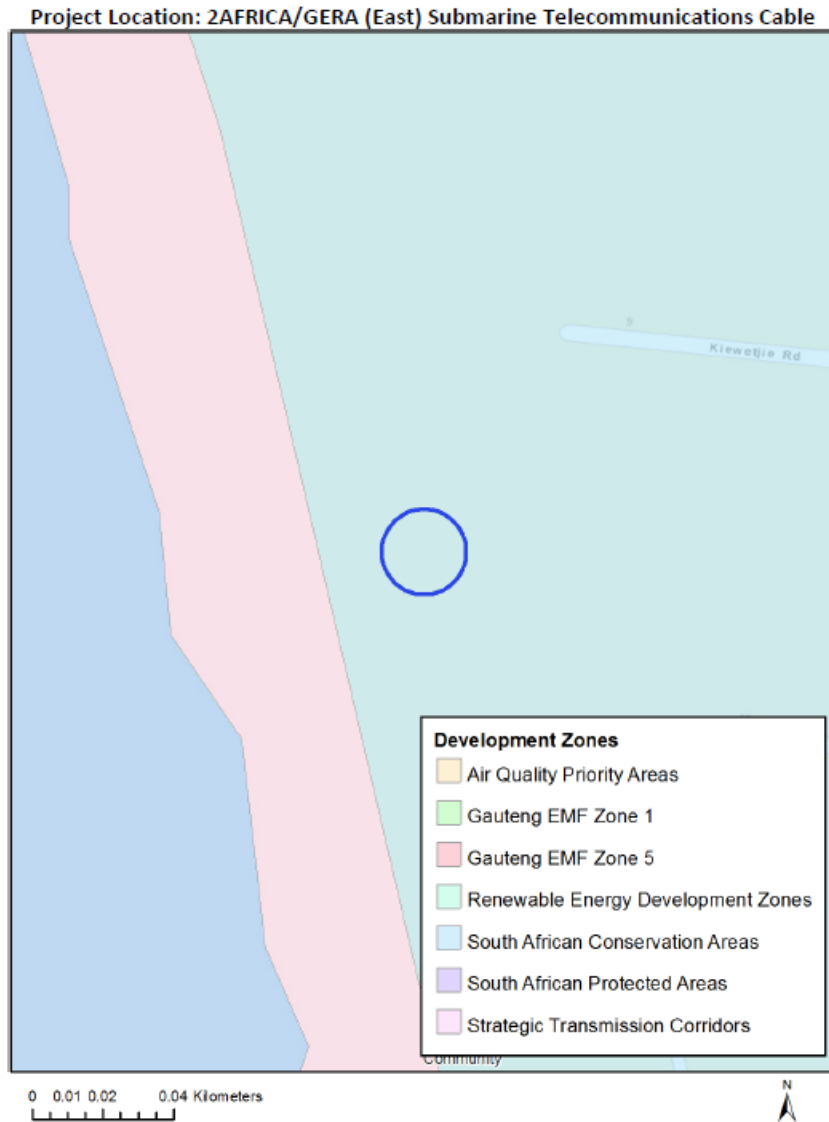
The following sections contain a summary of any development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmental sensitive features on the site based on the site sensitivity screening results for the application classification that was selected. The application classification selected for this report is: Utilities Infrastructure | Marine Cables | Marine Cables.

Relevant development incentives, restrictions, exclusions or prohibitions

The following development incentives, restrictions, exclusions or prohibitions and their implications that apply to this site are indicated below.

Incentive, restriction or prohibition	Implication
Strategic Transmission Corridor-Central corridor	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/GN_113_16_February_2018.pdf
South African Conservation Areas	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/SACAD_OR_2020_Q3_Metadata.pdf

Map indicating proposed development footprint within applicable development incentive, restriction, exclusion or prohibition zones



Proposed Development Area Environmental Sensitivity

The following summary of the development site environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Animal Species Theme			X	
Aquatic Biodiversity Theme				X

Page 6 of 15

Disclaimer applies
07/01/2021

Archaeological and Cultural Heritage Theme		X		
Civil Aviation Theme		X		
Defence Theme			X	
Paleontology Theme	X			
Plant Species Theme				X
Terrestrial Biodiversity Theme	X			

Specialist assessments identified

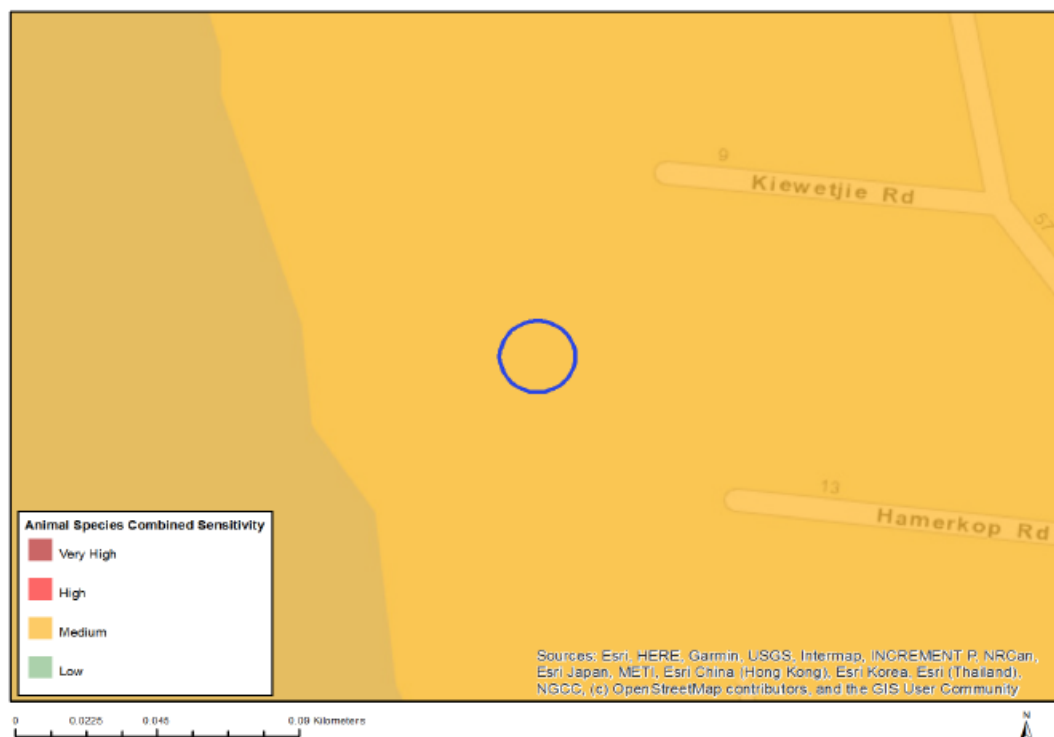
Based on the selected classification, and the environmental sensitivities of the proposed development footprint, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.

N o	Specialist assessment	Assessment Protocol
1	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted Aquatic Biodiversity Assessment Protocols.pdf
2	Marine Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted General Requirement Assessment Protocols.pdf
3	Defence Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted Defence Installations Assessment Protocols.pdf
4	Geotechnical Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted General Requirement Assessment Protocols.pdf

Results of the environmental sensitivity of the proposed area.

The following section represents the results of the screening for environmental sensitivity of the proposed site for relevant environmental themes associated with the project classification. It is the duty of the EAP to ensure that the environmental themes provided by the screening tool are comprehensive and complete for the project. Refer to the disclaimer.

MAP OF RELATIVE ANIMAL SPECIES THEME SENSITIVITY

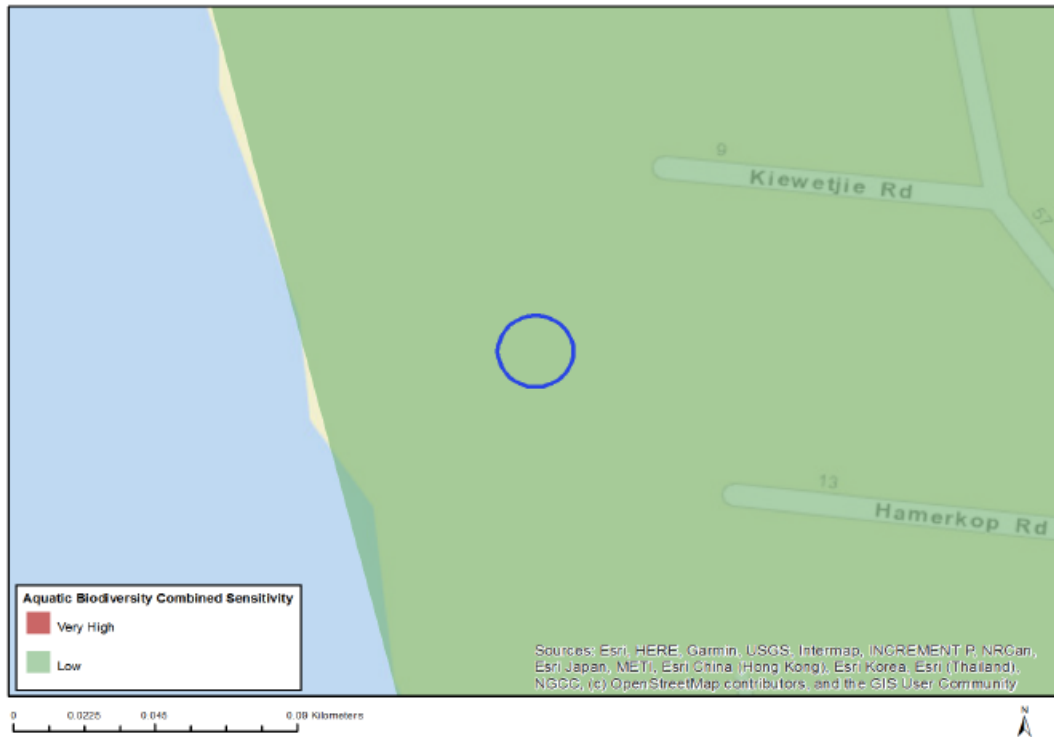


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Invertebrate-Pachysoma aesculapius
Medium	Invertebrate-Bullacris obliqua

MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY

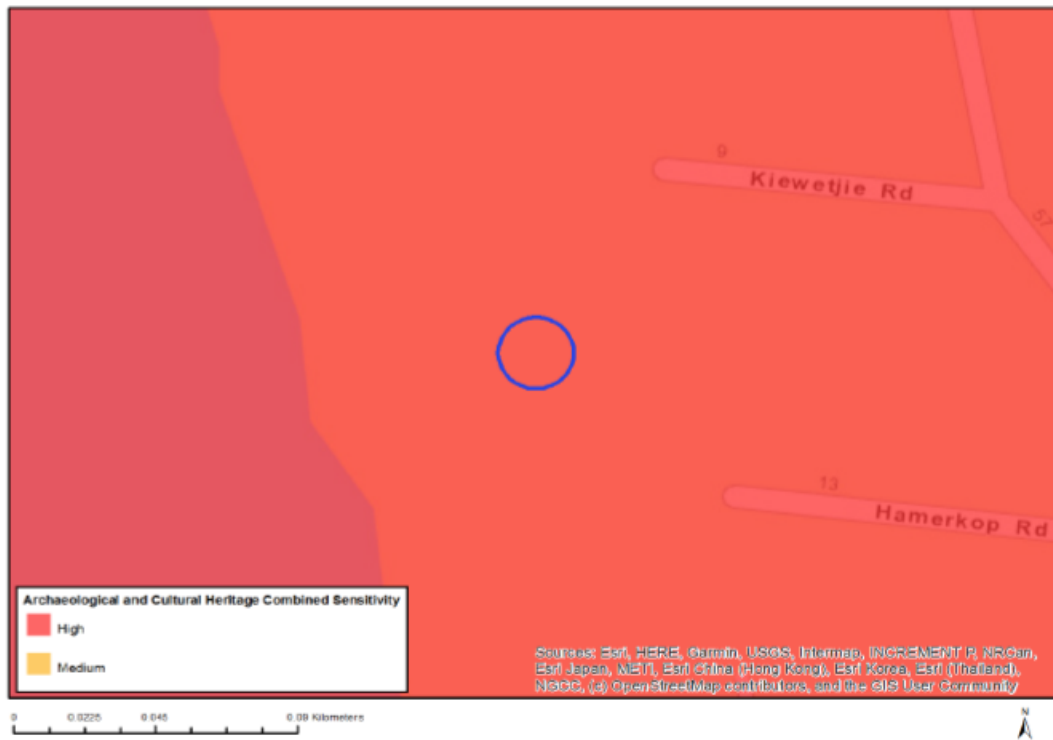


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low sensitivity

MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY

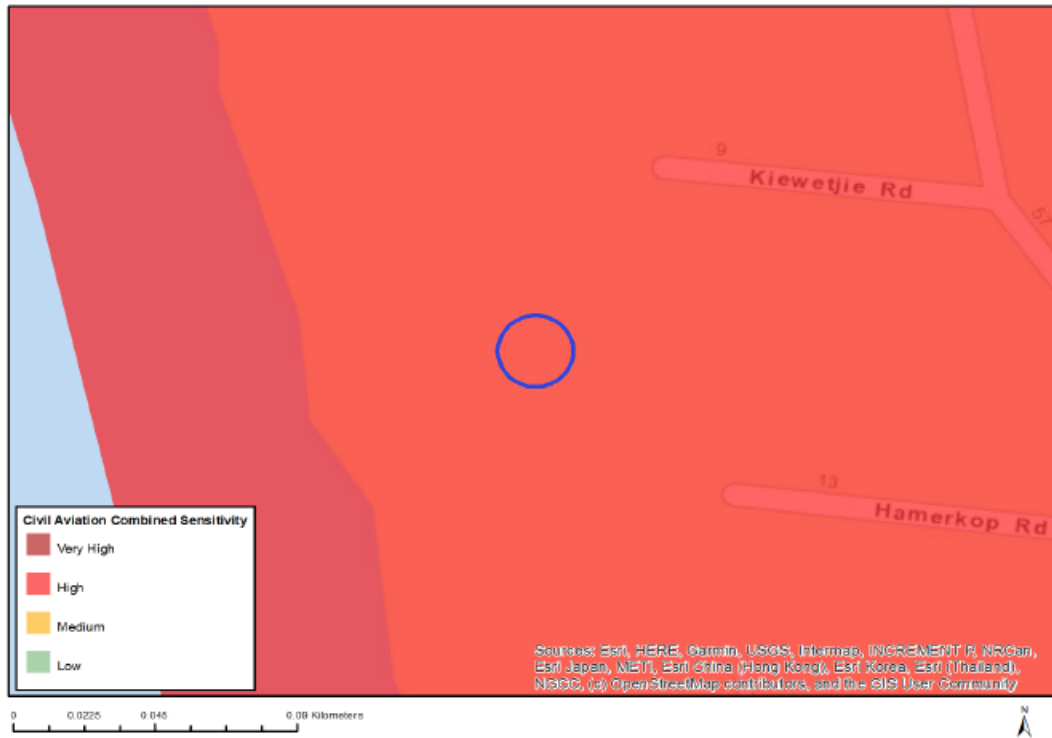


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Within coastal belt
High	Within 1 km of a protected area

MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY

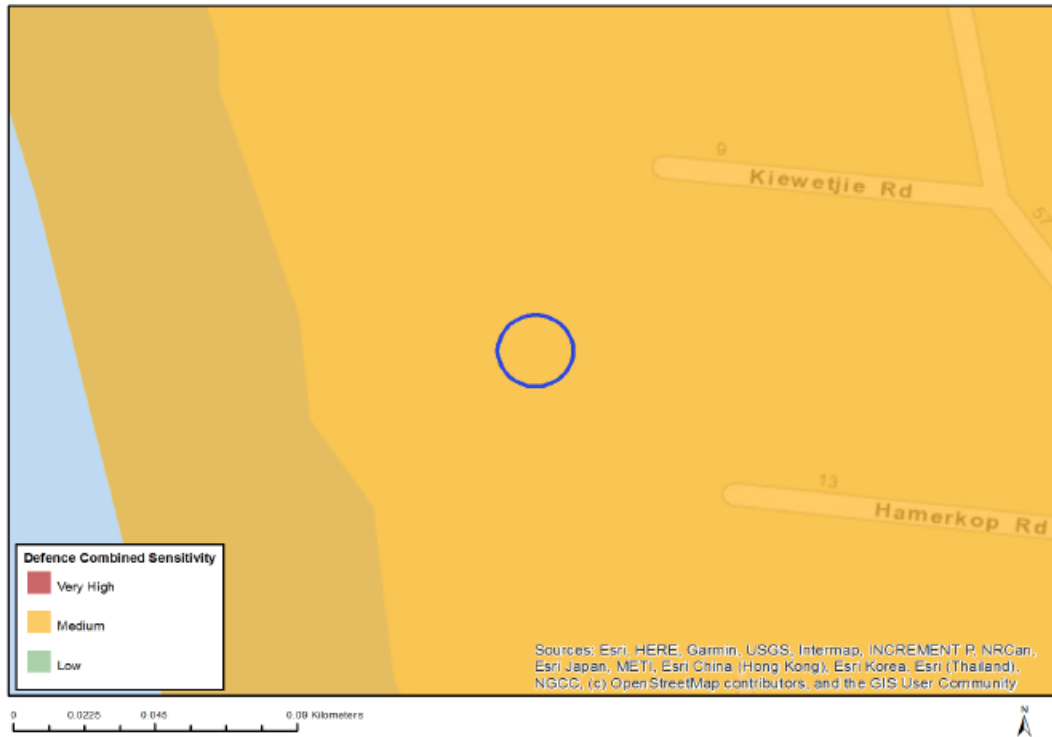


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Within 8 km of other civil aviation aerodrome
High	Dangerous and restricted airspace as demarcated
Medium	Between 15 and 35 km from a civil aviation radar
Medium	Between 15 and 35 km from a major civil aviation aerodrome

MAP OF RELATIVE DEFENCE THEME SENSITIVITY

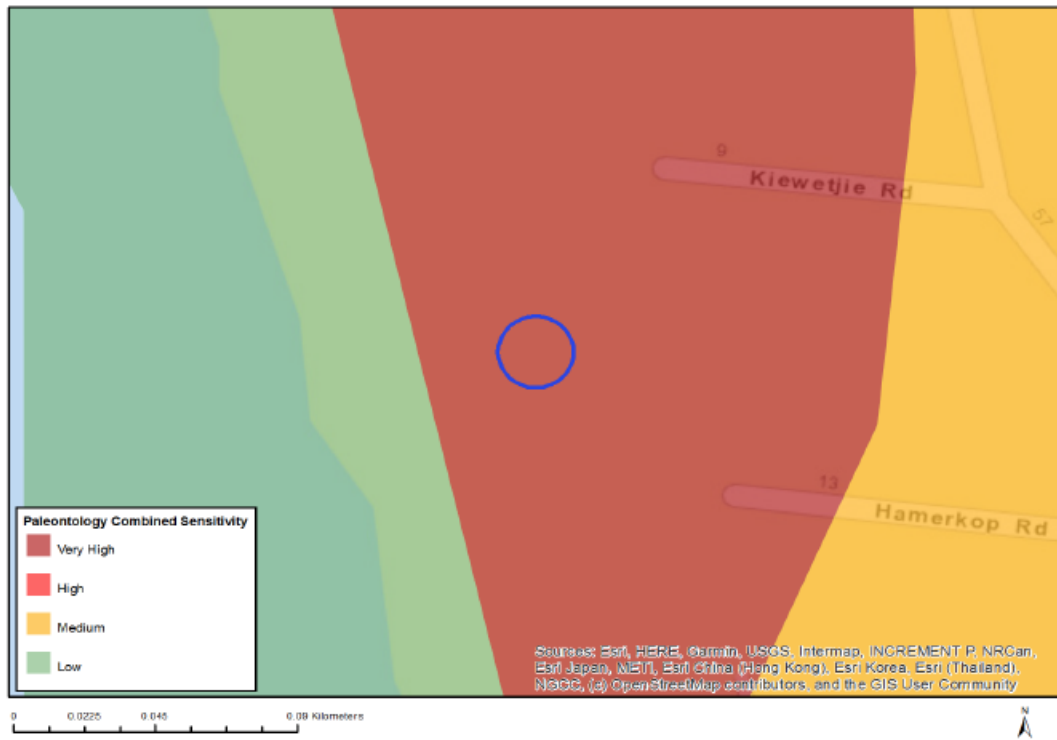


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Defence Site

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY

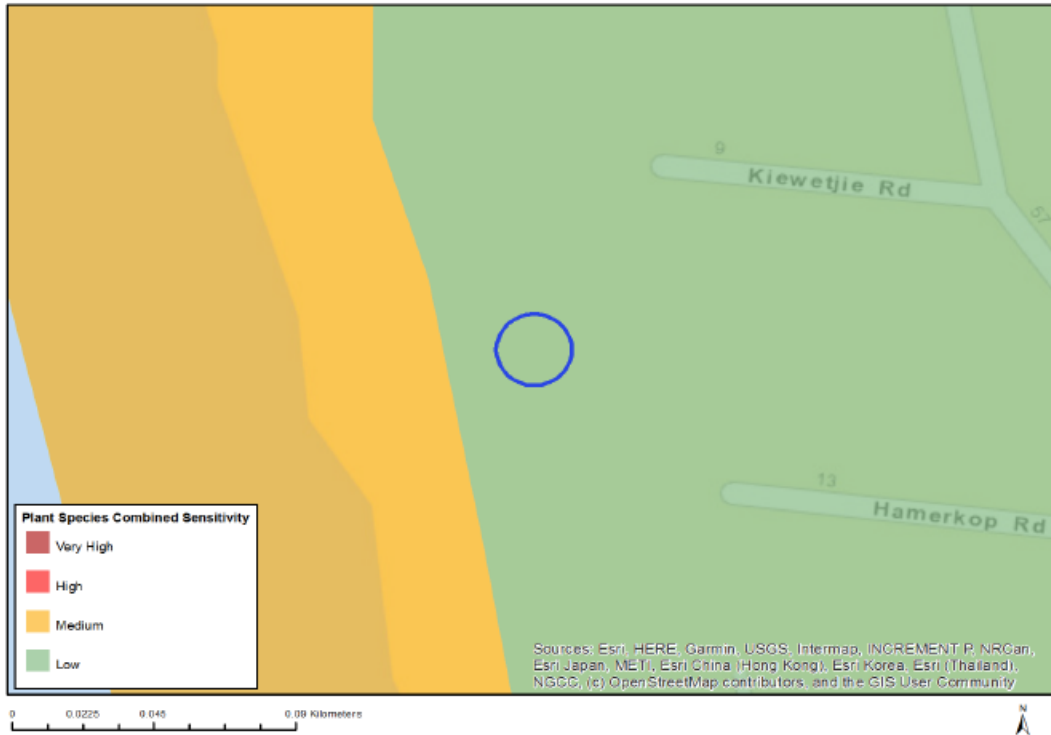


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Very High	Features with a Very High paleontological sensitivity

MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY

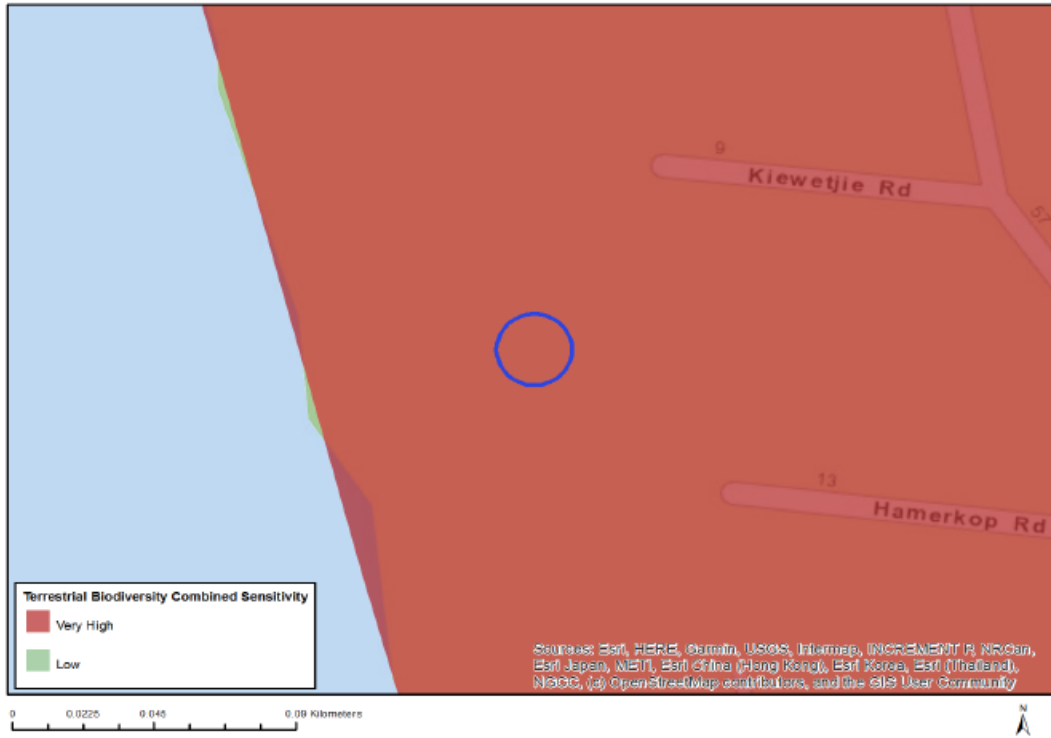


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Very High	Endangered ecosystem

2. BMH to offshore waters (within South African Waters) Screening Tool

**SCREENING REPORT FOR AN ENVIRONMENTAL AUTHORIZATION OR
FOR A PART TWO AMENDMENT OF AN ENVIRONMENTAL AUTHORISATION
AS REQUIRED BY THE 2014 EIA REGULATIONS – PROPOSED SITE
ENVIRONMENTAL SENSITIVITY**

EIA Reference number: N/A

Project name: 2AFRICA/GERA (East) Submarine Telecommunications Cable

Project title: Proposed 2AFRICA/GERA (East) Submarine Telecommunications Cable to be landed at Duynefontein, South Africa - Part 1 cable within SA territorial waters

Date screening report generated: 07/01/2021 12:10:01

Applicant: Mobile Telephone Network - MTN (Pty) Ltd

Compiler: ACER (Africa) Environmental Consultants

Compiler signature:



Table of Contents

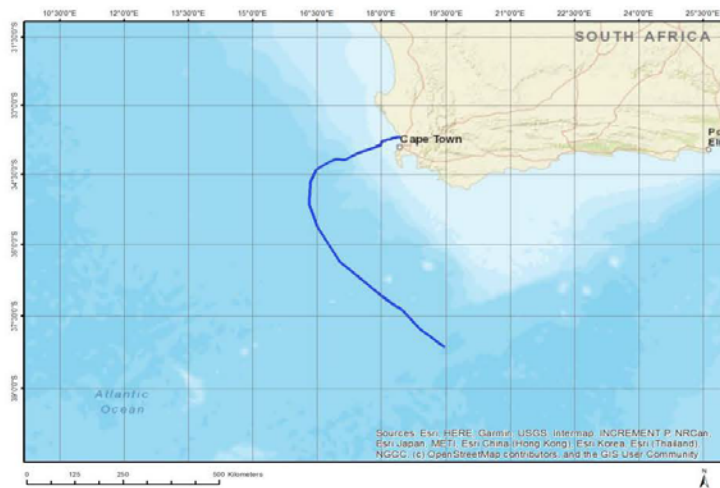
Proposed Project Location	3
Orientation map 1: General location	3
Map of proposed site and relevant area(s).....	4
Cadastral details of the proposed site	4
Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area.....	4
Environmental Management Frameworks relevant to the application	5
Environmental screening results and assessment outcomes	5
Relevant development incentives, restrictions, exclusions or prohibitions.....	5
Map indicating proposed development footprint within applicable development incentive, restriction, exclusion or prohibition zones.....	6
Proposed Development Area Environmental Sensitivity.....	6
Specialist assessments identified.....	7
Results of the environmental sensitivity of the proposed area.	8
MAP OF RELATIVE ANIMAL SPECIES THEME SENSITIVITY.....	8
MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY	9
MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY	10
MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY	11
MAP OF RELATIVE DEFENCE THEME SENSITIVITY.....	12
MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY	13
MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY	14
MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY	15

Proposed Project Location

Orientation map 1: General location



Map of proposed site and relevant area(s)



Cadastral details of the proposed site

Property details:

No	Farm Name	Farm/ Erf No	Portion	Latitude	Longitude	Property Type
1	MELKBOSCH STRAND	2302	0	33°41'58.19S	18°26'28.49E	Erven
2	MELKBOSCH STRAND	2312	0	33°41'59.76S	18°26'28.87E	Erven
3	MELKBOSCH STRAND	1084	0	33°42'11.04S	18°26'31.03E	Public Place

Development footprint¹ vertices:
No development footprint(s) specified.

Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area

No	EIA Reference No	Classification	Status of application	Distance from proposed area (km)
1	12/12/20/2109	Solar PV	Approved	24.3

¹ "development footprint", means the area within the site on which the development will take place and includes all ancillary developments for example roads, power lines, boundary walls, paving etc. which require vegetation clearance or which will be disturbed and for which the application has been submitted.

Environmental Management Frameworks relevant to the application

No intersections with EMF areas found.

Environmental screening results and assessment outcomes

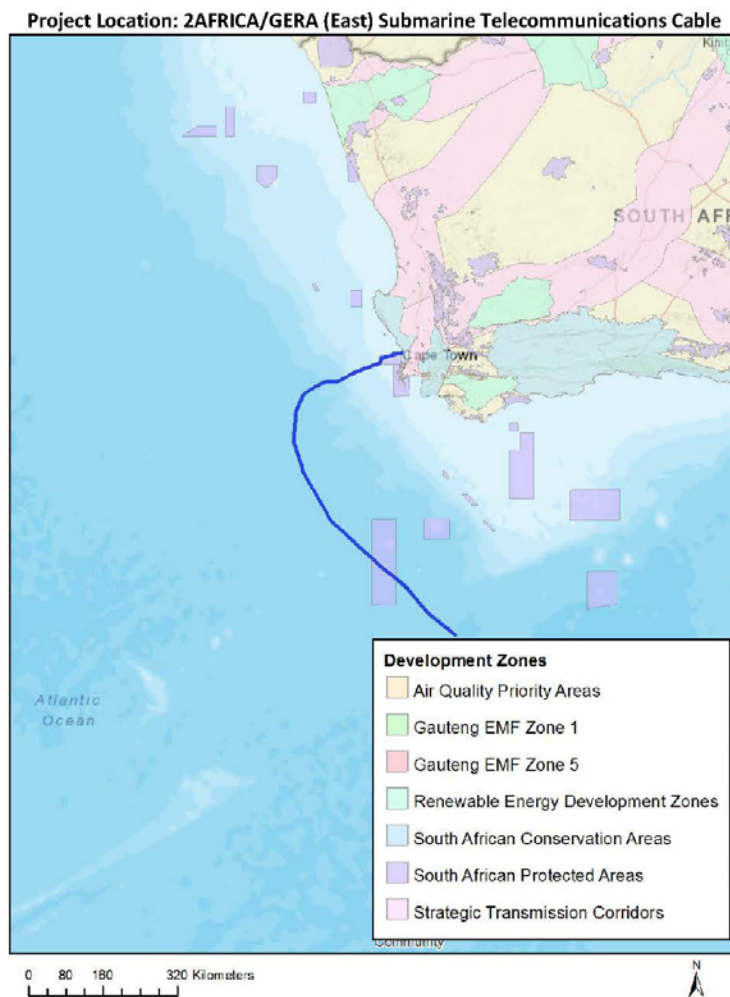
The following sections contain a summary of any development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmental sensitive features on the site based on the site sensitivity screening results for the application classification that was selected. The application classification selected for this report is: Utilities Infrastructure|Marine Cables|Marine Cables.

Relevant development incentives, restrictions, exclusions or prohibitions

The following development incentives, restrictions, exclusions or prohibitions and their implications that apply to this site are indicated below.

Incentive, restriction or prohibition	Implication
Strategic Transmission Corridor-Central corridor	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/GN11316February2018.pdf
South African Protected Areas	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/SAPADOR2020Q3Metadata.pdf
South African Conservation Areas	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/SACADOR2020Q3Metadata.pdf

Map indicating proposed development footprint within applicable development incentive, restriction, exclusion or prohibition zones



Proposed Development Area Environmental Sensitivity

The following summary of the development site environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Animal Species Theme			X	
Aquatic Biodiversity Theme				X

Page 6 of 16

[Disclaimer applies](#)

07/01/2021

Archaeological and Cultural Heritage Theme		X		
Civil Aviation Theme		X		
Defence Theme			X	
Paleontology Theme	X			
Plant Species Theme			X	
Terrestrial Biodiversity Theme	X			

Specialist assessments identified

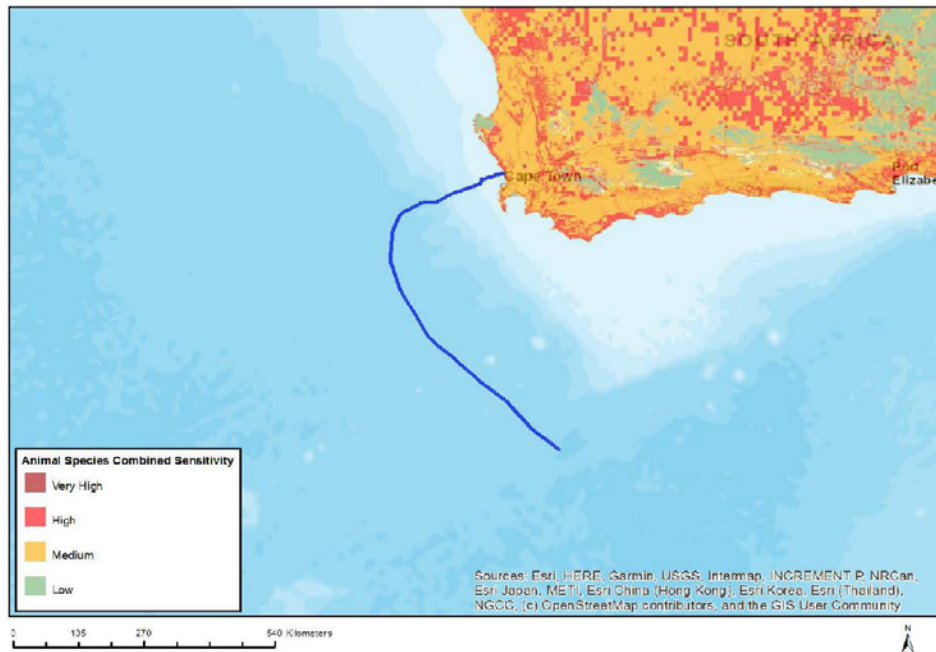
Based on the selected classification, and the environmental sensitivities of the proposed development footprint, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.

N o	Specialist assessment	Assessment Protocol
1	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted Aquatic Biodiversity Assessment Protocols.pdf
2	Marine Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted General Requirement Assessment Protocols.pdf
3	Defence Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted Defence Installations Assessment Protocols.pdf
4	Geotechnical Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted General Requirement Assessment Protocols.pdf

Results of the environmental sensitivity of the proposed area.

The following section represents the results of the screening for environmental sensitivity of the proposed site for relevant environmental themes associated with the project classification. It is the duty of the EAP to ensure that the environmental themes provided by the screening tool are comprehensive and complete for the project. Refer to the disclaimer.

MAP OF RELATIVE ANIMAL SPECIES THEME SENSITIVITY

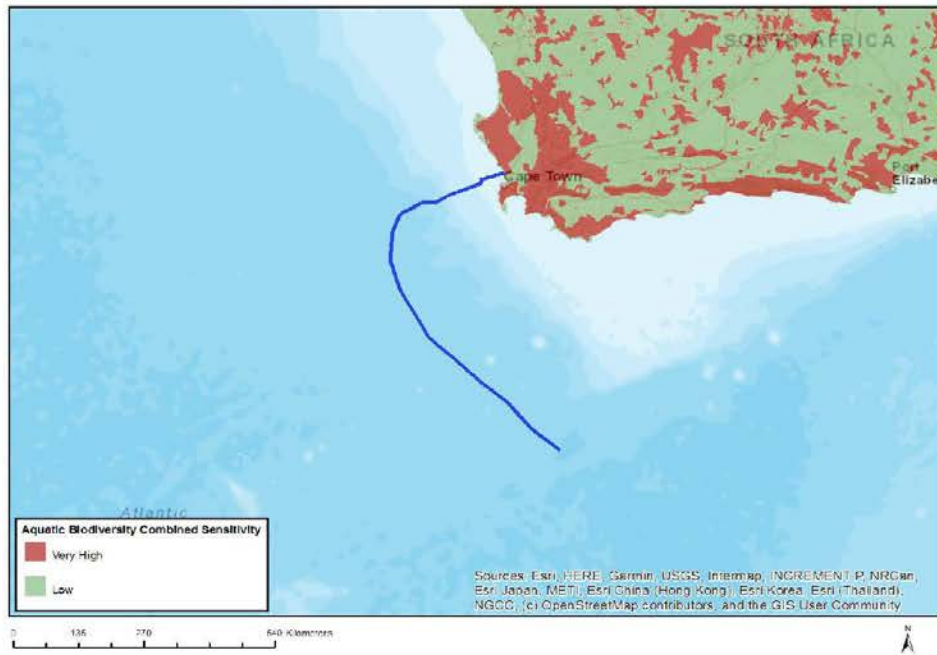


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Invertebrate-Pachysoma aesculapius
Medium	Invertebrate-Bullacris obliqua

MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY

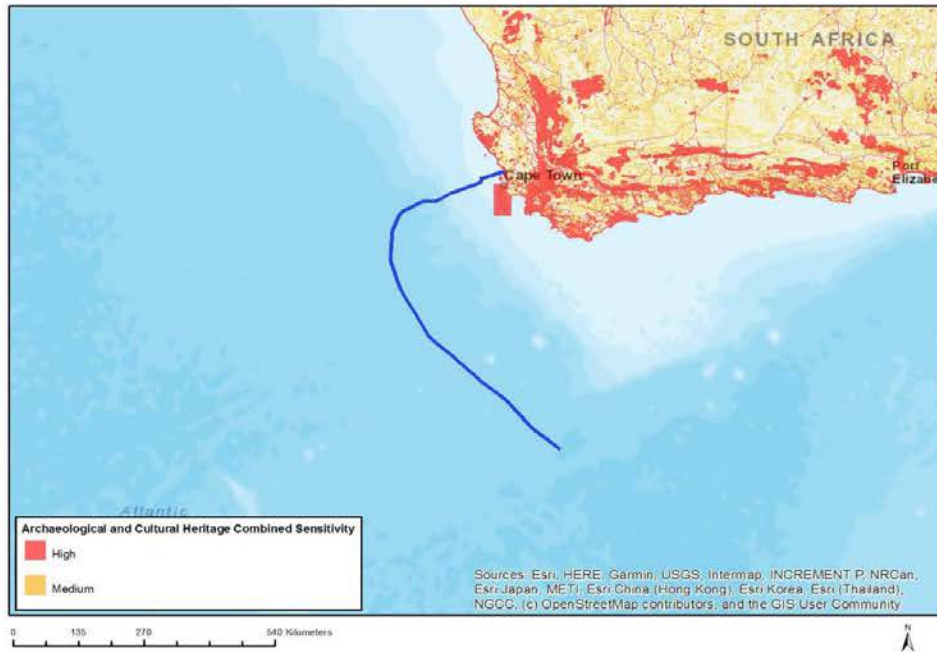


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low sensitivity

MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY

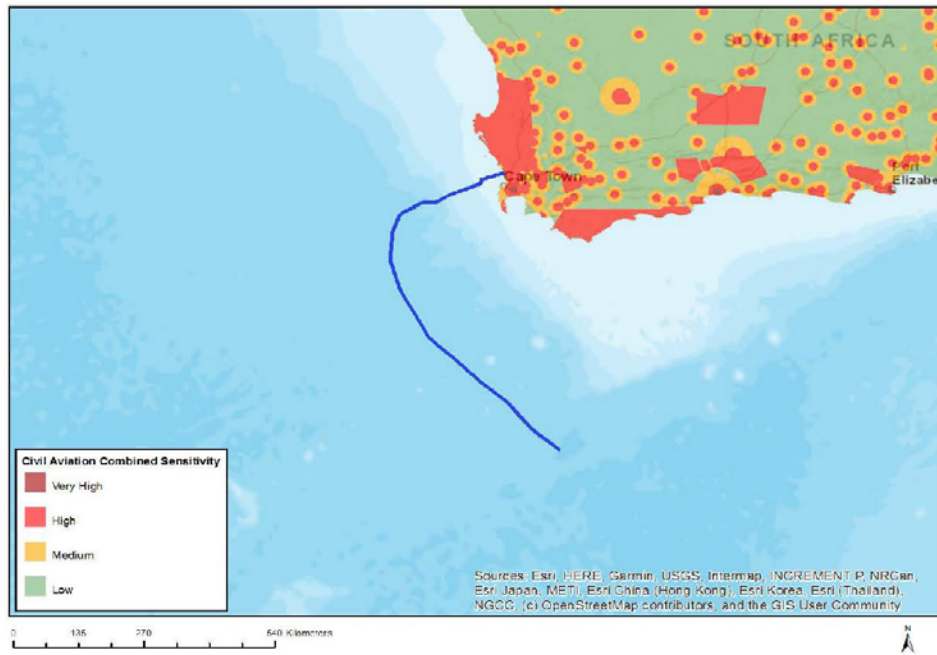


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Within coastal belt
High	Within 1 km of a protected area

MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY

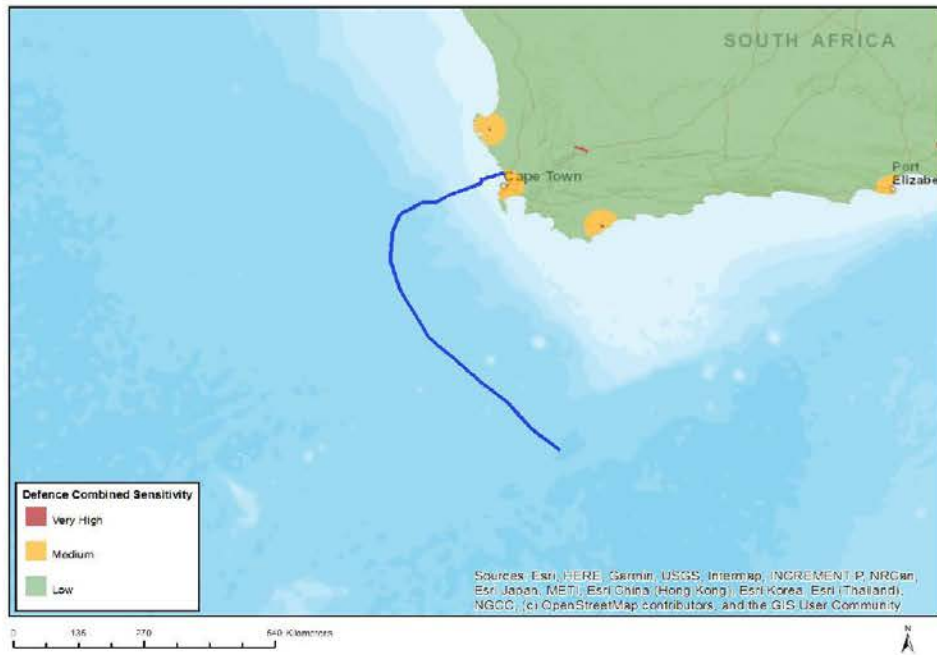


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Within 8 km of other civil aviation aerodrome
High	Dangerous and restricted airspace as demarcated
Medium	Between 15 and 35 km from a civil aviation radar
Medium	Between 15 and 35 km from a major civil aviation aerodrome

MAP OF RELATIVE DEFENCE THEME SENSITIVITY

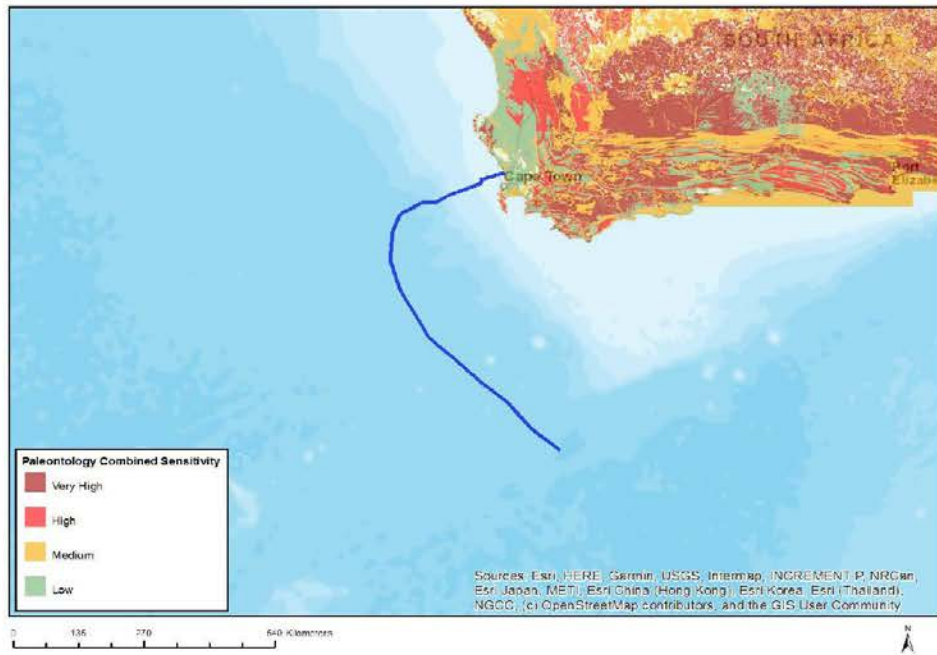


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Defence Site

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY

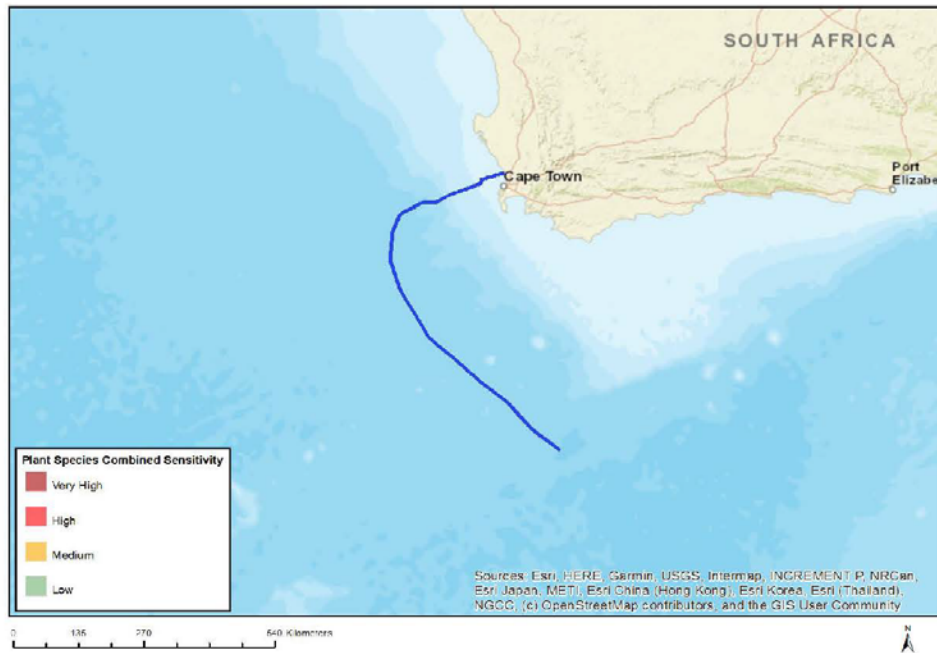


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Low	Features with a Low paleontological sensitivity
Very High	Features with a Very High paleontological sensitivity

MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY



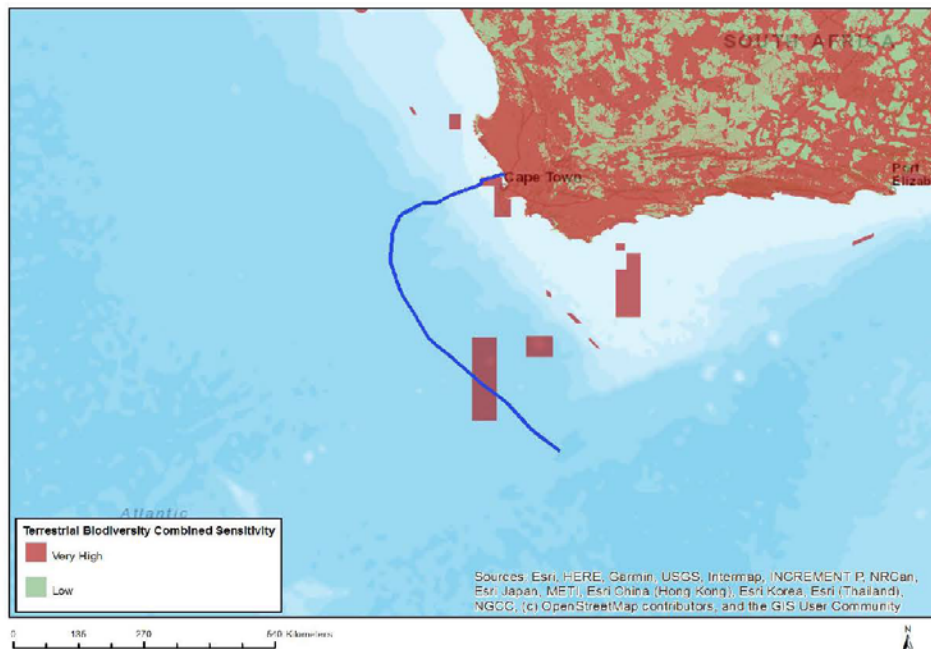
Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity
Medium	Lampranthus stenus
Medium	Lampranthus tenuifolius
Medium	Cleretum clavatum
Medium	Ruschia geminiflora
Medium	Lessertia argentea
Medium	Psoralea glauca
Medium	Indigofera platypoda
Medium	Indigofera psoraloides
Medium	Lebeckia plukenetiana
Medium	Podalyria sericea
Medium	Thesium litoreum
Medium	Leucospermum hypophyllocarpodendron subsp. canaliculatum
Medium	Leucospermum hypophyllocarpodendron subsp. hypophyllocarpodendron
Medium	Manulea corymbosa
Medium	Sensitive species 878
Medium	Sensitive species 816
Medium	Hermannia procumbens subsp. procumbens
Medium	Galenia crystallina var. maritima
Medium	Isolepis venustula
Medium	Cannomois arenicola
Medium	Elegia prominens

Medium	Cynanchum zeyheri
Medium	Sensitive species 985
Medium	Gnidia spicata
Medium	Metalasia capitata
Medium	Steirodiscus tagetes
Medium	Cotula duckittiae
Medium	Cotula eckloniana
Medium	Oncosiphon africanum
Medium	Agathosma corymbosa
Medium	Agathosma glabrata
Medium	Cliffortia ericifolia
Medium	Cliffortia hirta
Medium	Cliffortia longifolia
Medium	Limonium purpuratum
Medium	Muraltia macropetala
Medium	Muraltia mitior
Medium	Sensitive species 158
Medium	Phylica plumosa var. squarrosa
Medium	Argyrobium velutinum
Medium	Xiphotheca reflexa
Medium	Sensitive species 599
Medium	Sensitive species 654
Medium	Lachnaea grandiflora
Medium	Cotula pusilla
Medium	Caesia sabulosa

MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity
Very High	Endangered ecosystem
Very High	South African Protected Areas

3. Offshore to Mozambique Screening Report

SCREENING REPORT FOR AN ENVIRONMENTAL AUTHORIZATION OR FOR A PART TWO AMENDMENT OF AN ENVIRONMENTAL AUTHORISATION AS REQUIRED BY THE 2014 EIA REGULATIONS – PROPOSED SITE ENVIRONMENTAL SENSITIVITY

EIA Reference number: N/A

Project name: 2AFRICA/GERA (East) Submarine Telecommunications Cable

Project title: Proposed 2AFRICA/GERA (East) Submarine Telecommunications Cable to be landed at Duynfontein, South Africa - Part 2 cable within SA territorial waters

Date screening report generated: 07/01/2021 12:36:27

Applicant: Mobile Telephone Network - MTN (Pty) Ltd

Compiler: ACER (Africa) Environmental Consultants

Compiler signature:



Table of Contents

Proposed Project Location	3
Orientation map 1: General location	3
Map of proposed site and relevant area(s)	4
Cadastral details of the proposed site	4
Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area	4
Environmental Management Frameworks relevant to the application	4
Environmental screening results and assessment outcomes	4
Relevant development incentives, restrictions, exclusions or prohibitions	5
Map indicating proposed development footprint within applicable development incentive, restriction, exclusion or prohibition zones	5
Proposed Development Area Environmental Sensitivity	6
Specialist assessments identified	6
Results of the environmental sensitivity of the proposed area	7
MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY	7

Proposed Project Location

Orientation map 1: General location

General Orientation: 2AFRICA/GERA (East) Submarine Telecommunications Cable



Map of proposed site and relevant area(s)



Cadastral details of the proposed site

Property details:

No intersection with any properties found.

Development footprint¹ vertices:

No development footprint(s) specified.

Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area

No nearby wind or solar developments found.

Environmental Management Frameworks relevant to the application

No intersections with EMF areas found.

Environmental screening results and assessment outcomes

The following sections contain a summary of any development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmental

¹ "development footprint", means the area within the site on which the development will take place and includes all ancillary developments for example roads, power lines, boundary walls, paving etc. which require vegetation clearance or which will be disturbed and for which the application has been submitted.

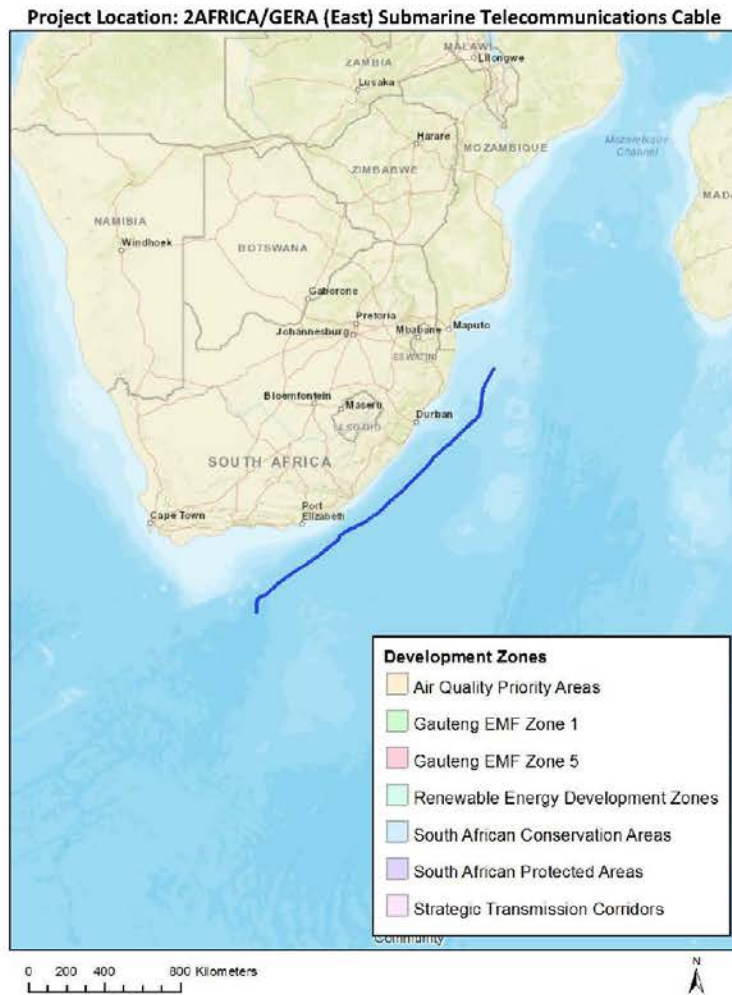
sensitive features on the site based on the site sensitivity screening results for the application classification that was selected. The application classification selected for this report is: Utilities Infrastructure | Marine Cables | Marine Cables.

Relevant development incentives, restrictions, exclusions or prohibitions

The following development incentives, restrictions, exclusions or prohibitions and their implications that apply to this site are indicated below.

No intersection with any development zones found.

Map indicating proposed development footprint within applicable development incentive, restriction, exclusion or prohibition zones



Proposed Development Area Environmental Sensitivity

The following summary of the development site environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Paleontology Theme			X	

Specialist assessments identified

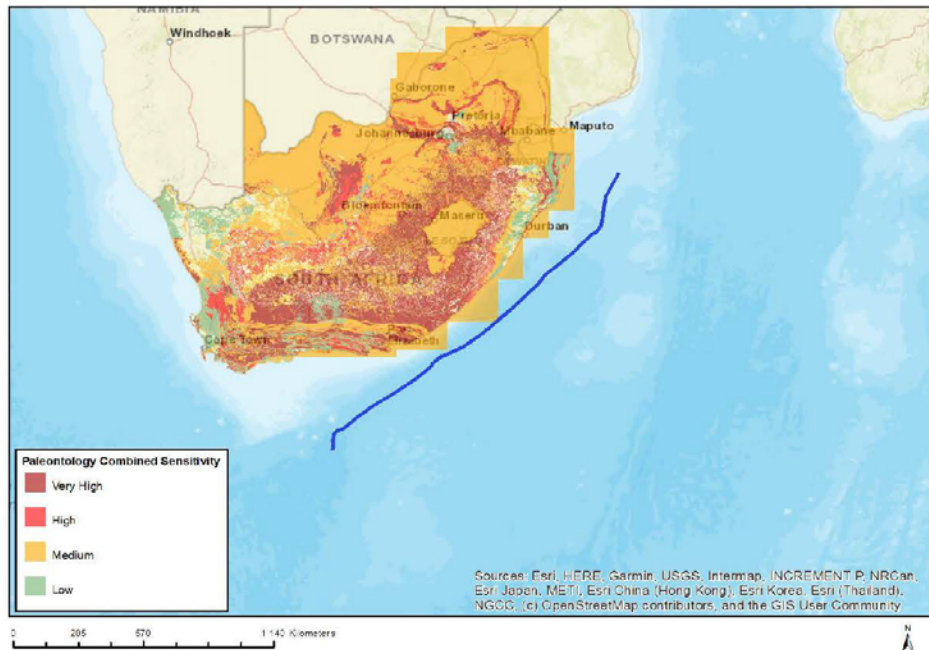
Based on the selected classification, and the environmental sensitivities of the proposed development footprint, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.

No	Specialist assessment	Assessment Protocol
1	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted Aquatic Biodiversity Assessment Protocols.pdf
2	Marine Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted General Requirement Assessment Protocols.pdf
3	Defence Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted Defence Installations Assessment Protocols.pdf
4	Geotechnical Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted General Requirement Assessment Protocols.pdf

Results of the environmental sensitivity of the proposed area.

The following section represents the results of the screening for environmental sensitivity of the proposed site for relevant environmental themes associated with the project classification. It is the duty of the EAP to ensure that the environmental themes provided by the screening tool are comprehensive and complete for the project. Refer to the disclaimer.

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Features with a Medium paleontological sensitivity

**APPENDIX 12
UNDERTAKING UNDER OATH/ AFFIRMATION**

Refer to Declaration of the EAP Section 3 (Appendix 10).