

## **APPENDIX E            DEA PRE-APPLICATION MEETING RECORDS**

- E1.            Presentation
  - A presentation outlining the proposed project was made at the pre-application meeting
  
- E2.            Minutes of Pre-Application Meeting
  - Minutes of the Pre-Application meeting were recorded and approved by officials from the Department of Environmental Affairs
  
- E3.            Pre-Application Meeting Attendance Register

**APPENDIX E1      PRESENTATION**



# METISS Submarine Cable System

Presented to: Department of Environmental Affairs

Presented by: Henry Camp

27 November 2018

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- Project Overview
- Environmental Impact Assessment Process
- Questions and Discussion

# Introduction

- METISS Consortium proposes to install a subsea cable (known as METISS) from Mauritius to South Africa via Réunion Island and Madagascar.
- Alcatel Submarine Networks (ASN) and Elettra have been appointed to install and commission the METISS Subsea Cable System. ASN are responsible for supporting the permitting process in South Africa and Elettra are responsible for the marine survey and installation.
- In South Africa, Liquid Telecom is appointed as the landing party and will be responsible for connecting the cable from the BMH to the backhaul network.
- The METISS Subsea Cable System is provisionally scheduled to be landed in the first quarter and completed by the end of the third quarter of 2020.
- ERM has been appointed as the Independent Environmental Assessment Practitioner.



# Project Area of Influence

Project Area of Influence (Aoi) includes:

- Republic of South African Economic Zone;
- Territorial Waters;
- Pipeline Beach – Amanzimtoti (Landing site, Terrestrial Fibre Optic cable and Beach Manhole); and
- Cable Landing Location (Amanzimtoti).

Competent Authority in this instance is the National DEA

- ‘Section 24(C) of the Act defines the competent decision-making authority which is normally the provincial environmental department. However, in cases where the project footprint transverses international boundaries, the National DEA becomes the competent authority’

# Meeting Objectives

- To provide an overview of the Project i.e., the proposed installation of the METISS Submarine Cable System, near the Pipeline Beach in Amanzimtoti, KwaZulu-Natal.
- To confirm the approach to the Environmental Impact Assessment.
- To confirm potential specialist studies required.



# Project Overview

METISS Submarine Cable System

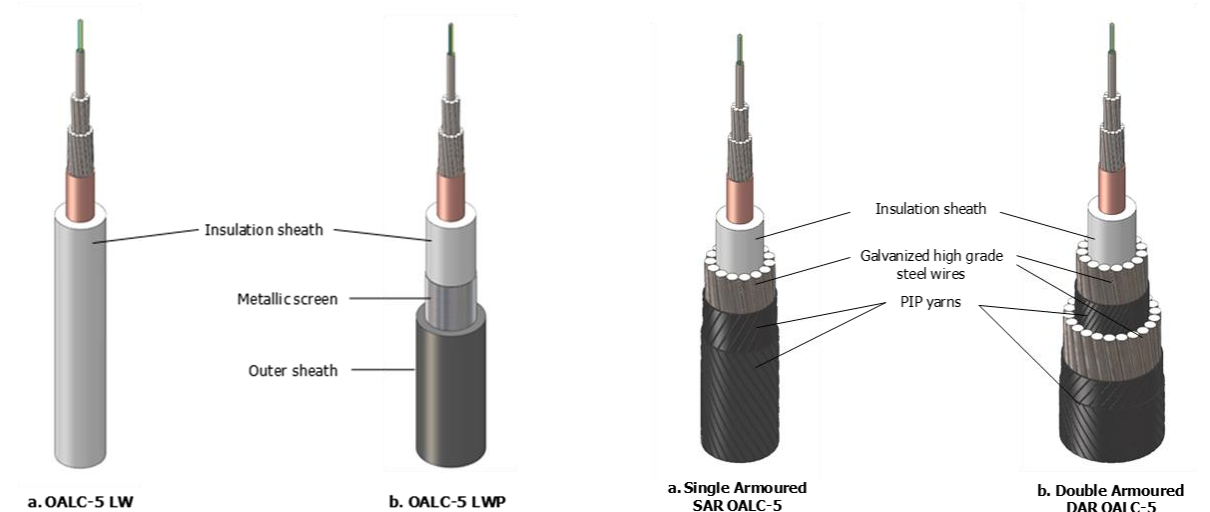
# Project Background and Motivation

- The Project involves the installation and operation of the METISS fibre optic subsea cable system.
- The system includes a 14 to 35 mm diameter subsea cable that will enter the South African Exclusive Economic Zone (approximately 506 km), through to the Territorial waters (approximately 33 km).
- The proposed landing site in South Africa is located in Amanzimtoti, KwaZulu-Natal.
- The Project will enable improved communication capacity and internet services to South African users as well as providing cross-connect opportunities from/to other networks within SA and the region.

# Project Components

The Project components include:

- Marine Fibre Optic cable;
- Beach Manhole (4m x 2m x 2m);
- Terrestrial fibre optic cable (Amanzimtoti);
- Cable Landing Station (Amanzimtoti); and
- Terrestrial ducts and articulated pipe.





# Site Alternatives Considered

Three options were considered for the landing location onshore:

**Option 1:** Amanzimtoti Golf Course;


**Option 2:** Amanzimtoti Pipeline Beach (preferred); and

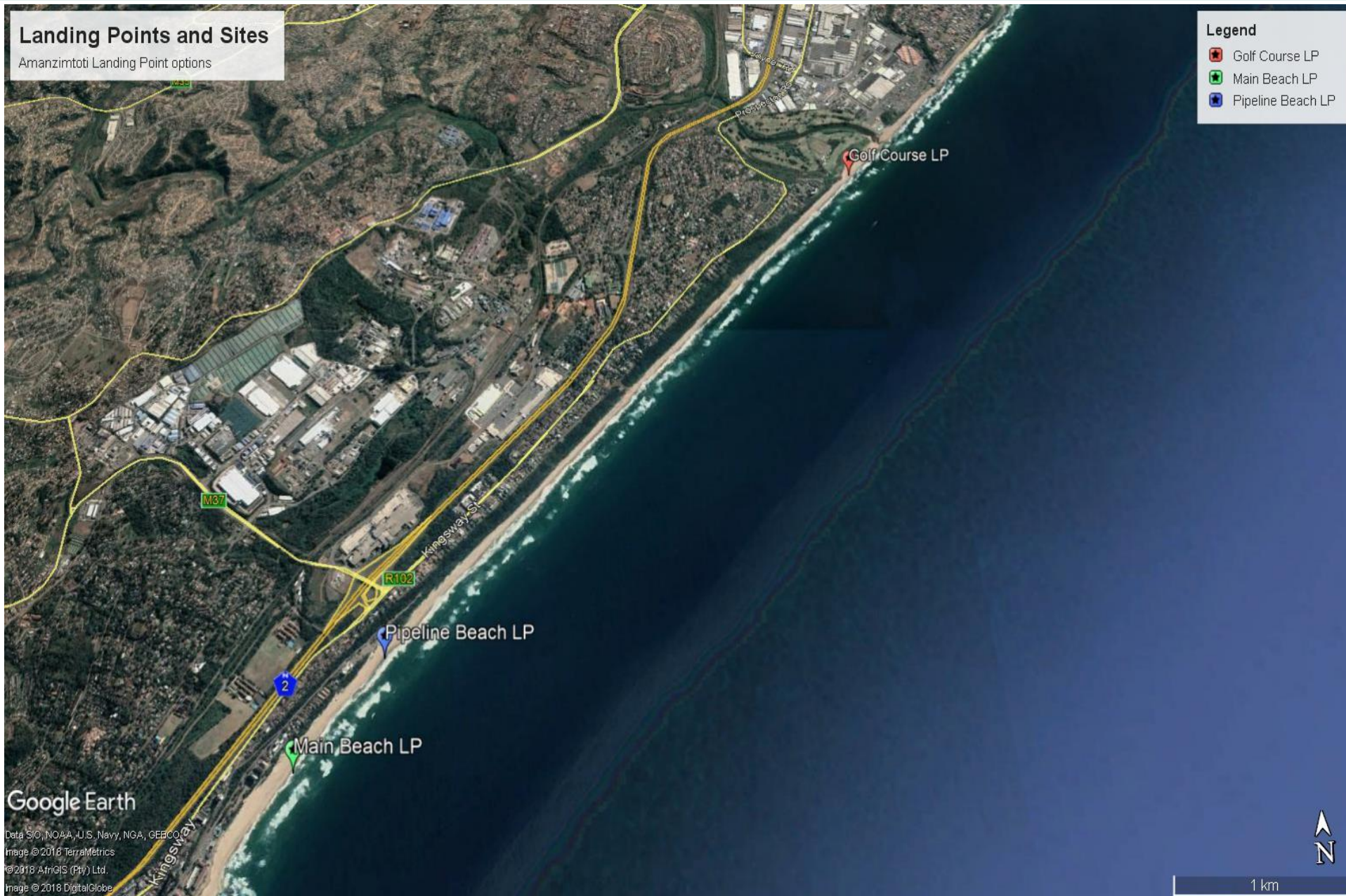
**Option 3:** Amanzimtoti Main Beach.

# Landing Points and Sites

Amanzimtoti Landing Point options

## Legend

-  Golf Course LP
-  Main Beach LP
-  Pipeline Beach LP



# Technical Alternatives Considered

Two options for installation of the cable at the beach are being considered:

- Horizontal Directional Drilling (HDD)

The development of the landing of a marine telecommunications cable near Amanzimtoti Pipeline Beach, entails horizontal directional drilling from Amanzimtoti Pipeline Beach.

- Trenching

The development of the landing of a marine telecommunications cable on Amanzimtoti Pipeline Beach, entails digging of a trench down the beach into the intertidal zone.

Selection of the preferred option will be made based on results of marine and terrestrial route survey

# Potential Impacts

- Dust and noise generation from construction activity during installation.
- Disturbance of the seabed and to marine ecology during cable installation.
- Potential to encounter marine heritage resources during installation.
- Disruption to fishing activities during installation and operation.
- Positive direct impact on employment (construction related); further indirect positive impacts during operation from access to improved connectivity.



# **Environmental Impact Assessment Process**

METISS Submarine Cable System

# Listed Activities

	<b>Trenching</b>	<b>Horizontal Directional Drilling</b>
GN R 327	Activity 15, 17 and 19A	Activity 15
GN R 325	Activity 14	Activity 6 and 14
GN R 324	Activity 12	

## Full Scoping and EIA Processes in terms of:

- National Environmental Management Act, 1998, (Act No. 107 of 1998), as amended (NEMA).
- EIA Regulations Listing Notice 1 (GNR R327), Notice 2 (GNR 325) and Notice 3 (GNR 324).



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# Public Participation Process during Scoping

Public Participation Process to be undertaken during Scoping Phase includes:

## **Disclosure of the Draft Scoping Report for comment for 30 days**

- Public notice in two newspapers;
- Notification at the site;
- Hardcopies placed at the Library and Municipal Office;
- Written notification to identified key stakeholders; and
- Placement of the draft Scoping Report on the Project website.

## **Direct engagements (meetings) with:**

- Local government authorities;
- Resident associations (if requested); and
- Fisheries representatives (if requested).

# Public Participation Process during EIA

Public Participation Process to be undertaken during EIA Phase includes:

## **Disclosure of the draft EIA report for comment for 30 days**

- Hardcopies placed at the Library and Municipal Office;
- Written notification to registered stakeholders; and
- Placement of the draft EIA Report on the project website.

# Specialist Studies

The EIA will be informed by specialist studies conducted by subject matter experts:

- Fisheries;
- Marine Heritage; and
- Marine Ecology.



Source: ERM



Source: Shutterstock



Source: ERM

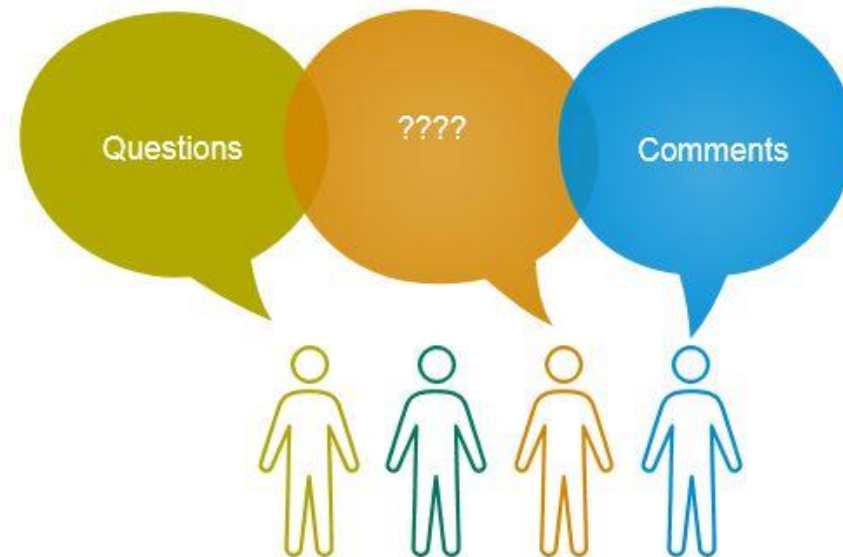
# Specialist Studies (2)

- Terrestrial Ecology (TBC)



# Questions and Discussion

- Overall EIA approach
- Specialist studies
- Public Participation Process
- Commenting authorities
- Other permitting requirements





# Contact

## **Liquid Telecom (Project Proponent)**

Mr Mervin Chetty

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## **ERM (EIA Consultant)**

Ms Vicky Stevens

- Tel: 021 681 5400
- Email: [metiss-subseacable-eia@erm.com](mailto:metiss-subseacable-eia@erm.com)
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# Additional Resources

For HDD

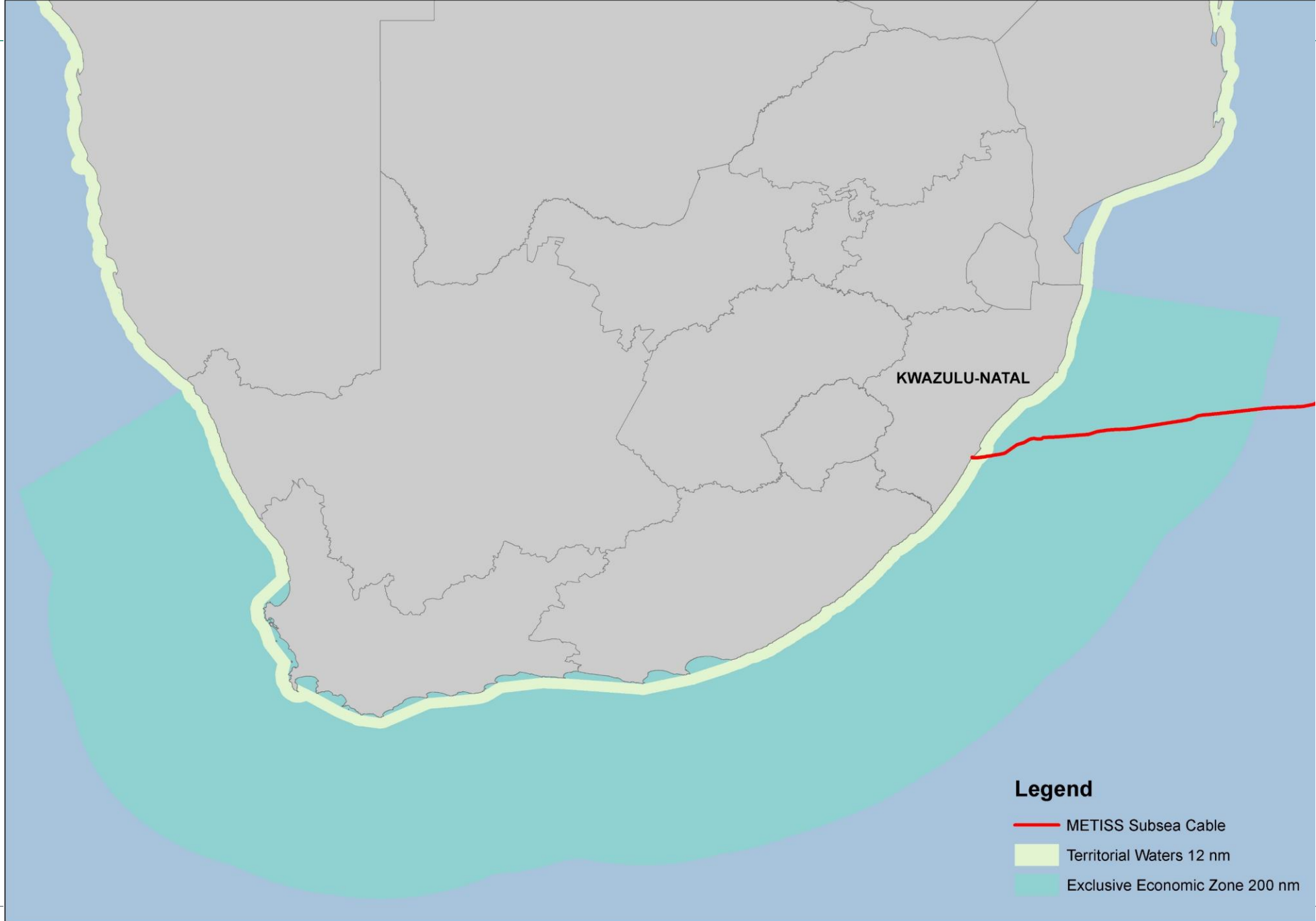
<https://www.youtube.com/watch?v=FQBVTlcl20c>

For general cable laying

<http://www.elettratl.c.it/video.php>

[https://www.youtube.com/watch?v=92flo47S5\\_8](https://www.youtube.com/watch?v=92flo47S5_8)

[https://youtu.be/Gsoo\\_BOwrrM](https://youtu.be/Gsoo_BOwrrM)



**APPENDIX E2      MINUTES OF PRE-APPLICATION MEETING**



<b>Subject/Ref</b>	Environmental Impact Assessment Pre-Application Meeting with respect to the METISS Subsea Cable System	
<b>Venue</b>	Environment House 473 Steve Biko Road Arcadia Pretoria	
<b>Date of Meeting</b>	27 November 2018	
<b>Present</b>	Thando Boo (TB)	DEA Integrated Environmental Authorisation Directorate: Case Officer
	Olivia Letlalo (OL)	DEA Integrated Environmental Authorisations Directorate
	Portia Makitla (PM)	DEA Biodiversity and Conservation Directorate
	Funanani Ditinti (FD)	DEA Ocean and Coast Directorate
	Dakalo Netshiombo (DN)	DEA Strategic Infrastructure Development Directorate
	Seoka Lekota (SL)	DEA Biodiversity and Conservation Directorate
	Thobekile Zungu (TZ)	DEA Biodiversity and Conservation Directorate
	Mmatlala Rabothata (MR)	DEA Integrated Environmental Authorisation Directorate
	Thea Graham (TG)	ASN, Permitting & Environment Manager
	Henry Camp (HC)	ERM, ESIA Study Director
	Angus Hay (AH)	Liquid Telecom, General Manager
	Reinett Mogotshi (RM)	ERM, Environmental Consultant
<b>Distribution</b>	As above	
<b>Date</b>	29 November 2018	

The following are the minutes of a meeting held with the South Africa Department of Environmental Affairs (DEA) with respect to the METISS Subsea Cable System, a proposed new telecommunication cable system. The meeting was held to present and discuss the proposed Project with the DEA prior to the submission of a formal application for Environmental Authorisation.

**Introductions**

- Ms Olivia Letlalo welcomed everyone and introductions were made by all attendees.
- The National Department of Environmental Affairs will be the Competent Authority in terms of the regulations.
- The Project owner is the METISS Consortium. The consortium proposes to install a subsea cable, known as MELting poT Indianoceanic Submarine System (METISS), from Mauritius to South Africa with connections to Réunion Island and Madagascar.
- Alcatel Submarine Networks (ASN) and Elettra have been contracted to install and commission the METISS Subsea Cable System. ASN is responsible for supporting the permitting process in South Africa and Elettra are responsible for the marine survey and installation.
- Liquid Telecom has been contracted as the Landing Party for South Africa. Liquid Telecom is responsible for connecting the cable from the Beach Manhole (BMH) to the backhaul network. Liquid Telecom has been delegated authority for obtaining Environmental Authorisation.
- Environmental Resource Management (ERM) has been contracted by ASN to act as the Independent Environmental Assessment Practitioner and conduct the EIA study.

**Meeting Objectives**

- To provide an overview of the Project
- To confirm the process for the Environmental Impact Assessment
- The presentation is included as an Annex to these minutes.

**Project Overview**

- ERM provided an overview of the development. The Project in terms of authorisation is the installation and operation of a subsea fibre optic cable system within the borders of South Africa. The system components comprise primarily the fibre optic cable.
- The cable will run along the seabed entering South Africa's Exclusive Economic Zone (about 506 km offshore) to a landing point near Amanzimtoti.
- The subsea cable will be buried into the seabed in water depths <1000m, to a target depth of 1.0m. At water depths >1000m, the subsea cable will be laid on the seabed surface.
- The cable will come onshore at the Pipeline Beach near Amanzimtoti and will be connected to a backhaul network from an existing facility, known as the Cable Landing Station (CLS).
- The expected duration of the installation for the subsea cable in South Africa is about one month. The onshore preparation activities (installing the Beach Manhole) will take about one week. The installation of the cable at the shore crossing to the Beach Manhole will take one to three days assuming installation is by trenching.
- ERM presented the analysis done to identify the preferred landing site. Three locations were evaluated and the preferred option was determined to be the Amanzimtoti Pipeline Beach location on the basis of environmental conditions and avoiding areas of activity that could pose risk to the cable. The Cable Protection Zone that will be applied to the cable has also been considered in the selection of the landing site.
- DEA indicated that site alternatives should not be presented just for the sake of presenting alternatives. All alternatives provided should be feasible to enable the department to authorise any alternative without objection from the applicant.

According to Appendix 2 (1)(g), the Scoping report must provide a full description of the process to reach the proposed preferred activity, site and location of development footprint within the site including details of alternatives considered. It is therefore ERM's understanding that site alternatives to be presented in the Scoping Report, may be screened out, provided that a detailed motivation as to why these alternatives were not assessed further is detailed in the Scoping Report.

- ERM presented the two options under consideration for the cable shore end (installation from the landing point across the beach to the BMH): Horizontal Directional Drilling (HDD) or trenching. Both techniques are still under evaluation and selection of the preferred option will be made based on results of marine and terrestrial route survey that is on-going.

#### **Environmental Impact Assessment Process**

- ERM explained that in terms of the South Africa National Environmental Management Act (NEMA) the proposed Project triggers Listed Activity 14 in Government Notice GNR 325 Listing Notice 2: *The development and related operation of (iii) any other structure or infrastructure on, below or along the seabed.*
- GNR 325 activities are those that require a comprehensive assessment (Scoping and an EIA). ERM will confirm whether any other listed activities are triggered based on the preferred method for shore crossing.
- In terms of the planned public participation process, the Scoping Report will be disclosed to the public for 30 days to allow for comment. Public notice will be made in two newspapers. Direct notification will be made to potentially interested and affected parties based on a stakeholder identification process. At the same time, direct engagements (meetings) will be held with representatives of local government, resident associations, and fishing groups if required.
- The DEA recommended that all stakeholder should be given an opportunity to participate in the EIA process to avoid appeals. ERM indicated that all stakeholders will be afforded the opportunity to request one-on-one engagement sessions which will be held on a specific date (to be determined by ERM during Scoping Phase). ERM will then be available in Amanzimtoti on this day to discuss and educate stakeholder about the Project.
- Installation of the subsea cable is provisionally scheduled to be landed in the first quarter and completed by the end of the third quarter of 2020. As such, the South Africa EIA process needs to commence immediately to have the Environmental Authorisation in place. ERM expects to submit the Application and Scoping Report in January to avoid the December holiday period and to ensure that commenting authorities are given adequate opportunity for consultation and comment.

#### **Specialist Studies**

- ERM is proposing to commission specialist studies for fisheries and fishing; marine and coastal ecology and marine heritage.
- The Department advised that a terrestrial ecology study, including disturbance of dunes, should be commissioned as the proposed site is located in a Critical Biodiversity Area.
- The Department indicated that a desktop study and professional opinion would very likely not be adequate given the situation.

### General Discussion

- DEA requested that impacts on fisheries should be addressed. ERM indicated that a fisheries and fishing specialist study has been commissioned and the baseline environment for fisheries will be presented in the Draft Scoping Report.
- The options for decommissioning were discussed during the meeting and will be evaluated further during the EIA Phase.
- The requirements for Coastal Waters Discharge Permit (which may be required for HDD) shall be confirmed by the Department of Environmental Affairs Oceans and Coast section upon review of the Scoping Report.
- The DEA requested information regarding subsea fault history and an indication of a number of times a subsea cable is likely to be repaired. ASN and Liquid Telecom indicated that cable repair and maintenance does not occur frequently and a summary of fault history for subsea cables will be included as part of the Scoping Report.
- Other permits (ie, seashore lease and permission to operating a vehicle in a coastal zone) can only be obtained after the environmental authorisation is issued, therefore, the applications for these permits would not run concurrently with the application for environmental authorisation.
- ERM confirmed that the METISS route is not within a Marine Protected Area (MPA).

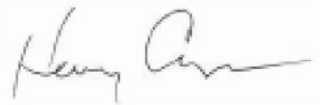
Acceptance of the meeting minutes.



Olivia Letlalo

DEA

13/12/2018



Henry Camp  
ERM



**APPENDIX E3**

**PRE-APPLICATION MEETING ATTENDANCE  
REGISTER**



**environmental affairs**

Department:  
Environmental Affairs  
REPUBLIC OF SOUTH AFRICA

I am committed to the Departmental values of Passion, Pro-active,  
Performance, People-centric and Integrity



DATE: 27 November 2018

PROJECT TITLE: Pre-Application meeting for the proposed installation of Alcatel Submarine Networks (ASN) METISS fibre optic cable system

VENUE: Environment House

START TIME: 11H00 to 13H00

NAME AND SURNAME	ORGANISATION	TELEPHONE	EMAIL	SIGNATURE
Oliva Letlato	DEA			
Funani Ditihi	DEA: OAC			
Portia Makita	DEA: B&C			
Dakalo Ntshwani	DEA: SII			
Seoka Lekota	DEA: B&C			
Thobekile Zungu	DEA: B&C			
Thea Graham	ALCATEL SUBMARINE NETWORKS			
Reiner Mogotji	ERM			
Henry Comp	ERM			
ANGUS HAY	LISA			

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