

**PROPOSED MARINE TELECOMMUNICATIONS SYSTEM: 2AFRICA/GERA (EAST) CABLE SYSTEM TO  
BE LANDED AT PORT ELIZABETH ON THE EAST COAST OF SOUTH AFRICA**

**(EIA REFERENCE: 14/12/16/3/3/2/2057)**

**DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT REVIEW PERIOD  
(22<sup>nd</sup> July - 22<sup>nd</sup> August 2021)**

**COMMENTS AND RESPONSE REPORT**

<b>Name</b>	<b>Organisation</b>
Mr John Gribble	ACO – Associates cc – Heritage Specialist
Ms Briege Williams	South African Heritage Resources Agency – Heritage Officer
Mr Philane Mthlane	SAMSA
Mr Thandimfundo Mehlo	Principal Officer: Gqeberha (Port Elizabeth) - South African Maritime Safety Authority [SAMSA]
Ms Michelle Pretorius	DFFE Sustainable Aquaculture Management
Mr Ephron Maradwa – DFFE EIA	DFE – EIA Applications – Integrated Environmental Authorisations
Mr Brynn Adamson	Harbourmaster - Transnet
Mr Laurence Pearce _ Asset Compliance Manager	Impact Oil and Gas
DFFE – Oceans and Coasts	DFFE – Oceans and Coasts
Mr Puleng Makhethhe – Junior Airport Planner	Airports Company South Africa
Mr Asanda Njobeni – DFFE	DFFE Sustainable Aquaculture Management

	DATE	COMMENT	RESPONSE
1	Date: 22.07.2021 Email DFFE: Oceans & Coasts	Thank you. Sorted with the above links.  The PP dates are noted. We currently reviewing these reports. I will revert to you with the comments in due course.	This email serves to inform you that the Draft Environmental Impact Assessment Report Period documents for the above-mentioned project has been loaded onto your departments link: <a href="https://environmentza-my.sharepoint.com/:f:/g/personal/fditinti_environment_gov_za/EnSN8C845udHg2gH3dJRQmQBy3sLI3PYMHKKRA9OucVVA?e=zXcx7a">https://environmentza-my.sharepoint.com/:f:/g/personal/fditinti_environment_gov_za/EnSN8C845udHg2gH3dJRQmQBy3sLI3PYMHKKRA9OucVVA?e=zXcx7a</a>
2	Date 22.07.2021 E Mail John Gribble ACO Associates cc Heritage Specialist	Done.	Please find attached the 2AFRICA/GERA (East) Draft Environmental Impact Assessment Report to upload onto SAHRIS. Please be so kind to let me know once uploaded, I will then notify Briege. Thanks so much for your assistance <a href="https://wettransfer.com/downloads/cbc8a477f6b51dcecf6ee4ab2213400920210722132050/ccda3e93ad2e84f46821db6a905094ca20210722132120/4ee734">https://wettransfer.com/downloads/cbc8a477f6b51dcecf6ee4ab2213400920210722132050/ccda3e93ad2e84f46821db6a905094ca20210722132120/4ee734</a>
3	Date 22.07.2021 E Mail Briege Williams South African Heritage Resources Agency Heritage Officer		The Draft Environmental Impact Assessment Report documents for the above-mentioned project have now been uploaded to SAHRIS for your review and comment. Please advise if you have received the documents.
4	Date: 22.07.2021 E Mail Ephron Maradwa DFFE – EIA Applications	The Department confirms having received the Draft Environmental Impact Assessment report for the abovementioned project on 22 <sup>nd</sup> July 2021. You have submitted these documents to comply with the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. You are hereby reminded of Section 24F of the National Environmental Management Act 1998 (Act No 107 of 1998) as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department. Kindly note the above mentioned reference number in any future correspondence in respect of the application.	Thank you for the acknowledgement of receipt.
5	Date 26.07.2021 E Mail: Philane Mthlane SAMSA	Kindly note that the Port of Port Elizabeth has recently appointed Mr Thandi Mehlo(ric) as the new Principal Officer, kindly direct any future correspondence to him.	The information regarding availability of the DEIAR was forwarded to Mr Mehlo.

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6	Date 26.07.2021 E Mail: Thandinfumdo Mehlo Principal Officer SAMSA	Thank you for the notification, I will circulate the DEIAR to our environmental specialists internally and revert back with our comments in due course.	Thank you for the acknowledgement.
7	Date:30.07.2021 E Mail: Michelle Pretorius DFFE Aquaculture Management & Development	We are currently reviewing the DEIAR and will submit formal comment but I just wanted to indicate to you that our EA appeal process has concluded and the appeals were overturned. We are thus authorised to move forward with the ADZ development.	Thank you for this information. ACER will updated the final EIAR accordingly.
8	Date 30.07.2021 E Mail Michelle Pretorius DFFE: Aquaculture Management & Development	Thanks I will include them in my database.	Hi Michelle, the cable management team would like you to add the following two people to your Consultative Forum who will represent the 2AFRICA cable in your discussions and updates going forward: T Mohamed and R Ambrose (details withheld).
9	Date 02.08.2021 E Mail Briega Williams South African Heritage Resources Agency Heritage Officer	<p>Proposed 2AFRICA/GERA (East) submarine fibre optics cable system to be landed at Summerstrand, Nelson Mandela Bay Municipality, Eastern Cape</p> <p>The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Environmental Impact Assessment Report (DEIAR) for the proposed 2AFRICA/GERA (East) submarine fibre optic cable system to be landed at Summerstrand, Nelson Mandela Bay Municipality Eastern Cape, South Africa.</p> <p>As part of the Environmental Authorisation process a Scoping Report was undertaken which SAHRA commented on in April 2021 and stated that a Maritime Heritage Impact Assessment (MHIA) must be included as part of the Environmental Impact Assessment.</p> <p>In terms of the National Heritage Resources Act, No 25 of 1999 (NHRA), Sections 2 and 35 stipulates that anywreck, being any vessel or aircraft or any part thereof older than 60 years old lying in South Africa's territorial waters or maritime cultural zone is protected and falls under the jurisdiction of SAHRA's Maritime and Underwater Cultural Heritage Unit. These heritage sites or</p>	<p>Thank you for your acknowledgement.</p> <p>A Maritime Heritage Assessment has been undertaken as part of the Impact Assessment process. Refer to Appendix B of the DEIAR.</p> <p>The EAP is aware of this condition.</p>

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		<p>objects may not be disturbed without a permit from the relevant heritage resources authority.</p> <p>The proposed cable runs to the south of Algoa Bay which is historically an area which has seen a high volume of maritime traffic and casualties. There are a number of vessels which are recorded as lying along the route of the proposed cable though it must be noted that the co-ordinates for the wrecks may not be accurate.</p> <p>SAHRA has reviewed the DEIAR and the included MHIA. The MHIA sets out the historical background of the area and considers the likelihood of encountering heritage resources. This research has informed the recommendations laid out in the MHIA which have been incorporated into the DEIAR under section 10.6.5. These recommendations are:</p> <ul style="list-style-type: none"> <li>• Should any possible archaeological or palaeontological material be accidentally disturbed during these activities it must be immediately reported to the ECO and/or the monitoring archaeologist for further advice. Any finds accidentally disturbed must be recorded, and their contextual information (a report) must be lodged with a SAHRA approved institution.</li> <li>• The three seabed anomalies (SSS contact E2-G-S527, and magnetic and sonar contacts E2-G-M001 and E2-G-S344) are avoided during cable installation.</li> <li>• If any further geophysical data, particularly in the Inshore Waters portion of the cable route, is generated to support the installation of the cable system it be archaeologically reviewed for the presence of historical shipwrecks or related material. If possible, the project archaeologist should be consulted before data are collected to ensure that the survey specifications and data outputs are suitable for archaeological review.</li> </ul>	<p>It is noted that the co-ordinates for the wrecks may not be accurate.</p> <p>Thank you for reviewing the DEIAR and MHIA.</p>

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		<ul style="list-style-type: none"> <li>• Any shipwreck-related material recovered from the seabed during the pre-lay grapnel runs must be retained, kept wet, and the maritime archaeologist must be notified of the find.</li> <li>• Should the data identify wreck material at or near the location of any portion of the cable, micro-siting of the cable and/or the possible implementation of an exclusion zone around the archaeological feature should be sufficient to mitigate the risks to the site.</li> <li>• Should any maritime archaeological sites or material be accidentally encountered during the course of laying the cable, work must cease in that area until the project archaeologist and SAHRA have been notified, the find has been assessed by the archaeologist, and agreement has been reached on how to deal with it.</li> <li>• There is a very small chance that fossils may occur in the aeolianites so a Fossil Chance Find Protocol should be added to the EMP. If fossils are found once trenching has commenced, then they should be rescued and a palaeontologist called to assess and collect a representative sample.</li> <li>• Along the inshore waters and beach crossing, an alert for the occurrence of palaeontological material be included in the EMP, specifically for the divers working in the shoreface and the operators excavating the trench in the beach and dune, particularly if rock trenching is required. Any fossil material noted during these activities must be collected immediately by the divers.</li> </ul> <p>These recommendations are supported by SAHRA and must be adhered to especially in the event that any cultural heritage should come to light.</p> <p>Should any shipwrecks be identified as part of this project then SAHRA must be notified to enable the information to be added</p>	<p>SAHRA's support for these recommendations is acknowledged.</p> <p>Noted. This is contained as a condition in the final EMP.</p>

	DATE	COMMENT	RESPONSE
		<p>to the national shipwreck database. Any new discoveries or updated data is a valuable resource in adding to our knowledge of South Africa's maritime history.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p>	Noted.
10	Date: 13.08.2021 E Mail B Adamson – Harbourmaster Transnet	Please could you assist with a PDF copy of the report. I am unable to access via the link.	<p>ACER provided B Adamson with the following new link:</p> <p>Download link  <a href="https://wettransfer.com/downloads/b93dcf632ece6c51dd0ec796a20dba9020210813110413/ba042b932d8562defba1d61c4e05b40120210813110457/20acbb">https://wettransfer.com/downloads/b93dcf632ece6c51dd0ec796a20dba9020210813110413/ba042b932d8562defba1d61c4e05b40120210813110457/20acbb</a></p>
11	Date: 17.08.2021 E Mail : Laurence Pearce – Asset Compliance Manager – Impact Oil and Gas	<p>Thank you for the below and other comment requests for the Draft EIA's. I have checked the maps (Appendix G from your website) for both 2Africa/Gera (East) – Amanzimtoti and 2Africa/Gera (East) Port Elizabeth – and they seem to be the same? I.e. both land at Amanzimtoti as opposed to one at Port Elizabeth, and one at Amanzimtoti? The draft EIA reports seem correct, but the Appendix G on your site <a href="https://acerafrica.co.za/current-projects-5-2/">https://acerafrica.co.za/current-projects-5-2/</a> I believe is incorrect?</p> <p>Can you please check this out, and update if wrong, or let me know if I have missed something please?</p>	Thank you for bringing this to ACER's attention. The website has been checked and corrected.
12	Date: 18.08. 2021 E Mail DFFE Oceans and Coasts	<p>SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED 2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT GQEBERHA (PORT ELIZABETH), SOUTH AFRICA</p> <p>The Oceans &amp; Coasts (O&amp;C) Branch of the Department of Forestry, Fisheries, and the Environment (<b>DFFE</b>) appreciates the opportunity granted to comment on the Draft Environmental Impact Report for the Proposed 2Africa/Gera (East) Submarine Fibre Optic Cable System to be Landed at Gqeberha (Port Elizabeth), South Africa. This Branch has provided</p>	Thank you for your email and recommendations provided in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), ( <b>"NEMA"</b> ) and the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ( <b>"ICM Act"</b> ).

	DATE	COMMENT	RESPONSE
		<p>recommendations in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), (“<b>NEMA</b>”) and the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“<b>ICM Act</b>”).</p> <p>The Branch O&amp;C has the mandate to ensure the holistic management of the coast and estuarine areas as an integrated system and promote coordinated coastal management. It ensures that the ecological integrity, natural character, and the economic, social, and aesthetic value of the coastal zone are maintained, and that people, properties, and economic activities are guarded against dynamic coastal processes. Guided by the principles of integrated coastal management, this Branch continues to strive for social equity and promote sustainable use of coastal resources.</p> <p>In line with the principles of international best practice, this Branch underscores the need for the coastal developments to be designed to build resilience to the impacts of climate change and sea-level rise, while ensuring the use of coastal environments is socially responsible, economically justifiable, and ecologically sustainable.</p> <p>Section 7A of the ICMA states that coastal public property is established to improve access to the seashore; protect sensitive coastal ecosystems, and protect people, property, and economic activities from risks arising from dynamic coastal processes, including the sustainable utilization of the oceans around South Africa to meet Government’s development targets.</p> <p>Based on the information presented in this report, specialist studies, and expert knowledge on coastal environments, this Branch supports the implementation of the proposed Draft Environmental Impact report for the proposed 2Africa/Gera (East) submarine fibre optic cable system to be landed at Gqeberha (Port Elizabeth), South Africa, conditional on compliance with the mitigation measures as recommended in this report and contained within the EMPr.</p>	<p>The EAP is aware of O&amp;C’s mandate to ensure the holistic management of the coast and estuarine areas as an integrated system and promote coordinated coastal management.</p> <p>The design of the proposed undersea cable and associated infrastructure takes into account potential effects of climate change. Chapter 3 of the EIAR reviews the Need and Desirability of the project in the terms of the principle of sustainability, viz. that a development is ecologically sustainable and socially and economically justifiable.</p> <p>The proposed project is in line with the South African Government’s development goals and will not have a significant negative impact on access to the seashore; sensitive coastal ecosystems, people, property, and economic activities or coastal processes, as indicated in Chapters 9, 10 and 11 of the EIAR.</p> <p>Thank you for your support of the implementation of the proposed project, conditional on compliance with the mitigation measures as recommended in the EIAR and contained within the EMPr.</p>

	DATE	COMMENT	RESPONSE
		<p>National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICM Act") Sections to be adhered to and implemented by the applicant and Competent Authority (CA):</p> <p><b>Section 7 of the ICM Act: Composition of Coastal Public Property (CPP)</b></p> <p>In terms of Section 7 of the ICM Act, the applicant should only be permitted to undertake construction and maintenance activities specified in the approved Environmental Management Plan. The applicant should have acquired the Seashore Lease Permit from the DEDTEA for installation of the cable within South Africa's territorial waters before commencement with construction activities. The competent authority is advised to include this as a condition for approval to ensure that this condition is adhered to.</p> <p>The report specifies that the implementation of the marine component of the cable is expected to have localized impacts on the marine benthic and shallow benthic environment. The terrestrial cable component is expected to have a localized impact on Summerstrand Beach for the preferred Alternative 1 and no additional impacts inland from the BMH. Taking this into account, the competent authority is advised to include a condition in the Environmental Authorisation which specifies that the applicant will be responsible for the project and compliance with relevant legislation.</p>	<p>Construction and maintenance activities are specified in the DEIAR and this is what will be authorised by the DFFE and implemented by the Applicant (Vodacom). On behalf of Vodacom, ACER has commenced with the application for a Seashore Lease Permit to the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT), for the proposed development.</p> <p>Vodacom will comply with the Environmental Authorisation and relevant legislation.</p>
		<p><b>Section 13 of the ICM Act: Access to coastal public property</b></p> <p>The report specifies that the project will entail the landing of a marine telecommunications cable at Pollock Beach in Summerstrand, Gceberha. This will require the digging of a trench along the beach (coastal public property) into the intertidal zone and the installation of the telecommunications cable, System Earth, and associated activities. It further specifies that the project</p>	



	DATE	COMMENT	RESPONSE
		<p>will entail the excavation and deposition of more than 5 m<sup>3</sup> of material within 100 m of the high-water mark of the sea when constructing the BMH and trenching for, and backfilling of, the marine telecommunications cable and System Earth into the intertidal zone and the installation of the telecommunications cable to the Beach Manhole (BMH).</p> <p>It further adds that the cable installation will mostly affect communities in unconsolidated habitats, which are less sensitive to disturbance and recover more quickly than those inhabiting hard grounds. As such, the project may cause minor nuisance impacts to the local community near Summerstrand during the installation phase.</p> <p>Taking this into account, an exclusion which permits temporary disturbance can be supported for the duration that the cable will be landed on condition that; (a) the general public is made aware of the proposed works/construction schedule; (b) appropriate notice is provided to ensure that the public tries to plan their recreational activities around the specified schedule for proposed works and that appropriate signage/notices are erected to ensure that the public is aware of which areas to keep out of and during which periods.</p> <p>Furthermore, the beach infrastructure including, paved car parks, signage, braai facilities, showers and toilets and lifesaver's hut/platform, shark nets in place which could be potentially impacted during cable installation needs to be protected or replaced at the cost of the applicant should they get damaged because of the implementation of the proposed project activities or negligence by the applicant.</p> <p>This Branch reiterates that coastal access to the public should not be restricted nor prohibited at any stage of this development as a result of the implementation of the proposed Marine Telecommunications Cable System.</p>	<p>The EMPr specifies that Sufficient notice to the local community, including neighbouring landowners and/or tenants, must be provided by the Project Engineer in consultation with the Environmental Manager and ECO, before construction commences. Information regarding the expected types of construction activities must be supplied.</p> <p>Any beach infrastructure that may be disturbed by the construction of facilities on land and by the installation of the cable will be protected or replaced at the cost of the applicant, should they get damaged because of the implementation of the proposed project activities or negligence by the applicant.</p> <p>Coastal access to the general public will not be restricted nor prohibited as a result of the implementation of the proposed development. During construction, a limited area of the beach and area behind the beach will be cordoned off to the public but access to the surrounding beaches will not be restricted. After installation, the only visible infrastructure will be the top of the BMH, which will not pose any access restrictions.</p>

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		<p><b>Section 63 of the ICM Act: Environmental authorisations for coastal activities</b></p> <p>The report specifies that the laying of the submarine cable in deep marine waters, including the ploughing and burial of the cable in shallower waters, could potentially result in the disturbance and/or degradation of sensitive marine environments. Further to this is the potential impact that the proposed submarine could have on and commercial and recreational fisheries during its installation and operation.</p> <p>In terms of Section 63 of the ICM Act we recommend before an EA is granted, the CA must ensure that sufficient measures to avoid, manage, minimize and mitigate potential adverse impacts in the coastal zone have been identified, addressed and mitigation measures are provided adequately within the Environmental Management Programme report (EMPr), or Maintenance Management Plan (MMP) or EA conditions.</p> <p>The CA should ensure that the proposed and associated operational activities; associated impacts are in line with coastal management policies and principles and will ensure that the aims and ensure the achievement of Coastal Public Property (CPP), Coastal Protection Zone, Economic Exclusive Zone, the littoral active zone are maintained and conserved.</p>	<p>The comments which are addressed to the CA are noted. Mitigation measures to avoid, manage, minimize and mitigate potential adverse impacts are provided in the EIAR and included in the EMPr contained in Appendix F of the EIAR.</p> <p>These items were considered and assessed in the DEIAR, with appropriate mitigations recommended (where mitigation is possible). Refer in particular to Chapter 4 (project description); Chapter 6 (Description of the receiving environment); Chapter 9 (specialist findings); Chapter 10 (assessment of impacts). Note that the potential negative impacts of the proposed 2AFRICA/GERA (East) Submarine Cable System (Gqeberha landing) are all assessed as LOW significance, after mitigation.</p>
		<p><b>Off-Road Vehicle (ORV)</b></p> <p>The site is located within the littoral active zone and thus, a Construction Off-Road Vehicle permit (ORV) will be required to authorise the transportation of materials in and out of the coastal zone during construction. The ORV Off-Road Vehicle Regulations regulate driving within the coastal area and ensure that development is undertaken in an environmentally friendly and sustainable manner. Upon receipt of Environmental authorisation, the applicant will be required to apply for a Construction Off-Road</p>	<p>An ORV permit will be applied for once Environmental Authorisation has been issued for the proposed development. Movement of vehicles and plant on the beach will be kept to a minimum.</p>

DATE	COMMENT	RESPONSE
	<p>Vehicle Permit. The applicant must consult this department's DFFE: Branch O&amp;C contact details to obtain an ORV permit <a href="mailto:ORVPermitting@environment.gov.za">ORVPermitting@environment.gov.za</a>.</p>	
	<p><b>Recommendations and Conditions for the attention of the EAP and CA to be included in the final EMPr:</b></p> <p>The report specifies that due to the transformed nature of the site, no sensitive ecosystems (or habitat) on land will be affected by the proposed 2AFRICA/GERA (East) Submarine Cable System (Gqeberha landing). It further ascertains that no Marine Protected Areas (MPA) will be affected. It further correctly stated that the marine cable will traverse CBAs. Indeed sections of the marine cable will traverse the Algoa to Amathole Ecologically or Biologically Significant Area (EBSA), as well as the proposed Alexandria coastal belt/Algoa Bay Islands Nature Reserve Marine Important Bird Area (IBA), classified as Critical Biodiversity Areas (CBA1, CBA2) and Ecologically Sensitive Areas (ESA).</p> <p>The specialist findings further conclude that much of the cable will disturb sandy substrates and the benthic organisms that live in it, due to cable burial. The final marine cable, as approved by the CA should be aligned, as far as possible, to avoid sensitive reef areas, threatened ecosystems, wetlands, MPA's, and all ecologically sensitive areas.</p> <p>The timing of surveying and cable laying should be outside of the most important whale period (June to October). Furthermore, it is recommended that vessel lighting be kept to a minimum for seabirds.</p> <p>A risk-averse and cautious approach should be adopted in terms of ecological impacts.</p> <p>The Marine Ecology Assessment identifies various impacts resulting from vessels and other activities during geophysical survey, installation, and operation of the cable. There will be impacts on marine benthic biota due to disturbance of the upper</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. This period will, as far as possible, be avoided. However the report also states that project scheduling is affected by many other factors that may also influence timing.</p> <p>The routing and mitigation measures aim to keep risk to a minimum.</p> <p>Noted.</p>

	DATE	COMMENT	RESPONSE
		<p>beach and intertidal and shallow subtidal sandy habitats, as well as the unconsolidated seabed beyond the surf zone and across the shelf. There will also be impacts on marine biota including fish, marine mammals, seabirds, and shorebirds. However, the significance of all these impacts is assessed as very low or low.</p> <p>Taking this into account, this Branch remains uncertain of the methodology applied or the assessment methodology used to determine <i>“that the residual impacts of the cable on the benthic environment will be of low significance”</i> as stated in the report. The potential negative impacts of the project on marine flora and fauna (small and large) onshore, nearshore, and offshore marine species to a large extent are irreversible even if feasible mitigation measures are applied. The cable, once in place, will have irreversible impacts on the ecological integrity of these protected areas. Caution needs to be undertaken when authorising developments that may potentially compromise the ecological status of these ecosystems.</p> <p>Algoa Bay is popular for recreational fishing and is a venue for yachting, scuba, and other water sports. Offshore in the study area, there are several other economic interests and activities to be considered, including commercial fisheries (especially the inshore demersal trawl sector), Oil and Gas (O&amp;G) exploration blocks, and the proposed Algoa1 Aquaculture Development 3 block on the seabed.</p> <p>The causes of potential impacts of the project on the fishing industry were identified as noise emissions; temporary exclusion from fishing grounds from vessels during cable laying (up to 1.5 km) and long-term exclusion of anchoring and trawling 500 m on either side of the cable. Various fishing sectors will be affected, but those most affected are the inshore demersal trawl. After mitigation (where applicable) the significance of all related impacts on fishing sectors (including squid jig) is assessed as very low or low.</p> <p>The long-term effect on operational activities due to the 500 m exclusion zone on either side of the cable will negatively impact</p>	<p>The assessment methodology is clearly outlined in the specialist reports dealing with deep water and shallow water benthic habitats. The cable will be buried as far as possible in unconsolidated sediments and minimal reef area will be impacted. Benthic organisms will recover post installation. Both marine ecology specialist reports, as well as the report on (large) marine mammals assess the impacts of undersea cables to be low (refer to Appendix B of the EIAR). Once installed, the cable is inert and buried along most of its length. The EIAR assesses the potential ecological impacts as being of low significance.</p> <p>Noted.</p> <p>Noted.</p> <p>A specialist study on the impacts on the fishing sector has been undertaken as part of this regulated EIA process (refer to Appendix B of</p>

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		<p>fishing sectors, most particularly the demersal trawl and demersal longline as it traverses a heavily trawled area. It is reiterated that the impact on fisheries because of the potential loss of fishing ground is regarded as a significant impact, as it potentially affects the livelihoods of communities and industries that are heavily reliant on fisheries as a source of income. A socio-economic assessment study is recommended to advise on the long-term unintended and cumulative impacts of this proposal on this industry as well as recommend mitigation measures to mitigate these impacts. An intense unhasty consultation with the trawling fishing community is recommended, off course within the regulated timeframe.</p> <p>This Branch notes the potential social and biophysical environment cumulative impacts as identified in terms of the conflicts of interest which may potentially increase over time between the subsea fibre optic cable developers and the oil and gas industry. This department further supports the recommendation that direct and early engagement between role-players is undertaken to ameliorate cumulative impacts between major role players in the oil and gas industry.</p> <p>The cable alignment also intersects with transects covered by DFFE bi-annual fishery research survey vessels. The competent authority should include a condition in the approval that sufficient coordination between the proponent and DFFE with regards to the timing of their respective activities in the affected area is facilitated to ensure that there is no significant impact on survey activities and results.</p> <p>Direct and early engagement between role-players is required to ameliorate cumulative impacts.</p>	<p>the EIAR). A permanent 500 m exclusion zone either side of the cable would cover 56 km<sup>2</sup> (0.3%) of inshore trawl fishing grounds. Once an exclusion zone is in place, skippers would raise their ground gear off the seabed as they transit the exclusion zone in order to avoid potential contact with the cable. This would result in a loss of fishing time within the area but will not prevent the trawlers from operating in the area. The fisheries specialist assesses the impact on all affected fisheries to be of low significance. Consultation with role-players in the fishing industry, including the trawling sector, has been undertaken as part of this EIA process. Opportunities to comment have been provided since project announcement in November 2020 and a Draft Scoping Report, Final Scoping Report and DEIAR have been made available for comment (refer to Chapter 8 of the EIAR for a detailed description of the public participation process undertaken). Only one comment has been submitted by representatives of the fishing industry, despite multiple opportunities provided by ACER to do so. A further specialist study focusing on socio-economic impacts on the fishing sector is not considered necessary to enable DFFE to make an informed decision on whether or not to authorise the proposed development.</p> <p>The support for this recommendation is noted. Affected parties in the O&amp;G sector have been notified of the proposed project via this EIA process and Vodacom has entered into engagement with the relevant parties in the O&amp;G sector.</p> <p>Notification of DFFE, the SA Fishing Industry Association, the South African Navy Hydrographic Office (SAN Hydrographer), SAMSA and Ports Authorities is specified as a condition in the EMPr (Section 6.4).</p> <p>Vodacom is in agreement with this statement.</p>

	DATE	COMMENT	RESPONSE
		<p>Potential pollution onshore should be limited to hydrocarbon spills and light industrial and domestic waste. Specifications for the handling of waste and dealing with incidents should be explicitly addressed and contained in the final approved EMPr.</p> <p><i>Alternative 1 (located along the southern section of Pollock Beach)</i> is recommended as it confines disturbance.</p> <p>Excavation and burial Alternative 1 (preferred) are recommended.</p> <p>The impact statement report identifies that the project may cause minor nuisance impacts to the local community near Pollock Beach during the installation phase. The local community should be informed of the schedule for construction works in due course to minimize the negative impacts identified.</p> <p>The report identifies various impacts resulting from vessels and other activities which could take place during geophysical surveys, installation, and operation of the cable. There will be impacts on marine biota due to disturbance of the upper beach and intertidal and shallow subtidal sandy habitats, as well as the unconsolidated seabed beyond the surf zone and across the shelf. There will also be impacts on marine biota including fish, marine mammals, seabirds, and shorebirds. However, the significance of all these impacts is assessed as very low or low.</p> <p>The EAP is requested to provide a comprehensive assessment of; the advantages and disadvantages associated with each site alternative methodology to be applied; technology; construction procedures, alternatives, phases, technologies, and methodologies to inform the decision on project alternative proposed. The options presented should consider the receiving environment, potential impacts, and threats to the sustainability of the marine environment and function of natural ecosystems.</p> <p>There are concerns for the general impact of cable deployment operations on coastal species such as Heaviside's and humpback</p>	<p>Specifications relating to the prevention of pollution and contamination as a result of fuels and oils are provided in the EMPr.</p> <p>This is the preferred alternative.</p> <p>This is the preferred alternative which will be implemented (if substrate conditions allow).</p> <p>The EMPr specifies that sufficient notice to the local community, including neighbouring landowners and/or tenants, must be provided by the Project Engineer in consultation with the Environmental Manager and ECO, before construction commences. Information regarding the expected types of construction activities must be supplied.</p> <p>Noted.</p> <p>These aspects are documented in the EIAR. Refer to Chapters 3, 4, 5, and 10 as well as Appendix B.</p>

	DATE	COMMENT	RESPONSE
		<p>dolphins and southern right whales during work in the nearshore environment. It is a recommendation of this Branch that a suitably trained crew member as a Marine Mammal / Protected Species Observer (MMO/PSO) is recruited to ensure that impacts relating to entanglement are avoided, minimized, or reduced.</p> <p>Cable laying should ONLY take place outside of the main migration seasons for whales where possible.</p> <p>The competent authority should include a condition in the approval which specifies that recommended routing is being adhered to by contractors and that management intervention is instituted on site.</p> <p>Only work necessary must be undertaken and no camping site should be planned and established within the CPP.</p> <p>Clearing of vegetation for construction purposes should be scheduled where it is only necessary to avoid loss of vegetation and retain as much vegetation as possible so that the area can continue to function and offer services in the best sustainable way possible.</p> <p>No construction activities with the potential to affect the public to enjoy the coast should be scheduled and take place during peak season.</p> <p>To ensure that pollution in the marine ecosystem and seawater contamination is minimized, a construction period should be scheduled to avoiding heavy rain and stormy season. Historical data must be used for the best period allocation.</p> <p>When planning on areas to place infrastructure and activities to take place, the designs should avoid areas that have been identified as sensitive and offer important functions, such as</p>	<p>It is specified in the EMPr that a suitably qualified crew member must be appointed as a dedicated Marine Mammal /Protected Species Observer (MMO/PSO).</p> <p>This will be undertaken where possible. In the event that cable landing does take place during this period ASN will appoint MMO,s to monitor and record any whale sightings during cable installation as per the conditions of the EMPr.</p> <p>The routing of the cable in the marine environment results from a highly specialised design process which minimises risk, and will be adhered to. The land portion of the cable will be adhered to, within the approved corridor.</p> <p>These items are specified in the EMPr.</p> <p>Vegetation clearance will be kept to a minimum. For this project however, it should be noted that no natural features that are synonymous with the reference state, or of conservation importance, are present within the direct construction footprint of the proposed development.</p> <p>There are many factors influencing the scheduling of the project. While efforts will be made to avoid the peak season, there may be conflicting priorities such as availability of the cable laying ship. The duration of the cable laying is short and thus associated impacts will be of short duration.</p> <p>It may not be possible to avoid the rainy season (summer months) due to other scheduling factors taking priority (vessel availability, peak tourism periods, whale migration period, etc.). The EMPr provides specifications for the prevention of pollution on land and at sea.</p> <p>Infrastructure on land is situated in previously disturbed areas. The alignment of the marine cable has taken into consideration avoidance of sensitive areas, as far as possible.</p>

	DATE	COMMENT	RESPONSE
		<p>habitat, breeding areas, areas where natural resources that are considered of important status occur, and migration route.</p> <p>Due to natural processes such as sea-level rise, current change, wind speed, erosion, accretion, flooding, etc. that take place within the coastal environment, mostly influenced by climate change, structures placed within the coastal zone and the sea are likely to require maintenance from time to time. To ensure that no additional strain is exposed to our already vulnerable and sensitive marine/coastal environment, we recommend that when planning for activities associated with the maintenance of the proposed Marine Telecommunications Cable System) to be landed at Gqeberha the designs should avoid areas that have been identified as sensitive and offer important functions, such as habitat and breeding areas where threatened and near-threatened species which are considered of important status have been identified to exist. The plan should pay special attention to the lifespan of the proposed cable and ensuring that the material of the cable is of the best quality and will be of the long term.</p> <p>Vehicles and machinery have the potential of releasing fuel and oil emissions while in operation. It is our view that the concentrations will be low if vehicles and machinery that will be used are maintained well and inspected regularly by the building contractor. Therefore, no vehicles and machinery must be scheduled to be refuelled within the coastal zone.</p> <p>Due to the demand for public safety, failure by the responsible contractor to reinstate the site location where the maintenance works will be taking place that falls within the coastal area, we recommend that the competent authority gives power to the Local Municipality to issue a notice instructing the applicant to undertake the works within a specific period. The Local Municipality should also be given permission to reserves the rights to proceed with maintenance works and recover the costs from the applicant should the applicant fail to comply", and recommend for this condition to form part of the EA conditions to be adhered to and implemented.</p>	<p>The Beach Manhole is designed to withstand coastal conditions and will require little to no maintenance. The marine cable is provided with cable protection (armour) in areas where abrasion may occur. Cable maintenance will only be required in the case of a break or damage. No routine maintenance is required. The lifespan of the cable is &gt; 25 years and is designed with high quality materials to withstand the harsh coastal and marine conditions. Mitigation measures as applied to construction activities will be applied during any cable maintenance required, as relevant.</p> <p>The EMPr specifies that no vehicles and machinery must be refuelled within the coastal zone.</p> <p>It is in the interests of the Applicant to complete the works in the shortest possible time, to reinstate the area and to maintain the infrastructure (noting that once installed, no routine maintenance is actually required- maintenance is only required in the case of breakage or damage which is highly unlikely).</p>



DATE	COMMENT	RESPONSE
	<p>Soil erosion onsite must be always prevented i.e., pre, during-and post-trenching activities. Erosion control measures must be implemented in areas sensitive to erosion such as near water supply points, edges of slopes, etc. These measures could include the use of sandbags, retention or replacement of vegetation.</p> <p>All waste and rubble generated during and/or after construction to be disposed of at an approved landfill site (records to be kept thereof).</p> <p>Water and ablution facilities should be made available for all staff working on site.</p> <p>Effluent to be disposed of at an approved site (records to be kept).</p> <p>Appointment of a Control Environmental Officer (CEO) who will ensure that identified mitigation measures and recommendations are considered, adhered and implemented. The CEO will also be responsible for undertaking site inspections to ensure compliance with the EA conditions to ensure that the marine ecosystem will be protected and conserved during construction and maintenance phases throughout all phases of this proposed project.</p> <p>Furthermore, the CEO must ensure that employees are aware of the procedure to be followed and ensures that necessary materials and equipment are available.</p> <p>Also, should spills and leaks transpires, this department DEFF: Branch O&amp;C must be part of the relevant authorities to be notified <a href="mailto:ypeterson@environment.gov.za">ypeterson@environment.gov.za</a>.</p> <p>You are kindly reminded of your duty of care towards the coastal environment per section 58 of the ICM Act read together with section 28 of NEMA which states that <i>"Every person who causes, has caused or may cause an adverse effect on the coastal environment must take reasonable measures to prevent such adverse effect from continuing, recurring or occurring or, in so far as such harm to the coastal environment is authorized by law or</i></p>	<p>Soil protection measures are contained in the EMPr , including the prevention of soil erosion.</p> <p>This condition is specified in the EMPr.</p> <p>This condition is specified in the EMPr.</p> <p>This condition is specified in the EMPr.</p> <p>An ECO will be appointed. The roles and responsibilities of the ECO are outlined in the EMPr.</p> <p>Employees will undergo Environmental Awareness Training, as specified in the EMPr.</p> <p>This condition has been added to the EMPr.</p> <p>The Applicant is aware of their Duty of Care and the recommendations made by DEFF:OC will be taken into consideration and are incorporated in the EIAR and EMPr as relevant.</p>

	DATE	COMMENT	RESPONSE
		<p><i>cannot reasonably be avoided or stopped, to minimize and rectify such adverse effect on the coastal environment"</i> by taking into consideration and implement recommendations provided in this comments document recommending measures to be undertaken to ensure the coastal zone is protected, preserved and managed.</p> <p>The CA must state clearly within the condition of the EA that no Organ of State will be held liable for the maintenance and upkeep of this project.</p> <p>Kindly note that the activity may not commence before an environmental authorization being granted by the CA. It is an offense in terms of Section 49A "NEMA" for a person to commence with a listed activity unless the CA has granted an environmental authorization for the undertaking of the activity. A person convicted of an offense in terms of the above is liable to a fine not exceeding 10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.</p> <p>Please be advised that the Sub Directorate: Coastal Development and Protection within the Branch: O&amp;C is responsible for coordinating and facilitating EIA comments and advice for developments within the marine environment. Please forward all EIA-related requests to, Email: <a href="mailto:OCeia@environment.gov.za">OCeia@environment.gov.za</a>.</p> <p>These comments should be sent to the CA for consideration and implementation. The EAP is kindly requested to submit proof of submission to <a href="mailto:OCeia@environment.gov.za">OCeia@environment.gov.za</a>.</p>	<p>Noted. No Organ of State will be held liable for the maintenance and upkeep of this project.</p> <p>The Applicant will not commence with the activity before an environmental authorisation is granted by the CA.</p> <p>Thank you for the information and the EAP will use these contact details.</p> <p>The comments from O&amp;C form part of the public record as contained in Appendix D and Appendix E of the EIAR, which has been submitted to DFFE for consideration and decision making.</p>
13	Date:23.08.2021 E Mail Puleng Makhetha – ACSA	<p><b>PROPOSED 2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT PORT ELIZABETH (GQEBERHA), EASTERN CAPE, SOUTH AFRICA</b></p> <p>The abovementioned application (EIA Ref: 14/12/16/3/3/2/2057, dated 22 July 2021) has reference.</p> <p>The Airports Company South Africa (ACSA) does not foresee any immediate impacts at this point, and therefore has no comments on the proposed development. However, may the developer</p>	<p>Thank you for your email. Notification of ACSA prior to the commencement of construction will be added to the EMPr.</p>

	DATE	COMMENT	RESPONSE
		<p>kindly advise ACSA once construction commences, so that any unforeseen impacts that may emanate from construction can be monitored, i.e. the potential for bright lights used at night to cause a disturbance to pilots on approach to the airport.</p> <p>The relevant local contact persons from the Airports Company South Africa (ACSA): Port Elizabeth International Airport Aviation Safety Compliance are as follows:</p> <p><b>Name:</b> Patric Maxaxa <b>Email:</b> info withheld Senior Safety Compliance Officer</p> <p><b>Name:</b> Gcisa Salukazana <b>Email:</b> info withheld Safety Compliance Officer</p>	
14	Date: 23.08.2021 E Mail Laurence Pearce – Asset Compliance Manager – Impact Oil and Gas	<p>Thank you for the opportunity to comment and the changes your team have made after previous comments made by Impact. We would like to formally request that in clause 10.3.3.9 of the EIR that the words ‘mineral exploration’ be removed from the sentence. We believe this may have been left in error as there will be no long term exclusion of these activities after previous comments on said matter. All other references have been gratefully removed, and only trawling/anchoring of vessels remains an (understandable) long term exclusion. Please can you remove/update as follows:</p> <p><b>Original:</b> <i>10.3.3.9 Long term protection due to exclusion zone</i> The long-term impacts of the marine telecommunications cable on the benthic environment (both fauna and flora) are expected to be positive due to the implementation of the legislated buffer zone, which protects this environment from disturbance due to bottom trawling activities, mineral exploration and the anchoring of vessels.</p> <p><b>Requested change to:</b></p>	Thank you for your email. The requested change has been made to the FEIAR.

	DATE	COMMENT	RESPONSE
		<p><i>10.3.3.9 Long term protection due to exclusion zone</i></p> <p>The long-term impacts of the marine telecommunications cable on the benthic environment (both fauna and flora) are expected to be positive due to the implementation of the legislated buffer zone, which protects this environment from disturbance due to bottom trawling activities, and the anchoring of vessels.</p> <p>Please do let me know if you require any additional information.</p>	
15	Date 23.08.2021 E Mail F Grimmert – DFFE IEA	<p><b>COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED ALCATEL SUBMARINE NETWORKS 2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT GQEBERHA (PORT ELIZABETH), SOUTH AFRICA</b></p> <p>The draft Environmental Impact Assessment Report (EIAR) dated July 2021 and received by the Department on 22 July 2021, refers.</p> <p>This letter serves to inform you that the following information must be included in the final EIAR:</p> <p><b>Listed Activities and Application Form</b></p> <p>Please ensure that all relevant listed activities in the EIA Regulations, 2014 (per the latest 2021 amendments) are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed.</p> <p>If the activities applied for in the application form differ from those mentioned in the final EIAR, an amended application form must be submitted. Please note that the Department’s application form template has been amended and can be downloaded from the following link <a href="https://www.environment.gov.za/documents/forms">https://www.environment.gov.za/documents/forms</a>.</p> <p>The project title on the draft EIAR differs to that on page 1 of the application form. Please indicate if the project title (for inclusion in</p>	<p>Thank you for commenting on the DEIAR. Please refer to responses below.</p> <p>The identified listed activities are described as they apply to the project, in Table 2 of the FEIAR.</p> <p>The listed activities tabled in Table 2 of the FEIAR are the same as those in the Application already submitted.</p> <p>The project title for inclusion in the Environmental Decision should read: “PROPOSED 2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT GQEBERHA (PORT</p>

	DATE	COMMENT	RESPONSE
		<p>the decision) should still make reference to Alcatel Submarine Networks.</p> <p><b>Public Participation Process</b></p> <p>You are reminded to provide evidence that all identified and relevant commenting authorities have been given an opportunity to comment on the proposed development, particularly the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT), the Nelson Mandela Bay Municipality, the South African Heritage Resources Agency (SAHRA), the Eastern Cape Provincial Heritage Resources Authority, the Department of Forestry, Fisheries and the Environment (DFFE): Biodiversity Conservation, DFFE: Oceans and Coast, and DFFE: Aquaculture Management and Development, the South African Deep-Sea Trawling Industry Association (SADSTIA), the South African National Parks (SANParks), the relevant stakeholders for the proposed Humpback Dolphin Marine Sanctuary, the Department of Human Settlements, Water and Sanitation (DHSWS), the Department of Public Works and Infrastructure, the Department of Minerals and Energy (Eastern Cape), the Petroleum Agency of South Africa, and the Transnet National Ports Authority.</p> <p>You are reminded to provide proof that the key stakeholders received written notification of the proposed activity as well as the of the availability of the draft EIAr for comment. Proof of correspondence with the various stakeholders must be included in the final EIAr. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended and the approved Public Participation (PP) Plan.</p> <p>A comments and response (C&amp;R) trail report must be submitted with the final EIAr. The C&amp;R report must incorporate all historical comments for this development. The C&amp;R report must be a separate document from the main report and the format must be in a table format, which reflects the details of the interested and</p>	<p>ELIZABETH), SOUTH AFRICA" please remove reference to Alcatel Submarine Networks.</p> <p>Please refer to Appendix D which contains proof of correspondence sent out, and to Appendix E which contains all comments received and responses thereto.</p> <p>All registered I&amp;APs (which include the key stakeholders) were notified and the delivery receipts are included in Appendix D of the FEIAR.</p> <p>Appendix E of the FEIAR contains separate CRRs for project announcement, DSR, FSR and DEIAR. The comments have been captured and responded to in line with the Department's stated recommendations.</p>

DATE	COMMENT	RESPONSE
	<p>affected parties (I&amp;APs) and the date comments were received, actual comments received, and responses provided. Please ensure that comments made by I&amp;APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully.</p> <p>Please ensure that all issues raised, and comments received on the Scoping Report and comments on the draft EIAr from registered I&amp;APs and organs of state which have jurisdiction in respect of the proposed activity, including this Department's comments, are adequately addressed in the final EIAr. Please note that a response such as "Noted" is not regarded as an adequate response to I&amp;AP's comments. The final EIAr must also comply with all conditions of the acceptance of the scoping report dated 04 June 2021.</p>	<p>It is the opinion of the EAP that all comments have been adequately addressed in the FEIAR.</p>
	<p><b>Undertaking under Oath</b></p> <p>Please note that the final EIAr must have an undertaking under oath/ affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended, which states that the EIAr must include:  <i>"an undertaking under oath or affirmation by the EAP in relation to:</i>  <i>(i) the correctness of the information provided in the reports;</i>  <i>(ii) the inclusion of comments and inputs from stakeholders and I&amp;APs;</i>  <i>(iii) the inclusion of inputs and recommendations from the specialist reports where relevant; and</i>  <i>(iv) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties".</i></p>	<p>An affirmation and undertaking under oath is included in the FEIAR, near the beginning of the report.</p>
	<p><b>Specialist Assessments</b></p> <p>Please include a table in the EIAr summarising the specialist studies required by the Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted.</p>	<p>A table was provided in the Draft and Final Scoping Reports, indicating the specialist studies required by the Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. The specialist assessments and Terms of Reference for specialist studies according to the Plan of</p>

	DATE	COMMENT	RESPONSE
		<p>It is further brought to your attention that the Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species) have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols, except where the applicant provides proof to the competent authority that the specialist assessment affected by these protocols had been commissioned before the date on which the protocols came into effect, in which case Appendix 6 of the Environmental Impact Assessment Regulations, 2014, as amended, will apply to such applications. Please indicate in the EIAr whether the protocols were applied.</p> <p><b>EIAr contents</b></p> <p>Please ensure that the final EIAr complies with the requirements of Appendix 3 of the NEMA EIA Regulations, 2014, as amended.</p> <p>Please indicate the width of the corridor (both the marine and terrestrial component) that has been assessed and is recommend for approval for development of the fibre optic cable system. Also indicate this on the layout map.</p>	<p>Study for Impact Assessment were accepted by DFFE at the end of Scoping. As requested, the EAP has included the specialist table into the FEIAR.</p> <p>The terms of reference for specialists specified that studies must be undertaken in accordance with the Protocols, where applicable. Protocols were applied to the Ecological Impact Assessment (vegetation, wetlands and fauna) and the Coastal Dune Dynamics report. The respective generic studies on impacts of cables on avifauna and impacts of cables on large marine mammals did not utilise protocols as they were generic to South Africa’s oceans and coasts.</p> <p>Table I of the EIAr lists the requirements of Appendix 3 of the NEMA EIA Regulations, 2014 and specifies the parts of the report where these requirements are provided.</p> <p>The width of offshore corridor assessed for the marine cable was 0.5 km (250 m either side of the cable). The cable footprint to be disturbed is only 6 m wide (the width of the sea plough) when cable burial takes place. The entire beach where the cable is to land was assessed, however the construction corridor on the beach will be limited to 50 m each side of the cable. On land, the cable trench is less than 1 m in width. However a construction corridor of 10 m will require approval. In summary, authorisation is requested for:</p> <ul style="list-style-type: none"> <li>• Offshore cable corridor – 1,0 km (500 m either side of cable)</li> <li>• Beach landing corridor – 0,1 km (50 m either side of cable)</li> <li>• Land cable corridor – 0,01 km (5 m either side of cable)</li> </ul>

	DATE	COMMENT	RESPONSE
		<p><b>Environmental Management Programme</b></p> <p>The EMPr must also include the following:</p> <p>All recommendations and mitigation measures recorded in the EIAR and the specialist studies.</p> <p>Measures to protect other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.</p> <p>Adequate rehabilitation measures for the proposed scope of works triggering Activity 18 of Listing Notice 1.</p> <p>The frequency for the auditing of compliance with the conditions of the EA and EMPr, and for the submission of such compliance reports to the competent authority.</p> <p>A layout map and environmental sensitivity map, indicating any no-go areas and environmental sensitive areas and features identified during the assessment process. The corridor route (including GPS coordinates and width of the corridor) must also be indicated.</p> <p>In addition to the above, the EMPr must comply with Appendix 4 of the EIA Regulations, 2014, as amended.</p> <p><b>General</b></p> <p>You are further reminded to comply with Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: <i>“The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority - (a) an environmental impact assessment report inclusive of any specialist reports, and an EMPr, which must have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.”</i></p>	<p>All recommendations and mitigation measures recorded in the EIAR and the specialist studies, as appropriate, are included in the EIAR.</p> <p>Specifications relating to the prevention of pollution and contamination as a result of fuels and oils are provided in the EMPr, as are specification for the protection of vegetation, soils, faunal habitat, etc.</p> <p>The EMPr includes specifications for reinstatement and rehabilitation.</p> <p>The EMPr specifies monthly compliance audits which must be submitted to DFFE.</p> <p>A map indicating these features has been provided in the EMPr.</p> <p>A table near the beginning of the EMPr lists the requirements of Appendix 4 of the NEMA EIA Regulations, 2014 and specifies the parts of the report where these requirements are provided.</p> <p>This condition was complied with when the DEIAR was submitted to DFFE.</p>



	DATE	COMMENT	RESPONSE
		<p>Should there be significant changes or new information that has been added to the EIAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 23(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: "The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority – (b) a notification in writing that the reports, and an EMPr, will be submitted within 156 days of acceptance of the scoping report by the competent authority, or where regulation 21(2) applies, within 156 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the environmental impact assessment report or EMPr, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in sub-regulation (1)(a) and that the revised environmental impact assessment report or EMPr will be subjected to another public participation process of at least 30 days".</p> <p>Should you fail to meet any of the timeframes stipulated in Regulation 23 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p>	<p>There are no significant changes to the project that require additional time during the legislated EIA process.</p> <p>The EAP and Applicant are aware of this condition.</p> <p>The Applicant will not commence with the activity until an Environmental Authorisation is granted by the Department.</p>
16	Date : 24 08.2021 E Mail : Mr Asanda Njobeni – DFFE (Sustainable Aquaculture Management)	<p>DRAFT ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED 2AFRICA/GERA (EAST) SUBMARINE CABLE SYSTEM TO BE LANDED AT GQEBERHA (PORT ELIZABETH) (EIA REFERENCE: 14/12/16/3/3/2/2057).</p> <p>Please take note that a decision was reached on the 18th June 2021, regarding the appeals lodged against the Environmental Authorisation for the Algoa Bay sea based Aquaculture</p>	<p>Thank you for the notification and the Applicant looks forward to further engagement, to ensure that implementation of the Aquaculture project,</p>

	DATE	COMMENT	RESPONSE
		<p>Development Zone, by the Minister of Justice and Correctional Services (ref: LSA 192739). The appeals lodged were dismissed, the DFFE, Chief Directorate Aquaculture and Economic Development is now able to proceed with the implementation of the ADZ. The applicant for the submarine cable (the current proposed project) has been captured on the stakeholder database for the ADZ and will be kept informed of the progress with respect to the implementation of the project related activities to allow for further engagements regarding both projects.</p> <p>It is noted that previous comments submitted by the Directorate SAM regarding the draft and final scoping report have been responded to adequately in the Comments and Response report (Appendix E) of the draft EIR, which included realignment of the cable to the southern edge of the ADZ concession area of Algoa 1 Option 1.</p> <p>Please note that the Directorate Sustainable Aquaculture Management reserves the right to review and/or provide additional comments in future.</p>	<p>as well as the proposed cable installation, can be undertaken with minimal risk to both projects.</p> <p>Thank you for the acknowledgement.</p> <p>In this EIA process, all registered stakeholders will be notified when the final EIAR (FEIAR) is submitted. They may send comment on the FEIAR directly to DFFE (EIA authorisations). Direct engagement between Aquaculture and the Applicant (Vodacom) regarding project implementation is also expected, should DFFE grant Environmental Authorisation for the proposed 2AFRICA cable landing at Gqeberha.</p>