PROPOSED MARINE TELECOMMUNICATIONS SYSTEM (2AFRICA/EAST CABLE SYSTEM) TO BE LANDED AT DUYNEFONTEIN ON THE WEST COAST OF SOUTH AFRICA

NOTIFICATION REVIEW PERIOD (03 SEPTEMBER 2020 – 05 NOVEMBER 2020) COMMENTS AND RESPONSE REPORT

Name	Organisation
Dr Johann Augustyn	SADSTIA Executive Secretary
Mr Rhine Barnes	Melkbosstrand Neighbourhood Watch - Chairperson
Mr Bongani Dilima	Transnet National Ports Authority – Environmental Specialist
Ms Funanani Ditinti	Department of Environmental Affairs – Oceans & Coasts EIA
Mr Basson Geldenhuys	National Department of Public Works and Infrastructure – Chief Town Planner
Ms Fiona Grimett	Department of Environment, Forestry and Fisheries
Councillor Nora Grose	City of Cape Town - Cl
Ms Lesa La Grange	South African Heritage Resources Agency - Manager: Maritime and Underwater Cultural Heritage
Ms Smokie La Grange	Melkbosstrand Ratepayers Association - Chairperson
Ms Adri La Meyer	Department of Environmental Affairs and Development Planning
Mr Madimetja S Lephoto	Exploration Geophysicist
Swartland Municipality	Swartland Municipality
Mr Morne Theron	City of Cape Town – Senior Environmental Practitioner
Ms Pat Titmuss	City of Cape Town Metropolitan Municipality – Environmental Management Department
Mr Alfons van Craeynest	Hydrographic Office
Mr Marius Wheeler	CapeNature
Ms Briege Williams	South African Heritage Resources Agency – Heritage Officer

Name and Organisation	Comment	Response
Date: 29 07 2020 (Email) Ms Fiona Grimett Department of Environment, Forestry and Fisheries	Apologies, I have been trying to send this email since Monday, because of IT difficulties. The attached public participation plan for 2AFRICA Duynefontein 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.	Please see attached the planned Public Participation Plan for the 2AFRICA Duynefontein Landing. Please let me know if this meets the departments requirements.
	submitting the draft documents to the Competent Authority for comment.	
Date: 02 09 2020 (Email) Ms Pat Titmuss City of Cape Town	Your email is acknowledged. Can you advise me if you sent it to any other officials at the City of Cape Town?	Thank you for your email.
Metropolitan Municipality Environmental Management Department	As previously undertaken with your other projects my office will provide collated technical comment from the City of Cape Town departments.	The officials that we have on our project database have been advised – Mr J Massyn, Mr M Theron, Ms N Newman and Ms M Van den Bergh. All future correspondence will be directed to your Department.
	Thank you for your reply. Please just keep me and my two ccd colleagues – Morne and Natalie on your list at this stage. Johan Massyn retired a couple of years ago.	Please advise if there are any other officials you would like us to add to the projects database? Noted thank you.
Date: 02 09 2020 (Email)	Mr Nelson has retired, and I have taken over his position.	Thank you for your email received.
Mr Alfons van Craeynest		
Hydrographic Office	I will read through the documents and provide feedback soonest.	
Date: 02 09 2020 (Email) Mr Marius Wheeler CapeNature	Thank you for your email. Please note that I am currently unable to respond as quickly as I would have liked to. I will try my best to get back to you soonest.	Thank you for your email. Noted.
Date: 02 09 2020 (Email)	Thank you for the communication. I will circulate in the community for comment.	Thank you for your email and assistance. We will keep you updated on
Councillor Nora Grose	Please keep me included in all public engagements.	all public engagements.

Name and Organisation	Comment	Response
City of Cape Town Councillor		
Date: 03 09 2020 (Email) Swartland Municipality	We Acknowledge receipt of your letter dated 2020-09-02 regarding PROPOSED MARINE TELECOMMUNICATIONS CABLE SYSTEM 2AFRICA/GERA (EAST) CABLE SYSTEM) TO BE LANDED AT DUYNEFONTEIN and confirm that the correspondence is being referred to the relevant Department for attention. Reference Number: 3534107	Thank you for your acknowledgement email and reference number.
Date: 03 09 2020 (Email) Mr Rhine Barnes Chairperson Melkbosstrand Neighbourhood Watch	Please find attached	Thank you for your email and comment sheet received. We will add you to the projects database.
Date: 03 09 2020 (Email) Ms Smokie La Grange Chairperson Melkbosstrand Ratepayers Association	Comment Sheet received: The Melkbosstrand Ratepayers Association has been an I&AP for the last five years. Our comments have not been taken into consideration. Please continue to keep me on your mailing list.	Thank you for your comments received. We will keep you on the above-mentioned projects database.
Date: 04 09 2020 (Email)	Kindly Register Oceans and Coasts as an interested and affected party for this	Thank you for your email.
Ms Funanani Ditinti	proposed project.	
Department of Environmental Affairs – Oceans & Coasts EIA	Kindly use OCEIA@environment.gov.za email going forward for all communication related to Coastal EIA applications and related queries. I hope you find the above in order and looking forward to your positive	Ms Nontsasa Tonjeni, email: OCEIA@environment.gov.za , Directorate: Coastal Conservation strategies is already registered on the projects database. Please advise if this is correct.
	response.	
Date: 07 09 2020 (Email) Ms Adri La Meyer Department of	Thank you for your e-mail of 2 September 2020. Kindly register the Department of Environmental Affairs and Development Planning as a commenting authority for the S&EIR application. It would be appreciated if you could please add me as the	We will do so thanks. Once the Draft Scoping Report has been finalised you will be sent an electronic copy of the report for comment.
Environmental Affairs and Development Planning	Department's contact person and exclude all other Departmental officials from your mailing list for this application. This request is merely to avoid future confusion as my inbox has been flooded by e-mails from officials notifying me of your e-mail! Kindly notify me of the availability of the DSR for comment. Just to confirm – I assume the s53 MPRDA application does not form part of the scope of the S&EIR application?	In terms of the S53 MPRDA application this will be undertaken by the applicant and will not form part of the EIA process although the need for it will be mentioned in the environmental reports.
	Many thanks for the response.	
Date: 07 09 2020 (Email)	Please add me to the list.	Thank you for your email and you have been added to the projects
Mr Madimetja S Lephoto	We do not object to the proposed cable landing.	database. We will forward your email to MTN.
Exploration Geophysicist	We do however request reciprocity when we have our seismic survey activities in the future.	

Name and Organisation	Comment	Response
Date: 05 10 2020 (Email) Mr Bongani Dilima Transnet National Ports Authority – Environmental Specialist	Navigation System for the Vessels that are calling Port of Cape Town. Traffic Management System for Vessel Tracking (V.T.S).	Thank you for your comments received.
Date: 05 10 2020 (Email) Mr Morne Theron City of Cape Town – Senior Environmental Practitioner	The abovementioned BID commenting deadline today refers. Further to my telephone conversation earlier today with your office administrator I thank you for the kind 24hr hour extension to submit the City of Cape town comment tomorrow 6 October.	Thank you for your email. The project is still only in the notification phase so we will accept comments whenever you are ready to submit to us. We are hoping to commence with the EIA on this development in the next month or two but there have been delays due to the Covid-19 lockdown period.
Date: 14 10 2020 (Email) Mr Morne Theron City of Cape Town – Senior Environmental Practitioner	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 Duynefontein, 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, Duynefontein. 1. Kindly register the Environmental Management Department: Blaauwberg District as the official City of Cape Town entry point for comment on	ACER will do so.
	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	ACER will do so.

Name and Organisation	Comment	Response
	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.	
	In the interim the following comment is provided based on the information provided in the BID:	
	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: Applicable legislation: 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 agreements that may need to entered into for infrastructure located in the intertidal zone. DEA&DP is the lead agent on lease agreement determinations).	Your comment is noted and ACER will engage with the DEA&DP
	Landing site:	Your comment is supported by the project developers and they will strive to do so.
	 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. 	Your comment is supported by the project developers and they will strive to do so.
	Operating a vehicle in the coastal zone: 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	An application for a Beach Driving Permit will be submitted once Environmental Authorisation for the project has been obtained.

Name and Organisation	Comment	Response
	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.	
	Public access, health and safety: All necessary precautions must be undertaken to ensure that the area is made safe during the two-week landing period. 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. 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.	The appointed contractor will have all work suitably demarcated and safety officers will be present on-site during landing operations. Your comment is noted, and the landing partner will strive to do so. The landing of the cable will be scheduled to take place outside of peak tourism periods.
	Depth of cable in the littoral active zone: The cable must be laid deep enough not to be exposed when beach profiles drop, especially during winter months.	From previous experience on the ACE cable the landing partner will try to bury the cable to at least 2 m below the beach profile to prevent cable exposure.
	Rehabilitation: The determination of whether rehabilitation is required must rest with the City's Environmental Management Department. 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. Should rehabilitation be required, the cost of rehabilitation will be for the account of the applicant. Rehabilitation will need to be competed 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.	Your comment is noted, and the City's Environmental Management Department will be consulted. Your comment is noted, and the City's Environmental Management Department will be consulted. Agreed. Agreed.

Name and Organisation	Comment	Response
	Spatial Planning and Environment Directorate: Environmental Management Department - Environmental & Heritage Management Branch	
	Both landing alternatives of the telecommunications system are proposed in an area of high archaeological sensitivity.	Your comment is noted however with the landing of the ACE Cable system no significant heritage resources were uncovered during cable installation. Given that the cable will terminate at the existing ACE BMH impacts on heritage resources are considered insignificant but will be confirmed through a heritage assessment.
	 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. 	Your comment is noted and will be abided by.
	 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: 	
	 A botanical impact assessment must be included as a specialist study; 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); 	This study will be commissioned as part of the EIA. Directional drilling will be considered by the landing partner. It should be noted however that following the installation of the ACE Cable system the primary dune cordon had recovered to its original profiles within 4 months of construction taking place. The Beach and Dune Dynamics Assessment will be undertaken to provide an assessment of drilling versus trenching.

Name and Organisation	Comment	Response
	FIGURE 1: Location of the CBA as identified by the City of Cape Town: Biodiversity Network Map (2016). 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:	ACER is aware of the Disaster Risk Management Centre's requirements and will be consulted during the EIA process.
	 That a risk assessment and emergency / evacuation management plan for the marine telecommunications system (during the construction and operational phases) be compiled; and 	This plan will be submitted to the DRMC for approval.
	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	The application will be tested against the TEM. It should be noted that once installed no additional staff or construction workers will be required by the landing partner within the PAZ.

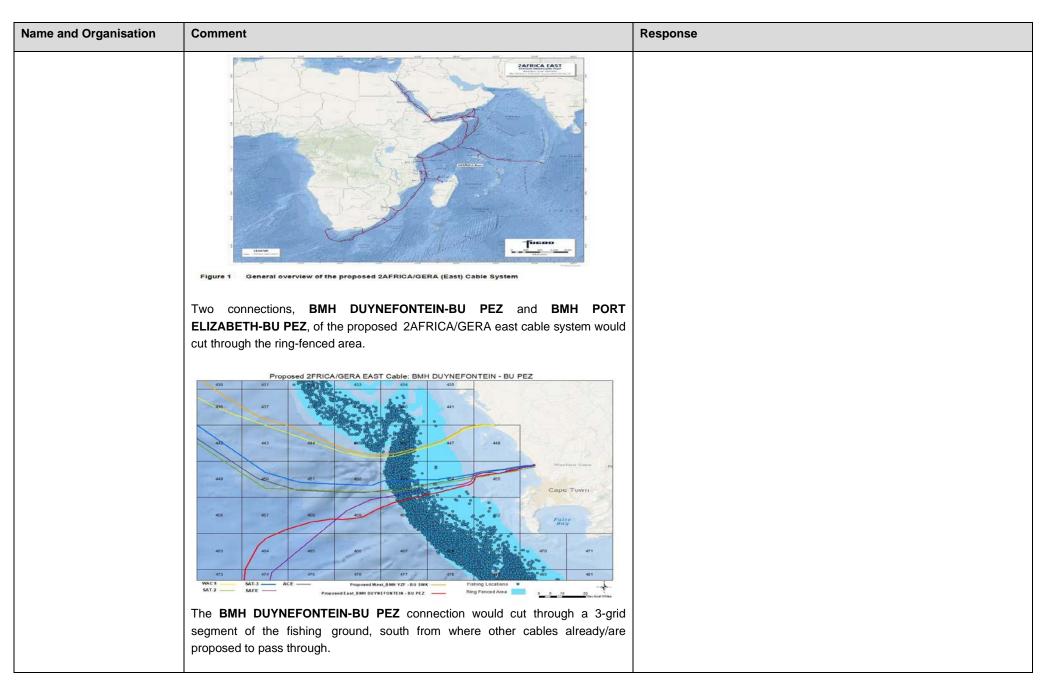
Name and Organisation	Comment	Response
	EIGURE 2: Location of Alternatives A & B in relation to the Koeberg Nuclear Power Station Precautionary Action Zone • Water & Sanitation Department: Technical Services Branch Indicated the following: • Water & Sewer Reticulation • Proposed Alternative 1 • There 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:	Noted and the project landing partner will be notified of this infrastructure. As existing cable sleeves are to be utilised for the 2AFRICA cable no further excavations will take place inland from the ACE BMH.

Name and Organisation	Comment	Response
	Figure 1 Existing Services – Alternative 1 o Proposed Alternative 2 o 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:	The presence of this infrastructure is noted however if Alternative 1 is authorised no impacts on this infrastructure is anticipated.

Name and Organisation	Comment	Response
	Figure 2: Existing Water & Sanitation reticulation services at Alternative	
	Bulk Water 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.	Your comment is noted.
	Wastewater Treatment The property falls within the catchment of the Melkbos Wastewater Treatment Works (WWTW). The Melkbos WWTW will not be affected by this application. Water & Sanitation mitigation requirement	Correct, no wastewater will be generated by the proposed development.
	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.	Your comment is noted and will be taken into consideration.
	The abovementioned City of Cape Town comment must be included in the Scoping Report.	Your comments will be included into the Scoping Report
Date: 04 11 2020 (Email) Mr Basson Geldenhuys	I can confirm that I am aware of the intended processes.	As you are aware ACER (Africa) Environmental Consultants are commencing with the Environmental Authorisation processes to have

Name and Organisation	Comment	Response
National Department of Public Works and Infrastructure – Chief Town Planner		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.
Date: 24 11 2020 (Date) Dr Johann Augustyn SADSTIA Executive	Comments from SADSTIA members on 2AFRICA West and 2AFRICA Port Elizabeth	Thank you for the comments received on the proposed cable landings forming part of the 2AFRICA/GERA (East) and 2AFRICA (West) Cable Systems. ACER will include your comments in the EIA documentation,
Secretary	Comment from Oceana:	and we will keep you informed of any future correspondence or reports to be released during the EIA processes.
	There is reference to a plough which is dragged on the seabed and which then lays the cable in trough approx. 1 m deep. There are strong currents in this area – loose soil could over time expose cable, so our Skippers need to know the exact position of cable. It is close to the current existing cable which is on the seabed (an obstacle for our fleet for many years).	
	In summary, there is little concern about the Port Elizabeth cable landfall since it has net recently been trawled, but considerable concern about the Yzerfontein area, since these are intensely trawled blocks.	
	We would like to be kept in the loop on future consultations.	
	Comment from Irvin and Johnson:	
	Please see additional PDF document pertaining to both 2AFRICA West and 2AFRICA Port Elizabeth.	
	Map response to 2AFRICA WEST Cable Proposal	

Name and Organisation	Comment	Response
	ZAFRICA (West) Overview Map AN HICA (West) Proposed 2AFRICA (West) Cable System	
	Proposed 2FRICA WEST Cable: BMH YZF - BU SWK The west cable BMH YZF - BU SWK proposed to be landed at Yzerfontein would cross through the ring-fenced area at grids 453 and 447, running close to the already existing WACS cable. Map response to 2AFRICA/GERA EAST Cable System Proposal	



Name and Organisation	Comment	Response
Date: 04 12 2020 (Email) Ms Briege Williams (Heritage Officer) Ms Lesa La Grange (Manager: Maritime & Underwater Cultural Heritage) South African Heritage Resources Agency	Proposed 2FRICA/GERA EAST Cable: BMH PORT ELIZABETH - BU PEZ The BMH PORT ELIZABETH-BU PEZ connection to land in Port Elizabeth would cut through eastern fishing grids that have not been trawled for the past 5 years. Proposed 2AFRICA/GERA (East) submarine fibre optics cable system to be landed at Duynefontein, City of Cape Town, Western Cape. The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Background Information Document (BID) for the proposed 2AFRICA/GERA (East) submarine fibre optics cable system to be landed at Duynefontein on the West coast of South Africa. As part of the Environmental Authorisation process a Scoping Report and Environmental Impact Assessment (EIA) must be completed. The BID has already identified that a Heritage Assessment is to be undertaken as part of the process, and SAHRA supports this. In terms of the National Heritage Resources Act, No 25 of 1999 (NHRA), Sections 2 and 35 stipulate that any wreck, being any vessel or aircraft, or any part thereof, older than 60 years 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 objects may not be disturbed without a permit from the relevant heritage resources authority.	Thank you for the comments submitted. As part of the impact assessment phase of the EIA process a suitably qualified Maritime Archaeologist will be appointed to assess the possible impacts on marine heritage resources. This report will be forwarded to you for your records.

Name and Organisation	Comment	Response
	The proposed cable runs to the north of both Robben Island and Table Bay. Historically both of these areas have seen a high volume of maritime traffic and causalities. 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.	
	There are no wrecks listed as lying close to the proposed site, the nearest recorded wreck is that of the French vessel L'lucie which is recorded as wrecking in 1808 3.5km south of the cable landing site in Melkbosstrand.	
	Due to the possibility that heritage resources may be present along the proposed route of the cable, the heritage impact assessment must include a specialist study of maritime and underwater cultural heritage to be undertaken by a suitably qualified Maritime Archaeologist.	
	Should you have any further queries, please contact the designated official using the case number quoted above in the case header.	
	CaseID: 15795 Terms & Conditions:	
	 This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately. SAHRA reserves the right to request additional information as required. 	