

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

(EIA REFERENCE: 14/12/16/3/3/2/2046)

DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT PERIOD (28 May – 29 June 2021)

COMMENTS AND RESPONSE REPORT

Name	Organisation
Mr John Gribble	Heritage Specialist
Briege Williams	SA Heritage Resources Agency - Heritage Officer
Department of Forestry, Fisheries and Environment – Oceans and Coasts	Department of Forestry, Fisheries and Environment – Oceans and Coasts
Lydia Kutu -Coordination, Strategic Planning and Support	Department of Forestry, Fisheries and Environment – Integrated Env. Authorisations
Mr Alfons van Craeyest – Superintendent Paper Chart Production	SAMSA
Nelisa Ndobeni – Control Environmental Officer	Department Water and Sanitation
Morne Theron - Acting Head: Environmental & Heritage Management	City Of Cape Town
Ismat Adams – Conservation Off - Res. Ceder-Berg Landscape Unit	Cape Nature
Phumla Ngesi	Environmental Compliance Petroleum Agency SA
Keshni Rughboor Hod – Department Of Env Affairs and Dev Planning	HOD - DEADP
Keely Harris – Asset & JV Manager	Impact Oil & Gas
Mr Morne Theron – Acting Head: Environmental & Heritage Management	City of Cape Town
Mr Nigel Rossouw	Impact Oil and Gas

Name and Organisation	Comment	Response
<p>Date: 28.05.2021 E Mail J Gribble – Heritage Specialist</p>	<p>I've been uploading the Duynefontein and Yzerfontein EIAs to SAHRIS but have limited the upload to those documents that are relevant to SAHRA, rather than uploading everything. Perhaps when you contact Briega to let her know the documents have been loaded onto SAHRIS for comment you can send her the link you sent me and ask whether they would want to see any of the other documents loaded to SAHRIS.</p> <p>Both cases on SAHRIS have now been updated with the uploads and marked as 'submitted' so SAHRA will be able to see them</p>	<p>Good day John Trust my mail finds you well, please find below the links to be uploaded onto SAHRA website.</p> <p>Please advise once documents have been uploaded in order for us to then inform SAHRA.</p> <p>Duynefontein: https://wetransfer.com/downloads/1442aefdb9f13df8548a3419bdecb65c20210527085042/baa0a2</p> <p>Yzerfontein: https://wetransfer.com/downloads/297ddca8c1f26fd69489e6e7bf693b1d20210527081104/ddd664</p>
<p>Date: 28.05.2021 E Mail Briega Williams SA Heritage Resources Agency – Heritage Officer</p>	<p>Thanks for your message, I look forward to working with you.</p> <p>I will keep a look out on SAHRIS for the documents and will let you know once I have received them.</p>	<p>The DEIA documents for the above-mentioned project will shortly be uploaded to SAHRIS for your review and comment. Please advise once you have received the documents.</p>
<p>Date: 28.05.2021 E Mail DFFE – Oceans & Coasts</p>		<p>Please note that the DEIA period for the above-mentioned project has been loaded onto your link, please advise if you have received the documents.</p>
<p>Date: 28.05.2021 Email Mr I Adams – I & AP's</p>	<p>Please register me as I&AP for this project:</p>	<p>Thank you for your mail, we will add you to the database</p>
<p>Date: 31.05.2021 E Mail Mr Alfons van Craeyest - SAMS Superintendent Paper Chart Production</p>	<p>We spoke on Friday regarding the proposed marine telecommunications cables currently undergoing an environmental authorisation process.</p> <p>As I mentioned, the South African Navy Hydrographic Office is responsible for safety of navigation during such operations. We would need to communicate with the operator who is installing the cable for the Superintendent of Safety Information, Cdr Theunissen, to promulgate Coastal Navigational Warnings during the installation.</p> <p>I have been provided with shape file data by the United Kingdom Hydrographic</p>	<p>Thank you for the comments received which ACER passed on to the ASN team to get clarity on the proposed landing schedules for the 2AFRICA/GERA (East) and 2AFRICA (West) cable systems to be landed in South Africa. Please be advised that ASN have also stated that they will contact your office as well Mr James Collicot from SAMSA well in advance of the proposed installation dates.</p> <p>Subject: RE: 2AFRICA SOUTH AFRICA HYDROGRAPHIC OFFICE REQUEST FOR PLANNED INSTALLATION DATES EIA Query</p>

Name and Organisation	Comment	Response																									
	<p>Office (UKHO) for the 2 AFRICA WEST cable which is planned for 2022/2023. I have attached a document and related graphic showing the plotted cable positions.</p> <p>The other cable is the 2 AFRICA/GERA (East) cable system and I have also attached a document relating to this cable. There is slight confusion, as the UKHO have published a preliminary Notice to Mariners stating that cable installation works are planned between November 2020 and November 2021 for segment Cape Town, Port Elizabeth, Durban and Maputo? I have attached a copy of the P NM for reference.</p> <p>It would be much appreciated if you would kindly provide comment or clarity regarding the above and attached documents. If there are any proposed cable installations planned for the future, it would be important for us to know in order to take the appropriate action.</p> <p>As requested, these are the contact details for James Collicot from SAMSA: (Email address withheld). He will most likely direct you to the appropriate person or department.</p>	<p>The information we have received so far is as below.</p> <table border="1" data-bbox="1251 321 1971 634"> <thead> <tr> <th>Project</th> <th>Site</th> <th>POW</th> <th>Start</th> <th>Finish</th> </tr> </thead> <tbody> <tr> <td>2AFRICA GERA</td> <td>Duynefontein, South Africa</td> <td>SIMBA GERA Issue AH</td> <td>16/08/22</td> <td>29/08/22</td> </tr> <tr> <td>2AFRICA GERA</td> <td>Port Elizabeth, South Africa</td> <td>SIMBA GERA Issue AH</td> <td>12/09/22</td> <td>25/09/22</td> </tr> <tr> <td>2AFRICA GERA</td> <td>Amanzimtoti, South Africa</td> <td>SIMBA GERA Issue AH</td> <td>03/10/22</td> <td>16/10/22</td> </tr> <tr> <td>2AFRICA WEST</td> <td>Yzerfontein, South Africa</td> <td>SIMBA WEST POW Issue 1.1</td> <td>19/04/23</td> <td>02/05/23</td> </tr> </tbody> </table> <p>Need anything else, please don't hesitate to contact me.</p> <p>Regards, Patrick McCloskey</p>	Project	Site	POW	Start	Finish	2AFRICA GERA	Duynefontein, South Africa	SIMBA GERA Issue AH	16/08/22	29/08/22	2AFRICA GERA	Port Elizabeth, South Africa	SIMBA GERA Issue AH	12/09/22	25/09/22	2AFRICA GERA	Amanzimtoti, South Africa	SIMBA GERA Issue AH	03/10/22	16/10/22	2AFRICA WEST	Yzerfontein, South Africa	SIMBA WEST POW Issue 1.1	19/04/23	02/05/23
Project	Site	POW	Start	Finish																							
2AFRICA GERA	Duynefontein, South Africa	SIMBA GERA Issue AH	16/08/22	29/08/22																							
2AFRICA GERA	Port Elizabeth, South Africa	SIMBA GERA Issue AH	12/09/22	25/09/22																							
2AFRICA GERA	Amanzimtoti, South Africa	SIMBA GERA Issue AH	03/10/22	16/10/22																							
2AFRICA WEST	Yzerfontein, South Africa	SIMBA WEST POW Issue 1.1	19/04/23	02/05/23																							
<p>Date: 02.06.2021 E Mail Lydia Kutu - Integrated Environmental Authorisations</p>	<p>ACKNOWLEDGEMENT OF RECEIPT OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED 2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTICS CABLE SYSTEM TO BE LANDED AT DUYNFONTEIN, WESTERN CAPE PROVINCE</p> <p>The Department confirms having received the Draft Environmental Impact Assessment Report for the abovementioned project on 28 May 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.</p> <p>Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that "Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but must be provided with an opportunity to comment on such reports</p>	<p>All I&APs and commenting authorities have been provided with the opportunity to comment on the DEIAR.</p>																									

Name and Organisation	Comment	Response
	<p>once an application has been submitted to the competent authority.”</p> <p>Further note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7) of these Regulations.</p> <p>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.</p>	<p>ACER is fully aware of the legislated EIA timeframes and will ensure all reports are submitted timeously.</p> <p>No activities will commence prior to issuance of environmental authorisation and the required permits for construction.</p>
<p>Date: 02.06.2021 E Mail Briege Williams SAHRA – Heritage Officer</p>	<p>PROPOSED MARINE TELECOMMUNICATIONS CABLE SYSTEM (2 AFRICA/EAST CABLE SYSTEM) TO BE LANDED AT DUYNEFONTEIN ON THE WEST COAST OF SOUTH AFRICA</p> <p>CaselD 15795</p> <p>I have now issued a comment for the above project and uploaded it onto SAHRIS, I have also attached a PDF copy to this email. It is very similar to the comment for Yzerfontein especially in regard to the comment highlighted in the emails for that case. 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 Duynefontein, City of Cape Town, Western Cape, South Africa.</p> <p>As part of the Environmental Authorisation process a Scoping Report was undertaken which SAHRA commented on in March 2021 and recommended that a Maritime Heritage Impact Assessment (MHIA) be included as part of the Environmental Impact Assessment. SAHRA also requested a change to a paragraph relating to the remit of the agency be amended to reflect the correct information.</p> <p>In terms of the National Heritage Resources Act, No 25 of 1999 (NHRA), Sections 2 and 35 stipulates that any wreck, being any vessel or aircraft or any part thereof older than 60 years old lying in South Africa's territorial waters or maritime cultural</p>	<p>Thank you for the comments received.</p>

Name and Organisation	Comment	Response
	<p>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.</p> <p>Island and Table Bay. Historically both areas have seen a high volume of maritime traffic and casualties. There are a number of vessels which are recorded as lying in the proximity of the route of the proposed cable.</p> <p>The proposed cable runs to the north of both Robben Island and Table Bay. Historically both areas have seen a high volume of maritime traffic and casualties. There are a number of vessels which are recorded as lying in the proximity of the route of the proposed cable.</p> <p>SAHRA has reviewed the document and is pleased to note that the recommended amendment regarding the remit of the agency has been made. The MHIA included as part of the DEIAR 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. These recommendations are:</p> <ul style="list-style-type: none"> ▪ No mitigation is proposed in deep and shallow water. ▪ In inshore waters and on the beach crossing, it is recommended that an alert for the occurrence of submerged prehistoric archaeological material, be included in the EMPr for the project, specifically for the divers working in the shoreface and the operators excavating the trench in the beach and dune. ▪ Due to the dynamic nature of the environment, any possible archaeological or paleontological material ▪ encountered in these activities must be immediately collected by the diver or operator before it is lost. The ECO and/or the monitoring archaeologist must be informed and take custody of the find and obtain its context. All such finds must be recorded, and their contextual information (a report) must be deposited at an SAHRA approved institution. ▪ 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 	<p>Your comment is noted and the EAP is aware of this.</p> <p>Your comment is noted and the EAP is aware of this.</p> <p>Thank you for your approval.</p>

Name and Organisation	Comment	Response
	<p>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.</p> <ul style="list-style-type: none"> ▪ 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. ▪ 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. ▪ Nine shipping losses are recorded within the EEZ and on continental shelf in the vicinity of the proposed cable route. With one exception these wrecks are all World War U-boat casualties and although not protected by the Act, should be treated as war graves, and avoided during installation of the cable system. <p>All but one of these recommendations are supported by SAHRA and must be adhered to especially in the event that any cultural heritage should come to light. The recommendation that is not supported by SAHRA is the third point which reads:</p> <p>“Due to the dynamic nature of the environment, any possible archaeological or palaeontological material encountered in these activities must be immediately collected by the diver or operator before it is lost. The context. All such finds must be recorded, and their contextual information (a report) must be deposited at an SAHRA-approved institution.”</p> <p>This paragraph must be edited as it currently bypasses important legal requirements as set out in Sections 35(3) and 35(4) of the NHRA which respectively state that <i>“Any person who discovers archaeological or palaeontological objects or material or a meteorite in the course of development or agricultural activity must immediately report the find to the responsible heritage resources authority, or to the nearest local authority offices or museum, which must immediately notify such heritage resources authority”</i> and <i>“No person may,</i></p>	<p>Thank you for your support of the mitigation measures. Please note that the amendment requested to the one mitigation measure has been updated in the FEIAR, HIA and the EMP as requested.</p>

Name and Organisation	Comment	Response
	<p><i>without a permit issued by the responsible heritage resources authority – (a) destroy, damage, excavate, alter, authority offices or museum, which must immediately notify such heritage resources authority” and “No person may, without a permit issued by the responsible heritage resources authority – (a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite; and (b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite.”</i></p> <p>It must be noted that neither approval of this development nor issuing of a comment in terms of NHRA Section 38(8) exonerate the developer from applying for a permit as contemplated in NHRA Section 35(4) should the need arise as no heritage resources may be disturbed without such a permit from SAHRA.</p> <p>SAHRA suggests that it is replaced with the following sentence: <i>“Due to the dynamic nature of the environment, 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.”</i> It is noted that this recommendation originated as part of the HI and is also included on page 27 of the EMPr. SAHRA therefore requests that this paragraph is amended in each of the three documents (i.e., HIA, DEIAR, and EMPr).</p> <p>Should any shipwrecks be identified as part of this project then SAHRA must be notified to enable the information to be added 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 officer using the case number quoted above in the case header,</p>	<p>Your comment is noted and supported.</p> <p>Please note that the amendment requested to the one mitigation measure has been updated in the FEIAR, HIA and the EMPr as requested.</p> <p>Thank you for your comments received and assistance during the EIA process.</p>

Name and Organisation	Comment	Response
<p>Date: 03.06.2021 E Mail: Nelisa Ndobeni Department Water & Sanitation</p>	<p>DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED MARINE TELECOMMUNICATIONS CABLE SYSTEM 2AFRICA/GERA (EAST) CABLE SYSTEM TO BE LANDED AT DUYNEFONTEIN, WESTERN CAPE, SOUTH AFRICA</p> <p>This Department has perused the above-mentioned document and has the following comments:</p> <ul style="list-style-type: none"> ▪ Please note that any development within the 1:100 year flood line or within 500m from any boundary of a wetland or water resource triggers water use activities and must be authorised and registered in terms of Section 21 (c) “impeding or diverting the flow of water in a watercourse” and (i) “altering the bed, banks, course or characteristics of a watercourse” of the National Water Act, 1998 (Act No. 36 of 1998). ▪ The Applicant is hereby advised to apply and obtain a Water Use Authorisation as prescribed in Section 21 (c) and (i) of the National Water Act, 1998 (Act No. 36 of 1998).The application should be submitted online via the Departmental Electronic Water Use License Application and Authorisation System (e-WULAAS) by following the link: http://164.151.129.107/ewulaas/. ▪ As per Government Gazette No. 40229 in Government Notice 509 dated 28 August 2016, a signed Risk Matrix (Appendix A) must be completed and submitted to the Department. The risk matrix can be found on the Department’s website www.dws.gov.za under Document Library – Documents – “Section 21 (c) and (i)” – click all scroll down to “Final Risk Assessment Matrix”. ▪ Any water use activity that is not a Schedule 1 or Existing Lawful use must be authorised with this Department in terms of Section 22 reading together with Section 21 of the National Water Act, 1998 (Act 36 of 1998). ▪ No abstraction of surface or groundwater may be done without prior authorisation from this Department, unless it is a Schedule 1 Use or an Existing Lawful Use. ▪ A signed letter from the City of Cape Municipality confirming that there is 	<p>Your comment is noted, and a Water Use License application has been submitted to the DHSWS for decision making.</p> <p>An online application has been submitted by the applicant for the required WUL.</p> <p>A risk matrix has been compiled by the appointed wetland specialist Mr D Ollis which will be submitted as part of the online application process.</p> <p>Your comment is noted and supported. The EAP is currently busy with the WULA.</p> <p>The EAP and developer is aware of this condition. No abstraction of surface or groundwater will be required for the proposed development.</p> <p>This will be provided as part of the WULA.</p>

Name and Organisation	Comment	Response
	<p>sufficient capacity to provide water, sewer and waste service for the proposed installation must be provided to the Department.</p> <ul style="list-style-type: none"> ▪ Please be advised that no pollution of surface water or groundwater resources may occur due to any activity on the property as such, adequate control measures should be implemented to prevent pollution. ▪ It is indicated that stockpiles of sands will be located outside any storm water drains. A stormwater management plan must be in place. Contaminated stormwater must not be disposed of in the stormwater system as it will result in the contamination of water bodies and its disposal may also require analysis before disposal ▪ Stormwater must be managed on-site and not be allowed to runoff into the natural environment unless it is clean and not polluted. ▪ Measures to control illegal dumping of construction waste must be in place as this may result in pollution of the surface water run-off ▪ All the requirements of the National Water Act, 1998 (Act 36 of 1998) in terms of water use and pollution control management must be adhered to at all times. ▪ Solid waste must be managed in accordance with the requirements of the relevant legislation. <p>Please note that this Department reserves the right to amend and/or add to the comments made above in the light of subsequent information received.</p>	<p>The EAP and developer are aware of this condition and measures to protect water resources have been included in the EMPr compiled for the proposed development.</p> <p>No contaminated water will be disposed of into stormwater drains.</p> <p>Mitigation measures for stormwater management are included in the EMPr.</p> <p>No dumping of construction waste will be permitted on site as per the conditions of the EMPr.</p> <p>The developer will abide by the requirements of the National Water Act and conditions outlined in the EMPr.</p> <p>Solid waste will be managed as per the conditions of the EMPr and the requirements of relevant legislation.</p> <p>Your comment is noted and ACER would like to thank you for the comments received to date.</p>
<p>Date: 25.06.2021 :E Mail Morne Theron - Acting Head: Environmental & Heritage Management City of Cape Town</p>	<p>Thank you for the confirmation and our telephone chat earlier this morning. Whilst I could not find any trace of an e-mail notification to myself via e-mail, my assistant did subsequently confirm that she informed me of the hard copy's delivery. As such this is an oversight on my part, yet we'll endeavour to get you city comment asap.</p> <p>I acknowledge your kind extension of the commenting deadline until <u>Friday, 2 July 2021</u></p>	<p>ACER is looking forward to the comments from the CoCT on the 2 July 2021.</p>

Name and Organisation	Comment	Response
<p>Date: 29.06.2021 E Mail Ismat Adams – Conservation Intelligence Manager – Cape Nature</p>	<p>Cape Nature would like to thank you for the opportunity to comment on this application. Our comments are as follows:</p> <ol style="list-style-type: none"> 1. Given the low impacts of the cable laying activity as per the marine ecology, beach and dune, avifaunal, marine mammal, terrestrial ecology and freshwater assessment, it appears that the overall environmental impact of cable laying activity will be low and could therefore proceed. We do however, have the following further comments. <ol style="list-style-type: none"> 1.1 The cabling route must avoid benthic marine flora and fauna that do not have high resilience. 1.2 Ploughing appears more favourable than jetting due to the substantially larger amount of sedimentation that will occur from jetting that will also impact a larger area. 1.3 The cable laying activity should not impact cetacean migration or breeding. The construction programme would need to take this into account. 2. In principle, we do not support construction activity within MPA area an ideally the cabling route should not traverse any portion of MPA. 3. Alternative 1 cable landing site is supported as there is existing infrastructure in place to which the cable will be connected, that will be of low impact to the 	<p>Thank you for the comments received on the Duynefontein DEIAR. Your comments will be addressed and included in the FEIAR to be submitted to DFFE for decision making</p> <p>Thank you for your support.</p> <p>The alignment of the cable has been selected to avoid substrates which have high species diversity, and it is the EAP's opinion that the preferred alignment is the best option in terms of the impacts on marine fauna and flora.</p> <p>Ploughing is the preferred method for cable installation although jetting is required in the shallow water environment through the surf zone to ensure suitable burial depths are obtained for the cable.</p> <p>Cetacean migration patterns will be taken into consideration during project scheduling and ASN will appoint a suitably qualified crew member as a designated Marine Mammal / Protected Species Observer (MMO/PSO). Data collected should include position, distance from the vessel, swimming speed and direction, and obvious changes in behaviour (e.g., startle responses or changes in surfacing/diving frequencies, breathing patterns.)</p> <p>While the EAP appreciates the departments stance on this matter it is unavoidable for cables landing along this section of the coastline on the Western Cape to avoid the MPA without having significant impacts on the fishing sector. It should be noted however that the presence of these cables also affords benthic communities with an extra level of protection through the exclusion zones which are associated with these marine installations.</p> <p>Your support for the preferred landing site is appreciated.</p>

Name and Organisation	Comment	Response
	<p>wetland system, fauna and flora as per the findings of the terrestrial ecology and freshwater assessment. Furthermore, this alternative has also been supported by the dune impact assessment.</p> <p>4. The recommendations by the marine mammal assessment for a MMO to be appointed and cable laying to avoid main migration seasons are supported.</p> <p>5. The recommendation by the avifaunal assessment that route planning avoids all important Bird Areas, Marine Protected Areas, other important onshore areas and other marine islands, is supported.</p> <p>6. The cabling route should avoid CBA and ESA areas depicted in figure 14 of the EIR.</p> <p>7. All mitigation measures and recommendations put forward by the marine ecology, beach and dune, avifaunal, marine mammal, terrestrial ecology and freshwater assessment must be implemented.</p> <p>Cape Nature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>Thank you for your support.</p> <p>Thank you for your support.</p> <p>Where possible the proposed cable alignment has been selected to avoid CBAS and ESA's.</p> <p>All the mitigation measures put forward in the specialist studies have been included in the EMPr.</p> <p>Your comment is noted and ACER thanks you for your comments to date.</p>
<p>Date 29.06.2021: E Mail Phumla Ngesi PASA - Env Compliance Manager</p>	<p>COMMENTS ON DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT (DEIAR) FOR THE PROPOSED 2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT DUYNEFONTEIN, CITY OF CAPE TOWN, WESTERN CAPE, SOUTH AFRICA</p> <p>The Petroleum Agency SA (hereafter referred to as "the Agency") has reviewed the DEIAR and would like to provide the following comments:</p> <p>1. Implication of permanent exclusion zones on oil and gas industry:</p> <p>It is noted that a permanent exclusion zone of 500m on either side of the proposed cable will apply on oil and gas activities. Please be advised that oil and gas industry is still at an infancy stage with a number of exploration rights areas undergoing early phase exploration to identify areas with prospects and</p>	<p>Please note that reference to the 500 m exclusion zone in relation to oil and gas activities has been removed from the EIA report. The EAP believes that the commercial and operational objectives of protecting the cable infrastructure can be achieved while at the same time</p>

Name and Organisation	Comment	Response
	<p>leads. Permanent exclusion zones will impact the oil and gas industry negatively as follows:</p> <ul style="list-style-type: none"> ▪ The opportunity to explore excluded areas will be lost as the seabed will be unavailable permanently, meaning that even if the said areas have significant oil and gas resources, there will be never a chance to discover them, unless other activities such as geophysical surveys and directional drilling is permitted. ▪ Holders' exploration plans will be extensively impacted as it is impossible to undertake discontinuous geophysical surveys over a particular area as this creates gaps in data collected. ▪ Holders of exploration rights have the exclusive right to undertake activities over the exploration right areas and such exclusion zones will infringe on their right explore on these areas. <p>2. Yzerfontein cable landing area and affected right holder: It is noted that the cable landing area will render very limited areas of the seabed permanently unavailable to the right holder. Clarity is sought as to how much area will be affected.</p> <p>3. Direct consultation with affected oil and gas rights holders: The suggestion made by the EAP that MTN should deal with affected rights holders outside the EIA process is inappropriate and is against the objectives of public consultation as espoused by the EIA Regulations and guidelines. It is our view that the EAP should consult with affected rights holders during the</p>	<p>protecting the exploration rights of offshore concession holders by obtaining legal consent from the concession holders and if required drawing up co-operation agreements where activities of both parties can co-exist without limiting each other's commercial operations.</p> <p>To effectively plan cable routes, armouring and burial and prevent cable system damage on the seabed (from Oil and Gas activities), the Applicant (MTN) undertakes to proactively inform offshore concession holders of its concept designs (for cable laying and routing) and to collaboratively plan on an ongoing basis its detailed installation designs and operational procedures with the concession holders. Given the small footprint of the cable it is unlikely that the proposed cable route will have any impact on the opportunity to explore the seabed for oil and gas deposits</p> <p>Additionally, to eliminate interactions with future oil and gas activities on cable system infrastructure the applicant will work with the offshore concession holders to map the marine cable system route and formally Register the cable routing as a real right against the Deed and against the Oil and Gas</p> <p>The physical footprint of the 2AFRICA (West) cable from the shore at Yzerfontein to the EEZ boundary is 570 km. If a cable footprint of 1 m wide is used the surface area equates to 570,000 m² or 57 ha. The Duynefontein cable alignment (length of 2,830 km) will have a footprint of 2,830,000 m² from Duynefontein to the EEZ boundary with Mozambique which equates to 283 ha.</p> <p>Please note that the EAP, ASN and MTN are engaging with all rights holders as part of the EIA process and co-operation agreements are being drawn up to meet the needs of both parties. This process does not form part of the EIA process however all offshore concession</p>

Name and Organisation	Comment	Response
	<p>EIA as required by the Regulations.</p> <p>Please do not hesitate to contact the aforementioned should you need clarity on any of the comments raised.</p>	<p>holders have been included in the EIA process and requested to comment and on the reports compiled.</p> <p>Thank you for the comments received and your assistance with the identification of affected concession holders and rights holders is greatly appreciated.</p>
<p>Date: 30.06.2021 E Mail: Keshni Rughboor Hod – Department of Env Affairs and Dev Planning</p>	<p>COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED 2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT DUYNEFONTEIN, CITY OF CAPE TOWN (DFFE REF: 14/12/16/3/3/2/2046)</p> <p>The e-mail notification of 02 September 2020 providing a Background Information Document, the Department’s acknowledgement of receipt of the notification sent via e-mail on 07 September 2020, the Draft Scoping Report (“DSR”) dated January 2021, the Department’s comments on the DSR dated 15 February 2021, and the e-mail notification of 28 May 2021 informing the Department of the availability of the Draft Environmental Impact Assessment (“EIA”) Report for comment, refer.</p> <p>Thank you for the opportunity to participate in the EIA process. Please find collated comments from various directorates within the Department on the Draft EIA Report dated May 2021 that was available for download from various online platforms provided by the environmental assessment practitioner.</p> <p>Directorate: Development Management (Region 1) – Mr Rainer Chambeau (Rainer.Chambeau@westerncape.gov.za):</p> <p>1.1 This Directorate is satisfied that its comments on the DSR have been addressed in the Draft EIA Report.</p> <p>1.2 The activity description must be amended to include an indication of the location for vehicle access to the beach. Furthermore, the length of the proposed fibre optic cable for the terrestrial component of the cable system must be provided in the Draft EIA Report.</p>	<p>Noted with thanks.</p> <p>Thank you for your comment and support for the proposed development.</p> <p>Access to the beach will be along an existing beach access ramp which is located near the Melkbosstrand Beach parking area to the north of the Sout River (33°42'46.54"S and 18°26'39.27"E). The City of Cape Town currently uses this beach access ramp for TLB's and tractors to access the beach for cleaning operations and for the maintenance of storm water drains which have outlets further north on the Van Riebeeckstrand Beach. The beach access point is approximately 2 km</p>

Name and Organisation	Comment	Response
	<p>1.3 Proof of the public participation process conducted must be included in the Final EIA Report.</p> <p>1.4 The description of the proposed development in the Draft Environmental Management Programme (“EMPr”) must be amended to include the information requested in paragraph.</p> <p>1.5 A method statement for access to the proposed landing site must be included in the EMPr.1.2. above.</p> <p>1.6 The Rehabilitation Plan (Annexure 2 of Appendix F) compiled by Acer (Africa) Environmental Consultants must be dated accordingly.</p> <p>2. Directorate: Waste Management – Mr Gary Arendse (Gary.Arendse@westerncape.gov.za):</p> <p>2.1 Section 4.4.5, page 46 of the Draft EIA Report indicates that for the terrestrial component of the project, a skip will be placed for the disposal of all waste. Please note that hazardous and general waste must always be stored separately to avoid the entire waste stream being classified as hazardous waste.</p> <p>3. Directorate: Development Facilitation – Mr Ryan Apolles (Ryan.Apolleswesterncape.gov.za):</p> <p>3.1 This Directorate is satisfied that the findings from the various specialist studies concluded that the identified environmental impacts can be mitigated</p>	<p>south of the proposed cable landing point. The length of the terrestrial cable component from the BMH to the CLS Duynefontein is approximately 1.3 km in length (Section 5.1 of the FEIAR).</p> <p>This has been included in the FEIAR. Please refer to Section 8 of the FEIAR and Appendix D.</p> <p>The description of the proposed development in the EMPr has been updated as requested.</p> <p>A method statement will not be included in the EMPr for access to the proposed landing site as the contractor and staff will use existing access roads to access the site. Access control measures are clearly defined in the EMPr. Access to the beach will be in accordance with the conditions of the ORV permit to be issued to the contractor which will outline permissible beach access points, vehicles to be used and the drivers of such vehicles.</p> <p>The rehabilitation plan has been dated accordingly as requested.</p> <p>Your comment is noted and the FEIAR has been updated accordingly.</p> <p>Thank you for your comment and support of the EMPr compiled.</p>

Name and Organisation	Comment	Response
	<p>to acceptable levels and that the EMPr provided adequate avoidance and mitigation measures to address potential impacts.</p> <p>4. Directorate: Biodiversity and Coastal Management – Ms Mercia Liddle (Mercia.Liddle@westerncape.gov.za):</p> <p>4.1 The proposed site for the marine cable landing does not fall within a Critical Biodiversity Area but is classified as “Other Natural Areas”. According to the Western Cape Biodiversity Spatial Plan (2017), the proposed site falls under an area that is not currently identified as a priority but should retain most of their natural character and perform a range of biodiversity and ecological infrastructure functions. Although not prioritised, they are still an important part of the natural ecosystem. The management objective for these areas is to minimise habitat and species loss, and to ensure ecosystem functionality through strategic landscape planning. These areas offer flexibility in permissible land-uses; however, a precautionary approach must be applied when considering high-impact land-uses.</p> <p>4.2 The increased effects of climate change, sea level rise and increased storm surges in coastal environments obliges the Department to adopt a more cautious approach when considering development along the coast. The coastline of the City of Cape Town (“CoCT”) is a harsh and highly dynamic environment, where the biophysical attributes of the coastline are in a constant state of flux. Some of this change is cyclical and predictable, taking place over relatively short (seasonal) temporal scales, whilst other change is unseasonable and unpredictable. These unpredictable fluctuations often result in abrupt changes in coastal geomorphology. This paired with the increased effects of climate change, sea level rise and increased storm surges in coastal environments, obliges authorities to adopt a more cautious approach when considering land use applications along the coast.</p> <p>4.3 The CoCT undertook proactive measures with the intent to address a multitude of growing pressures along its coastline by delineating a coastal urban edge along the City’s coastline, taking into consideration the requirements of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“NEM: ICMA”). The</p>	<p>Your comment is noted and supported.</p> <p>Your comment is noted and supported.</p> <p>Your comment is noted and supported.</p>

Name and Organisation	Comment	Response
	<p>Department formally established the CoCT's coastal urban edge as the CoCT coastal management line in March 2021 in terms of the NEM: ICMA. The principle purpose of the coastal management line ("CML") is to protect coastal public property; private property and public safety; to protect the coastal protection zone ("CPZ"); and to preserve the aesthetic value of the coastal zone. The use of the CML is of importance in response to the effects of climate change as it involves both a quantification of risks, and pro-active planning for future development.</p> <p>4.4 The proposed development will enter the Coastal Protection Zone ("CPZ") as defined in section 16 of the NEM: ICMA. The purpose of the CPZ is to avoid increasing the severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes, including the risk of sea level rise. The proposed development will involve laying of the cable across the beach up to the position of the existing ACE cable system beach manhole 2 (requiring excavations within the intertidal zone to bury the cable before it will be anchored into the existing ACE cable system beach anchor block), and installation of a sea earth system.</p> <p>4.5 The landing of the proposed marine telecommunications cable will enter the littoral active zone ("LAZ") of Van Riebeeckstrand Beach, and it is said to have an impact on the coastal dune cordon. The LAZ is defined as "any land forming part of, or adjacent to, the seashore that is –</p> <ul style="list-style-type: none"> ▪ Unstable and dynamic as a result of natural processes; and ▪ Characterised by dunes, beaches, sand bars and other landforms composed of unconsolidated sand, pebbles or other such material which is either unvegetated or only partially vegetated. ▪ The LAZ comprises a very dynamic system and should be treated as such to allow for the free movement of sand without any interferences. The proposed activity is located along a sandy shore that is naturally subjected to cycles of erosion and accretion and it is essential that adequate space or buffers are provided for and maintained to allow for such processes. <p>4.6 The applicant has identified relevant permits for working in the CPZ. The Draft EMPr states that only those vehicles and drivers permitted to access</p>	<p>Your comment is noted.</p> <p>The EAP and project proponent are aware of the sensitive and highly dynamic nature of the coastal environment and have planned the project accordingly to ensure infrastructure is protected and not exposed through erosion and accretion cycles. Every effort will be made to minimise the construction footprint and duration of construction within this environment.</p> <p>Thank you for your comment.</p>

Name and Organisation	Comment	Response
	<p>the beach as per the Off-Road Vehicle Permit ("ORV") would drive on the beach Access to the beach would only be allowed from the access point authorised in the ORV permit. The Draft EIA Report noted the Seashore Act, 1935 (Act No. 21 of 1935) Lease Permits, as one of the permits that is required for the development.</p> <p>4.7 As far as possible, the proposed activities should not hinder the general public's ability to access the coast. Appropriate signage should be used to inform the public during the installation/excavation phase to ensure public safety.</p> <p>4.8 This Directorate is satisfied that section 63 of the NEM: ICMA was adequately addressed in the Draft EIA Report. Although the proposed activity is located within the CPZ, the LAZ and seaward of the City of Cape Town's CML, due to the nature of the proposed activities, its location seaward of the CML is warranted. Alternative 1 is supported as the impact on the dynamic and sensitive coastal environment as well as the possible impact on resident bird species, will be localised and short-term. The mitigation and rehabilitation measures proposed for the beach and coastal dunes (including the upper beach, intertidal and shallow subtidal sandy habitats), are supported</p> <p>5. Directorate: Pollution and Chemicals Management – Ms Shehaam Brinkhuis (Shehaam.Brinkhuis@westerncape.gov.za):</p> <p>5.1 The recommended management and mitigation measures proposed by the specialists are supported, with emphasis on the following mitigation measures supplied in the Ecological Impact Assessment Report compiled by Inland Waters Consultancy in association with Capensis dated February 2021, as noted in the EMPr:</p> <ul style="list-style-type: none"> ▪ Any temporary toilets and solid waste disposal facilities should be located at least 20m from the edge of the dune slack wetland. Please amend section 6.5.1 of the EMPr to specifically include the recommendation of a 20m buffer. ▪ The dune slack wetland outside of the development footprint should be 	<p>As per the section 6.1.1 of the EMPr access for the public will be suitably demarcated and signage will be erected to ensure public safety.</p> <p>Thank you for your comment and support for the preferred alternative.</p> <p>Section 6.5.1 has been amended to include the 20 m buffer as requested.</p> <p>Section 6.1.2.1 of the EMPr has been amended to include the proposed</p>

Name and Organisation	Comment	Response
	<p>treated as a “no-go” area and appropriately demarcated when construction work is carried out. No vehicles, machinery, personnel, construction material, cement, fuel, oil, or waste should be allowed into this area, unless express permission is granted by the environmental control officer (“ECO”) for specific activities and such work is carried out under close supervision of the ECO.</p> <ul style="list-style-type: none"> ▪ Mechanical diggers and all other machinery and vehicles that are to be used in close proximity to the dune slack wetland should be checked for oil and fuel leaks every day, before they are allowed to enter the wetland or a buffer area of 10m around the edge of the wetland. If any machinery or vehicles are found to have an oil or fuel leak, they must not be allowed to enter within 10m of the edge of the dune slack wetland until the leaks have been rectified. ▪ No discharge of effluents or polluted water, including sediment-laden water from the dewatering of trenches (if carried out), should be allowed to enter the dune slack wetland. ▪ No fuel storage, refuelling, vehicle maintenance or vehicle depots should be allowed within 20 m of the edge of the dune slack wetland. <p>5.2 The excavation and trenching activities for the shore-crossing of the subsea cable must be strictly controlled and monitored by an ECO, to prevent any unnecessary disturbance to sensitive shore environments.</p> <p>5.3 The storage of hazardous substances (i.e. diesel, petrol and lubricants etc.) should be located on impervious surfaces with bunds (to accommodate 110% of the maximum allowable volume) around them to contain any fugitive spillages and/or leakages</p> <p>5.4 Appropriate dust control management practices and procedures must be defined to ensure the effective suppression of dust during all activities, such as trenching during the construction phase on shore, especially during high winds.</p> <p>5.5 Cement mixing should be prepared in a designated area with an impervious surface. The mixing area must either be bunded or have a berm structure to</p>	<p>mitigation measure.</p> <p>This mitigation measure is found in Section 6.5.1 of the EMPr.</p> <p>This mitigation measure is found in Section 6.4.1 of the EMPr.</p> <p>As included in the EMPr (Section 6.4.1) refuelling and fuel storage areas may not take place or be located within 100 m of the beach or dune slack wetland.</p> <p>An ECO will be appointed to monitor the site during construction and to ensure works are undertaken as per the conditions of environmental approval and the conditions of the approved EMPr.</p> <p>This condition is included under 6.4.3 of the EMPr.</p> <p>Dust control measures will be implemented as and when required on site however given the sandy nature of the beach no dust is expected to be generated on site.</p> <p>No cement mixing will be required on site.</p>

Name and Organisation	Comment	Response
	<p>control run-off into an impervious sump area.</p> <p>5.6 Please amend the contact details of the Department's official for the reporting of section 30 incidents in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") (section 6.6.5, page 37 of the EMPr) to Mr Simon Botha (e-mail: Simon.Botha@westerncape.gov.za and telephone: (021) 483 0752).</p> <p>6. The applicant is reminded of its "duty of care" prescribed in section 28 of the NEMA which states that "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment", read together with section 58 of the NEM: ICMA, 2008 which refers to one's duty to avoid causing adverse effects on the coastal environment.</p> <p>7. Please direct any enquiries via e-mail to the official/s indicated in this correspondence should you require any clarity on any of the comments provided The Department reserves the right to revise initial comments and request further information based on any information received.</p>	<p>The contact details have been updated and amended in the EMPr as requested.</p> <p>The EAP is aware of the duty of care towards the coastal environment and will make every effort to ensure no adverse effects on the coastal environment takes place.</p> <p>Thank you for the comments received and support for the proposed development.</p>
<p>Date: 30.06.2021 E Mail: Keely Harris - Asset & JV Manager - Impact Oil and Gas</p>	<p>We refer to the draft Environmental Impact Assessment for the proposed marine telecommunications cable system 2AFRICA/GERA (EAST) to be landed at Duynefontein, Western Cape, South Africa.</p> <p>Impact Africa Limited would like to submit the following review comments for consideration to edit the Final EIA Report, and to have a formal response provided in the Issues and Response Report.</p> <ul style="list-style-type: none"> ▪ In Table 4, ref# 7.2 (page 23) a statement is made that "An exclusion zone of 500 m either side of the cable will be enforced once the cable is laid, within which no trawling or anchoring will be allowed, nor prospecting or mining for Oil and Gas." Section 10.1.3 (page 149) highlights the impacts on Oil and Gas exploration blocks and a statement is made that "O&G interests and their future drilling activities pose a risk to the development of the proposed 	<p>Thank you for your comments received.</p> <p>Your comment is noted, and the report has been amended accordingly.</p>

Name and Organisation	Comment	Response
	<p>2AFRICA/GERA (EAST) Cable System". We understand the need and objective to protect the cable infrastructure from disturbance during the operational phase. As an existing Exploration Rights Holder, we have a "limited real right" to explore for petroleum resources over the full extent of our exploration block without any restrictions. The proposal for installation and operation of the cable system cannot amount to sterilization of petroleum resources, nor permanently hinder our legal right to fully explore for petroleum resources. In addition, the Applicant's proposed project cannot be contrary to the objectives of the MPRDA. In the Executive Summary on page xii, reference is correctly made to Section 53 of the MPRDA, which legally obliges the Applicant to obtain consent from both the Exploration Rights Holder (Impact Africa Limited) and the DMRE Minister. Negotiating and obtaining consent from Impact Africa Limited is therefore not a mitigation measure</p> <ul style="list-style-type: none"> ▪ We believe that the commercial and operational objectives of protecting the cable infrastructure can be achieved while at the same time protecting the exploration rights of Impact Africa Limited. In addition to obtaining the legal consent required, a mutually beneficial agreement needs to be negotiated, where activities of both parties can co-exist without limiting each other's commercial operations. <p>Co-operation with Impact Africa Limited can be achieved by editing the current Draft EIR mitigation measures in the following ways:</p> <ul style="list-style-type: none"> ▪ Delete the statements in the Draft EIR referring to "... exclusion zone of 500 m either side of the cable No....prospecting or mining for Oil and Gas." ▪ Replace the exclusion proposal for prohibiting Oil and Gas with the following avoidance mitigation measure: "To effectively plan cable routes, armouring and burial and prevent cable system damage on the seabed (from Oil and Gas activities), the Applicant (MTN) undertakes to proactively inform Impact Africa Limited of its concept designs (for cable laying and routing) and to collaboratively plan on an ongoing basis its detailed installation designs and operational procedures with Impact Africa Limited." 	<p>The EAP and cable operator agree with this statement from Impact Oil and Gas and a co-operation agreement will be entered into between both parties to ensure both parties can co-exist without limiting each other's commercial operations.</p> <p>This has been removed from the report as requested.</p> <p>The report has been updated as follows as per your request; <i>"To effectively plan cable routes, armouring and burial and prevent cable system damage on the seabed (from Oil and Gas activities), the Applicant (MTN) undertakes to proactively inform Impact Africa Limited of its concept designs (for cable laying and routing) and to collaboratively plan on an ongoing basis its detailed installation designs and operational procedures with Impact Africa Limited"</i>.</p>

Name and Organisation	Comment	Response
	<ul style="list-style-type: none"> ▪ Insert the following additional mitigation measure: “To eliminate interactions with future Oil and Gas activities on cable system infrastructure and operations, work with Impact Africa Limited to map the marine cable system route and formally Register the cable routing as a real right against the Deed and against the Oil and Gas Rights at the Mineral and Petroleum Titles Registration Office. <p>We look forward to your response.</p>	<p>The report has been updated as follows as per your request; <i>“Additionally, to eliminate interactions with future oil and gas activities on cable system infrastructure the applicant will work with Impact Africa Limited to map the marine cable system route and formally Register the cable routing as a real right against the Deed and against the Oil and Gas Rights at the Mineral and Petroleum Titles Registration Office”.</i></p>
<p>Date: 02/07/2021 E Mail Mr Morne Theron – City of Cape Town</p>	<p>The Draft Environmental Impact Assessment Report, dated May 2021, pertaining to the above, refers. The City of Cape Town comment dated 25 March 2021, on the Final Scoping Report has adequately been reflected in the Draft Environmental Impact Assessment Report’s <i>Comments and Responses Report</i> (Appendix E of the DEIAR).</p> <p>The following additional comment is provided based on the draft EIAR:</p> <p>1. Community Service and Health Directorate: Recreation and Parks Department</p> <p>1.1. The draft EIA report does not make reference to the impact on Kelp Harvesters that operate within the development area. It is noteworthy that Kelp Harvesters have obtained a permit from the Department of Environmental, Forestry and Fisheries (DEFF) to harvest kelp along this stretch of the coast.</p> <p>1.2. The preferred alternative follows the existing alignment of the ACE cable, which traverses a public open space before landing on the coastal sand area. It must be noted that any damage caused to the public open space will require rehabilitation by the contractor.</p> <p>2. Spatial Planning and Environmental Directorate: Environmental Management Department – Environmental and Heritage Management Branch</p> <p>2.1. The EMPr (Appendix F) does not accurately reflect the recommendations</p>	<p>Thank you for your comment and acknowledging that ACER has addressed your earlier comments in the DEIAR.</p> <p>Reference to Kelp harvesters has been included in the EMPr (Section 1.3.1) as well as the contact person at the CoCT to liaise with in terms of Kelp Harvesters.</p> <p>As stipulated in the EMPr a preconstruction site visit will be held with the Coastal Management Branch of the CoCT and the required rehabilitation measures on site will be discussed and agreed on.</p> <p>Section 6.1.3 of the EMPr has been updated as requested with the</p>

Name and Organisation	Comment	Response
	<p>of the HIA. It is suggested that the relevant recommendations be copied from pages 54 and 55 of the HIA to the EMPr instead of being paraphrased by the compiler of the report. For example:</p> <ul style="list-style-type: none"> • No mitigation is required or proposed in the respect of submerged prehistoric archaeology or palaeontology in the Deep and Shallow water. • In the inshore waters and the beach crossing it is recommended that an alert for the occurrence of fossil bones and teeth as well as potential submerged prehistoric archaeological material be included in the EMPr for divers working in the shoreface and operators excavating the trench in the beach and dune. • There is a very low potential for impact on historical shipwrecks, the following recommendations are made in respect of mitigation measures to be applied: <ul style="list-style-type: none"> ○ If any further geophysical data be generated, it must be archaeologically reviewed for the presence of historical shipwrecks or related material and the project archaeologists consulted before data are collected ... if possible. ○ Should wreck material be near any portion of the cable, micro-siting of the cable and/or exclusion zone around the feature should be implemented. ○ Should any archaeological material be accidentally encountered, work must cease in that area until the project archaeologist and SAHTA have been notified. The find assessed by the archaeologist and agreement has been reached in how to deal with it. <p>3. General (typing/grammar errors and corrections)</p> <p>3.1. It is noted in draft EIA report, particularly on Page 58, that there are references reflecting text as "Error".</p> <p>3.2. There are numerous typographical errors in the EIA report.</p> <p>The abovementioned comments must be addressed in the final EIAR.</p> <p>Yours faithfully</p>	<p>recommendations of the HIA.</p> <p>ACER apologises for this and has reviewed the final report for typographical errors. It has emerged that when converting to PDF on the electronic copy submitted to your organisation some files created error codes on certain pages which was not picked up on. This has been addressed in the FEIAR.</p> <p>Your comments have been addressed in the FEIAR.</p>

Name and Organisation	Comment	Response
<p>Email: 09/07/2021 Mr Nigel Rossouw Impact Oil and Gas</p>	<p>I would like to submit additional comments on behalf of Impact Oil & Gas for your consideration to amend the Draft EIR (see attached document, referencing sections in the Draft EIR where Impact has made proposals for you to consider editing).</p> <p>The key issue that Impact Oil & Gas wants to have communicated clearly in the Draft EIR is that: <i>“With respect to Oil and Gas Right Holders the Applicant needs to obtain a right of access to the seabed by way of a Consent Letter from existing Oil & Gas Rights Holders as required by the MPRDA and negotiate a Cooperation Agreement with Oil and Gas right Holders outlining the principles of cooperation to limit the disruption of either parties’ commercial interests”.</i></p> <ol style="list-style-type: none"> 1. Impact’s original email submission should stand and be recorded in the “Comments and Response Report”. 2. The content in the Table (the Needs and Desirability Section in the Draft EIR) should focus on justifying why telecommunications is one of the many optimal uses of the “seabed resource”. We recommend that reference should be made to “Oil & Gas” as a current priority for use of the “seabed” as well as use of the potential below seabed hydrocarbon resources. Proposed revised wording is given in red font below. 3. Where reference is made in the Draft EIR (particularly the mitigation measures defined in the EMP) to...”An exclusion zone of 500 m either side of the cable...”, we suggest that this wording be replaced with the following mitigation wording: <ol style="list-style-type: none"> 3.1 To effectively plan cable routes, armouring and burial and prevent cable system damage on the seabed (from other marine users who have current legal rights to perform activities in the marine environment and who have rights to install infrastructure on the seabed), the Applicant undertakes to implement the objectives of the International Cable Protection Committee to “share the seabed in harmony with others”. 3.2 Applying the guidance from the International Cable Protection Committee to proactively inform all current marine users who have legal rights of its concept designs (for cable laying and routing) and to collaboratively plan on an ongoing basis its detailed installation designs and operational procedures. 3.3 To promote spatial awareness and information sharing, and to 	<p>Thank you for the comments received. ACER will include them in the FEIAR and amend the report accordingly to reflect the suggested amendments.</p> <p>The original comment received is captured in this CRR.</p> <p>Table 4 has been amended as per your suggestion.</p> <p>This has been amended in the FEAIR as requested.</p> <p>For items 3.2 to 3.4 this will be undertaken by the cable operator and by ASN in terms obtaining right of access from the rights holders and the formalisation of Co-operation Agreements with the affected concession holders.</p>

Name and Organisation	Comment	Response
	<p>formally document the cable routing, the Applicant undertakes to ensure that the cable routing is formally mapped on hydrographic and navigational charts by the South African Navy Hydrographic Office and</p> <p>3.4 With respect to Oil and Gas right Holders the applicant will obtain a right of access to the seabed by way of a Consent Letter from existing Oil & Gas Rights Holders as required by the MPRDA and negotiate a Cooperation Agreement with Oil and Gas right Holders outlining the principles of cooperation to limit the disruption of either parties commercial interests</p> <p>Thank you for engaging with us on the Draft EIR and if you have any questions, please don't hesitate to contact me.</p>	<p>ACER welcomes your comments received and appreciates the level of input provided by Impact Oil and Gas into the EIA process.</p>