

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

DRAFT SCOPING REPORT PERIOD (15 JANUARY 2021 – 15 FEBRUARY 2021)

COMMENTS AND RESPONSE REPORT

Name	Organisation
Ms Roelda Brown	Koeberg Library – Senior Librarian
Department of Environment, Forestry & Fisheries – Integrated Environmental Authorisations	Department of Environment, Forestry & Fisheries – Integrated Environmental Authorisations
Department of Environment, Forestry & Fisheries – Ocean & Coasts	Department of Environment, Forestry & Fisheries – Ocean & Coasts
Ms Waseefa Dhansay	Heritage Western Cape – Resource Management Services
Ms Sindiswa Dlomo	Department of Environment, Forestry & Fisheries – Integrated Environmental Authorisations
Mr Basson Geldenhuys	National Department of Public Works & Infrastructure – Chief Town Planner
Mr Gerhard Gerber	Department of Environmental Affairs & Development Planning – Western Cape – Head of Department
Mr John Gribble	Aco-Associates
Mr Maxhoba-ayakhawuleza Jezile	DEFF – Fisheries Management, Directorate: Sustainable Aquaculture Management
Mr Steve Kirkman	Department of Environment, Forestry & Fisheries – Ocean & Coasts
Ms Nicole Lomborg	Eni South Africa BV - HSE & Sustainability Coordinator
Ms Aulicia Maifo	Department of Environment, Forestry & Fisheries - Intern: Biodiversity Mainstreaming EIA
Ms Nelisa Ndobeni	Department Human Settlements, Water & Sanitation – Western Cape Regional Office
Mr Laurence Pearce	Impact Oil and Gas – Asset Compliance Manager
Ms Chanel Rampartab	CapeNature - Capability Manager Conservation Innovation
Mr Morne Theron	City of Cape Town - Environmental & Heritage Management Department
Ms Pat Titmuss	City of Cape Town – Head of Environmental & Heritage Management Department
Yumna van der Schyff	University of Cape Town
Ms Briega Williams	South African Heritage Resources Agency – Heritage Officer

Name and Organisation	Comment	Response
<p>Date: 22 12 2020 (Email) Ms Waseefa Dhansay Heritage Western Cape Resource Management Services</p>	<p>There will be no S38(1) trigger and no NID required as the cables affecting HWC's jurisdiction would be less than 100m.</p> <p>The standard archeological approach will apply nonetheless – if any heritage resources are uncovered work is to stop and HWC to be informed.</p>	<p>I'm doing impact assessments for two submarine telecoms (fibre) cables that will be landed on the west coast - one at Duynefontein and the other at Yzerfontein.</p> <p>SAHRA has requested HIA's for the offshore component (i.e. below the high-water mark) of each cable route and these are underway.</p> <p>I need to check with you both about the NIDs for the terrestrial portions of both cables will be required.</p> <p>At Duynefontein the cable will land at the existing ACE Cable landing point where a number of other cable systems already come ashore (SAT2, SAT3, ACE and the future Equiano cable system), and at Yzerfontein landfall will be at the existing submarine cable WACS landing point, where again a number of existing cable make landfall.</p> <p>In both instances once they have crossed the beach and high/low water boundary the cables will be routed to existing Beach Manholes (BMH) and from there each will routed in an existing buried cable sleeves to their respective Cable Landing Stations (CLS) which are the control centres for the cable systems and where they connect to the domestic telecoms network. No disturbance to the terrestrial environment will thus occur between the BMH and CLS in either case.</p> <p>Where there <u>will</u> be disturbance to the ground between the high water mark and the BMHs, the documentation I have for both projects indicates that the total length of new terrestrial cabling will be approximately 100 m in the case of Yzerfontein and approximately 250 m or 200 m (depending on which BMH option is used) at Duynefontein. In both cases, therefore, less than the 300 m required to trigger a NID.</p> <p>Could you please confirm for me that a NID application is thus <u>not</u> required for either of these two projects?</p> <p>I have attached a copy of the BIDs for both projects for your information.</p>

Name and Organisation	Comment	Response
		<p>Many thanks for your speedy reply. Much appreciated.</p> <p>All understood and we will make sure that the client is aware that should anything be found during the landing of the cable; work will be stopped and HWC will be notified.</p>
<p>Date: 12 01 2021 (Email) Ms Pat Titmuss City of Cape Town Head of Environmental & Heritage Management Department</p>	<p>I just want to confirm that we received the documentation today. My office will provide co-ordinated City of Cape Town comment by the due date in mid-Feb.</p>	<p>Thank you for your acknowledgment.</p>
<p>Date: 14 01 2021 (Email) Department of Environment, Forestry & Fisheries - Ocean & Coasts</p>		<p>This email serves to inform your Department that the Draft Scoping Report for the above-mentioned project is available on ACER's website: www.acerafrica.co.za under the link "Projects -Current Public Review" - (2AFRICA/GERA (East) - Duynfontein). The report is also available for download at the following link: https://www.dropbox.com/sh/s1ujhk0sbaotm3/AAAHmIVMwMKsvwa0F6_E4VjGa?dl=0%20Duynefontein https://drive.google.com/drive/folders/1QdiZqjV5w7U682xyBFUMDiAt9y-hrwP7?usp=sharingDuynefontein</p> <p>The DSR notification mail merge will however be sent out to all I&APs on Friday, 15 January 2021.</p>
<p>Date: 15 01 2021 (Email) Ms Chanel Rampartab CapeNature - Capability Manager Conservation Innovation</p>	<p>I am not the correct contact person. Please liaise with those in CC.</p> <p>Yes, please. Thank you.</p>	<p>Thank you for your email. Do you want to be removed from the projects database?</p> <p>No problem we will remove you from the database.</p>
<p>Date: 15 01 2021 (Email) Yumna van der Schyff University of Cape Town</p>	<p>Thank you for your email. Kindly redirect your email to Prof Alison's personal assistant, Ms Scheepers: mel.scheepers@uct.ac.za</p>	<p>Thank you for your email. We will forward Ms Scheepers all the information.</p>
<p>Date: 15 01 2021 (Email) Ms Nicole Lomborg Eni South Africa BV - HSE & Sustainability Coordinator</p>	<p>Please send us through a map of the proposed route at your earliest convenience.</p> <p>Thanks, we will be in contact should we require any additional information.</p>	<p>Thank you for your email. Please see attached the project maps for the proposed Cable System as well as the KML file.</p> <p>Please let the EAP know if there is any additional information you would like us to provide.</p>

Name and Organisation	Comment	Response
<p>Date: 15 01 2021 (Email) Mr Basson Geldenhuys National Department of Public Works & Infrastructure Chief Town Planner</p>	<p>You need to please ensure that you apply for a lease/wayleave agreement over the CPP as soon as possible. It is my understanding from the DEADP that they will not approve your EA until the lease agreement is not in place.</p>	
<p>Date: 18 01 2021 (Email) Ms Nicole Lomborg Eni South Africa BV - HSE & Sustainability Coordinator</p>	<p>Our technical team has analysed the proposed cable route to identify any overlap with our Exploration Right block ER236. We note that the proposed route cable does enter our block, however it seems the cable does not cross through our area of drilling interest as outlined in our drilling EIA. Should the route change, please contact us to verify the routing once again through our block. Prior to starting any operation, the Company must send us the notice for entering the block.</p>	<p>Thank you for your mail. I will forward this on to ASN to ensure that they notify you prior to undertaking any activities within this exploration block.</p>
<p>Date: 18 01 2021 (Email) Ms Briega Williams South African Heritage Resources Agency – Heritage Officer</p>	<p>Please can you upload the DSR onto SAHRIS under the relevant case file.</p>	<p>Just to let you know the Duynefontein Draft Scoping Report and associated documents have been added to the SAHRIS case. John Gribble</p>
<p>Date: 19 01 2021 (Email) Ms Aulicia Maifo Department of Environment, Forestry & Fisheries - Intern: Biodiversity Mainstreaming EIA</p>	<p>Kindly note that your report for the proposed marine telecommunications cable system 2Africa/Gera (East) cable system was received on the 15/01/2021 and has been allocated to the case officers Ms Portia Makitla (copied on this email) and myself.</p>	<p>Thank you for the confirmation of receipt of this report. I will liaise with Portia going forward.</p>
<p>Date: 19 01 2021 (Email) Department of Environment, Forestry & Fisheries - Ocean & Coasts</p>	<p>Kindly note that we are encountering an error while downloading the PDF documents for this project. Also ensure that the version is PDF that can used offline without requiring an internet connection. Kindly drop all documents in this drive link (https://environmentza-my.sharepoint.com/:f/g/personal/fditinti_environment_gov_za/EoJT0sLrxCNAiMSBmqQ54j0BGSbouGrNtLSP_Td4pVzITQ?e=noOkYn) for our review. Kindly remove all officials in your database representing DEFF, and all future correspondence and documentation, Enquiries, Meetings and site inspection requests related to EIA applications (hard copy and an electronic copy) must be</p>	<p>The Draft Scoping Report documents for the proposed Marine Telecommunications Cable Systems 2AFRICA (West) and 2AFRICA/GERA (East) to be landed at Yzerfontein and Duynefontein are now available on your drive link for your review. Please advise if you have received the documents.</p>

Name and Organisation	Comment	Response
	<p>submitted to our office or via OCeia@environment.gov.za / or Physical Address: Department of Environment Affairs (DEA), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.</p> <p>29 01 2021 (Email) Yes, we received the documents.</p>	<p>26 01 2021 (Email) Please advise if you received my and if you have received the documents.</p> <p>Thank you for your acknowledgement of receiving the DSR documents for the Duynefontein and Yzerfontein projects.</p>
<p>Date: 20 01 21 (Email) Department of Environment, Forestry & Fisheries Integrated Environmental Authorisations</p>	<p>14/12/16/3/3/2/2046</p> <p>ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION AND DRAFT SCOPING REPORT FOR ENVIRONMENTAL AUTHORISATION FOLLOWING A SCOPING ASSESSMENT PROCESS FOR THE PROPOSED 2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTICS CABLE SYSTEM TO BE LANDED AT DUYNEFONTEIN, WESTERN CAPE PROVINCE.</p> <p>The Department confirms having received the Application form and draft Scoping Report for Environmental Authorisation for the abovementioned project on 15 January 2021. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.</p> <p>Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 21 of the 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 Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.</p>	<p>Thank you and we have referred to regulation 21 of the EIA regulations and are aware of the conditions.</p> <p>The authority and other commenting authorities and I&APs have been afforded a chance to comment on the application and Draft Scoping Report.</p>

Name and Organisation	Comment	Response
	<p>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 by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.</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>Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p>	<p>This condition is noted, and ACER will strive to meet the required timeframes.</p> <p>No activities will commence prior to receiving environmental authorisation.</p> <p>All future correspondence and reports will include the above-mentioned reference number.</p>
<p>Date: 21 01 2021 (Email) Ms Briega Williams South African Heritage Resources Agency Heritage Officer</p>	<p>CaseID: 15795</p> <p>Proposed 2AFRICA/GERA (East) submarine fibre optics cable system to be landed at Duynefontein, City of Cape Town, Western Cape.</p> <p>The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Scoping Report (DSR) for the proposed 2AFRICA/GERA (East) submarine fibre optics cable system to be landed at Duynefontein on the West coast of South Africa.</p> <p>As part of the Environmental Authorisation process a Scoping Report and Environmental Impact Assessment (EIA) must be completed. The DSR has identified that a Heritage Assessment is to be undertaken as part of the process, and SAHRA supports this.</p> <p>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</p>	<p>Thank you for the Duynefontein comments received. The contents are noted and will make sure your requirements are met in the HIAs which are currently being produced.</p> <p>The EAP is aware of this and SAHRA will be consulted to get the required permits if required.</p>

Name and Organisation	Comment	Response
	<p>be disturbed without a permit from the relevant heritage resources authority.</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. The nearest recorded wreck on SAHRA's database is that of the French vessel L'Lucie (1808) which is recorded as wrecking 3.5km south of the cable landing site in Melkbosstrand. It must, however, be noted that shipwreck co-ordinates on SAHRA's database may not be accurate and the potential for other wrecks to lie close to the proposed cable route exists.</p> <p>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.</p> <p>Section 8.7 indicates that survey data for the alignment of the subsea cable will be provided to the heritage specialist for review, this is supported by SAHRA as it is an important aid to inform the specialist report.</p> <p>On Page 15 under Section 3.1.5 the last sentence of the last paragraph reads <i>"It must be noted that SAHRA is the relevant heritage authority for all heritage resources located under the low water mark of the sea up to a distance of 24 Nautical miles seaward from the high-water mark of the sea."</i> This sentence is somewhat confusing and should read <i>"SAHRA is the relevant heritage authority for all heritage resources located below the high-water mark of the sea up to a distance of 24 Nautical miles seaward."</i></p> <p>The applicant is advised that a comment on possible terrestrial heritage impacts from the relevant Provincial Heritage Resources Authority (PHRA) must be obtained in addition to this comment.</p> <p>All correspondence and reports relating to this project must be uploaded to the South African Heritage Resources Information System (SAHRIS) to provide SAHRA with the opportunity to comment. SAHRA does not accept hard</p>	<p>The EAP is aware of this shipwreck and the Heritage Specialist will be asked to undertake a maritime assessment of the area.</p> <p>A qualified maritime archaeologist will be appointed to assess the potential impacts on maritime heritage resources.</p> <p>Thank you for your support.</p> <p>Thank you for your comment this has been updated in the FSR.</p> <p>Comment from the Provincial Heritage Resources Authority (PHRA) will be obtained once the heritage assessment has been completed.</p> <p>All documents will be uploaded to the SAHRIS system as requested.</p>

Name and Organisation	Comment	Response
	<p>copy documents, links to documents, or documents received via post.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p> <p>Terms & Conditions:</p> <ol style="list-style-type: none"> 1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work. 2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately. 3. SAHRA reserves the right to request additional information as required. 	<p>Thank you we will do so.</p>
<p>Date: 22 01 2021 (Email) Ms Nelisa Ndobeni Department Human Settlements, Water & Sanitation – Western Cape Regional Office</p>	<p>DRAFT SCOPING REPORT FOR THE PROPOSED 2AFRICA (EAST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT DUYNFONTEIN, CITY OF CAPE TOWN, WESTERN CAPE, SOUTH AFRICA</p> <p>Your correspondence dated January 2021 refers.</p> <p>The Department reviewed the above-mentioned report and has the following comments:</p> <ul style="list-style-type: none"> • It is stated that the proposed 2AFRICA/GERA (East) Cable System will have an impact on one wetland within the terrestrial environment. Please note that any development within the 1:100 year flood line and/or delineated riparian habitat, whichever is the greatest distance or on the area within 100m from the edge of a watercourse or within 500m from any boundary of a wetland or a pan constitutes a water use in terms of Section 21 (c) “impeding or diverting the flow of water in a watercourse” and Section 21 (i) “altering the bed, banks, course or characteristics of a water course” of the National Water Act (Act 36 Of 1998). • The above-mentioned activity must be authorized and registered in terms of the National Water Act (Act 36 of 1998) before the proposed development may commence. Please note that as from January 2018, this Department ONLY accepts electronic water use 	<p>The EAP is aware of this and when the wetland assessment is undertaken the appointed specialist will be requested to assess the impact on the surrounding wetlands.</p> <p>The EAP is aware of this condition and the procedures for submitting the WUL Application.</p>

Name and Organisation	Comment	Response
	<p>applications. Water use applications can be submitted by following http://www.dwa.gov.za/projects.aspx and then click on e-wulaas.</p> <ul style="list-style-type: none"> 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”. <p>Please do not hesitate to contact the above office should there be any queries.</p>	<p>The appointed wetland specialist will provide a signed Risk Matrix as part of their assessment.</p> <p>Thanks, we will do so.</p>
<p>Date: 03 02 2021 (Email) Mr Steve Kirkman Department of Environment, Forestry & Fisheries - Ocean & Coasts</p>	<p>Please ensure that these emails do not come directly to me anymore. I work only through the Oceans and Coasts EIA section (cc'd here) on EIA related matters. This should apply to all Oceans and Coasts research staff.</p>	<p>Thank you for your email. You have been deleted from the above-mentioned email database. Sorry for the inconvenience caused.</p>
<p>Date: 03 02 2021 (Email) Ms Roelda Brown Koeberg Library – Senior Librarian</p>	<p>Just to reassure you: The Draft Scoping Report and the comment sheets are available for perusal in the library. So far nobody has shown much interest, though.</p>	<p>Thank you for your email and assistance with the DSR process.</p>
<p>Date: 04 02 2021 (Email) Mr Basson Geldenhuys National Department of Public Works & Infrastructure Chief Town Planner</p>	<p>The abovementioned project has bearing. My comments are around the establishment of a lease agreement with DPWI for the area on the CPZ. As discussed, your client needs to apply for a lease agreement for the said area between the high and low water marks. Furthermore, that you need to apply for all the required licenses/permits to the relevant environmental law.</p> <p>Thank you for your response.</p>	<p>Thank you for your email. ACER is currently busy sourcing the required documents for the wayleave application for this landing and will be submitting the wayleave application to the Department of Public Works as soon as we have the required information.</p>
<p>Date: 08 02 2021 (Email) Mr Maxhoba-ayakhawuleza Jezile Department of Environment, Forestry & Fisheries (Fisheries Management Directorate: Sustainable Aquaculture Management)</p>	<p>Please find the attached document, DEFF: Fisheries Management, Directorate Sustainable Aquaculture Management's comment on the draft scoping reports.</p> <p>Comments: Department of Environment, Forestry and Fisheries, Branch Fisheries Management, Directorate Sustainable Aquaculture Management has reviewed the draft Scoping Report for the Proposed Marine Telecommunications Cable System 2AFRICA (West) Cable System to be landed at Yzerfontein and</p>	<p>Thank you for your email and comments received.</p> <p>Please be advised that there are two cable landings one for the 2AFRICA/GERA (East) Cable system in Duynefontein and one for the 2AFRICA (West) Cable System in Yzerfontein. These cable landings are separate environmental authorisation processes.</p>

Name and Organisation	Comment	Response
	<p>Duynefontein, Western Cape, South Africa. The coordinates provided in the draft Scoping Report indicate that the landing sites fall within the Western Cape Aquaculture Abalone ranching area (WC3a -34 23 58 68; 19 07 27 22, WC b -32 25 12 00; 19 10 49 17). Consideration should be made for impact when the cable is being laid going to the landing sites. Impacts that are likely to happen are, the cable might be intersecting the ranching area and disruption of the abalone and its habited, related the construction impacts for future or existing seeded areas on the ranching operation. Please note that there are no ranching operations or seeding in the Western Cape Aquaculture Abalone Ranching site at the moment but there has been interest shown by potential investors.</p>	<p>Thank you for bringing to our attention the presence of the Western Cape Aquaculture Abalone Ranching Area. Do you by any chance have KMLs for the proposed Western Cape Aquaculture Abalone ranching area (WC3a -34 23 58 68; 19 07 27 22, WC b -32 25 12 00; 19 10 49 17) so that ACER can plot these areas on Google Earth in relation to the cable alignment. It is unlikely that the proposed cable system will impact on the ranching operations as the cable alignment avoids rocky seabed's which is a requirement for ranching operations.</p>
<p>Date: 10 02 2021 (Email) Department of Environment, Forestry & Fisheries Ocean & Coasts</p>	<p>COMMENTS ON THE DRAFT SCOPING REPORT FOR PROPOSED 2AFRICA (EAST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT DUYNEFONTEIN, CITY OF CAPE TOWN, WESTERN CAPE, SOUTH AFRICA</p> <p>The Oceans & Coasts (O&C) Branch of the Department of Environment Forestry and Fisheries (DEFF) has reviewed the Draft Scoping Report for proposed 2africa (East) Submarine Fibre Optic Cable System to Be Landed at Duynefontein, City of Cape Town, Western Cape, South Africa in the Western Cape in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), (“NEMA”) and has provided inputs based on coastal considerations and objectives in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“ICM Act”).</p> <ol style="list-style-type: none"> 1. The Environmental Assessment Practitioner (EAP) must take note that the Branch O&C has a mandate to protect the ecological integrity, natural character and the economic, social and aesthetic value of the coastal zone; as well as to protect people, property and economic activities from risks arising from dynamic coastal processes. It further ensures that the use of natural resources in the coastal zone and development associated with the coastal zone is socially and economically justifiable and ecologically sustainable. The EAP is reminded that comments and recommendations as provided below are intended to ensure the achievement of the aims and objectives of the ICM Act and guarantees that the coastal environment will be protected and conserved throughout all phases. 	<p>Thank you for your email and comments received.</p> <p>The EAP is aware of the O&C mandate and has proactively engaged with the department during the EIA process. The EAP is aware that the comment made below are intended to achieve the objectives of the ICM Act and the EAP has endeavoured to assesses and items raised.</p>

Name and Organisation	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>2. <u>Section 63 of the ICM Act: Environmental authorisations for coastal activities</u> (2.1) Considering what the CA must take into account in terms of Section 63 of the ICM Act that 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. Additionally, the CA must take into account the following but not limited to proposed project associated operational and maintenance activities; and potential Impacts on purpose and objective of CPP, Coastal Protection Zone, Economic Exclusive Zone, the littoral active zone, adjacent existing structure, functions of marine ecosystems, setback and management lines.</p> <p>3. <u>Off Road Vehicle (ORV)</u> (3.1) To ensure that driving within the coastal zone is carried out in an environmentally friendly manner, the applicant would require a Construction Off Road Vehicle permit after obtaining an EA. The applicant must consult this department DEFF: Branch O&C contact details to obtain an ORV permit ORVPermitting@environment.gov.za.</p> <p>We have provided the following Mitigation Measure to be included in the EMPr:</p> <ul style="list-style-type: none"> To ensure that pollution of the marine ecosystem and seawater contamination is minimized, we recommend that only work necessary must be undertaken within coastal zone. Additionally, no camping site should be planned and established within the CPP No construction activities with potential to affect the general public to enjoy the coast should be scheduled and take place during peak 	<p>Your comment is supported and the EMPr will include measures to protect and reduce potential impacts on the Coastal Protection Zone, Economic Exclusive Zone, the littoral active zone, adjacent existing structure, functions of marine ecosystems and setback and management lines.</p> <p>This permit will be applied for once Environmental Authorisation has been issued for the proposed development.</p> <p>This will be included in the EMPr as per your suggestion.</p> <p>This will be included in the EMPr as per your suggestion. The City of Cape Town has also requested that the landing is not scheduled to take</p>

Name and Organisation	Comment	Response
	<p>season.</p> <ul style="list-style-type: none"> • Construction period to be scheduled avoiding heavy rain and stormy season. Historical data must be used for best time period allocation. • We recommend that cable landing route should avoid areas that have been identified as sensitive and offer important functions, such as habitat, breeding areas, areas where natural resources that are considered of important status occur and migration routes. • Construction should be scheduled to avoid any identified local species breeding and migration routes and season, ships/vessels routes, and where active fishing activities is dominant. Historical data must be used to identify breeding areas, routes and migration seasons that has potential of being affected. • Clearing of vegetation for cable landing purpose should be scheduled where its 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 as possible. • Vehicles and machinery have 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, we recommend that no vehicles and machinery should be scheduled to be refuelled within the coastal zone. • Due to the demand for public safety, failure by the responsible contractor 	<p>place during peak tourism periods.</p> <p>This will be undertaken if possible, as once the cable is brought to shore the cable must be anchored on shore and secured in the BMH. It is unlikely that this will take place during stormy conditions as sea conditions would not allow a safe cable landing.</p> <p>The proposed landing point has been selected to minimise impacts on the environment and to make use of the existing ACE Cable System infrastructure already installed on land. Similarly, the offshore alignment has been selected to follow closely existing telecommunication alignments landing near Duynfontein to reduce impacts on seabed users and to avoid rocky substrates which are known to be more ecologically sensitive areas.</p> <p>The proposed construction period will have to be scheduled to coincide with the overall project programme out as vessels installing the cable are working in different areas around Africa installing the cable. Migration patterns, ship/vessel routes and the fishing sector will however be taken into account during the assessment phase of the EIA process. This condition will however be included in the EMPr</p> <p>The proposed landing of the cable at the preferred landing alternative will not require the removal of any indigenous vegetation as the cable will tie into the ACE anchor block at the base of the primary dune cordon. This condition will however be included in the EMPr</p> <p>No vehicles will be permitted to be refuelled within the coastal zone and all vehicles must be in good working order. This condition will be included in the EMPr.</p> <p>This will be included in the EMPr.</p>

Name and Organisation	Comment	Response
	<p>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 time 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”.</p> <ul style="list-style-type: none"> • We recommend for the appointment of the Control Environmental Officer (CEO) who will ensure that identified mitigation measures and recommendations are taken into account, 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. Furthermore, the CEO must ensure that employees are aware of the procedure to be followed and ensures that necessary materials and equipment are available for dealing with spills and leaks. • List of Specialist / Assessment required/supported by us include but not limited to: <ul style="list-style-type: none"> ○ Fisheries Specialist Study ○ Marine Vegetation and Ecological Specialist Study ○ Beach and Coastal Dune Specialist Study ○ Coastal Processes and Climate Change Impact Assessment ○ Major Hazardous Installation Assessment 	<p>An Environmental Control Officer (ECO) will be appointed to ensure the conditions of the EMPr, and EA are implemented on site. The ECO will also liaise with Ms Natalie Newman from the City of Cape Town Coastal Management Branch (CMB) e-mail: Natalie.newmand@capetown.gov.za to ensure compliance with the conditions of authorisation.</p> <p>A fisheries assessment will be commissioned.</p> <p>A marine benthic assessment and onshore ecology and vegetation assessment will be commissioned.</p> <p>A beach and coastal dune assessment will be commissioned.</p> <p>The coastal dune assessment will cover issues related to coastal processes and climate change in their assessment and as such a separated assessment will not be commissioned for this Environmental Impact Assessment</p> <p>A major hazardous installation assessment will not be commissioned for this Environmental Impact Assessment as the proposed development</p>

Name and Organisation	Comment	Response
	<ul style="list-style-type: none"> ○ Socio-Economic Impact • Therefore, you are kindly reminded of your duty of care towards the coastal environment in accordance with section 58 of the ICM Act read together with section 28 of NEMA which states that “Every person who causes, has caused or may cause 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 authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such adverse effect on the coastal environment” 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; • Kindly note that the activity may not commence prior to an environmental authorisation being granted by the CA. It is an offence in terms of section 49A “NEMA” for a person to commence with a listed activity unless the CA has granted an environmental authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable to a fine not exceeding 10 million or to imprisonment 	<p>involves the laying of an inert marine telecommunications cable which is not hazardous. In terms of the legislation a "major hazard installation" means an installation (a) where more than the prescribed quantity of any substance is or may be kept, whether permanently or temporarily; or (b) where any substance is produced, processed, used, handled or stored in such a form and quantity that it has the potential to cause a major incident. None of these apply to the proposed development and as such this assessment is not necessary. The Koeberg Nuclear Power Station which is the closest hazardous installation to the landing site. Emergency evacuation plans will however be submitted to the City of Cape Town for approval to ensure that workers can vacate the site in the event of an incident at Koeberg.</p> <p>A socio-economic impact assessment will not be commissioned for this Environmental Impact Assessment as the proposed socio-economic impacts are well known.</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>No construction or installation of the proposed cable system will take place until a positive Environmental Authorisation has been issued for the proposed development.</p>

Name and Organisation	Comment	Response
	<p>for a period not exceeding 10 years, or to both such fine and imprisonment.</p> <ul style="list-style-type: none"> Please be advised that the Sub Directorate: Coastal Development and Protection within the Branch: O&C is responsible for coordinating and facilitate EIA comments and advice for developments within the marine environment. Kindly forward request of EIA Comments to, Email: OCeia@environment.gov.za. <p>For attention of the EAP and CA:</p> <ul style="list-style-type: none"> The applicant must take into account, adhere to and implement the relevant section of the National "ICM Act" applicable to this project. The EAP is requested to confirm that the area where the cable will be landed will not result in negative impact on existing and adjacent ships/vessels route and the fishing industry. The applicant is advised to bear in mind that the coast is dynamic and characterized by natural processes, such as flood, sea level rise, accretion, erosion, and storm sedges influenced by the ongoing climate change experienced in the whole of South Africa. The proposed site location for this project has potential of being affected by all of these natural processes. To ensure that our marine environment that is already vulnerable and sensitive is not exposed to additional strain, the design plan, including technology and methodology to be applied will need to take into account effect of climate change. Therefore, the design plan must pay special attention to the long lifespan of the cable and should requires less maintenance. Furthermore, the EAP is requested to provide a detailed description of the state of the locations where the cable is proposed to be landed. The EAP is requested to provide a detailed documentation with advantages and disadvantages on comparison of the proposed site 	<p>Your comment is noted, and all future correspondence will be addressed to OCeia@environment.gov.za for comment.</p> <p>Your comment is noted and will be addressed in the DEIAR.</p> <p>A fisheries assessment will be undertaken as part of the environmental impact assessment phase. It should be noted however that the proposed alignment has been selected to closely follow existing submarine telecommunications cables thus reducing the impact to the deep-sea trawling industry.</p> <p>The proposed landing site has been selected for the prevailing beach characteristics and seabed conditions in order to reduce environmental impacts and to ensure the longevity of the cable system. The cables are also installed using internationally recognised techniques which ensures the cable is protected from external factors which could impact on the cable and require maintenance. Ideally the cable is laid and then not disturbed again for its lifespan. A detailed description of the environment at the cable landing site will be provided in the DEIAR as requested.</p> <p>The assessment of landing alternatives has been discussed in the scoping reports provided for comment and the best environmental</p>

Name and Organisation	Comment	Response
	<p>locations, alternatives, technologies and methodologies proposed for this project. The options presented should take into account the receiving environment, potential impacts and threat to sustainability of the marine environment and function of natural ecosystems.</p> <ul style="list-style-type: none"> 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 any structures related to this project. <p><u>NB: With all the above-mentioned recommendations and conditions, the Branch: O&C has no objections to the Draft Scoping Report for proposed 2africa (East) Submarine Fibre Optic Cable System to Be Landed at Duynefontein, City of Cape Town, Western Cape, South Africa.</u></p> <p>These comments must be sent to the CA for consideration and implementation, and the EAP is kindly requested to submit proof of such submission to us.</p> <p>Kindly note that the Department reserves the right to revise its comments and request further information based on any additional information that might be received. All future correspondence and documentation (hard copy and an electronic copy) must be submitted to our office via OCeia@environment.gov.za / or Physical Address: Department of Environment Affairs (DEA), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.</p>	<p>option is Alternative 1. In terms of cable infrastructure there are no technology alternative or installation methods as all cables are installed as per the ICPC (International Cable Protection Committee) guidelines which is considered to be best practice both from an environmental perspective and in terms of cable protection.</p> <p>This comment is supported by the EAP.</p> <p>Thank you for your comment.</p> <p>Your comments are included in the DEIAR which will be forwarded to the CA for review and decision making.</p> <p>Your comment is noted and the EAP is aware that your comments can be revised.</p>
<p>Date: 12 02 2021 (Email) Mr Laurence Pearce Impact Oil and Gas Asset Compliance Manager</p>	<p>We refer to the scoping report for the 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 (Impact) currently holds offshore Oil and Gas (O&G) exploration rights on the East coast of South Africa where some activities have already started for the exploration of hydrocarbons offshore. We would like you to consider the activities of O&G exploration and future possible offshore and subsea infrastructure development for O&G, and ask you note section 53 of the MPRDA, which provides that applicants should seek a no objection from the</p>	<p>Thank you for your email. ACER will request the landing partner to engage with Impact Africa Limited (Impact) so that a MOU can be formalised so that the Section 53 application can be submitted to DMR.</p>

Name and Organisation	Comment	Response
	<p>DMRE, as well as mineral rights holders in terms of potential competing surface use activity that may infringe on mineral right extraction activities.</p> <p>In respect of this we request early engagement on the drafting of an MOU to clearly outline the roles and responsibilities of both parties in terms of financial obligations, protection of subsea infrastructure, insurance, rights and obligations, and principles of co-operation so this is in place in good time prior to commencement of cable operations over Impact's Exploration rights.</p> <p>Please consider how the environmental impact of cable laying activities over Impact's Exploration right is to be assessed and remediated, and how the cumulative effects of operations will be assessed and remediations apportioned.</p> <p>The current information provided on the cable route is insufficient to accurately locate the proposed cable path over Impact's Exploration Rights relative to currently planned operations and potential future Exploration drilling locations - we request that you provide coordinates for the planned cable route so this may be properly evaluated, or if this is not yet fully determined coordinates for a corridor that the cable will likely sit within.</p> <p>Impact is already registered with you as an Interested and Affected Party however we request that you update your IAP list to include Keely Harris (k.harris@impactoilandgas.com), and myself (lpearce@impactoilandgas.com) as the contacts for Impact, and remove the following now outdated Impact contacts: s.lunn@impactoilandgas.co.uk, m.dougherty@impactoilandgas.co.uk</p>	<p>ACER has forwarded you the KML of the proposed cable alignment for your records. Please let us know if you require any additional information.</p> <p>The database will be updated as requested.</p>
<p>Date: 15 02 2021 (Email) Mr Gerhard Gerber Department of Environmental Affairs & Development Planning Western Cape – Head of Department</p>	<p>The e-mail notification of 02 September 2020 providing a Background Information Document and invitation to participate in the environmental impact assessment ("EIA") process, the Department's acknowledgement of receipt of the e-mail notification sent via e-mail on 07 September 2020, and the e-mail notification of 15 January 2021 regarding the availability of the Draft Scoping Report ("DSR") for comment, refer.</p> <p>Find attached here consolidated comment from various directorates within the Department on the DSR and Plan of Study for EIA dated January 2021 that was downloaded from the link provided by the environmental assessment practitioner</p>	<p>Thank you, your comments have been, received and will be included in the comments and response report.</p>

Name and Organisation	Comment	Response
	<p>("EAP").</p> <p>Please acknowledge receipt of this e-mail.</p> <p>Comments: DEPARTMENTAL REFERENCES: 16/3/3/6/4/2/A1/10/3006/21 (Development Management) 19/2/5/3/A1/10/WL0074/20 (Waste Management) 19/3/2/4/A1/10/DDF002/21 Pollution and Chemicals Management)</p> <p>COMMENT ON THE DRAFT SCOPING REPORT AND PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED 2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT DUYNEFONTEIN, CITY OF CAPE TOWN</p> <p>The e-mail notification of 02 September 2020 providing a Background Information Document and invitation to participate in the environmental impact assessment ("EIA") process, the Department's acknowledgement of receipt of the e-mail notification sent via e-mail on 07 September 2020, and the e-mail notification of 15 January 2021 regarding the availability of the Draft Scoping Report ("DSR") for comment, refer.</p> <p>Please find consolidated comment from various directorates within the Department on the DSR and Plan of Study for EIA dated January 2021 that was downloaded from the link provided by the environmental assessment practitioner ("EAP").</p> <ol style="list-style-type: none"> Directorate: Development Management (Region 1) – Mr Rainer Chambeau (Rainer.Chambeau@westerncape.gov.za): <p>(1.1) The description of Activity 19A of Listing Notice 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") EIA Regulations, 2014 (as amended) as described in Table 2 of the DSR, is incorrect. Please ensure that the correct description is provided in the Final Scoping Report ("FSR") and subsequent documents.</p>	<p>Activity 19A is correct as included in Table 2 of the DSR and FSR as the project will entail the excavation and deposition of more than 5 m³ of material within 100 m of the high-water mark of the sea when trenching for, and backfilling of, the marine telecommunications cable and system earth takes place.</p>

Name and Organisation	Comment	Response
	<p>(1.2) Given that the proposed development will impact on the “dune slack wetland” located behind the primary dunes at Van Riebeeckstrand, confirmation of the applicability of Activity 19 of Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended) must be determined. Should the mentioned listed activity be triggered by the proposed development, the Scoping Report must be amended accordingly, and the application form amended to include said activity.</p> <p>(1.3) Although Activity 15 of Listing Notice 3 of the NEMA EIA Regulations, 2014 (as amended) was included in the list of applicable listed activities for the alternative landing point, this listed activity does not appear to be applicable to the application as the proposed site will not be transformed to residential, retail, commercial, industrial or institutional use. Instead, trenching is planned through open space areas, with possible registered servitudes on these affected properties.</p> <p>(1.4) This Directorate notes that three Screening Tool Reports have been generated for the proposed development. In addition, this Directorate notes that the Screening Tool Reports have generated a list of specialist assessments to be undertaken. Based on the <i>Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Section 24(5) (a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation</i> (“the Protocols”) promulgated in Government Gazette¹, it is noted that Protocols are applicable to environmental themes for activities requiring environmental authorisation.</p> <p>(1.5) According to the Protocols, before commencing with a specialist assessment, the current use of the land and environmental sensitivity of the site under consideration identified by the Screening Tool must be confirmed by undertaking site sensitivity verification. A site sensitivity verification report for applicable environmental themes must therefore be provided. Further, a signed copy of the specific compliance statement for each applicable environmental theme identified, must be appended to the FSR.</p>	<p>Activity 19 relates to the movement of material or deposition of material in a watercourse. The proposed development will not result in any excavations in the dune slack wetland at the preferred alternative as the cable will be housed in the existing cable sleeves which were installed when the ACE cable system was installed. The only material which will be excavated occurs on the beach and the primary dune where the anchor block for the ACE cable system is located. Refer to Appendix 7 Supporting Maps.</p> <p>Activity 15 was included in the application and the DSR and FSR as if Alternative 2 is selected the cable alignment would require the registration of servitudes and wayleaves for the cable to be installed. This in the EAPs opinion does constitute a change in land use from open space to institutional use.</p> <p>Given that the proposed cable system is going to feed into the existing cable sleeves installed when the ACE cable system was landed no disturbance to the terrestrial environment is expected inland from the beach. As such it is unlikely that protocols relevant to Terrestrial Biodiversity and Aquatic Biodiversity will be applicable to this development. The appointed specialists will however be required to confirm this and abide by the prescribed protocols.</p> <p>Site screening has been undertaken by the EAP and the site will be assessed by the specialists. Since the specialist were only appointed now, it would be unreasonable to request that signed compliance statements for the applicable environmental themes be submitted with the FSR. If compliance statements are indeed required, they will be submitted when the specialist reports are completed, i.e., when the Draft and Final EIA Reports are released. This request will be adhered to during the EIA phase of the assessment.</p>

Name and Organisation	Comment	Response
	<p>(1.6) Although the Plan of Study for EIA indicates that a number of assessments will be undertaken, the onus is on the EAP to provide confirmation whether the assessments (identified in the Screening Tool Reports) will be undertaken, or to provide a motivation why the specialist studies will not be undertaken as part of the EIA process.</p> <p>(1.7) The terms of reference for the specialist studies as contained in the Plan of Study for EIA indicates that the specialist studies are required to meet the requirements of Appendix 6 of the NEMA EIA Regulations, 2014 (as amended). Please note that this is only applicable to those specialist studies that do not have prescribed Protocols.</p> <p>(1.8) Proof of the written notices of the availability of the DSR for comment must be included in the FSR. Please note that a copy of the approved Public Participation Plan was not included in the DSR and should be included in the FSR.</p> <p>(1.9) Comment from the City of Cape Town's Disaster Risk Management Branch regarding the submission of the application form for the Koeberg Nuclear Power Station Traffic Evacuation Modal must be included in the FSR or the Draft EIA Report.</p> <p>2. Directorate: Waste Management – Mr Gary Arendse (Gary.Arendse@westerncape.gov.za):</p> <ul style="list-style-type: none"> This Directorate is satisfied with the Plan of Study for EIA and awaits the Draft EIA Report for further comment. <p>3. Directorate: Biodiversity and Coastal Management – Ms Mercia Liddle (Mercia.Liddle@westerncape.gov.za):</p> <ul style="list-style-type: none"> This Directorate has no comments on the DSR and Plan of Study for EIA. Detailed comments will be provided on the Draft EIA Report. <p>4. Directorate: Pollution and Chemicals Management – Ms Shehaam</p>	<p>A description of the specialist studies to be undertaken are outlined in Section 9 of the FSR. Motivations why some assessments will not be undertaken are also provided in this section.</p> <p>The EAP is aware of this and has made all specialists aware of this fact.</p> <p>Proof of written notices are included in Appendix 2 of the FSR. The Public Participation Plan was included in the DSR submitted for review in Appendix 2 of the DSR and is also included in Appendix 2 (Appendix 2.4) of the FSR.</p> <p>The City of Cape Town's Disaster Management Branch has been asked to comment on the Risk Assessments and Emergency Evacuation Plans submitted for their approval.</p> <p>Thank you for your comment.</p> <p>Thank you for your comment.</p>

Name and Organisation	Comment	Response
	<p>Brinkhuis (Shehaam.Brinkhuis@westerncape.gov.za):</p> <ul style="list-style-type: none"> • This Directorate will provide detailed comments on the Draft EIA Report. <p>5. Please direct any enquiries to the official/s indicated in this correspondence should you require any clarity on any of the comments provided.</p> <p>6. The Department reserves the right to revise initial comments and request further information based on any information received.</p>	<p>Thank you for your comment.</p> <p>Noted with thanks.</p> <p>The EAP will provide any information requested.</p>
<p>Date: 16 02 2021 (Email) Ms Sindiswa Dlomo Department of Environment, Forestry & Fisheries Integrated Environmental Authorisations</p>	<p>DEFF Reference:14/12/16/3/3/2/2046</p> <p>COMMENTS ON THE CRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE 2AFRICA/GERA (EAST) CABLE SYSTEM LANDING AT DUYNEFONTEIN, CITY OF CAPE TOWN, WESTERN CAPE PROVINCE</p> <p>The Application for Environmental Authorisation and Draft Scoping Report (SR) dated January 2021 and received by the Department on 15 January 2021, refer.</p> <p><u>This letter serves to inform you that the following information must be included to the Final Scoping Report:</u></p> <p>A. <u>Listed Activities</u></p> <ul style="list-style-type: none"> • Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. • If the activities applied for in the application form differ from those mentioned in the final SR, 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 https://www.environment.gov.za/documents/forms. <p>B. <u>layout & Sensitivity Maps</u></p> <p>Please provide a layout map which indicates the following:</p>	<p>The listed activities and what components of the project that trigger them is outlined in the FSR in Table 2.</p> <p>No changes to the listed activities have taken place since submission of the application for authorisation.</p>

Name and Organisation	Comment	Response
	<ul style="list-style-type: none"> • The proposed Alternative 1 (preferred) and Alternative 2 alignments for the landing of the cable and associated infrastructure for each option. • All supporting or onsite infrastructure e.g., roads (existing and proposed): • The Location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected • Buffer areas; and • All "no-go" areas. • The above map must be overlain with a sensitivity map and a cumulative map which shows existing cable networks and their associated infrastructure. • Please be advised that Google maps will not be accepted. <p>C. <u>Public Participation Process</u></p> <ul style="list-style-type: none"> • The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development; particularly SAN Parks, City of Cape Town, Western Cape Department of Environmental Affairs and Development Planning (DEADP), Heritage Western Cape (HWC) and the South African Heritage Resources Agency (SAHRA), Department of Environment, Forestry and Fisheries - Branch: Oceans and Coasts; Fisheries Management, and Biodiversity Conservation, Department of Human Settlements, Water and Sanitation (DHSWS), South African Deep-Sea Trawling Industry Association (SADSTIA), CapeNature, Eskom Koeberg. • Please ensure that all issues raised, and comments received during the circulation of the SR from registered I&APs and organs of state which 	<p>This map is provided in Appendix 7 Supporting Maps.</p> <p>This is provided in Appendix 7 Supporting Maps. It must be noted that the preferred alternative will make use of the existing WACS cable infrastructure on land and as such no additional land-based cable infrastructure is required.</p> <p>This map is provided in Appendix 7 Supporting Maps.</p> <p>This map is provided in Appendix 7 Supporting Maps.</p> <p>This map is provided in Appendix 7 Supporting Maps.</p> <p>Please refer to Appendix 7 Supporting Maps.</p> <p>Your comment is noted.</p> <p>Please refer to Appendix 2 where all correspondence to competent authorities has been included as well as reminder letters requesting comment. To date most of the authorities mentioned have provided comment.</p> <p>All comment received have been recorded and the FSR updated accordingly where required. All comments received and the EAPs</p>

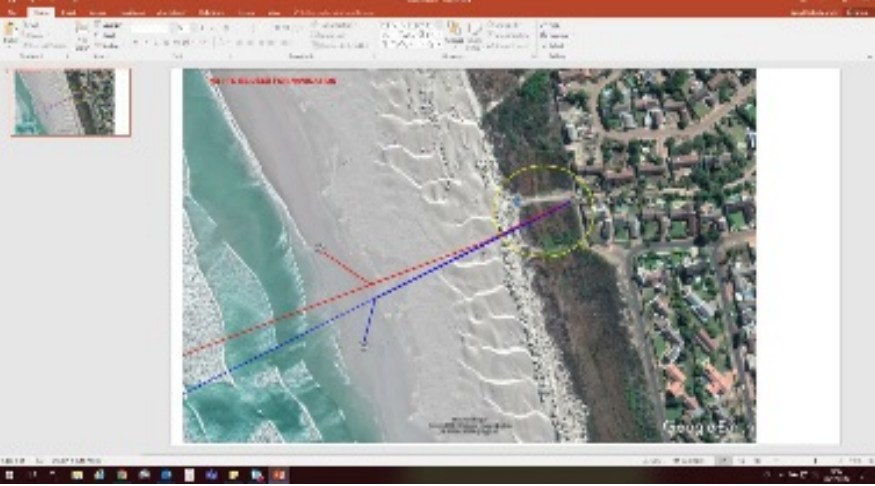
Name and Organisation	Comment	Response
	<p>have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the Final SR. Proof of correspondence with the various stakeholders must be included in the Final SR. Should you be unable to obtain comments, proof should 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 & 44 of the EIA Regulations 2014, as amended.</p> <ul style="list-style-type: none"> • Issues raised in City of Cape Town's letter dated 13 October 2020 must be fully considered and addressed in your final Scoping Report. • A comments and response trail report (C&R) must be submitted with the final SR The C&R report must incorporate all comments (pre- and post-submission of draft SR) for this development. The C&R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&AP and date comments received, actual comments received, and response provided. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments. <p>D. <u>Specialist Assessments</u></p> <ul style="list-style-type: none"> • A detailed description of the study's methodology; an indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisation. • The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season (where required) and providing that as a limitation, will not be accepted. 	<p>responses are included in Appendix 2 and 3 of the FSR.</p> <p>Reminder letters requesting comment are also shown in Appendix 2 of the FSR.</p> <p>The comments received from the City of Cape Town have been addressed in the FSR. The NID application must still be submitted to the City of Cape Town which will be completed and submitted by the appointed Heritage Specialist.</p> <p>This is included in this document and the earlier comments and response reports are also available in Appendix 3 of the FSR.</p> <p>The use of noted has been used when the comment received does not require a response from the EAP.</p> <p>The terms of reference for the specialist studies have been included in Section 10 of the FSR.</p> <p>The specialists have been asked to describe the limitations to their studies where relevant.</p>

Name and Organisation	Comment	Response
	<ul style="list-style-type: none"> • Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas. • Should the specialist definition of 'no-go' area differ from the Departments definition, this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable. • Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice. • Where specialist studies are conducted in-house or by a specialist other than a suitably qualified specialist in the relevant field per the requirements of the protocols, such specialist reports must be peer reviewed by a suitably qualified external specialist in the relevant field. • 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 (i.e., "the Protocols"), which were promulgated in Government Notice No. 320 of 20 March 2020, came into effect on 09 May 2020. 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 9 May 2020, in which case Appendix 6 of the Environmental impact Assessment Regulations, 2014, as amended, will apply to such applications. <p>E. Cumulative Assessment</p> <ul style="list-style-type: none"> • Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all 	<p>The EAP agrees with this description of a “no-go” area.</p> <p>The EAP will request all specialists to consider a no-go area as an area where no development of any infrastructure is allowed.</p> <p>This will be undertaken as part of the impact assessment process in order to find the best environmentally feasible option for the proposed development.</p> <p>o Specialist studies have been conducted in-house.</p> <p>Your comment is noted, and your comments have also been sent to the appointed specialists to ensure that their reports meet the requirements of Appendix 6 of the National Environmental Management Act.</p> <p>The assessment will consider cumulative impacts as the project is located within 30 km of a number of other telecommunications cables.</p>

Name and Organisation	Comment	Response
	<p>identified and assessed impacts must be refined to indicate the following:</p> <ul style="list-style-type: none"> ➤ Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated. ➤ Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. ➤ The cumulative impacts significance rating must also inform the need and desirability of the proposed development. ➤ A cumulative impact environmental statement on whether the proposed development must proceed. <p>F. <u>General</u></p> <p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:</p> <p><i>"If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has 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>You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.</p> <p>Further note that in terms of Regulation 45 of the EIA Regulations 2014, as</p>	<p>This will be undertaken as requested.</p> <p>This will be undertaken as requested.</p> <p>Agreed.</p> <p>This will be provided in the DEIAR.</p> <p>The EAP is aware of the regulations and the prescribed time periods.</p>

Name and Organisation	Comment	Response
	<p>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).</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>No construction will commence until such time as an Environmental Authorisation has been issued by DEFF.</p>
<p>Date: 17 02 2021 (Email) Mr Morne Theron City of Cape Town Environmental & Heritage Management Department</p>	<p>The abovementioned commenting deadline of 15 February 2021 reminder refers.</p> <p>Due to unforeseen IT challenges the past week, as well as staff departmental shortages, the City of Cape Town will not be able to meet the 15 February 2021 commenting deadline.</p> <p>We'll endeavour to submit the city comment on the DSR by next week Tuesday (or C.O.B. Wednesday, 17 February) at the latest.</p> <p>Your understanding in this regard is much appreciated.</p> <p>We apologise for any inconvenience this might cause.</p>	<p>Thank you for your email. Please note that I am currently finalising the report and comments and response report which I need to send to both MTN and ASN for review and signoff. If your comments can be submitted by close of business today, ACER will be able to incorporate them into the CRR before we submit to MTN and ASN but if we get them next week they will have to be submitted with the CRR to DEFF as ACER will not have enough time to respond to them and still have them reviewed and signed off by the client before we have to submit to DEFF to meet the EIA timeframes.</p> <p>Please be assured that either way your comments will be submitted with the FSR to DEFF.</p>
<p>Date: 17 02 2021 (Email) Ms Pat Titmuss City of Cape Town – Head of Environmental & Heritage Management Department</p>	<p>PROPOSED NEW MARINE TELECOMMUNICATION CABLE SYSTEM (2AFRICA/GERA – EAST) TO MAKE LANDFALL AT DUYNEFONTEIN, MELKBOSSTRAND: DRAFT SCOPING REPORT (DSR)</p> <p>The Background Information Document dated 2 September 2020, this office's previous letter, dated 13 October 2020, and the Draft Scoping Report dated January 2021, refers.</p> <p><u>1. Spatial Planning and Environment Directorate: Environmental Management Department - Coastal Management Branch</u></p> <p>1.1 During the City's comment on the BID the city indicated its preference of the preferred alternative (Alternative 1). The city indicated that the existing MTN fibre optic infrastructure must be used to limit any negative impacts/disturbance associated with the landing, and installation of, the cable. It was furthermore requested that the cable must be aligned as close as possible to the existing MTN</p>	<p>Thank you for your email and comments received.</p>

Name and Organisation	Comment	Response
	<p>cable at this site in the littoral active zone, and up to the existing BMH.</p> <p>1.2 The Coastal Management Branch has the following concern about the one proposed alignment of the cable as illustrated on the DSR map (refer to Figure 1 below):</p> <p>1.2.1 The cables appear to go through the dunes and would result in some significant disturbance – yellow circle; and</p> <p>1.2.2 It is the City's understanding that there is an anchor point at the area marked with a blue star. If this is the case, it is questioned why the cables cannot be routed via this point?</p> <p>The map of the cables below may also be a case of the cable being drawn at a coarse scale and thereby not reflecting this detail in terms of alignment. This must be clarified.</p> <p>1.3 Proposed plan of study is to ensure that all the alternative landfall routes, including the two options mentioned above, are properly assessed in order to avoid and/or identify the route of least damage to the dunes.</p>	<p>Your concern is shared, and ACER has revisited the maps included in the DSR as the proposed cable alignment does not cross the primary dune cordon and dune setback wetland as shown on the maps in the DSR.</p> <p>Your comment is supported, and the proposed alignment does not go through the dunes. Please refer to Appendix 9 supporting Maps where the correct cable alignment has been mapped.</p> <p>You are correct and the proposed 2AFRICA/GERA (East) cable system will tie into the existing ACE Cable System anchor block at this point. No further disturbance to the terrestrial environment will take place from this point to the CLS in Duynefontein.</p> <p>Please refer to Appendix 9 where this issue has been resolved.</p> <p>Both proposed landing points will be assessed in detail by the appointed specialists and their findings will be included in the DEIAR with proposed mitigation measures to reduce impacts.</p>

Name and Organisation	Comment	Response
	 <p>FIGURE 1: Proposed cable landfall route map as contained in the DSR</p> <p>2. Spatial Planning and Environment Directorate: Environmental Management Department - Environmental & Heritage Management Branch</p> <p>2.1 The comments raised by the City of Cape Town: Environmental and Heritage Management department has adequately been reflected in <i>Appendix 3: Comments and Responses</i> of the DSR.</p> <p>2.2 On page 112 and 130 of the DSR, the EAP states that <i>“it is necessary for a Heritage Practitioner to submit the necessary notices to SAHRA and HWC for information purposes of the intention by MTN to land the 2AFRICA/GERA (East) Cable system at Duynefontein”</i>. As such, point 3.2.2 of this department’s previous comment dated 13 October 2020 is reiterated that a Notification of Intent to Develop must be submitted to this office for written comment before submission to HWC.</p> <p>2.3 Further to point 2 the requirement of a NID submission must be annotated in the DSR as acknowledgement of EMDs previous comment.</p>	<p>Thank you for your comment.</p> <p>The appointed heritage specialist will submit a NID to the City of Cape Town for written comment. The heritage specialist has only recently been appointed and the NID will be submitted within the next few weeks.</p> <p>The need for the submission of the NID to the City of Cape Town has been included in the FSR see Section 8.7.</p>

Name and Organisation	Comment	Response
	<p>2.4 General (typing/grammar errors and corrections): The general information provided below are mere examples of amendments to be made in the DSR. For the purpose of this letter, illustrations are provided.</p> <p>2.4.1 Page 67, key point 6.1.1, bullet point 7, referencing to “<i>the wetland has also been canalised—should be [channelled] to facilitate drainage of stormwater</i>”.</p> <p>2.4.2 Page 125, key point 2, bullet point 1, referring to “<i>exotic and invader should be [invasive] species</i>”.</p> <p>The abovementioned comments must be addressed in the final scoping report. The City of Cape Town now awaits the decision of the Competent Authority’s decision on the proposed plan of study for the EIA phase and thereafter a copy of the Draft Environmental Impact Assessment Report (EIAR).</p>	<p>Thank you for your comments. The required changes have been made in the FSR.</p> <p>Thank you for the comments received and the assistance offered to the EAP to date.</p>