

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

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

FINAL SCOPING REPORT PERIOD - COMMENTS AND RESPONSE REPORT

Name	Organisation
Ms Stephanie Barnardt	Heritage Western Cape
Department of Environment, Forestry & Fisheries – Oceans & Coasts	Department of Environment, Forestry & Fisheries – Oceans & Coasts
Ms Sindiswa Dlomo	Department of Environment, Forestry & Fisheries - Integrated Environmental Authorisations
Mr Basson Geldenhuys	Department of Public Works & Infrastructure – Chief Town Planner
Mr John Gribble	ACO-Associates cc - Heritage Specialist
Councillor Nora Grose	City of Cape Town Metropolitan Municipality - Councillor
Mr Maxhoba Jezile	DEFF – Fisheries Management, Directorate: Sustainable Aquaculture Management
Ms Daisy Kotsedi	Department of Environment, Forestry & Fisheries – Oceans & Coasts
Mr Robert Landman	I & J Limited
Ms Julliet Mahlangu	Department of Environment, Forestry & Fisheries - Integrated Environmental Authorisations
Ms Nelisa Ndobeni	Department of Water & Sanitation Western Cape – Control Environmental Officer
Ms Pat Titmuss	City of Cape Town - Environmental Management Department
Mr Marius Wheeler	CapeNature
Ms Briega Williams	South African Heritage Resources Agency – Heritage Officer

Name and Organisation	Comment	Response
<p>Date: 25 02 2021 (Email) Department of Environment, Forestry & Fisheries Oceans & Coasts</p>	<p>Noted and received</p>	<p>This email serves to inform you that the Final Scoping Report documents for the above-mentioned project has been loaded onto your Departments link: https://environmentza-my.sharepoint.com/:f/g/personal/fditinti_environment_gov_za/EnSN8C845udHg2gH3dJRQmQBy3sLI3PYMHKKRA9OucVVA?e=zXcx7a</p> <p>Please advise if you have received the documents.</p> <p>Thank you for your Acknowledgement email.</p>
<p>Date: 25 02 2021 (Email) Mr Maxhoba Jezile DEFF – Fisheries Management, Directorate: Sustainable Aquaculture Management</p>	<p>I am very sorry for the late response. I had requested the KML file from a service provider assisting with the Marine Special Planning but have not received a response. Please see attached KML file. Please note that some of the coordinates appear in land kindly move them to the coast.</p>	<p>Thank you for the information provided. None of the points occur close to the proposed cable alignment.</p>
<p>Date: 25 02 2021 (Email) Ms Briege Williams South African Heritage Resources Agency Heritage Officer</p>	<p>Yes, the documents are uploaded onto SAHRIS, thanks!</p>	<p>The Final Scoping Reports for Duynefontein – Case 15795 and Yzerfontein – Case 15812 has been loaded onto the SAHRA website for your review and comments. Please advise if you have received these documents.</p> <p>Thank you for your acknowledgement.</p>
<p>Date: 25 02 2021 (Email) Councillor Nora Grose City of Cape Town Metropolitan Municipality Councillor</p>	<p>Thank you for the information received. I will circulate to our community.</p>	<p>Thank you for your email and assisting with the circulating to your community.</p>
<p>Date: 25 02 2021 (Email) Mr Robert Landman I & J Limited</p>	<p>Please drop the final scoping report for the telecom cables in this link as I do not have access to Dropbox.</p>	<p>The document was sent to Mr Landman on 26 02 2021.</p>
<p>Date: 26 02 2021 (Email) Mr Marius Wheeler CapeNature</p>	<p>No further comment from CapeNature. Thanks for keeping us informed.</p>	<p>Thank you for your email. It is noted that Cape Nature has no further comment.</p>

Name and Organisation	Comment	Response
<p>Date: 01 03 2021 (Email) Ms Briega Williams South African Heritage Resources Agency Heritage Officer</p>	<p>I have now issued the comment for the above case and uploaded it onto SAHRIS, I have also attached a copy to this email. Please let me know if you have any queries.</p> <p>Interim Comment In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)</p> <p>Proposed 2AFRICA/GERA (East) submarine fibre optics cable system to be landed at Duynfontein, City of Cape Town, Western Cape. CaseID: 15795</p> <p>The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Final Scoping Report (FSR) for the proposed 2AFRICA/GERA (East) submarine fibre optics cable system to be landed at Duynfontein 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 FSR 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 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.</p> <p>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</p>	<p>Thank you for your email and comments received.</p> <p>A Heritage Assessment will be undertaken as part of the Impact Assessment process.</p> <p>The EAP is aware of this condition.</p> <p>SAHRA's information regarding wrecks in the vicinity of the proposed marine cable for the 2AFRICA/GERA (East)) Cable System (Duynfontein landing) is appreciated and will be taken into consideration in the Impact Assessment.</p>

Name and Organisation	Comment	Response
	<p>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>SAHRA commented on the Draft Scoping Report in January 2021 and made the following request: "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> SAHRA is disappointed to note that the requested update has not been made and the paragraph in the FSR remains unchanged. This sentence must be updated in the EIA to ensure the correct information is provided in the document.</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 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>The specialist Heritage Assessment will be undertaken by a suitably qualified maritime archaeologist as part of the Impact Assessment.</p> <p>Noted with thanks.</p> <p>The EAP apologises for this oversight and this sentence has been updated in the EIA (as applicable).</p> <p>The preferred Alternative for this project involves no construction inland of the beach and no comment is required from HWC.</p> <p>Noted. The documents will be uploaded to the SAHRIS website.</p> <p>The terms and conditions are noted and the official will be contacted if required.</p>

Name and Organisation	Comment	Response
	<p>ADMIN: Direct URL to case: https://sahris.sahra.org.za/node/545938 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>Date: 02 03 2021 (Email) Ms Daisy Kotsedi Department of Environment, Forestry & Fisheries Oceans & Coasts</p>	<p>Could you kindly indicate if you've received comments from the Oceans & Coasts branch or not? My comments would have been included in the branch comments.</p>	<p>Thank you for your email. We received comments on the Draft Scoping Report for the above-mentioned project on 10/02/2021. We have however uploaded the Final Scoping Report onto your Departments link (see attached correspondence) and haven't received notification if you have received the documents. Please advise if you have received the FSR documents.</p>
<p>Date: 02 03 2021 (Email) Ms Stephanie Barnardt Heritage Western Cape</p>	<p>I discussed this with Waseefa, she has confirmed that no trigger can be taken as our final word.</p> <p>The only case that I can think of is when there was initial no trigger then the proposed changes, example proposed pipeline was under 300m then the applicant revised the proposal and it is now more than 300m. That will trigger section 38(1)(a) then formal NID must be submitted.</p> <p>HWC cannot comment on matters which do not trigger the NHRA.</p>	<p>Thank you, ACER acknowledges that HWC need not comment on this project.</p>
<p>Date: 03 03 2021 (Email) Mr Basson Geldenhuys Department of Public Works & Infrastructure – Chief Town Planner</p>	<p>I am working from home and will not be in the office. I also doubt it whether they will allow the courier company into the building.</p> <p>Yes, it will sufficient. My apology for the inconvenience.</p>	<p>I tried calling your office today. We sent a CD copy for your attention, with DHL courier services on 26/02/2021, for the above-mentioned project. DHL has informed us that the delivery of the parcel was refused at the Department. Please advise if there is someone else at the Department who will sign/accept the parcel on your behalf. Many thanks for your assistance.</p> <p>Thank you for your email and assistance. I will inform the courier company to return the parcel. For future project notifications and correspondence will the ACER website link be sufficient?</p>

Name and Organisation	Comment	Response
<p>Date: 03 03 2021 (Email) Ms Julliet Mahlangu Department of Environment, Forestry & Fisheries Integrated Environmental Authorisations</p>	<p>14/12/16/3/3/2/2046 ACKNOWLEDGEMENT OF RECEIPT OF THE FINAL SCOPING REPORT 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 final Scoping Report and Application form for the abovementioned project on 25 February 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>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>Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p>	<p>Thank you for your acknowledgement of receipt of the FSR and Application. The Applicant is aware that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p>
<p>Date: 15 03 2021 (Email) Ms Nelisa Ndobeni Department of Water & Sanitation Western Cape Control Environmental Officer</p>	<p>FINAL SCOPING REPORT FOR THE PROPOSED 2AFRICA (EAST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT DUYNEFONTEIN, CITY OF CAPE TOWN, WESTERN CAPE, SOUTH AFRICA</p> <p>Your application dated February 2021 with EIA Ref No.: 14/12/16/3/3/2/2046 refers.</p> <p>The Department has evaluated the above-mentioned application and please note that the Department's comments dated 22 January 2021 regarding this application are still valid.</p> <p>In addition to the above, the following must be noted:</p> <ul style="list-style-type: none"> 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 activity and must be authorized and registered in terms of the National Water Act (Act 36 of 1998) before the proposed development may commence. 	<p>Thank you for your email and the additional comments received.</p> <p>ACER has appointed a specialist to identify and assist with the application requirements for the water uses pertaining to this project.</p>

Name and Organisation	Comment	Response
	<ul style="list-style-type: none"> • The report indicated that water for construction purposes will be sourced from the closest municipal water supply point and tankered to site when required. A signed letter from the municipality confirming that they will have sufficient water to supply the proposed development must be obtained and submitted to the Department. Please note that 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. • The chemical toilets that will be utilised during the construction phase must be properly located such that they do not pose a risk of water resource pollution and its contents must be disposed of at a licensed facility. • A stormwater management plan must be put in place. The clean stormwater system must be separated from the dirty stormwater system. • No surface, ground or storm water may be polluted as a result of any activities emanating from the site. • Solid waste must be managed in accordance with the requirements of the relevant legislation. • All the requirements of the National Water Act, 1998 (Act 36 of 1998) regarding water use and pollution management must be adhered to at all times. <p>Please do not hesitate to contact the above office should there be any queries.</p>	<p>The preferred Alternative for Duynfontein involves no construction of new infrastructure and therefore no water will be required for construction.</p> <p>This condition is noted and will be incorporated into the EMPr to be compiled for the proposed development.</p> <p>The preferred Alternative for Duynfontein involves no construction of new infrastructure on land and will therefore not require a stormwater management plan. Municipal stormwater management systems are already in place behind the beach.</p> <p>This condition is noted and will be incorporated into the EMPr to be compiled for the proposed development.</p> <p>This condition is noted and will be incorporated into the EMPr to be compiled for the proposed development.</p> <p>The Developer and their appointed sub-contractors will undertake the work in compliance with relevant legislation.</p>
<p>Date: 25 03 2021 (Email) Ms Pat Titmuss City of Cape Town Environmental Management Department</p>	<p>PROPOSED NEW MARINE TELECOMMUNICATION CABLE SYSTEM (2AFRICA/GERA – EAST) TO MAKE LANDFALL AT DUYNFONTEIN, MELKBOSSTRAND: FINAL SCOPING REPORT (FSR) [DEA Reference: 14/12/16/3/3/2/2046]</p>	<p>Thank you for your email confirming (as per points 1-4) that the City of Cape Town's comments dated 17 February 2021, have adequately been reflected and addressed in the Final Scoping Report. When ready, the Draft EIA Report will be circulated for the City of Cape Town's comment.</p>

Name and Organisation	Comment	Response
	<p>The Final Scoping Report, dated February 2021, pertaining to the above, refers.</p> <ol style="list-style-type: none"> 1. The City of Cape Town comment dated 17 February 2021, on the draft scoping report has adequately been reflected and addressed in the final scoping report's <i>Comments and Responses Report</i> (Appendix 3 of the FSR). 2. The list of Specialist studies, listed on page (x) of the Executive summary, as well as Section 10 of the FSR (pages 131 to 137), is sufficient as it pertains to the sections of the study area that falls within the jurisdiction of the City of Cape Town. 3. The City has nothing further to add to the proposed Plan of Study for the EIA as contained in Section 10 (pages 130 to 140) of the FSR. 4. The City takes note of Heritage Western Cape's comment, dated 22 December 2020, indicating that a NID submission is not required. As such the comment on page 23 of 29 of the <i>Comments and Responses Report</i> (Appendix 3 of the FSR) that states "<i>The NID application must still be submitted to the City of Cape Town which will be completed and submitted by the appointed Heritage Specialist</i>" may be changed to reflect that a NID application does not have to be submitted to the City of Cape Town for comment anymore. <p>The City of Cape Town now awaits the decision of the Competent Authority on the proposed plan of study for the EIA phase and thereafter a copy of the Draft Environmental Impact Assessment Report (EIAR).</p> <p>Kindly submit the Draft Environmental Impact Report (once available) to this office in the form of 1 x hard copy and 1 x CD / flash disk version.</p>	
<p>Date: 26 03 2021 (Email) Department of Environment, Forestry & Fisheries Oceans & Coasts</p>	<p>Kindly find attached comments for your perusal and implementation on the Final Scoping Report for the proposed 2Africa (East) Submarine Fibre Optic Cable System to Be Landed at Dufnefontein, City of Cape Town, Western Cape, South Africa.</p>	<p>Thank you for your email and contact details for future correspondence.</p>

Name and Organisation	Comment	Response
	<p>Kindly note that all future correspondence and documentation, Enquiries, Meetings and site inspection requests related to EIA applications (hard copy and an electronic copy) must be 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>SUBJECT: COMMENTS THE FINAL SCOPING REPORT FOR THE 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 Final Scoping Report for the proposed 2africa (East) Submarine Fibre Optic Cable System to Be Landed at Duynefontein, City of Cape Town, Western Cape, South Africa 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. We have reviewed the Final Scoping Report for the proposed 2africa (East) Submarine Fibre Optic Cable System to Be Landed at Duynefontein, City of Cape Town, Western Cape, South Africa, and have noted the response to our comments provided on the Draft Scoping Report for this project. This Branch advocate for implementation of Comments provided on the Draft Scoping report, more especially concerning the need for the EAP to provide outstanding information/assessment reports acknowledged in your response to our comments provided on the Draft Scoping report. A copy has been attached for your easy reference. 2. It is a recommendation of this Branch that the competent authority ensures that all comments and recommendations made be taken into account and implemented throughout the proposed project phases. 	<p>Outstanding information has been addressed and included in the DEIAR.</p> <p>This comment to the CA is noted.</p>

Name and Organisation	Comment	Response
	<p>Comments on the Final 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> <ol style="list-style-type: none"> 1. Regarding marine mammals on p98: the occurrence of very large feeding aggregation of humpback whales ('superpods') off the west coast including the areas of interest is not mentioned. These aggregations and their timing should be taken into account for proposed activities in the territorial waters offshore the landing site alternatives. 2. On p86-89, interactions with MPAs and focus areas for offshore protection are considered. The focus areas for offshore protection were integrated in the description of Ecologically or Biologically Significant Marine Areas (EBSAs), and parts of many were incorporated in the declaration of 20 MPAs (mainly offshore) in 2019. 3. It would make more sense to explore the interaction of the proposed cable with the new Coastal and Marine Critical Biodiversity Areas map (available at https://cmr.mandela.ac.za/Research-Projects/EBSA-Portal/South-Africa/National-Coastal-and-Marine-Spatial-Biodiversity-P). 4. The CBA Map incorporates existing spatial priorities such as EBSAs, focus areas and other information, and presents a spatial plan for the marine environment, designed to inform planning and decision-making regarding activities such as this, in support of sustainable development. 5. On what basis is the following statement in the Executive Summary made: "Within the marine environment, impacts on the biophysical environment are considered negligible"? Why then is the need for a marine specialist study identified? 6. The report seems unclear about the need for a specialist study on marine avifauna. The need is identified on p 124 and 126, yet such a study is not listed in Section 10.2. 	<p>The occurrence of very large feeding aggregation of humpback whales ('superpods') off the west coast including the areas of interest is referred to in the DEIAR (Section 6.1.3). Timing of whale activities will be taken into account for this project and MMO's will be provided on the cable laying vessel.</p> <p>This is noted and referred to in the DEIAR.</p> <p>The marine ecology specialist report makes reference to the new Coastal and Marine Critical Biodiversity Areas map. Reference to this map and the affected CBAs is also provided in the DEIAR.</p> <p>Noted. Reference to this map and the affected CBAs is provided in in the DEIAR.</p> <p>This sentence should rather have read: "Within the marine environment, impacts on the biophysical environment are anticipated to be negligible". A marine specialist assessment was commissioned to confirm and assess the significance of the impacts associated with installation of the proposed marine cable.</p> <p>ACER commissioned additional specialist studies to address impacts on avifauna (seabirds and shorebirds) as well as marine mammals, to support the findings of the marine ecology report and address concerns of O&C. The findings of these specialist studies are referred to in Chapter</p>

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	<p>7. The EAP is required to provide a response on the actual specialist studies to be undertaken. And if the above said specialist will be excluded, what is the reason and motivation.</p>	<p>9 of the DEIAR and the specialist reports are contained in Appendix B of the DEIAR.</p> <p>The specialist studies undertaken are summarise below.</p> <table border="1" data-bbox="1346 416 2078 1377"> <thead> <tr> <th data-bbox="1346 416 1384 480"></th> <th data-bbox="1384 416 1749 480">Specialist Study</th> <th data-bbox="1749 416 2078 480">Organisation</th> </tr> </thead> <tbody> <tr> <td data-bbox="1346 480 1384 612">1</td> <td data-bbox="1384 480 1749 612">Ecological Impact Assessment Report (Vegetation , Wetlands/Watercourses & Fauna)</td> <td data-bbox="1749 480 2078 612">Inland Waters Consultancy in association with Capensis</td> </tr> <tr> <td data-bbox="1346 612 1384 745">2</td> <td data-bbox="1384 612 1749 745">Commercial Fisheries Specialist Study</td> <td data-bbox="1749 612 2078 745">Capricorn Marine Environmental (Pty) Ltd (CapMarine)</td> </tr> <tr> <td data-bbox="1346 745 1384 845">3</td> <td data-bbox="1384 745 1749 845">Beach and Coastal Dune Dynamics Impact Assessment</td> <td data-bbox="1749 745 2078 845">SDP Ecological & Environmental Services</td> </tr> <tr> <td data-bbox="1346 845 1384 946">4</td> <td data-bbox="1384 845 1749 946">Marine Ecology Assessment</td> <td data-bbox="1749 845 2078 946">Pisces Environmental Services (Pty) Ltd</td> </tr> <tr> <td data-bbox="1346 946 1384 1046">5</td> <td data-bbox="1384 946 1749 1046">Maritime Archaeological Impact Assessment</td> <td data-bbox="1749 946 2078 1046">ACO Associates cc</td> </tr> <tr> <td data-bbox="1346 1046 1384 1211">6</td> <td data-bbox="1384 1046 1749 1211">A review of the potential effects of submarine telecommunications cables on marine mammals in Southern Africa</td> <td data-bbox="1749 1046 2078 1211">Sea Search Research and Conservation</td> </tr> <tr> <td data-bbox="1346 1211 1384 1377">7</td> <td data-bbox="1384 1211 1749 1377">Submarine Telecommunications Cables Environmental Impact Assessment. Generic Avifaunal Impact Assessment</td> <td data-bbox="1749 1211 2078 1377">WildSkies Ecological Services (Pty) Ltd</td> </tr> </tbody> </table>		Specialist Study	Organisation	1	Ecological Impact Assessment Report (Vegetation , Wetlands/Watercourses & Fauna)	Inland Waters Consultancy in association with Capensis	2	Commercial Fisheries Specialist Study	Capricorn Marine Environmental (Pty) Ltd (CapMarine)	3	Beach and Coastal Dune Dynamics Impact Assessment	SDP Ecological & Environmental Services	4	Marine Ecology Assessment	Pisces Environmental Services (Pty) Ltd	5	Maritime Archaeological Impact Assessment	ACO Associates cc	6	A review of the potential effects of submarine telecommunications cables on marine mammals in Southern Africa	Sea Search Research and Conservation	7	Submarine Telecommunications Cables Environmental Impact Assessment. Generic Avifaunal Impact Assessment	WildSkies Ecological Services (Pty) Ltd
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	<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><u>NB: Findings of assessment on the proposed site, alternatives, technology and methodology suitability will be provided when the Environmental Impact Assessment Report becomes available.</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>The DEIAR will be submitted to O&C for comment.</p>
<p>Date: 06 04 2021 (Email) Ms Sindiswa Dlomo Department of Environment, Forestry & Fisheries Integrated Environmental Authorisations</p>	<p>14/12/16/3/3/2/2046 ACCEPTANCE OF THE FINAL SCOPING REPORT (FSR) FOR THE DEVELOPMENT OF THE 2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTICS CABLE SYSTEM TO BE LANDED AT DUYNEFONTEIN, SOUTH AFRICA</p> <p>The final Scoping Report (SR) and the Plan of Study for Environmental Impact Assessment dated February 2021 and received by the Department on 25 February 2021, refer.</p> <p>The Department has evaluated the submitted final SR and the Plan of Study for Environmental Impact Assessment dated February 2021 and is satisfied that the documents comply with the minimum requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. The final SR is hereby accepted by the Department in terms of Regulation 22(1)(a) of the EIA Regulations, 2014, as amended.</p>	<p>Thank you for your acceptance of the FSR and Plan of Study for Impact Assessment.</p>

Name and Organisation	Comment	Response
	<p>You may proceed with the environmental impact assessment process in accordance with the tasks contemplated in the Plan of Study for Environmental Impact Assessment as required in terms of Appendix 3 of the EIA Regulations, 2014, as amended.</p> <p><u>In addition, the following additional information is required for the Environmental Impact Assessment Report (EIAR):</u></p> <p>a) Please ensure that the listed activities and activity description provided in the application form matches the listed activities and activity description in the EIAR (amend the application form to include the same listed activities in both the application form and the EIAR if necessary).</p> <p>b) The heritage impact assessment must include an assessment of potential maritime and underwater cultural heritage impacts by a suitably qualified Maritime Archaeologist.</p> <p>c) The final SR indicates that 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. You are reminded to consider the potential impact on the activities of O&G exploration and future possible offshore and subsea infrastructure development for O&G, and you are requested to note section 53 of the MPRDA, which provides that applicants should seek a no objection from the 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>d) You are requested to remind the City of Cape Town's Disaster Management Branch to provide comment on the Risk Assessments and Emergency Evacuation Plans submitted for their approval.</p> <p>e) The final SR indicates that the activity will take place within a national proclaimed protected area or other conservation area under the control of a national authority i.e. the proposed cable will traverse sections of the newly established Robben Island Marine Protected Area (MPA) and</p>	<p>The activities included in the application for authorisation have remained the same.</p> <p>A qualified Maritime Archaeologist was appointed to undertake a maritime and underwater cultural heritage assessment as part of the Impact Assessment. It is contained in Appendix B of the DEIAR.</p> <p>The impacts on offshore Oil and Gas (O&G) exploration rights have been addressed in the Impact Assessment (Chapter 10)</p> <p>The EAP will remind the City of Cape Town's Disaster Management Branch for comment and approval.</p> <p>Impacts on MPAs will be assessed by specialists during the Impact Assessment. South African National Parks (SANParks) has been, and will continue to be, consulted during the EIA process. The EAP is aware that</p>

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	<p>the Southeast Atlantic Seamount MPA. Please ensure that impacts on the protected areas are assessed, that the management authority, the South African National Parks (SANParks), is consulted and that the relevant consent / permissions are obtained, if required in terms of the National Environmental Management: Protected Areas Act 57 of 2003. Please also consider whether any additional specified activities in Listing Notice 3 of the EIA Regulations, 2014 as amended are applicable in this regard, and apply for these accordingly.</p> <p>f) 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> <p>g) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr. This includes but is not limited to the SANParks, the City of Cape Town, the Western Cape Department of Environmental Affairs and Development Planning (DEADP), Heritage Western Cape (HWC), the South African Heritage Resources Agency (SAHRA), the Department of Environment, Forestry and Fisheries - Branch: Oceans and Coasts; Fisheries Management, and Biodiversity Conservation, the Department of Human Settlements, the Department of Public Works, Water and Sanitation (DHSWS), the South African Deep-Sea Trawling Industry Association (SADSTIA), CapeNature, and Eskom Koeberg.</p> <p>h) Please ensure that all issues raised, and comments received during the circulation of the draft SR and draft EIAr from registered interested and affected parties (I&APs) and organs of state which have jurisdiction in respect of the proposed activity (including this Department) are adequately addressed in the final EIAr.</p> <p>i) Please ensure that the mitigation measures specified in the EIAr and specialist reports are also incorporated into the Environmental Management Programme (EMPr). In addition, ensure that the EMPr complies with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.</p>	<p>consent / permission is required from SANParks to traverse the Robben Island MPA.</p> <p>The Public Participation Process Plan has been accepted by DFFE and has been designed to comply with the requirements of the EIA Regulations, 2014, as amended.</p> <p>Comments from all of these stakeholders has been requested during the Impact Assessment and those submitted to date are included in the CRR's published to date for this project..</p> <p>Noted. Responses to all comments received to date are provided in the CRR and addressed in the DEIAR, as relevant.</p> <p>The draft EMPr appended to the draft EIAr has been compiled in accordance with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended. The mitigation measures from the specialist reports have been included in the EMPr, as relevant.</p>

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	<p>j) The EMPr must also include the frequency for auditing of compliance with the conditions of the EA and EMPr, and the frequency for the submission of such compliance reports 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 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>Noted. This has been included in the EMPr.</p> <p>Noted. The EAP is aware of the timeframes associated with the EIA application process.</p> <p>Noted. The project will not commence before an environmental authorisation is granted by the Department.</p>