

## **APPENDIX C      COMMENTS AND RESPONSES REPORT**

All comments received have been captured and responded to in the Comments and Responses Report.

| No.:  | Details   | Comment   | Response from EAP/ Applicant/ Specialist  |
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| <b>Comments and Responses Report - Draft Scoping Report</b> |   |   |   |
| 1   | <p><b>31/01/2019</b></p> <p>Email</p> <p><b>Earl Baillache – South Coast Sun Newspaper</b></p>  | <p>I would like to register as an interested party regarding the subsea cable system. Can you send me all the relevant information so that I can publish an article on it or should I get the information from the project website? Any photos or artist's impressions you have would also be welcome.</p>  | <p>You have been added to the stakeholder database and will receive correspondence and updates periodically.</p>  |
| 2   | <p><b>09/02/2019</b></p> <p>Email</p> <p><b>Lesla La Grange - SAHRA</b></p>                     | <p>Thank you for sending this notification. Can you kindly inform me whether this application has been lodged on the South African Heritage Resources Information System (SAHRIS) and what the Case ID is?</p>  | <p>The application for the subsea cable has been lodged on SAHRIS portal and the assigned Case ID No is <b>13412</b> (5 February 2019).</p> <p>The application for the terrestrial cable has been lodged on SAHRIS portal and the assigned Case ID No is <b>13534</b> (4 March 2019).</p> |
| 3   | <p><b>05/02/2019</b></p> <p>Uploaded to SAHRA Website</p> <p><b>Lesla La Grange - SAHRA</b></p> | <p>The South African Heritage Resources Agency (SAHRA) thanks the applicant for providing the Draft Scoping Report (DSR) for comment.</p> <p>The applicant proposes to install a new subsea fibre optic cable connecting Mauritius to South Africa. The cable will run approximately 538 km (inclusive of Territorial Waters and Economic Exclusive Zone (EEZ)). The system includes a 14 mm to 35 mm diameter subsea cable that will enter the South African EEZ (approximately 370 km from the seashore) and continue through Territorial Waters (approximately 22 km from the seashore), to a landing site at Amanzimtoti Pipeline Beach in KwaZulu-Natal.</p> <p>This activity requires statutory comment from SAHRA in terms of Section 38(8) of the National Heritage Resources Act, No. 25 of 1999 (the "NHRA").</p> <p>SAHRA notes that the applicant has identified the need for a Maritime and Underwater Heritage Impact Assessment (MUCHIA), as referred to on Page 9 of the DSR, and supports the need for this specialist study.</p> <ul style="list-style-type: none"> <li>• Please replace the term "Marine Heritage" with "Maritime Heritage" throughout the document. The Heritage Impact Assessment referred to on Page 112 must also note the potential for the presence of heritage resources at the cable landing site, assess the potential impact, and make recommendations for mitigation where applicable.</li> </ul> | <p>"Marine Heritage" has been replaced with "Maritime Heritage" throughout the scoping report.</p> <p>The potential for the presence of heritage resources at the cable landing station is noted, and will be investigated in the Heritage Impact Assessment.</p>                         |
|   |   | <ul style="list-style-type: none"> <li>• The HIA must be submitted to SAHRA via the South African Heritage Resources Information System (SAHRIS) for comment.</li> <li>• All efforts must be made to avoid damage and/or disturbance of cultural heritage material along the offshore cable routes.</li> </ul>  | <p>A Maritime Heritage Specialist Study will be undertaken for the Project and the results of this study will be included in the Draft EIA Report and uploaded onto the SAHRIS.</p>   |

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|   |  | <ul style="list-style-type: none"> <li>• Should any shipwreck or cultural heritage material be detected below the high water mark via sidescan sonar or other means, the position must be recorded and SAHRA must be notified immediately. In this event, work must cease and may not commence until feedback has been received from SAHRA.</li> <li>• If shipwreck or cultural heritage material is detected along the offshore alignment is proven or suspected to be older than 60 years, and the applicant is unable to alter the alignment, a permit shall be required from SAHRA before work may commence.</li> <li>• SAHRA must be provided with information regarding any wrecks or anomalies found on or within 200m of the offshore alignment. Specifically, the name of the vessel (if known), any associated chronological data, and the sources for this information must be provided.</li> </ul> | <p>The proposed route has been screened to ensure that it avoids locations of any known physical resources.</p> <p>Prior to installation, Sidescan Sonar Data has been used to confirm that the route is clear, by identifying any wrecks within the vicinity of the proposed subsea cable route. The subsea cable route will be modified, if necessary to avoid any known or identified wrecks or cultural heritage material.</p>  |
|   |  | <ul style="list-style-type: none"> <li>• Page 101 - Please add a paragraph to Section 6.7.12 which summarises the remit of the South African Heritage Resources Agency in relation to the Provincial Heritage Resources Authority (Amafa KZN) - e.g. "SAHRA is responsible for maritime and underwater heritage resources, including those located on land and within 24 nautical miles seaward of the high-water mark."</li> </ul> <p>SAHRA particularly supports the following statement in the DSR:</p> <p>P. 103 - "Sidescan Sonar Data will be used to identify any wrecks within the vicinity of the proposed cable prior to installation. The subsea cable route will be designed to avoid any known or identified wrecks."</p>   | <p>The requested text has been added to Section 6.7.12 which summarises the remit of the South African Heritage Resources Agency in relation to the Provincial Heritage Resources Authority (Amafa KZN).</p>  |
| 4 | <p><b>15/02/2019</b></p> <p>Email</p> <p><b>Theo Stokes – SA Navy: Captain</b></p>   | <p>It is requested that this Office is approached as work commences to take the necessary action to notify the mariner bmo promulgating a Coastal Navigation Warning and taking the necessary charting action as required.</p>   | <p>You have been added to the stakeholder database and will receive correspondence and updates periodically.</p> <p>The requirement for the vessel operator to notify the Office prior to marine activities will be added to the notification requirements in the EIA.</p>  |
| 5 | <p><b>18/02/2019</b></p> <p>Email</p> <p><b>Karen Moodley – KZN Department of Agriculture, Forestry and Fisheries: Senior Forester</b></p> | <p>Seeing that the cable route transverses through a section of KZN Coastal Lowlands (forest) vegetation before connecting to the existing infrastructure, DAFF would like to conduct a site inspection prior commenting on the project.</p> <p>It is noted that ERM consultants will be in Amanzimtoti on the 01<sup>st</sup> - 02<sup>nd</sup> March 2019 to have one on one sessions, however the comment end date is one the 04<sup>th</sup> March 2019 (Monday), I think that this timeframe would be too short for DAFF to comment as we have internal processes that need to be followed prior submitting comments to the EAP.</p> <p>Based on the above I propose the following options:</p>   | <p>The KMZ file for the two route alternatives as described in the Scoping Report was sent on 25 February 2019 and 26 February 2019 to DAFF for your desktop analysis.</p> <p>The terrestrial specialist will be going to site during March to identify indigenous vegetation present in the two route alternatives and to propose mitigation measures to minimize the impact to indigenous vegetation along the proposed routes.</p> <p>ERM would suggest that DAFF wait until they have seen the results of the terrestrial ecologist's report before going to site as their study will provide detailed information of the vegetation present at site and the area of vegetation likely to be disturbed.</p> |

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|   |  | <p>1. A site inspection can be arranged with a representative from ERM prior the 01<sup>st</sup> March 2019.</p> <p>Or</p> <p>2. The EAP can extend the comment end date by a week.</p>  | <p>However, if DAFF would like to attend this site visit in the next two weeks arrangements can be made with the specialists. Please confirm as soon as possible if you would like to attend a site visit in the next two weeks?</p> <p>The case officer has also confirmed that they would like to go to site after the release of the Draft EIA Report and we are also happy to coordinate and organize for both authorities to go at the same time.</p> <p>Unfortunately, we cannot extend the current commenting period as we need to meet the regulated timeframe in terms of NEMA. Please note that this phase 1 commenting period is on the scoping report alone and that a commenting period for the environmental impact phase of the Project is yet to follow. As such, DAFF may choose to make comments regarding their concerns in relation to the Draft Scoping Report. Following this, DAFF could take part in the site inspection with the case officer and submit any additional, site-specific comments to ERM to be included for consideration during the impact assessment public participation phase.</p> |
| 6 | <p><b>25/02/2019</b></p> <p>Email</p> <p><b>Karen Moodley</b><br/> <b>– KZN</b><br/> <b>Department of</b><br/> <b>Agriculture,</b><br/> <b>Forestry and</b><br/> <b>Fisheries:</b><br/> <b>Senior Forester</b></p> | <p>The National Forests Act of 1998 (as amended) provides the strongest and most comprehensive legislation and mandate for the protection of all natural forests in South Africa. The principles of the Act in Section 3 state clearly that “natural forests may not be destroyed save in exceptional circumstances where, in the opinion of the Minister, a proposed new land use is preferable in terms of its economic, social or environmental benefits” This prescribes that no development affecting forests may be allowed unless “exceptional circumstances” can be proven. Section 7 of the Act prohibits the cutting, disturbance, destruction or removal any indigenous living or dead tree in a forest without a licence, while section 15 places a similar prohibition on protected tree species listed under the Act.</p> <p>DAFF through the sub-directorate Forestry regulations and Support is the authority mandated to implement the National Forestry Act No. 84 of 1998 by regulating the use of natural forests<sup>1</sup> and protected trees species in terms of the said Act.</p> <p>With reference to the DSR received on 01/02/2019, majority of the subsea cable runs through South African waters however a portion of the cable will run on terrestrial land. It is noted that there are three alternatives for the landing site location of the subsea cable. Alternative 1 and 3 are situated near a sensitive dune system and therefore considered to be environmentally sensitive whilst Alternative 2 (preferred) is situated in a transformed area (tarred parking area). It is therefore recommended that although Alternative 2</p> | <p>The practicality as well as environmental impact risk relating to the options will be carefully investigated during the EIA phase and the final route selected to ensure that disturbance to the natural forests is, as far as possible, minimised. ERM notes that DAFF will be contacted to organise a site visit during the EIA phase of the Project.</p>  |

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|   |  | <p>is a longer route, it is the most preferred route by DAFF as it follows the road servitude in order to limit the disturbance of the natural vegetation. DAFF will provide further comments upon receipt of the Draft Environmental Impact report as this will entail a detail description of the route options as well as the vegetation specialist study which will address concerns regarding the disturbance of indigenous vegetation. A site visit will also be undertaken during the Draft Environmental Impact stage by DAFF officials.</p> <p>1. "Natural forest" means a group of indigenous trees-</p> <p>(a) Whose crowns are largely contiguous; or</p> <p>(b) Which have been declared by the Minister to be a natural forest under section 7(2); (xxviii)</p> |   |
| 7 | <p>25/02/2019</p> <p>Email</p> <p><b>Sabelo Malaza –<br/>DEA Integrated<br/>Environmental<br/>Authorisations:<br/>Chief Director</b></p> | <p>This department has the following comments:</p> <p><u>Activities applied for:</u></p> <p>Please furnish the development footprint in square metres in relation to both activity 15 and 17 of GNR 938 of NEMA regulations of 2014 as amended.</p>   | <p><u>Activities applied for:</u></p> <p>The development footprint for Project is estimated in Table 2.1, and will be confirmed during the EIA Phase.</p>   |
|   |  | <p><u>Alternatives</u></p> <ul style="list-style-type: none"> <li>Please provide a description of the identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 2, (2) (1) (g) (i-xi), of GN R982 of 2014, as amended.</li> <li>Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist as per the requirements of Appendix 2, (2) (1) (g) (x).</li> </ul>   | <p><u>Alternatives:</u></p> <p>The Project alternatives, including the advantages and disadvantages are described in Section 3 of the Final Scoping Report. Alternatives described include: subsea cable route alternatives, landing site location alternatives, terrestrial cable route alternatives, activity alternatives and technology alternatives.</p> |
|   |  | <p><u>Impacts Assessment</u></p> <p>This Department requests the EAP to familiarise themselves with the requirements of Appendix 2 of GNR 982 of the EIA Regulations, 2014 (as amended) and ensure that the final SR submitted to this Department for consideration meets the requirements in terms of identifying, assessing and providing mitigation measures of the impacts on the alternatives and preferred site.</p>  | <p><u>Impact Assessment:</u></p> <p>The Final Scoping Report will adhere to requirements of Appendix 2 of GNR 982 of the EIA Regulations, 2014 (as amended). Refer to Table 1.3 in the Final Scoping Report.</p>  |
|   |  | <p><u>Plan of Study of the EIA</u></p> <p>Please ensure that the Plan of Study of the EIA is compiled in accordance with Appendix 2(h-j) of NEMA EIA Regulations 2014 as amended.</p>   | <p><u>Plan of Study of the EIA:</u></p> <p>The Plan of Study will be developed according to Appendix 2(h-j) of NEMA EIA Regulations 2014 as amended during the EIA Phase.</p>   |
|   |  | <p><u>Maps</u></p> <p>Please ensure that the final Scoping Report includes the following maps.</p>  | <p><u>Maps:</u></p> <p>The requested maps have been included in Appendix D.</p>   |

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|  |  | <ul style="list-style-type: none"> <li>• <b><u>Locality Map</u></b><br/> An A3 locality map. The scale of the locality map must be relevant to the size of the development (at least 1:50000. For linear activities of more than 25km, a smaller scale e.g. 1:250 000 can be used. The scale must be indicated on the map).<br/> <b>The map must include the following:</b> <ul style="list-style-type: none"> <li>○ an accurate indication of the Project site position as well as the positions of alternative sites, if any; indication of all alternatives identified; closest town(s)</li> <li>○ road access from all major roads in the area;</li> <li>○ road names or numbers of all major roads as well as the roads that provide access to the site(s);</li> <li>○ all roads within a 1km radius of the site or alternative sites; and</li> <li>○ a north arrow; a legend and locality: GPS co-ordinates must indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates must be provided in degrees, minutes and seconds. The Projection that must be used in all cases is the Hartebeesthoek94 WGS84 co-ordinate system, in line with Regulation 5(6) of the EIA Regulations, 2014 as amended.</li> </ul> </li> <li>• <b><u>A3 Layout Map</u></b><br/> A detailed site plan must be prepared for the site.<br/> <b>The site or route plans must indicate the following:</b> <ul style="list-style-type: none"> <li>○ the property boundaries and numbers of all the properties within 50 metres of the site;</li> <li>○ the current land use, the land use zoning of the site and of each of the properties adjoining the site</li> <li>○ the exact position of each structure to be developed triggered by the proposed development (including alternatives);</li> <li>○ servitude(s) indicating the purpose of the servitude</li> <li>○ a legend; and</li> <li>○ a north arrow</li> </ul> </li> <li>• <b><u>Sensitivity Map</u></b><br/> A sensitivity layout plan overlaid by the sensitive features i.e. no go areas and irreplaceable Critical Biodiversity Areas (CBA), Conservation Areas, sensitive ecosystems, no go areas and water bodies also the existing structures in the vicinity of the proposed development must be submitted as part of the report for the analysis of the effect of the proposed Project on the environment. Please ensure all features are clearly indicated on the legend of the sensitivity layout plan.</li> </ul> |  |
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|  |  | <p><b><u>Public Participation Process</u></b></p> <ul style="list-style-type: none"> <li>• Please ensure that all issues raised and comments received during the circulation of the SR from the registered I&amp;APs and the organs of state which have jurisdiction (including this Department's Biodiversity Section and Coastal Conservation and Strategies Directorate) in respect of the proposed activity are adequately addressed in the final SR.</li> <li>• Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof of attempts that were made to obtain comments must be submitted to the Department.</li> <li>• The Public Participation process must be conducted in terms of Regulations 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended.</li> </ul>   | <p><b><u>Public Participation:</u></b></p> <p>All stakeholder comments have been included in this CRR, and addressed in the Final Scoping Report submitted to the DEA. Please refer to Appendix B6 for comments received.</p>   |
|  |  | <p><b><u>General Comments</u></b></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 amended EIA Regulations, 2014.</p> <p>Further note that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of the these Regulations, unless an extension has been granted in terms of regulation 3(7).</p> <p>You are requested to submit one (1) copy of the final scoping report to the Department and two (2) unprotected electronic copy (CD/DVD-PDF Format) of the complete final report with the hard copy documents. All documents to be submitted must include the above DEA reference number.</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><b><u>General comments:</u></b></p> <p>The Draft Scoping Report has been undertaken to meet the applicable South African legal requirements.</p> <p>Additionally, the EAP acknowledges that the Final Scoping Report was written in accordance with Appendix 2 and Regulation 21(1) of the amended EIA Regulations, 2014.</p> <p>Regulation 45 and Section 24F of the National Environmental Management Act, Act No 107 of 1998 are both understood and acknowledged by the EAP.</p> |
| <b><u>Comments and Responses Report - Comments on Final Scoping Report</u></b> |  |  |   |
| 8  | <p>15/04/2019<br/>Email<br/><b>Sabelo Malaza –<br/>DEA Integrated<br/>Environmental<br/>Authorisations:<br/>Chief Director</b></p> | <p>The final Scoping Report (SR) and Plan of Study for Environmental Impact Assessment (poSEIA) dated 11 March 2019 and received by this department on 13 March 2019 refer.</p> <p>This Department has evaluated the submitted final SR and the PoSEIA dated 11 March 2019 and is satisfied that the documents comply with the minimum requirements of the Environmental Impact Assessment (EIA) Regulations</p>   | <p>Acceptance of the Final Scoping Report is noted. The Draft EIA Report will be compiled in accordance with the EIA Regulations 2014 as amended and incorporate the comments submitted by DEA.</p>   |

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|  | Acceptance of the Final Scoping Report | 2014, as amended. However, you must take note of the following comments from the Department.   |  |
|  |  | <p><b><u>Public Participation Process</u></b></p> <ul style="list-style-type: none"> <li>• All comments and recommendations made by all stakeholders and various Interested and Affected Parties (I&amp;As) in the draft SR and submitted as part of the final SR must be taken into consideration when preparing an Environmental Impact Assessment report (EIAr) in respect of the proposed development.</li> <li>• Please ensure that all relevant stakeholder's comments are submitted to the Department with the final EIAr. This includes but not limited to the Department of Environmental Affairs: Biodiversity and Conservation Directorate KwaZulu Natal Department of Economic Development, Tourism and Environmental Affairs, Ezemvelo KZN Wildlife, eThekweni Metropolitan Municipality, the Department of Agriculture, Forestry and Fisheries (DAFF): International Relation Fisheries, Department of Water and Sanitation (DWS), Department of Mineral Resources, South African Maritime Safety Authority, Department of Public Works, Petroleum Agency of South Africa, South African Navy Hydrographic Office, Department of Transport, Department of Human Settlement, the South African Heritage Resources Agency (SAHRA), AMafa KwaZulu Natal, the Wildlife &amp; Environment Society of South Africa (WESSA) and Birdlife South Africa, South Africa Institute for Aquatic Biodiversity, Fresh Tuna Exporters Association, Fish SA, South African Commercial Line Fishing Association, South African Deep-Sea Trawling Industry Association and South African Squid Management Industrial Association.</li> <li>• You are also required to address all issues raised by Organs of state and I&amp;As prior to the submission of the EIAr to the Department</li> <li>• Proof of correspondence with the various stakeholders must be included in the EIAr. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments</li> <li>• The EAP must in order to give effect to regulation 7, give registered I&amp;As access to and an opportunity to comment on the draft report in writing within 30 days before submitting the final EIAr to the Department</li> </ul> | <p><b><u>Public Participation:</u></b></p> <p>All stakeholder comments have been included in this CRR, and addressed in the Final Scoping Report submitted to the DEA and in this Draft EIA Report. Please refer to Appendix B for documentation of correspondence.</p> <p>The Draft EIA Report will be made available for comment to registered I&amp;As for the required 30 days (Reg 7)</p> |
|  |  | <p><b><u>Maps</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Environmental sensitivity map</u></b> <ul style="list-style-type: none"> <li>○ An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process must be on an A3 page with a clear legend.</li> </ul> </li> </ul>   | <p><b><u>Maps:</u></b></p> <p>The specified sensitivity map and the topographical map is included in Chapter 6 and Appendix D of the Draft EIA Report.</p>   |



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|  |  | <ul style="list-style-type: none"> <li>• <b><u>Topographical Map</u></b></li> </ul> <p>A topographical map combining the final layout map superimposed (overlain) on the environmental sensitivity map must be submitted with the final EIAr.</p>  |   |
|  |  | <p><b><u>Environmental Management Programme</u></b></p> <p>The EMPr to be submitted as part of the EIAr must include the following:</p> <ul style="list-style-type: none"> <li>• All recommendations and mitigation measures recorded in the EIAr and the specialist studies conducted.</li> <li>• A good quality site final layout map with clear legend</li> <li>• A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site and be implemented prior to commencement of the construction phase.</li> <li>• A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility.</li> <li>• A traffic management plan for the site access roads illustrating how traffic will be controlled especially on local commuters travelling on public road during peak hours and how traffic or any other impacts as a result of traffic will be managed,</li> <li>• Measures to protect archaeological sites, artefacts, paleontological fossils or graves from construction and operational impacts.</li> </ul> | <p><b><u>Impact Assessment:</u></b></p> <p>The EMPr in the Draft EIA Report includes all recommendations and mitigation measures specified in the specialist studies in Appendix F. The following management plans have been developed to support the EMPr:</p> <ul style="list-style-type: none"> <li>• Site final layout map (Chapter 2 and Appendix D);</li> <li>• Plant Rescue and Protection Plan (Appendix G);</li> <li>• Re-Vegetation and Habitat Rehabilitation Plan (Appendix G); and</li> <li>• Traffic Management Plan (Appendix G).</li> </ul> <p>The EMPr (Chapter 9 and Appendix G), has mitigation measures included to address impacts to both terrestrial and maritime heritage and cultural heritage</p>   |
|  |  | <p><b><u>General Comments</u></b></p> <ul style="list-style-type: none"> <li>• You are hereby reminded that should the EIAr fail to comply with the requirements of this acceptance letter, Regulation 23(2) and Appendix 3 and 4, the proposed METTIS subsea cable system to be landed in Amanzimtoti, KwaZulu Natal Province will be refused in terms of the EIA Regulations 2014, as amended.</li> <li>• Furthermore, it must be reiterated that, should an application for Environmental Authorisation be subject to the provisions of Chapter II, Section 38 of the National Heritage Resources Act, Act 25 of 1999, then this Department will not be able to make nor issue a decision in terms of your application for Environmental Authorisation pending a letter from the pertinent heritage authority categorically stating that the application fulfils the requirements of the relevant heritage resources authority as described in Chapter II, Section 38(8) of the National Heritage Resources Act, Act 25 of 1999. Comments from SAHRA and/or the provincial department of heritage must be provided in the EIAr.</li> </ul>  | <p><b><u>Environmental Impact Assessment Report:</u></b> The EAP will ensure that the EIA Report complies with the requirements of the acceptance letter as well as NEMA Regulation 23(2) and Appendix 3 and 4.</p> <p>The project will not impact heritage resources and as such is not subject to provisions of Chapter II, Section 38 of the National Heritage Resources Act, Act 25 of 1999. In any case, the Draft EIA Report will be submitted to SAHRA and comments received shared with the DEA in the Final EIA Report Comments and Responses Report</p> <p>The EAP notes that 2 electronic copies (CD/DVD) and one (1) hard copy of the EIA Report are to be provided to the Department.</p> <p>Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended will be adhered to and no activity will commence prior to authorisation.</p> |

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|  |   | <ul style="list-style-type: none"> <li>You are requested to submit two (2) electronic copies (CD/DVD) and one (1) hard copy of the EIA to the Department as.</li> </ul> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended, which stipulates that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p>  |  |
| <b>Comments Received Post-Submission of the Final Scoping Report</b> |   |  |  |
| <b>10</b>  | <b>25/03.2019</b><br><b>J.S. Ndebele</b><br><b>Email</b><br><br><b>Development Planning, Environment and Management</b> | <b>eThekwini Electricity Department</b><br><p>The H.V. Operations has no objection to the above mentioned application, however please note:</p> <ul style="list-style-type: none"> <li>The applicant must consult eThekwini Electricity's mains records (held in the drawing office at eThekwini Electricity Headquarters, 1 Jelf Taylor Crescent, for the presence of underground electrical services. In addition should any overhead line and/or servitude be affected, the specific permission of the Head: Electricity must be sought regarding the proposed development.</li> <li>The relocation of MV/LV electrical services, if required in order to accommodate the proposed development, will be carried out at the expense of the applicant.</li> </ul> | <p>It is noted that the HV Operations have no objection to the proposed project.</p> <p>The Department was engaged regarding the presence of underground electrical services and confirmed that there is a 33kVA line on Andrew Zondo Road. There is no alternative to this crossing and as such Liquid Telecoms will be meeting with the Electricity Department to agree on the crossing methodology.</p> |
|  |   | <b>Environmental Planning and Climate Protection Department.</b><br><p>The Environmental Planning and Climate Protection Department has no Biodiversity objection to the proposed Installation and Operation of the METISS Subsea Cable.</p> <p>The landing area along the beach, is easily accessible, and no vegetation is envisaged to be lost.</p> <p>This Department will comment further on the submission of the Final Scoping Report.</p>  | <p>The comment has been noted.</p>   |
|  |   | <b>Land Use Management Branch.</b><br><p>There are no adverse comments from the Land Use Management Branch at this stage.</p>  | <p>The comment has been noted.</p>   |
|  |   | <b>Strategic Spatial Planning Branch.</b><br><p>The Strategic Spatial Planning Branch (SSPB) notes the Draft Scoping Report for the installation and operation of the Melting Pot Indianoceanic Submarine System (METISS) in South Africa. In this regard, the SSPB do hereby request clarity regarding:</p>   | <p>Equipment and infrastructure descriptions are discussed in the Project Description (Chapter 2) of the Draft EIA Report. The terrestrial cable and subsea cable (in shallow waters) will be trenched and buried and therefore not be visible after construction.</p>   |

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|  |  | <ul style="list-style-type: none"> <li>• The equipment and infrastructure that will be visible pre and post construction;</li> <li>• To what extent will this proposal affect commercial as well as subsistence fisheries and what mitigation measure will be put in place; -</li> <li>• Post construction, what will the daily/routine operations be, and how will this impact on the beach;</li> <li>• How will the pre and post construction impact on tourism given that Amanzimtoti is a tourist destination.</li> </ul> <p>In terms of Landing Site Location Alternative, the SSPB prefers Alternative 2: Amanzimtoti Pipeline Beach, due to the fact that from an environmentally sensitivity point of view the Beach Manhole will be located in a transformed area.</p> <p>With regards to the Terrestrial Cable Route Alternatives, the SSPB prefers the Alternative 2 alignment route as it follows the road servitude thus limiting disturbance of the natural vegetation.</p> <p>Finally, it should be noted that the SSPB will comment further upon receipt of the Final Scoping Report.</p> | <p>The impact on fishing has been assessed in Chapter 8 and appropriate mitigation is included in Chapter 9 and Appendix G.</p> <p>The impact of the project on tourism was considered non-significant and screened out because the installation of the terrestrial cable route will be completed within 3.5 months, and as such, any impact will be temporary in nature.</p> <p>Preference for Alternative 2 for the terrestrial route alignment has been noted and this option has been selected as the preferred alternative (Chapter 3).</p> |
|  |  | <p><b>Project Executive: Coastal Policy.</b></p> <p>No objection</p>  | <p>The comment has been noted.</p>   |
|  |  | <p><b>Coastal, Storm-water and Catchment Management.</b></p> <p>This Department has no objection.</p>   | <p>The comment has been noted.</p>   |
|  |  | <p><b>Parks, Leisure and Cemeteries.</b></p> <p>No comment received.</p>  | <p>No comments received.</p>   |
|  |  | <p><b>Pavement and Geotechnical Engineering.</b></p> <p>No geotechnical objection in principle. Once on-shore at Amanzimtoti, this Branch prefers the Option 2 alignment along the road as the dune crossing of Option 1 is already oversteep and zoned potentially unstable, the feasibility of crossing the dune will depend on the proposed methods of laying the cable.</p>   | <p>The preference for Alternative 2 for the terrestrial route alignment has been noted and this is the preferred alternative (Chapter 3).</p> <p>The preferred installation method for the terrestrial cable is a combination of Horizontal Directional Drilling and trenching). This methodology avoids destruction of sensitive vegetation and dune ecosystems, as well as allow for the cable to be installed underneath road crossings without destroying infrastructure. Refer to Chapter 3 for details of Alternative 1.</p>               |
|  |  | <p><b>eThekwini Transport Authority</b></p>   | <p>No comments received</p>  |
|  |  | <p><b>Environmental Health Department.</b></p>  | <p>The construction of the subsea cable system will be in line with the Occupational Health and Safety Act as well all other</p>   |

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|    |  | <p>In principle, this Department supports the proposed development of the above mentioned project, however, it is recommended that the development be conducted within the following parameters:</p> <ul style="list-style-type: none"> <li>• Construction to be in accordance with the Occupational Health and Safety Act and any other applicable bylaws and Regulations.</li> <li>• Waste generated during/and or after construction to be disposed of at an approved landfill site (records thereof to be kept).</li> <li>• Water and ablution facilities at the construction site to be available at the beginning through to the end of construction. Effluent to be disposed of at an approved site (records to be kept)</li> <li>• Dust control measures to be in place during the construction phase.</li> <li>• Trenches to be safe guarded ensuring human and animal safety.</li> </ul> <p>This Department reserves the right to call for additional requirements should any health nuisance arise.</p> | <p>applicable by laws and regulations, as per Chapter 9 and Appendix G.</p> <p>Waste management is detailed in the EMPr as per Chapter 9 and Appendix G.</p> <p>As per sanitation requirements, potable water and ablution facilities will be available throughout construction. Effluent will be disposed of as per the EMPr as per Chapter 9 and Appendix G.</p>   |
|    |  | <p><b>eThekwini Water and Sanitation Department.</b></p> <p>No comment received.</p>   | No comments received   |
|    |  | <p><b>Cleansing and Solid Waste.</b></p> <p>No comment received.</p>   | No comments received   |
|    |  | <p><b>Disaster Management.</b></p> <p>No comment from this Department.</p>   | No comments received   |
|    |  | <p><b>Fire Safety.</b></p> <p>Full compliance with all applicable Legislative requirements.</p>  | The applicable fire safety legislation will be adhered to throughout the construction and operation process.   |
| 11 | <p><b>03/05/2019</b><br/>Email<br/><b>Judy Bell – I&amp;AP</b></p> | <p>Please would you ensure that this next phase of the project includes an in depth review of assumptions following the recent coastal flooding and dune slumping in Toti.</p> <p>Please also ensure this comment is formally recorded.</p>  | <p>Potential impacts of the cable to the coastal environment were evaluated as part of the EIA process. The impact of the subsea cable was determined to not be significant. The installation of the cable will not contribute to flooding or dune slumping.</p> <p>In addition, potential damage to the cable by natural changes in the coastal environment was also considered.</p> <p>The design includes protection measures as listed below:</p> <ul style="list-style-type: none"> <li>• Cable armoring,</li> <li>• Deep burial,</li> <li>• Conduits,</li> <li>• Concrete encasement, and</li> <li>• Horizontal Directional Drilling.</li> </ul> |

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|    |  |  | Therefore the mitigation measures include protecting the cable from damage, rather than avoiding coastal erosion.   |
| 12 | <p><b>03/05/2019</b></p> <p>Email</p> <p><b>Diane VanRensburg – eThekweni EIA Planning Division</b></p>                                    | Please provide 4 hard copies and 6 CD copies of the full report for circulation/comment by the relevant Municipal Departments once the documents are ready for review. | 4 hard copies and 6 CD copies will be provided to the eThekweni Planning Division.  |
| 13 | <p><b>06/05/2019</b></p> <p>Email</p> <p><b>Karen Moodley – KZN Department of Agriculture, Forestry and Fisheries: Senior Forester</b></p> | Request copy of this report.   | <p>One hard copy and one soft copy of the Draft EIA Report will be sent to the KZN Department of Agriculture Forestry and Fisheries upon release of the Draft EIA Report. Alternatively, the report will be made available on the project website upon release of the Draft EIA Report. A notification letter will be sent to all Interested and Affected Parties indicating the release of the report.</p> <p>The project website is as follows <a href="http://www.erm.com/metiss-fibre-optic-submarine-cable-system">www.erm.com/metiss-fibre-optic-submarine-cable-system</a></p>   |
| 14 | <p><b>07/05/2019</b></p> <p>Email</p> <p><b>Karen Moodley – KZN Department of Agriculture, Forestry and Fisheries: Senior Forester</b></p> | With regards to the above-mentioned project, please may you forward us a copy of the finalized report.   | <p>An electronic copy of the Final Scoping Report and Appendices was sent to Karen Moodley via email on 28 May 2019.</p> <p>One hard copy and one soft copy of the Draft EIA Report will be sent to the KZN Department of Agriculture Forestry and Fisheries upon release of the Draft EIA Report. Alternatively, the report will be made available on the project website upon release of the Draft EIA Report. A notification letter will be sent to all Interested and Affected Parties indicating the release of the report.</p> <p>The project website is as follows <a href="http://www.erm.com/metiss-fibre-optic-submarine-cable-system">www.erm.com/metiss-fibre-optic-submarine-cable-system</a>.</p> |