

**PROPOSED MARINE TELECOMMUNICATIONS SYSTEM:  
2AFRICA/GERA (EAST) CABLE SYSTEM TO BE LANDED AT  
GQEBERHA (PORT ELIZABETH) ON THE EAST COAST OF  
SOUTH AFRICA**

**(EIA REFERENCE: 14/12/16/3/3/2/2057)**

**FINAL SCOPING REPORT PERIOD - COMMENTS AND  
RESPONSE REPORT**

<b>Name</b>	<b>Organisation</b>
Department of Forestry, Fisheries & Environment – EIA Applications	Department of Forestry, Fisheries & Environment – EIA Applications
Department of Forestry, Fisheries & Environment – Ocean & Coasts	Department of Forestry, Fisheries & Environment – Ocean & Coasts
Mr John Gribble	ACO-Associates cc - Heritage Specialist
Mr Jacques van Der Walt	Openserve (Telkom)
Ms Briege Williams	South African Heritage Resources Agency – Heritage Officer
Michelle Pretorius	Environmental Officer - Shellfish Production Sustainable Aquaculture Management - DFFE
M Owais – I&AP	I&AP
Mr Maxhoba Jezile	Department of Forestry, Fisheries & Environment – Sustainable Aquaculture Management
Michelle Pretorius	Environmental Officer – DFFE Sustainable Aquaculture Management
Ashleigh Mackenzie	Senior Environmental Consultant - Acer

#	Name and Organisation	Comment	Response
1	Date : 13.04.2021 Email Maxhoba Jezile Environmental Officer Aquaculture DFFE	<p>Please find attached document, DFE, Branch Fisheries Management, Directorate Sustainable Aquaculture Management's comment letter on the draft Scoping report.</p> <p>The Directorate: Sustainable Aquaculture Management within the Department of Forestry, Fisheries and the Environment (DFFE) has reviewed the draft Scoping Report for the proposed development, and has the following comments to be considered:</p> <ol style="list-style-type: none"> <li>1. The Department of Forestry, Fisheries and the Environment: Branch Fisheries Management, Chief Directorate Aquaculture and Economic Development conducted an Basic Assessment for the Algoa Bay Aquaculture Development Zone (ADZ) and was granted the Environmental Authorisation (DEA ref: 14/12/16/3/3/1/2055) on the 26<sup>th</sup> February 2021 and the application is currently undergoing the appeals process, a decision is still pending from the Minister of Justice in this regard.</li> <li>2. The draft scoping report does take note that the proposed route of the cable transverses through the proposed Algoa 1 precinct, and as such would have an impact on the proposed aquaculture operations within this zone. It is also noted that there is a proposed specialist report which focuses on fisheries and the aquaculture industry which is to assess the impacts of the cable installation on these sectors. The DFFE will review this report when it becomes available.</li> </ol>	<p>Thank you for your comments submitted for the Proposed 2AFRICA/GERA (East) Cable System to be landed in Port Elizabeth .ACER is currently checking with the cable engineers to see if burial is possible as it passes through the aquaculture block (this will depend on the substrate) and will provide feedback to you as soon as ACER has been provided with feedback. For your information ACER has shared the KML attached which shows the cable alignment and where it crosses the Algoa 1 Aquaculture concession area.</p> <p>Your comment is noted and ACER awaits your feedback following review of the DEIAR.</p>

		<p>3. The draft report indicates that further discussions between the landing partner and/or route planners and the aquaculture concession holder will need to be undertaken to establish if the cable can traverse the concession area or if the anchors for the aquaculture cages pose a risk to the cable. Please note that the DFFE would welcome such discussions. Please note that the proposed Algoa 1 precinct proposes to include longline bivalve culture and not finfish cage culture, however bivalve culture also has mooring lines and anchorage blocks which would be impacted if operators are in place in the area where the cable is to be routed.</p> <p>4 Reference is made to Figure 22 on page 128 of the report which indicates the regular yacht sailing area as well as the positions of Algoa 5 and the Algoa 1 precincts. Please note that the Algoa 5 precinct was identified as part of the first EIA process conducted in 2013 for the Algoa Bay Aquaculture Development Zone, however this precinct was not taken forward in the second application process approved in 2020. Please also note that the coordinates for the Algoa 1 precinct in Figure 22 is the previous coordinates for this precinct and should rather depict the coordinates as depicted in Figure 21 of the report.</p> <p>5 The draft report on page 126 reference is made to a small oyster breeding station about 2 km from the harbour, maintained by the Nelson Mandela Metropolitan University (NMMU) for research purposes. Please note that there is an existing operator located in the Port Elizabeth harbour called Zwembsi Farms Pty (Ltd) located in Algoa 6 precinct and should be consulted going forward.</p> <p>Please note that the Directorate Sustainable Aquaculture Management reserves the right to review and/or provide additional comments in future.</p>	<p>Your comment is noted and subsequent to this submission the landing partner and cable operator has put forward a person to engage with the ADZ on this matter.</p> <p>Thank you for this clarification. The map has been updated as per your request in the DEIAR.</p> <p>ACER has added Zwembsi Farms Pty (Ltd) to the project database, and they will be notified of all future correspondence with regards to this EIA.</p> <p>Your comment is noted and ACER values your comments submitted.</p>
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3	Date: 23 04 2021 (Email) Mr John Gribble ACO-Associates cc Heritage Specialist	Done	Please find attached the 2AFRICA/GERA (East) Final Scoping Report to upload onto SAHRIS. Please be so kind to let me know once uploaded, I will then notify Briega. Thanks so much for your assistance.
4	Date: 26 04 2021 (Email) Ms Briega Williams South African Heritage Resources Agency Heritage Officer	I have checked SAHRIS and the documents are there so I will issue a comment in due course	The Final Scoping Report documents for the above-mentioned project have now been uploaded to SAHRIS for your review and comment. Please advise if you have received the documents.  Thank you for your acknowledgement
5	Date: 26 04 2021 (Email) Department of Forestry, Fisheries & Environment EIA Applications	<p>ACCEPTANCE OF THE SCOPING REPORT FOR THE PROPOSED ALCATEL SUBMARINE NETWORKS 2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTIC CABLE SYSTEM TO BE LANDED AT PORT ELIZABETH, SOUTH AFRICA</p> <p>The final Scoping Report (SR) and the Plan of Study for Environmental Impact Assessment dated April 2021 and received by the Department on 23 April 2021, refer.</p> <p>The Department has evaluated the submitted final SR and the Plan of Study for Environmental Impact Assessment dated April 2021 and is satisfied that the documents comply with the minimum requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. The FSR is hereby accepted by the Department in terms of Regulation 22(1)(a) of the EIA Regulations, 2014, as amended.</p> <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 the EIA Regulations, 2014, as amended.</p> <p>In addition, the following additional information is required for the Environmental Impact Assessment Report (EIAR):</p>	Please be advised that I have uploaded the Final Scoping Report for the proposed 2AFRICA/GERA (East) Cable System to be landed at Port Elizabeth (EIA REFERENCE: 14/12/16/3/3/2/2057).
		(a) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for	This will be addressed in the DEIAR.

		<p>(b) The listed activities represented in the EIAr and the application form must be the same and correct.</p>	<p>The listed activities submitted in the application have not changed and will remain the same in the DEIAR.</p>
		<p>(c) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations, 2014, as amended (as adapted by the approved Public Participation (PP) Plan, submitted in terms of the Directions Regarding Measures to Address, Prevent and Combat the Spread of COVID-19 Relating to National Environmental Management Permits and Licences).</p>	<p>Public participation has been undertaken as per the regulations and the Public Participation Plan has been approved by DFFE.</p>
		<p>(d) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr. This includes but is not limited to the South African National Parks (Sanparks), Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT), South African Heritage Resources Agency (SAHRA), Department of Environment, Forestry and Fisheries (DEFF) - Branches: Oceans and Coasts; Fisheries Management; and Biodiversity Conservation, Department of Human Settlements, Department of Water and Sanitation, South African Deep-Sea Trawling Industry Association (SADSTIA), Transnet National Ports Authority, Nelson Mandela Bay Metropolitan Municipality, Petroleum Agency of South Africa, Department of Mineral Resources (Eastern Cape), the Department of Public Works &amp; Infrastructure, and the relevant stakeholders for the proposed Humpback Dolphin Marine Sanctuary.</p> <p>(e) Please ensure that all issues raised and comments received during the circulation of the draft SR and draft EIAr from registered I&amp;APs and organs of state which have jurisdiction (including this Department's Oceans and Coast, and Fisheries Management Branches) in respect of the proposed activity are adequately addressed in the final EIAr. Proof of correspondence with the various stakeholders must be included in the final EIAr. Should you be unable to obtain</p>	<p>All comments received have been captured in the Comment and Response Reports submitted with the DEIAR along with the original comments received from I&amp;APs and Authorities.</p> <p>The issues raised by I&amp;APs and authorities have been addressed in the DEIAR.</p>

		<p>comments, proof should be submitted to the Department of the attempts that were made to obtain comments.</p>	
		<p>(f) Comments and Response (C&amp;R) trail report must be submitted with the final EIAr. The C&amp;R report must incorporate all comments received for this development. The C&amp;R report must be a separate document from the main report and the format must be in table format. Please ensure that comments made by I&amp;APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully.</p>	<p>This has been captured in the Comments and Response Report and all comments and responses are also included in Appendix D of the DEIAR.</p>
		<p>(g) Comments from I&amp;APs must not be split and arranged into categories. Comments from each submission must be responded to individually.</p>	<p>All comments received have been responded to individually.</p>
		<p>(h) Please provide a description of each of the preferred alternative types and provide detailed motivation on why it is preferred</p>	<p>Please refer to Section 5 of the DEIAR where alternatives are described in detail and the motivation put forward for the preferred alternative.</p>
		<p>(i) The EAP must ensure that the terms of reference for all the identified specialist studies include the following:</p> <ul style="list-style-type: none"> <li>➤ A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisation</li> <li>➤ A detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed</li> <li>➤ Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no</li> </ul>	<p>Please refer to Section 7.3 and Section 9 of the DEIAR as well as Appendix B of the DEIAR.</p> <p>The limitations of the specialist studies are included in Appendix B of the DEIAR where each specialist report outlines the limitations in terms of the studies undertaken.</p> <p>The EAP agrees with the departments definition of a No-Go area and this is stated as much in the EMPr.</p>

		<p>development of associated infrastructure including access roads is allowed in the 'no-go' areas.</p> <ul style="list-style-type: none"> <li>➤ 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.</li> <li>➤ All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA</li> <li>➤ Should a specialist recommend specific mitigation measures, these must be clearly indicated.</li> </ul> <p>Regarding cumulative impacts:</p> <ul style="list-style-type: none"> <li>➤ Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified</li> <li>- A detailed process flow 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.</li> <li>- Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process</li> <li>- The significance rating must also inform the need and desirability of the proposed development.</li> </ul>	<p>Your comment is noted, and this is addressed in the Specialist Reports submitted in Appendix B of the DEIAR.</p> <p>Your comment is noted however if comments received on the DEIAR require specialists to reconsider certain aspects their reports will be updated for submission with the FEIAR.</p> <p>All mitigation measures put forward by the specialists have been included in the EMPr compiled for this development.</p> <p>This has been included in the DEIAR. Please refer to Section 10.7 of the DEIAR.</p> <p>As no similar projects have taken place in Gqeberha ACER consulted other EIA's undertaken in the area specifically the Algoa 1 Aquaculture Development Zone EIA and other available literature to assess cumulative impacts associated with the proposed development. These were taken into consideration when drafting the mitigation measures and assessment of cumulative impacts for the proposed development.</p> <p>Please refer to Table 20 in Section 10.7 of the DEIAR.</p> <p>Please refer to Section 10.7 of the DEIAR.</p>
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		- A cumulative impact environmental statement on whether the proposed development must proceed	Please refer to Section 11 of the DEIAR.
		(j) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.	The specialist studies conducted do not specify contradicting recommendations.
		(k) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.	The specialist studies conducted do not specify contradicting recommendations.
		(l) 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 EIA Regulations, 2014, as amended	All mitigation measures included in the DEIAR, and the Specialist Reports have been included in the EMPr. The EMPr drafted complies with Appendix 4 of the EIA regulations.
		(m) The EMPr must also include the frequency for auditing of compliance with the conditions of the EA and MPr, and for the submission of such compliance reports to the competent authority	The frequency for auditing and submission of audit reports to the competent authority are stipulated in Section 3.2.4 of the EMPr.
		(n) Please ensure that the EIAR complies with Appendix 3 of the EIA Regulations, 2014,	The DEAIR complies with Appendix 3 of the EIA Regulations.
		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.	The EAP is aware of the EIA timeframes and will ensure that all submissions are made within the prescribed timeframes.



		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	The EAP and project proponent are fully aware that no construction may take place prior to the issuance of the Environmental Authorisation.
6	Date: 26 04 2021 (Email) Department of Forestry, Fisheries & Environment Ocean & Coasts		This email serves to inform you that the Final Scoping Report Period documents for the above-mentioned project has been loaded onto your departments link:  Please advise if you have received the documents.
7	Date: 26.04.2021 (E Mail) Mr Jacques van Der Walt Openserve (Telkom)	Well noted, Openserve (Telkom) is in support of this initiative. We will download the document and review it.	Thank you for acknowledging receipt of the Final Scoping Report.
8	Date: 29 04 2021 (Email) Ms Brieger Williams South African Heritage Resources Agency Heritage Officer	<p>Please find attached my comment for the above case, I have also uploaded it onto SAHRIS.</p> <p><b>Interim Comment</b> <b>In terms of Section 38 of the National Heritage Resources Act (Act 25 of 1999) CaseID: 15813</b></p> <p><b>Proposed 2AFRICA/GERA (East) submarine fibre optics cable system to be landed at Summerstrand, Nelson Mandela Bay Municipality, Eastern Cape</b></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 Port Elizabeth, 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 stipulates that any wreck, being any vessel or aircraft or any part thereof older than 60 years old lying in South Africa's territorial waters or maritime cultural zone is protected and</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>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 south of Algoa Bay which is historically an area which has seen a high volume of maritime traffic and casualties. There are a number of vessels which are recorded as lying along the route of the proposed cable though it must be noted that the co-ordinates for the wrecks may not be accurate.</p> <p>On the approach to the proposed landing site, the cable runs close to Despatch or Roman Rock. There are two vessels listed as lying close to these rocks; the Balaclava which wrecked on the rocks in 1867, and the Haerlem which was scuttled in 1987.</p> <p>Just north of the cable landing site, closer to the harbour mouth lies the Paris Maru, a fishing vessel which wrecked in 1934. To the south of the landing site is Cape Recife which has seen an estimated 16 vessels wrecked in the vicinity around the point. The approximate positions of some of these vessels are known but some are just recorded as wrecking in the general area of the cape.</p> <p>There are also numerous wrecks further out in deeper waters, some of which were casualties of German U-boats during the Second World War. The locations of these wrecks are approximate positions but as they are considered war graves their possible presence and cultural heritage significance should be highlighted during any heritage assessments.</p>	<p>SAHRA's information provided on wrecks in the vicinity of the proposed marine cable for the 2AFRICA/GERA (East) Submarine Cable System (Gqeberha landing) is appreciated and has been taken into consideration in the Impact Assessment. Refer to Sections 6.6, 9.6 and 10.6 of the DEIAR.</p> <p>Regarding historical shipwrecks, the HIA assessment found that three shipwrecks may occur within the 1 km study area buffer around the proposed cable alignment. Two of these wrecks are older than 60 years and thus subject to protection under the National Heritage Resources Act. The Inshore and Shallow Waters geophysical surveys noted the presence along the route of two occurrences of possibly anthropogenic debris and magnetic anomalies, although none of these contacts could be more accurately described or positively identified. It is therefore not known whether any of these anomalies represent historical shipwrecks or related material.</p>
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		<p>Due to the possibility that heritage resources may be present along the proposed route of the cable, the heritage assessment must include a specialist study of maritime heritage to be undertaken by a suitably qualified Maritime Archaeologist.</p> <p>SAHRA is pleased to note that the amendment to Section 3.1.5 that was requested in the previous comment on the Draft Scoping Report has been accepted and updated in the FSR.</p> <p>Section 8.6 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>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><b>ADMIN:</b>  <b>Direct URL to case: <a href="https://sahris.sahra.org.za/node/546467">https://sahris.sahra.org.za/node/546467</a></b></p> <p><b>Terms &amp; Conditions:</b></p> <ol style="list-style-type: none"> <li>1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.</li> <li>2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.</li> </ol>	<p>A specialist Heritage Impact Assessment (HIA) has been undertaken by a suitably qualified maritime archaeologist. Refer to Appendix B of the DEIAR.</p> <p>Noted.</p> <p>It is confirmed that the survey data was provided to the heritage specialist for review.</p> <p>The HIA undertaken includes investigation of terrestrial heritage resources. Refer to Appendix B of the DEIAR.</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> <p>Noted.</p> <p>All heritage resources encountered will be reported to SAHRA and the provincial heritage authority.</p>
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		3. SAHRA reserves the right to request additional information as required.	Your comment is noted and accepted.
9	Date: 30 04 2021 Email Department of Forestry, Fisheries & Environment Ocean & Coasts	<p>SUBJECT: COMMENTS ON THE DRAFT SCOPING REPORT OF AN ENVIRONMENTAL IMPACT ASSESSMENT FOR A PROPOSED ALCATEL SUBMARINE NETWORKS 2AFRICA/GERA (EAST) SUBMARINE FIBRE OPTICS CABLE SYSTEM TO BE LANDED AT PORT ELIZABETH (GQEBERHA), EASTERN CAPE, SOUTH AFRICA</p> <p>The Oceans &amp; Coasts (O&amp;C) Branch of the Department of Forestry, Fisheries and the Environment (DFFE) appreciates the opportunity given to provide comments and advice on the proposed development at Port Elizabeth (Gqeberha), Eastern Cape.</p> <p>The O&amp;C Branch has reviewed the Draft Scoping Report of an Environmental Impact Assessment for a proposed Alcatel Submarine Networks 2africa/Gera (East) Submarine Fibre Optics Cable System to be landed at Port Elizabeth (Gqeberha) in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), ("NEMA") and has provided inputs based on coastal management considerations and objectives in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICM Act").</p>	Thank you for your email and comments received
		<p>1. The Environmental Assessment Practitioner (EAP) must take note that the Branch O&amp;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.</p> <p>The EAP is reminded that comments and recommendations as provided below are intended to ensure the achievement of the aims and</p>	The EAP is aware of the O&C mandate and has proactively engaged with the department during this EIA process. The EAP is aware that the comments submitted are intended to achieve the objectives of the ICMA.

		<p>objectives of the ICM Act and guarantees that the coastal environment will be protected and conserved throughout all phases.</p>	
		<p>The following sections in the ICM Act to be adhered to and implemented by the applicant and Competent Authority (CA):</p> <p><u>2 Section 7 of the ICM Act: Composition of Coastal Public Property (CPP)</u></p> <p>2.1 Taking into account the purpose of the CPP, and that the proposed Alcatel Submarine Networks Fibre Optics Cable System to be landed at Port Elizabeth is located on Pollock Beach within the suburb of Summerstrand which falls within the CPP. We advocate that caution must be observed and ensure that only necessary activities are designed to take place within the CPP.</p> <p>2.2 The CA is advised to ensure that this condition is taken into account and adhered to. Also, the implementation of activities associated with this project that will be taking place within the coastal zone (including the leases area) must result in the privatization of land/space.</p> <p>2.3 The applicant should be solely permitted to undertake necessary construction and maintenance works.</p>	<p>No additional activities outside of the work required to construct the BMH and trenching, and to install the cable (and associated activities at the site), will be undertaken within the CPP. Activities are detailed in the Project Description Chapter of the DEAIR.</p> <p>The implementation of this development will require a Seashore lease Permit from the DEDTEA for installation of the cable within South Africa's territorial Waters. Once registered, the lease will result in the registration of the cable servitude thus authorizing this land (seabed) for the use of the cable.</p> <p>The Applicant will be responsible for the project and compliance with relevant authorisations. The Applicant will be appointing approved sub-contractors to undertake the construction and maintenance works on their behalf.</p>
		<p><u>3. Section 13 of the ICM Act: Access to coastal public property</u></p> <p>3.1 We recommend that coastal access to the general public should not be restricted nor prohibited as a result of the implementation of the proposed Alcatel Submarine Networks 2Africa/Gera (East) Submarine Fibre Optics Cable System. An exclusion is tolerated for the temporal time when the cable will be landed.</p> <p>3.2 Therefore, should the CA decides to grant this proposed project, we recommend that the CA must ensure that they include a condition within the EA that will ensure that public access will not be affected, for the applicant to adhere and implement.</p>	<p>Coastal access to the general public will not be restricted nor prohibited as a result of the implementation of the proposed 2AFRICA/GERA (East) Submarine Cable System (Gqeberha landing). After installation, the only visible infrastructure will be the top of the BMH.</p> <p>These comments addressed to the CA are noted. There will be no impact on public access after installation of the cable.</p>

		<p><u>4. Section 63 of the ICM Act: Environmental authorisations for coastal activities</u></p> <p>4.1 Considering what the CA must take into account in terms of Section 63 of the ICM Act 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;</p> <p>4.1 Additionally, the CA must take into account the following but not limited to: proposed project associated operational activities; and project potential Impacts on the purpose, objective and goals of CPP, Coastal Protection Zone, Economic Exclusive Zone, the littoral active zone, impacts to and from the existing structure, sea, project site proximity to the nearest Estuary and Marine Protected Area, the existing setback line, and management lines; and</p> <p>4.2 The CA must also, authenticate if the area falls within a Critical Biodiversity Area, Ecological Support Area, an Estuary and Marine Protected Area, and ensure that potential adverse impact to vulnerable species and environment will be mitigated and managed in order to reduce the threat to become endangered or extinct.</p>	<p>These comments addressed to the CA are noted. Mitigation measures to avoid, manage, minimize and mitigate potential adverse impacts in the coastal zone are included in the EMPr contained in Appendix F of the DEIAR.</p> <p>These comments addressed to the CA are noted. The aspects mentioned are covered in the relevant specialist reports, the relevant sections of the DEIAR and mitigations carried across into the EMPr, as relevant. Refer to Appendix B and Appendix F of the DEIAR.</p> <p>The branch cable to Gqeberha traverses offshore habitats of varying conservation status, viz. Least Concern, Near Threatened and Vulnerable. It does not traverse any MPAs but does traverse the Algoa to Amathole EBSA and areas defined in the recent National Coastal &amp; Marine Spatial Biodiversity Plan (Version 1) as CBA1, CBA2 and ESA. It also crosses the proposed Alexandria coastal belt/Algoa Bay Islands Nature Reserve Marine IBA.</p> <p>However, as indicated in the specialist findings and in the DEAIR the identified impacts of cable installation and operation on the coastal zone, the marine benthic habitats and associated biota, fish, marine mammals, seabirds, and shorebirds are all considered to be of low significance. Furthermore, the specialist assessment of the nearshore ecology considers the cable to be</p>
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			compatible with CBA1 areas. Refer to Section 10.3.4 of the DEIAR.
		<p>5 <u>Off-Road Vehicle (ORV)</u></p> <p>5.1 The implementation of the proposed Alcatel Submarine Networks Fibre Optics Cable System to be landed at Port Elizabeth will entail transportation of materials in and out of the coastal zone. The proposed site location falls within the coastal zone and to ensure that driving within the affected coastal zone will be compliant with the Off-Road Vehicle regulations and carried out in an environmentally friendly manner, the applicant would require a Construction Off-Road Vehicle permit after obtaining an EA.</p> <p>5.2 The applicant must consult this department DEFF: Branch O&amp;C contact details to obtain an ORV permit ORVPermitting@environment.gov.za.</p>	<p>This permit will be applied for once Environmental Authorisation has been issued for the proposed development.</p> <p>The details provided will be used when applying for the ORV permit.</p>
		<p>6 Recommendations and condition for the attention of the EAP and CA to be included in the final MMP:</p> <p>6.1 The applicant must take into account, adhere to and implement the relevant section of the National "ICM Act" applicable to this project;</p> <p>6.2 Only work necessary must be undertaken and no camping site should be planned and established within the CPP;</p> <p>6.3 Clearing of vegetation for construction purposes should be scheduled where it is 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;</p>	<p>The relevant sections of the ICMA as specified in the comments from Oceans and Coasts have been taken into account and reflected as relevant in the EMPr.</p> <p>This condition has been included in the EMPr.</p> <p>This condition has been included in the EMPr. Note, however, that there is no natural vegetation on site (mainly planted lawns).</p>

		<p>6.4 No construction activities with the potential to affect the general public to enjoy the coast should be scheduled and take place during peak season;</p> <p>6.5 To ensure that pollution in the marine ecosystem and seawater contamination is minimized, a construction period should be scheduled to avoiding heavy rain and stormy season. Historical data must be used for best time period allocation;</p> <p>6.6 When planning on areas to place infrastructure and activities to take place, the designs 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 route;</p> <p>6.7 The EAP is requested to provide a detailed documentation with advantages and disadvantages on comparison of the proposed site locations, construction procedures, alternatives, phases, technologies and methodologies proposed for this project.</p> <ul style="list-style-type: none"> <li>• 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;</li> </ul> <p>6.8 Due to natural processes such as sea-level rise, current change, wind speed, erosion, accretion, flooding etc. that take place within the coastal environment, mostly influenced by climate change, structures placed within the coastal zone are likely to require maintenance at all times.</p> <ul style="list-style-type: none"> <li>• To ensure that no additional strain is exposed to our already vulnerable and sensitive marine/coastal environment, we recommend that when planning for activities associated with</li> </ul>	<p>The peak season will be avoided if possible. However, there are many factors affecting scheduling. Note the cable landing activities on the beach will be of very short duration (1-2 days). Access to the beach will remain open to the public during construction and installation activities. Good housekeeping will be practised to reduce negative aesthetic and nuisance impacts. Specifications will be included in the EMP, accordingly.</p> <p>Project scheduling will be influenced by many criteria which must be balanced against each other, including vessel schedules, whale migration seasons, sailing and sporting events, peak holiday seasons, etc. It may not be possible to avoid the rainy season.</p> <p>The design of the cable avoids sensitive areas wherever possible. As shown in the DEIAR, where it does pass through sensitive areas, the impacts of the cable installation and operation are of low significance. Refer also to the response provided for item 4.2.</p> <p>Refer to Chapter 5 of the DEIAR which discusses the alternatives investigated during this Scoping and EIA process.</p> <p>The Beach Manhole is designed to withstand coastal conditions and will require little to no maintenance.</p> <p>No routine maintenance is required. Cable maintenance will only be required in the case of a break or damage. The cable will be anchored to the inshore reef by way of pins/clamps therefore</p>
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		<p>the maintenance of the proposed Alcatel Submarine Networks Fibre Optics Cable System, the designs should avoid areas that have been identified as sensitive and offer important functions, such as habitat and breeding areas where threatened and near- threatened species which are considered of important status have been identified to exist.</p> <ul style="list-style-type: none"> <li>• The plan should pay special attention to the lifespan of the proposed sub cable and ensuring that the material of the Optics cable is of the best quality and will be of long term;</li> </ul> <p>6.9 Vehicles and machinery have the 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, no vehicles and machinery must be scheduled to be refuelled within the coastal zone.</p> <ul style="list-style-type: none"> <li>• Due to the demand for public safety, failure by the responsible contractor 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.</li> <li>• 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”, and recommend for this condition to form part of the EA conditions to be adhered to and implemented;</li> </ul> <p>6.10 Appointment of a Control Environmental Officer (CEO) who will ensure that identified mitigation measures and recommendations are taken into account, adhered and implemented.</p>	<p>preventing movement and damage to either the cable or the reef.</p> <p>The lifespan of the cable is &gt; 25 years and is designed with high quality materials to withstand the harsh coastal and marine conditions.</p> <p>This is supported and is specified accordingly in the EMPr.</p> <p>This comment is noted. It is in the interests of the Applicant to complete the works in the shortest possible time period.</p> <p>This comment is noted. Little maintenance will be required. However, it is in the interests of the Applicant to ensure the infrastructure is in working order at all times, to ensure return on significant financial investment.</p> <p>An Environmental Control Officer (ECO) will be appointed to oversee installation activities on land and a suitably qualified crew member will be appointed as a Marine Mammal Observer (MMO) on the vessel.</p>
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		<p>We will provide additional comments on the next PPP phase when more information is available.</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. 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.</p> <p>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:</p> <p>Department of forestry and fisheries and the environment (DFFE), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.</p>	<p>Noted. Comments on the DEAIR will be the next phase of the EIA process.</p> <p>These comments are included in the Appendix D and Appendix E (this CRR) of the DEIAR which has been submitted to the CA (DFFE: Environmental Authorisations) for their consideration. The Departments right to revise its comments and request further information is acknowledged.</p> <p>Thank you for the contact and address details. These have been included in the project database.</p>

10	<p>Date: 07.05.2021: E Mail Michelle Pretorius Environmental Officer: Shellfish Production Sustainable Aquaculture Management Department of Forestry, Fisheries and the Environment</p>	<p>I have some queries regarding the cable installation.</p> <p>It would be best to lay the cable as close to the edge of the concession area as possible this would be advised for the following reasons:</p> <p>Initial installation is of course going to have a short-term impact on the visibility/ water quality of the water but will be a short-term impact. In this area we are to farm mussel or oysters on longlines - these are filter feeders and so disturbing the sediment is not ideal for these animals.</p> <p>Please note that the long line infrastructure has moorings and anchorage blocks which are installed to keep infrastructure in place. These are maintained to ensure that all lines are taut, and ropes are maintained/replaced over time. So, if infrastructure is in place in the area before the cable is installed, this may pose a challenge to the farm as well as the installation of the cable.</p> <p>What mitigations would be considered to avoid impacting the farms?</p>	<p>Thank you for your email and your queries posed. The Please see below, the responses from both ACER and the cable engineers.</p> <p>The route engineers have realigned the cable to the southern edge of the concession area.</p> <p>Increased turbidity during installation will be once-off and of extremely short duration. The impact of increased turbidity on marine biota (deep and shallow waters), as a result of the 2AFRICA/GERA (East) Submarine Cable System (Gqeberha landing) is considered to be of low significance. Refer to Section 10.3.3.3 of the DEIAR.</p> <p>No infrastructure will be allowed within 500 m either side of the submarine cable, once it is in place. The route engineers have realigned the cable to the southern edge of the concession area, to minimise the impact on the concession area.</p> <p>If environmental authorisation is granted for the cable, installation is scheduled in early 2022. As it is difficult to ascertain when farming will commence, impacts on farming operations can be mitigated as follows:</p> <ul style="list-style-type: none"> <li>• Aligning the cable to the southern edge, as has been done.</li> <li>• Should farming have commenced at cable installation phase, use plough burial rather than jetting, to minimise sediment plumes. At this depth, plough burial will be the preferred to jetting as it is quicker and will achieve better results. Sediment will be disturbed in both cases but only for a minimal amount of time and suspended sediment should settle/be washed away relatively quickly, given prevailing currents within the</li> </ul>
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			<p>electric and magnetic fields. Perturbations from external electric and magnetic fields on such physiological systems need not necessarily have detrimental biological effects, as the magnitude of the effect will depend on the field intensities and exposure times to them, their frequency content, modulation, etc. A wide variety of taxa are sensitive to electromagnetic fields. Elasmobranchs and chimaerids are the taxa most likely to detect the electrical fields produced by fibre-optic cables because their electroreceptive organs are sensitive to stimuli in the very low frequency range from 0.125 Hz to 8.0 Hz.</p> <p>The injection of a low frequency electrical signal from the land station is known as 'toning' and is undertaken to aid in cable location in the event of a fault or when a safe distance needs to be kept from a cable during other marine work. Toning has been used for many years on submarine cables throughout the world, and no adverse effects on marine life have been reported.</p>
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11	Date:11.05.2021 E Mail : Michelle Pretorius Environmental Officer: Shellfish Production Sustainable Aquaculture Management Department of Forestry, Fisheries and the Environment	<p>I think that it answers my questions. I think the best is for both projects to be informed of the status of the other. We have been given the EA; however this was appealed and we are currently awaiting a decision on the appeals from the Ministers office.</p> <p>We will have to assess the projects and how they impact on each other when implementation occurs. Our project has a requirement for the establishment of a Consultative Forum where we the DFEE as the EA holder are required to establish this committee and provide ongoing updates and progress on the ADZ with registered stakeholders. I would suggest that the Project manager represent the interest of the company on our committee and that we keep each other informed.</p>	It is agreed that the DFEE ADZ Project Manager and the cable Developer maintain communication regarding the status quo and anticipated implementation dates of both projects, to ensure that impacts are avoided and/or minimised.
12	Date:24.05.2021 E Mail Muhammed Owais I&AP	Please advise if the cable landing station will be open-access and which data centres in PE will be able to connect.	At present Vodacom is still finalising the CLS and the layout thereof. In future Vodacom will be able to provide backhaul to datacentres following negotiations between parties.
13	Date 25.05.2021 E Mail: M Pretorius Environmental Officer: Shellfish Production Sustainable Aquaculture Management Department of Forestry, Fisheries and the Environment	Thank you for the image and information regarding the rerouting of the cable in the interest of both projects. Once we have an outcome for our appeal we will be starting with the implementation is approved. I will make a note to add the email addresses to the CF once a database has been established.	Thank you. We look forward to further communication regarding the respective developments.

14	Date 21.06.2021 E Mail Ashleigh Mckenzie - Acer		<p>FOR ATT: the management of the Buffalo River yacht club/sailing:</p> <p>Dear Sir/Madam</p> <p>ACER (Africa) Environmental Consultants is undertaking an EIA process for an undersea telecommunications cable to be landed at Gqeberha, Algoa Bay.</p> <p>We need to understand how this may potentially interact with scheduled sailing events, regattas etc. along this stretch of coastline and would appreciate information/ a high level contact person who can provide a relevant yacht race calendar.</p> <p>We also understand that some of the yacht clubs at Algoa Bay are being evicted and seem to be battling to get hold of the right people. While we have various contacts on our database, we do not seem to have received comment from the yachting fraternity.</p> <p>For further information on the cable installation project, please refer to ACER's website: <a href="http://www.acerafrica.co.za">www.acerafrica.co.za</a> under the link "Projects -Current Public Review" - (2AFRICA/GERA (East) – Port Elizabeth). Please also do not hesitate to contact me if you have queries.</p> <p>We look forward to your response.</p>
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15	Date 17.06.2021 E Mail Ashleigh Mckenzie - Acer		<p>FOR ATT: the management of the yacht club/sailing:</p> <p>Dear Sir/Madam</p> <p>ACER (Africa) Environmental Consultants is undertaking an EIA process for an undersea telecommunications cable to be landed at Gqeberha, Algoa Bay.</p> <p>We need to understand how this may potentially interact with scheduled sailing events, regattas etc.</p> <p>We would appreciate information and a high level contact person pertaining to the above. While we have various contacts on our database, we do not seem to have received comment from the yachting fraternity.</p> <p>For further information on the cable installation project, please refer to ACER's website: <a href="http://www.acerafrica.co.za">www.acerafrica.co.za</a> under the link "Projects -Current Public Review" - (2AFRICA/GERA (East) – Port Elizabeth)</p> <p>We look forward to your response.</p>
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